

## **PUBLIC DISCLOSURE**

July 17, 2023

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Comerica Bank  
RSSD # 60143  
1717 Main Street  
Dallas, Texas 75201

Federal Reserve Bank of Dallas  
2200 North Pearl Street  
Dallas, Texas 75201

NOTE: 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

### OVERALL RATING

**Institution's Community Reinvestment Act Rating: Comerica Bank is rated Outstanding.**

The following table indicates the Community Reinvestment Act (CRA) performance level of Comerica Bank (Comerica or the bank) with respect to the lending, investment, and service tests.

### PERFORMANCE TEST RATINGS TABLE

Performance Levels	Comerica Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Non-Compliance			

\* The Lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

### SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness and record of serving the credit needs of low-income individuals, very small businesses, and the assessment areas (AAs), including low-income areas.
- A substantial majority of loans are made in the bank's AAs.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels, including low- and moderate-income (LMI) individuals, and businesses of different revenue sizes is good.
- Comerica is a leader in making community development (CD) loans. Since the prior evaluation, the bank's CD lending increased by 181.5 percent by dollar amount despite the cessation of the Small Business Administration's (SBA's) Payroll Protection Program (PPP) in May 2021.
- The bank makes use of innovative and/or flexible lending practices in serving the AAs' needs.
- Comerica is often in a leadership position given its excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors. Since the prior evaluation, the bank's qualified CD investments increased by 23.3 percent.
- The bank exhibits good responsiveness to credit and CD needs as well as occasionally uses innovative and/or complex investments to support CD initiatives.
- Delivery systems are accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing branches has not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- Comerica provides a relatively high level of CD services, increasing the total hours by 47.1 percent since the prior evaluation.

## INSTITUTION

### DESCRIPTION OF THE INSTITUTION

Comerica is a financial institution headquartered in Dallas, Texas, which has the following characteristics:

- The bank is a wholly owned subsidiary of Comerica Incorporated, also headquartered in Dallas, Texas.
- As of June 30, 2023, the bank reported total assets of approximately \$90.9 billion and gross loans of \$55.5 billion.
- The bank operates 409 branches and 571 deposit-taking automated teller machines (ATMs) throughout the states of Arizona, California, Florida, Michigan, and Texas.
- Since the previous CRA performance evaluation, Comerica closed 26 branches and opened four branches within its AAs.
- The bank offers traditional deposit and loan products to meet the needs of the communities it serves.
  - Comerica is predominately a commercial lender, with commercial loans representing 78.9 percent of the bank's loan portfolio as of June 30, 2023.
  - Commercial loans are made for a variety of business purposes, including financing for interim construction of industrial and commercial properties; financing for equipment, inventories, and accounts receivable; and acquisition financing.
  - While residential real estate loans comprise a smaller portion of the total loan portfolio, at 6.9 percent, it is still considered significant.
  - During the COVID-19 pandemic, Comerica leveraged its knowledge and expertise of commercial lending to support and extend loans to small businesses within the bank's defined AAs.
- The bank's ability to meet various credit needs of the communities it serves has not been hampered by its capacity to lend, financial condition and size, product offerings, prior performance, legal impediments, or other factors.

Table 1 below reflects the bank's loan portfolio mix as of June 30, 2023.

Table 1		
Composition of Loan Portfolio as of June 30, 2023		
Loan Type	\$(000,000)	Percent (%)
Agricultural	53	0.1
Commercial	43,731	78.9
Consumer	483	0.9
Residential Real Estate	3,840	6.9
Other	7,349	13.3
<b>Gross Loans</b>	<b>55,456</b>	<b>100.0</b>
Note: Percentages may not total 100.0 percent due to rounding.		

The bank delineates 27 AAs among five states, as listed in Table 2A through 2E. The delineation of the AAs remained unchanged since January 1, 2020. Additional descriptions of the AAs can be found in the applicable AA sections of this report.

**Table 2A**

<b>Michigan</b>	
<b>Assessment Area Name</b>	<b>Assessment Area Description</b>
Ann Arbor, MI MSA AA	<ul style="list-style-type: none"> <li>• Washtenaw County</li> <li>• Entire MSA</li> </ul>
Battle Creek, MI MSA AA	<ul style="list-style-type: none"> <li>• Calhoun County</li> <li>• Entire MSA</li> </ul>
Fenton, MI MSA AA	<ul style="list-style-type: none"> <li>• Genesee County</li> <li>• Entire MSA</li> </ul>
Grand Rapids-Kentwood Metropolitan AA	<ul style="list-style-type: none"> <li>• Ottawa and Kent counties</li> <li>• Grand Rapids-Kentwood, MI MSA, excluding Ionia and Montcalm counties</li> </ul>
Jackson, MI MSA AA	<ul style="list-style-type: none"> <li>• Jackson County</li> <li>• Entire MSA</li> </ul>
Kalamazoo-Portage, MI MSA AA	<ul style="list-style-type: none"> <li>• Kalamazoo County</li> <li>• Entire MSA</li> </ul>
Lansing-East Lansing Metropolitan AA	<ul style="list-style-type: none"> <li>• Eaton, Clinton, and Ingham counties – part of the Lansing-East Lansing MI, MSA, excluding Shiawassee County</li> </ul>
Midland, MI MSA AA	<ul style="list-style-type: none"> <li>• Midland County</li> <li>• Entire MSA</li> </ul>
Muskegon, MI MSA AA	<ul style="list-style-type: none"> <li>• Muskegon County</li> <li>• Entire MSA</li> </ul>
Southeast Michigan Metropolitan AA	<ul style="list-style-type: none"> <li>• Livingston, Oakland, Macomb, Lapeer, and Wayne counties</li> <li>• Detroit-Warren-Dearborn, MI MSA, excluding St. Clair County</li> </ul>
Lenawee County Nonmetropolitan AA	<ul style="list-style-type: none"> <li>• Lenawee County</li> </ul>

**Table 2B**

<b>Texas</b>	
<b>Assessment Area Name</b>	<b>Assessment Area Description</b>
Austin Metropolitan AA	<ul style="list-style-type: none"> <li>• Travis and Williamson counties – part of the Austin-Round Rock-Georgetown, TX MSA, excluding Bastrop, Caldwell, and Hays counties</li> </ul>
Dallas-Fort Worth Metropolitan AA	<ul style="list-style-type: none"> <li>• Collin, Dallas, Denton, Ellis, Rockwall, and Tarrant counties – part of the Dallas-Fort Worth-Arlington, TX MSA, excluding Hunt, Kaufman, Johnson, Parker, and Wise counties</li> </ul>
Houston Metropolitan AA	<ul style="list-style-type: none"> <li>• Brazoria, Fort Bend, Galveston, Harris, and Montgomery counties – part of the Houston-The Woodlands-Sugar Land, TX MSA, excluding Austin, Chambers, Liberty, and Waller counties</li> </ul>
San Antonio Metropolitan AA	<ul style="list-style-type: none"> <li>• Bexar and Kendall counties – part of the San Antonio-New Braunfels, TX MSA, excluding Atascosa, Bandera, Comal, Guadalupe, Medina, and Wilson counties</li> </ul>
Bank of the Hills Nonmetropolitan AA	<ul style="list-style-type: none"> <li>• Kerr County</li> </ul>

**Table 2C**

**California**

<b>Assessment Area Name</b>	<b>Assessment Area Description</b>
Los Angeles-Long Beach-Anaheim, CA MSA AA (Greater Los Angeles MSA AA)	<ul style="list-style-type: none"> <li>• Los Angeles and Orange counties</li> <li>• Entire MSA</li> </ul>
Riverside-San Bernardino-Ontario, CA MSA AA (Inland Empire MSA AA)	<ul style="list-style-type: none"> <li>• San Bernardino and Riverside counties</li> <li>• Entire MSA</li> </ul>
Salinas, CA MSA AA	<ul style="list-style-type: none"> <li>• Monterey County</li> <li>• Entire MSA</li> </ul>
San Diego-Chula Vista-Carlsbad, CA MSA (San Diego MSA AA)	<ul style="list-style-type: none"> <li>• San Diego County</li> <li>• Entire MSA</li> </ul>
San Francisco Bay Metropolitan AA	<ul style="list-style-type: none"> <li>• Alameda, Contra Costa, San Francisco, and San Mateo counties</li> <li>• San Francisco-Oakland-Berkeley, CA MSA, excluding Marin County</li> </ul>
San Jose Metropolitan AA	<ul style="list-style-type: none"> <li>• Santa Clara County</li> <li>• San Jose-Sunnyvale-Santa Clara, CA MSA, excluding San Benito County</li> </ul>
Santa Cruz-Watsonville, CA MSA AA (Santa Cruz MSA AA)	<ul style="list-style-type: none"> <li>• Santa Cruz County</li> <li>• Entire MSA</li> </ul>
Oxnard-Thousand Oaks-Ventura, CA MSA AA (Ventura County MSA AA)	<ul style="list-style-type: none"> <li>• Ventura County</li> <li>• Entire MSA</li> </ul>

**Table 2D**

**Florida**

<b>Assessment Area Name</b>	<b>Assessment Area Description</b>
Fort Lauderdale-West Palm Beach Metropolitan AA	<ul style="list-style-type: none"> <li>• Palm Beach and Broward counties</li> <li>• Miami-Fort Lauderdale-Pompano Beach, FL MSA, excluding Miami Dade County</li> </ul>
Naples-Marco Island, FL MSA AA (Naples MSA AA)	<ul style="list-style-type: none"> <li>• Collier County</li> <li>• Entire MSA</li> </ul>

**Table 2E**

**Arizona**

<b>Assessment Area Name</b>	<b>Assessment Area Description</b>
Phoenix Metropolitan AA	<ul style="list-style-type: none"> <li>• Maricopa County</li> <li>• Phoenix-Mesa-Chandler, AZ Metropolitan Statistical Area (MSA), excluding Pinal County</li> </ul>

The Federal Reserve Bank of Dallas rated the bank's CRA performance as Satisfactory at the previous performance evaluation dated February 8, 2021. The bank received a High Satisfactory rating under the Lending Test, a High Satisfactory rating under the Investment Test, and a High Satisfactory rating under the Service Test.

## SCOPE OF THE EVALUATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AAs' demographic and economic characteristics, and credit needs.

This evaluation consists of a review of the bank's 2020, 2021 and 2022 HMDA and CRA-reported small business lending data, as well as the CD loans, investments, and services extended between January 1, 2021, and June 30, 2023, including prior period CD investments. Given that the bank's volume of small business lending exceeds that of HMDA lending, small business lending carried more weight when assessing Comerica's CRA performance. While the CRA-reported small farm lending data is displayed, it was not considered in assessing the bank's CRA performance given that agricultural lending represents less than 1 percent of Comerica's total loan portfolio. Moreover, small farm lending volume was insufficient in every AA; thus, a meaningful analysis could not be performed for this product. Lastly, HMDA-related lending activity classified as Multi-Family, Other Purpose Closed/Exempt and Loan Purpose Not Applicable was not evaluated separately due to negligible volume.

Full-scope reviews were conducted for nine of the bank's 27 delineated AAs. Factors to determine which AAs would receive full-scope reviews include, but are not limited to, the level of the bank's lending, investment, and service activities as well as the availability of opportunities in the AAs; comments received from community groups and the public regarding the institution's CRA performance; population density; the number of other institutions located in the AAs; and the length of time since the most recent full-scope review.

Table 3 depicts the scope of the review for each AA.



**Table 3**

<b>Full-Scope Review Assessment Areas</b>	<b>Limited-Scope Review Assessment Areas</b>
<b>Michigan</b>	
<ul style="list-style-type: none"> <li>Ann Arbor MSA AA</li> <li>Southeast Michigan Metropolitan AA</li> </ul>	<ul style="list-style-type: none"> <li>Battle Creek, MI MSA AA</li> <li>Flint, MI MSA AA</li> <li>Grand Rapids-Kentwood Metropolitan AA</li> <li>Jackson, MI MSA AA</li> <li>Kalamazoo-Portage MSA AA</li> <li>Lansing-East Lansing Metropolitan AA</li> <li>Midland, MI MSA AA</li> <li>Muskegon, MI MSA AA</li> <li>Lenawee County Nonmetropolitan AA</li> </ul>
<b>Texas</b>	
<ul style="list-style-type: none"> <li>Dallas-Fort Worth Metropolitan AA</li> <li>San Antonio Metropolitan AA</li> </ul>	<ul style="list-style-type: none"> <li>Austin Metropolitan AA</li> <li>Houston Metropolitan AA</li> <li>Bank of the Hills Nonmetropolitan AA</li> </ul>
<b>California</b>	
<ul style="list-style-type: none"> <li>Greater Los Angeles MSA AA</li> <li>Salinas MSA AA</li> <li>San Jose Metropolitan AA</li> </ul>	<ul style="list-style-type: none"> <li>Inland Empire MSA AA</li> <li>San Diego MSA AA</li> <li>San Francisco Bay Metropolitan AA</li> <li>Santa Cruz MSA AA</li> <li>Ventura County MSA AA</li> </ul>
<b>Florida</b>	
<ul style="list-style-type: none"> <li>Fort Lauderdale-West Palm Beach Metropolitan AA</li> </ul>	<ul style="list-style-type: none"> <li>Naples MSA AA</li> </ul>
<b>Arizona</b>	
<ul style="list-style-type: none"> <li>Phoenix Metropolitan AA</li> </ul>	None

The evaluation of the bank's lending record in the individual AAs includes the use of and comparison to demographic characteristics. The primary sources for the demographic information are 2011-2015 U.S. Census Bureau's American Community Survey (ACS) data, 2020 U.S. Census data as well as Dun & Bradstreet (D&B) data for 2020, 2021, and 2022. Demographic characteristics of a particular AA are useful in analyzing the bank's record of lending, as they provide a means of estimating loan demand and identifying lending opportunities. To understand small businesses, examiners rely on D&B data, which consists of self-reported data of revenue size and geographical location by businesses entities. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers, as the information is used to understand the bank's performance context. Lastly, examiners interviewed community leaders serving the bank's AAs receiving a full-scope review to expand on the bank's performance context and understand the credit needs of such areas. Community contacts included representatives of community-based organizations, municipalities, and quasi-governmental agencies.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

The bank's overall Lending Test rating is Outstanding. While the state ratings for Michigan and Texas are consistent with the overall rating, the state ratings for Arizona, California, and Florida are high satisfactory. Greater weight was given to Comerica's performance in the states of Michigan and Texas, as the bank's operations in these states represent 71.4 percent of total branches, 65.7 percent of total deposits, and 60.8 percent of the loans reviewed.

#### *Lending Activity*

The bank's overall lending levels reflect good responsiveness to credit needs of the bank's AAs, taking into consideration performance context such as the bank's resources and business strategy. In alignment with its business focus, Comerica extended more small business loans than HMDA and small farm loans during the review period. Generally, the bank's small business lending carried more weight when assessing the overall CRA performance. Table 4 summarizes the bank's lending activity from January 1, 2020 through December 31, 2022.

**Table 4**

<b>Summary of Lending Activity</b>				
<b>January 1, 2020 through December 31, 2022</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$000s</b>	<b>%</b>
Home Purchase	1,616	2.9	697,604	5.1
Refinancing	6,630	11.8	2,175,895	15.8
Home Improvement	7,029	12.5	1,273,125	9.2
Multifamily	94	0.2	1,425,857	10.3
Other Purpose Lines of Credit	4,576	8.2	934,316	6.8
Other Purpose Closed/Exempt	260	0.5	317,367	2.3
<b>Total HMDA</b>	<b>20,205</b>	<b>36.1</b>	<b>6,824,164</b>	<b>49.5</b>
<b>Total Small Business</b>	<b>35,231</b>	<b>62.8</b>	<b>6,927,237</b>	<b>50.2</b>
<b>Total Small Farm</b>	<b>630</b>	<b>1.1</b>	<b>43,881</b>	<b>0.3</b>
<b>TOTAL LOANS</b>	<b>56,066</b>	<b>100.0</b>	<b>13,795,282</b>	<b>100.0</b>

The bank makes use of flexible lending practices in its AAs, including the National Faith Home Buyers Program, the Micro Business Lending Program, and government-insured loan programs. Comerica's Micro Business Lending Program offers secured business lines of credit and term loans in smaller dollar amounts. This well-established program, which is offered throughout the bank's footprint, uses flexible lending practices to better serve the credit needs of small businesses. The bank also offers a variety of government-insured loan programs to help meet the credit needs of LMI borrowers and small businesses. During the review period, Comerica extended Veteran Administration (VA) and Federal Housing Administration (FHA) loan products in California, Michigan and Texas, as well as loans insured by the SBA throughout its AAs.

### **Assessment Area Concentration**

Comerica made a substantial majority of its loans in the delineated AAs. Table 5 displays the number volume and dollar amount of loans originated inside and outside of the bank's AAs.

**Table 5**

<b>Lending Inside and Outside of the Assessment Areas</b>								
<b>Loan Type</b>	<b>Inside Assessment Areas</b>				<b>Outside Assessment Areas</b>			
	<b>#</b>	<b>%</b>	<b>\$000s</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>\$000s</b>	<b>%</b>
Home Purchase	1,408	87.1	523,503	75.0	208	12.9	174,101	25.0
Refinancing	6,226	93.9	1,911,183	87.8	404	6.1	264,712	12.2
Home Improvement	6,628	94.3	1,199,820	94.2	401	5.7	73,305	5.8
Multifamily	67	71.3	903,560	63.4	27	28.7	522,297	36.6
Other Purpose Lines of Credit	4,332	94.7	879,139	94.1	244	5.3	55,177	5.9
Other Purpose Closed/Exempt	189	72.7	213,804	67.4	71	27.3	103,563	32.6
<b>Total HMDA-Related</b>	<b>18,850</b>	<b>93.3</b>	<b>5,631,009</b>	<b>82.5</b>	<b>1,355</b>	<b>6.7</b>	<b>1,193,155</b>	<b>17.5</b>
<b>Small Business</b>	<b>32,103</b>	<b>91.1</b>	<b>6,027,873</b>	<b>87.0</b>	<b>3,128</b>	<b>8.9</b>	<b>899,364</b>	<b>13.0</b>
<b>Small Farm</b>	<b>572</b>	<b>90.8</b>	<b>35,535</b>	<b>81.0</b>	<b>58</b>	<b>9.2</b>	<b>8,346</b>	<b>19.0</b>
<b>TOTAL LOANS</b>	<b>51,525</b>	<b>91.9</b>	<b>11,694,417</b>	<b>84.8</b>	<b>4,541</b>	<b>8.1</b>	<b>2,100,865</b>	<b>15.2</b>

The remaining loan distribution analyses discussed in this performance evaluation consider only those loans originated within the bank's AAs. A detailed discussion of the facts and data supporting the overall conclusions for the geographic and borrower distribution and CD lending are presented in the Conclusions with Respect to Performance Criteria section for each AA.

### **Geographic Distribution of Loans**

The overall geographic distribution of lending reflects excellent penetration throughout the bank's AAs.

### **Lending to Borrowers of Different Income Levels and Businesses of Different Sizes**

The bank's overall lending reflects good penetration among individuals of different income levels and businesses of different sizes.

### **Community Development Lending**

Comerica is a leader in making CD loans. The bank originated 1,348 CD loans during the evaluation period for a variety of purposes, as noted in Table 6. Since the previous evaluation, the number of CD loans extended by the bank increased by 38.3 percent despite the cessation of the SBA's PPP on May 31, 2021. Comerica responded by substantially increasing the dollar amount of its non-PPP CD lending (up almost 350 percent from the previous evaluation), which reflects very favorably on its responsiveness to the CD needs of its AAs. Moreover, the bank focused primarily on CD lending that fosters economic development, with an increase of more than 1,000 percent by number and dollar amount since the prior evaluation.

**Table 6**

<b>Community Development Lending All Assessment Areas</b>		
<b>Purpose</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	84	431,084
Community Services	137	310,576
Economic Development	870	4,192,974
Revitalization and Stabilization	257	401,877
<b>Total</b>	<b>1,348</b>	<b>5,336,511</b>

## INVESTMENT TEST

The bank's overall Investment Test rating is Outstanding. The state ratings for California, Michigan, and Texas are consistent with the overall rating. The state ratings for Arizona and Florida are high satisfactory.

Overall, Comerica is often in a leadership position given its excellent level of CD investments, grants, and donations. While the bank makes occasional use of innovative and/or complex investments, it exhibits good responsiveness to the credit and CD needs of its AAs. Consistent with prior performance evaluations, the bank's strategy focuses on selecting CD investments that are eligible for low-income housing tax credit (LIHTC), funding housing projects that meet certain rent affordability requirements in the bank's AAs. Additionally, the bank has a substantial volume of investments that foster economic development, noting an increase of 321.0 percent by number volume and 197.6 percent by dollar amount since the prior evaluation.

In addition to the CD investments, the bank's level of CD donations is particularly responsive to organizations that provide community services for LMI individuals and families. Comerica's philanthropic activities include donations to organizations that promote and support economic development. While the number of CD donations made by the bank decreased from the previous evaluation, Comerica's focus on targeted donations supporting small businesses increased by 400.0 percent by number volume and 1,728.6 percent by dollar amount.

Table 7 illustrates the bank's overall level of CD investments. Specific details regarding investments, grants, and donations can be found in the Conclusions with Respect to Performance Tests section for each AA.

**Table 7**

<b>Investments, Grants, and Donations All Assessment Areas</b>								
<b>Community Development Purpose</b>	<b>Prior Period Investments<sup>1</sup></b>		<b>Current Investments<sup>2</sup></b>		<b>Donations</b>		<b>Total</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	309	291,967	73	298,557	86	715	468	591,239
Community Services	0	0	0	0	161	3,534	161	3,534
Economic Development	7	5,347	46	56,450	1,071	12,077	1,124	73,874
Revitalization and Stabilization	0	0	0	0	20	128	20	128
<b>Total</b>	<b>316</b>	<b>297,314</b>	<b>119</b>	<b>355,007</b>	<b>1,338</b>	<b>16,454</b>	<b>1,773</b>	<b>668,775</b>
<sup>1</sup> Book value of investment								
<sup>2</sup> Original market value of investment								

**SERVICE TEST**

The bank's overall Service Test rating is High Satisfactory. The state ratings for Arizona, California, and Florida are consistent with the overall rating, while the state ratings for Michigan and Texas are outstanding.

**Retail Services**

Comerica's branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in each AA. The overall distribution of the bank's branch offices and full-service ATMs generally favor upper-income census tracts, though branches are distributed among geographies of all income levels throughout Comerica's AAs. The bank operates 409 branches and 571 full-service ATMs in its AAs, of which 101 branches or 24.7 percent are located in LMI census tracts. Moreover, the bank's record of opening and closing branches has not adversely affected the accessibility of Comerica's delivery systems, particularly in LMI areas or to LMI individuals. Since the previous evaluation, Comerica closed 26 branches. Twenty of the closed branches or 76.9 percent were located in middle- and upper-income census tracts, limiting impact to LMI geographies. Lastly, the bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby hours and drive-through services vary by branch location, with lobbies generally operating seven to nine hours on weekdays and offering extended drive-through hours daily. Additionally, Saturday drive-through hours are available at many bank locations.

Table 8 illustrates the distribution of banking offices and full-service ATMs by income level of geographies, as well as numbers of branch openings/closings during the evaluation period.

**Table 8**

<b>Branch and Full-Service ATM Locations All Assessment Areas</b>								
<b>Tract Income</b>	<b>Census Tracts</b>		<b>% of Households</b>	<b>% of Businesses</b>	<b>Branches</b>		<b>Full-Service ATMs</b>	
	<b>#</b>	<b>%</b>			<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	1,140	7.8	6.7	4.8	21	5.1	34	6.0
Moderate	3,754	25.6	24.7	19.8	80	19.6	111	19.4
Middle	4,615	31.5	33.1	30.7	130	31.8	183	32.0
Upper	4,717	32.2	34.5	42.8	164	40.1	218	38.2
Unknown	421	2.9	1.1	1.8	14	3.4	25	4.4
<b>Total</b>	<b>14,647</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>409</b>	<b>100.0</b>	<b>571</b>	<b>100.0</b>
<b>Changes in Branch Locations</b>								
<b>Tract Income</b>	<b>Low</b>	<b>Moderate</b>	<b>Middle</b>	<b>Upper</b>	<b>Unknown</b>	<b>Total</b>		
Openings (#)	0	0	1	3	0	<b>4</b>		
Closings (#)	1	3	9	11	2	<b>26</b>		
<b>Net Change</b>	<b>(1)</b>	<b>(3)</b>	<b>(8)</b>	<b>(8)</b>	<b>(2)</b>	<b>(22)</b>		

**Community Development Services**

Overall, the bank provides a relatively high level of CD services throughout its AAs. The state ratings for California, Florida, and Texas are consistent with the overall rating, while the state ratings for Arizona and Michigan reflect an adequate level and an excellent level of CD services,

respectively. Additionally, the volume of qualified CD services provided by the bank has grown substantially since the previous evaluation.

Bank representatives provided 7,002 services totaling 22,340 hours to 877 organizations, with a significant portion of services provided to local grassroots and well-known organizations that provide varying levels of community services to LMI individuals and families in the bank's AAs. This level of CD services represents an increase of 119.4 percent in services and 47.1 percent in hours since Comerica's previous evaluation. The increase is attributable to the bank's commitment to CRA through various initiatives, such as designating paid time-off for employees to volunteer and requiring senior officers to incorporate qualified volunteer hours in their annual performance plans. Two noteworthy initiatives are:

- Comerica Financial Education Brigade consists of approximately 1,000 employees who volunteer virtually or in person to help meet the identified need for financial education throughout the AAs' diverse communities.
- Comerica BusinessHQ, a collaborative space established in the Dallas-Fort Worth Metropolitan AA in early 2023, has the express mission of serving small businesses in the severely underserved South Dallas region. This proof-of-concept location, at an estimated cost of \$5 million, has served more than 400 individuals by providing approximately \$4,500 worth of no-cost coworking space and tailored technical assistance by bank employees. In response to the overwhelming success of Comerica BusinessHQ and the development of new avenues to serve the area created through the program, Comerica plans to extend the concept to other AAs. This commitment to community service, despite it not fitting within established definitions of qualified CD activity, reflects very favorably on the bank's responsiveness and creativity to meet the needs of its AAs.

## **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) established the Consumer Financial Protection Bureau (CFPB). In general, the Dodd-Frank Act gives the CFPB, among other things, primary supervisory authority over insured depository institutions with total assets of more than \$10 billion when assessing compliance with the requirements of federal consumer financial laws. The Federal Reserve System retains authority to enforce compliance with the CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation, the Federal Reserve Bank of Dallas did not cite violations involving illegal discrimination or other illegal credit practices that adversely affected the evaluation of the bank's CRA performance. As of the date of this evaluation, the Federal Reserve Bank of Dallas is unaware of any violations of the Equal Credit Opportunity Act or Regulation B, or any unfair, deceptive, or abusive acts or practices identified by the CFPB.

## STATE OF MICHIGAN

<b>CRA RATING FOR MICHIGAN:</b>	<b>Outstanding</b>
The Lending Test is Rated:	Outstanding
The Investment Test is Rated:	Outstanding
The Service Test is Rated:	Outstanding

Major factors supporting the institution's rating include:

- Lending activity reflects excellent responsiveness and record of serving the AAs' credit needs, including low-income individuals, low-income areas, and very small businesses.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels and businesses of different revenue sizes is good.
- Comerica is a leader in making CD loans.
- The bank makes use of innovative and/or flexible lending practices in serving AAs' needs.
- Comerica is often in a leadership position given its excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors.
- The bank makes occasional use of innovative and/or complex investments to support CD initiatives.
- Comerica exhibits good responsiveness to credit and CD needs.
- Delivery systems are readily accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services that do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- Comerica is a leader in providing CD services.

## SCOPE OF THE EVALUATION

The scope of the review for the state of Michigan is consistent with the overall scope for the institution, including evaluations under the Lending, Investment, and Service tests. The time period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

Two of the 11 AAs in the state of Michigan were reviewed using full-scope procedures.

- Southeast Michigan Metropolitan AA
- Ann Arbor MSA AA

The remaining nine AAs received limited-scope reviews.

- Battle Creek, MI MSA AA
- Flint, MI MSA AA
- Grand Rapids-Kentwood Metropolitan AA
- Jackson, MI MSA AA
- Kalamazoo-Portage MSA AA
- Lansing-East Lansing Metropolitan AA
- Midland, MI MSA AA
- Muskegon, MI MSA AA
- Lenawee County Nonmetropolitan AA

AAs were selected for full-scope reviews based on the strategic importance of the AA, considering volume of lending, number of branches, and percentage of total deposits, as well as the length of time since the AA last received a full-scope review. Approximately 81.4 percent of lending activity (by number of loans), 92.3 percent of the deposits, and 76.3 percent of branches within the state of Michigan were evaluated through the full-scope reviews. The bank's performance in the Southeast Michigan Metropolitan AA was given greater consideration as it is Comerica's largest AA in any state, representing more than 30 percent of total branches and more than 40 percent of total deposits.

## **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN MICHIGAN**

The bank delineates 11 of its 27 AAs and operates 177 of its 409 branches in the state of Michigan. As of June 30, 2022, Comerica had \$37.7 billion in deposits in the state, representing 49.1 percent of total deposits. According to the June 30, 2022, FDIC Summary of Deposits, the bank had a deposit market share of 12.0 percent and ranked 3<sup>rd</sup> out of 103 FDIC-insured financial institutions across the state.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in Michigan is Outstanding. The Lending Test conclusions in the Southeast Michigan Metropolitan AA is considered excellent, which is consistent with the overall state rating, while the Lending Test conclusion in the Ann Arbor MSA AA is good. Overall, the bank's performance in its AAs receiving limited-scope reviews support the bank's state rating.

### **Lending Activity**

Comerica's lending activities in the state of Michigan reflect excellent responsiveness to the credit needs of its AAs. The bank makes use of innovative and/or flexible lending programs through its participation in numerous industry-recognized, government-guaranteed programs, including 33 FHA/VA loans, 9,734 SBA loans, and 2,001 small business micro loans in the state of Michigan.

As outlined in Table 9, this evaluation considered 21,917 loans totaling \$3.9 billion. The loan products and origination volumes appear consistent with the credit needs of the bank's Michigan AAs. The number of small business and HMDA loans extended by the bank was compared against the number of loans made by aggregate lenders during the review period. Comerica ranked 12<sup>th</sup> out of 229 CRA reporters and 27<sup>th</sup> of 807 HMDA reporters in its Michigan AAs.



**Table 9**

<b>Summary of Lending Activity – January 1, 2020 through December 31, 2022 Michigan Assessment Areas</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$000s</b>	<b>%</b>
Home Purchase	655	3.0	142,159	3.7
Refinancing	2,617	11.9	488,002	12.5
Home Improvement	1,591	7.3	164,860	4.2
Multifamily	20	0.1	89,044	2.3
Other Purpose Lines of Credit	1,186	5.4	154,192	4.0
Other Purpose Closed-End/Exempt	76	0.3	29,356	0.8
<b>Total HMDA-Related</b>	<b>6,145</b>	<b>28.0</b>	<b>1,067,613</b>	<b>27.5</b>
<b>Total Small Business</b>	<b>15,515</b>	<b>70.8</b>	<b>2,806,724</b>	<b>72.2</b>
<b>Total Small Farm</b>	<b>257</b>	<b>1.2</b>	<b>14,498</b>	<b>0.4</b>
<b>TOTAL LOANS</b>	<b>21,917</b>	<b>100.0</b>	<b>3,888,835</b>	<b>100.0</b>

### ***Geographic Distribution of Loans***

The overall geographic distribution of lending reflects excellent penetration throughout the bank's Michigan AAs. This performance is consistent across Comerica's Southeast Michigan Metropolitan AA, while the geographic distribution of lending in the Ann Arbor MSA AA is adequate.

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's overall lending reflects good penetration among individuals of different income levels and businesses of different revenue sizes. This performance is consistent across the bank's Southeast Michigan Metropolitan and Ann Arbor MSA AAs. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each AA.

### ***Community Development Lending***

Comerica is a leader in making CD loans in the state of Michigan. As reflected in Table 10, the bank originated 612 CD loans totaling approximately \$2.2 billion within the state, which comprises 45.4 percent of overall bank-wide CD loan volume by number and 41.7 percent by dollar amount. The level of CD lending is excellent in the Southeast Michigan Metropolitan and Ann Arbor MSA AAs.

The number of CD loans originated by the bank in the state of Michigan decreased slightly from the review period of the previous evaluation; however, this is attributed to the cessation of the SBA's PPP, in which the bank was heavily involved, making up 37.9 percent of the bank's qualified CD loans at the previous evaluation. Despite the decrease in the number of qualified originations in the state, the dollar amount of qualified originations increased substantially, growing by approximately 103.4 percent.

CD loans originated by the bank during the evaluation period were extended for a variety of purposes, as noted in Table 10. Specific details regarding the CD lending can be found in the Conclusions with Respect to Performance Tests section for each AA.

**Table 10**

<b>Community Development Lending Michigan Assessment Areas</b>		
<b>Purpose</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	17	123,340
Community Services	72	160,921
Economic Development	421	1,780,763
Revitalization and Stabilization	102	161,765
<b>Total</b>	<b>612</b>	<b>2,226,789</b>

## INVESTMENT TEST

Comerica's performance under the Investment Test in the state of Michigan is Outstanding. The Investment Test conclusions in the bank's Southeast Michigan AA is excellent, which is consistent with the overall state rating. In the bank's Ann Arbor MSA AA, the bank's performance is good. Generally, the bank's performance in its AAs that received limited-scope reviews is consistent with the overall performance in the state of Michigan.

Comerica is often in a leadership position, as it has an excellent level of qualified CD investments and grants. The bank exhibits good responsiveness to the credit and CD needs of its AAs while occasionally using innovative and/or complex investments. Since the previous evaluation, the bank has increased the dollar amount of investments by 30.1 percent or \$54.1 million. As illustrated in Table 11, the bank made a significant number of investments in affordable housing initiatives within the AA, which was identified as a CD need by a community contact. Many of these investments were comprised of LIHTC funds to assist with building affordable housing, reflecting favorably on the bank's responsiveness in meeting AA CD needs. Additionally, the level of the bank's CD investments and donations are particularly responsive to area organizations that support community services for LMI individuals, with Comerica extending 502 donations for a total of \$4.4 million.

Details regarding investments and donations in each of the bank's Michigan AAs can be found in the Conclusions with Respect to Performance Tests section for each AA. In addition to the volume of qualified CD investments and donations within the bank's delineated AAs, Comerica made five additional qualified CD investments in the broader statewide area. These investments include a \$5 million investment in a large rent-restricted affordable housing project as well as multiple deposits in minority- and women-owned financial institutions.

**Table 11**

<b>Investments, Grants, and Donations Michigan Assessment Areas</b>								
<b>Community Development Purpose</b>	<b>Prior Period Investments<sup>1</sup></b>		<b>Current Investments<sup>2</sup></b>		<b>Donations</b>		<b>Total</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	85	99,991	29	122,633	39	203	153	222,827
Community Services	0	0	0	0	502	4,347	502	4,347
Economic Development	2	1,153	8	9,747	38	937	48	11,837
Revitalization and Stabilization	0	0	0	0	15	92	15	92
<b>Total</b>	<b>87</b>	<b>101,144</b>	<b>37</b>	<b>132,380</b>	<b>594</b>	<b>5,579</b>	<b>718</b>	<b>239,103</b>

<sup>1</sup> Book value of investment

<sup>2</sup> Original market value of investment

## SERVICE TEST

Comerica's performance under the Service Test in the state of Michigan is Outstanding. The Service Test conclusions in the Southeast Michigan Metropolitan and Ann Arbor MSA AAs are excellent and good, respectively. Generally, the bank's performance in the AAs that received limited-scope reviews is consistent with the performance in the full-scope review areas and the state of Michigan. A notable example of the bank's CD services is its Financial Education Brigade, which consists of approximately 1,000 employees who volunteer virtually or in person to provide financial education throughout the AAs' diverse communities.

### ***Retail Services***

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are readily accessible to the bank's various geographies and to individuals of different income levels in each AA. Of Comerica's 177 full-service offices and 277 full-serve ATMs in the state of Michigan, 45 branches and 80 ATMs are located in LMI tracts. During the review period, the bank closed 14 branches, three of which were in moderate-income census tracts, and opened two branches, one of which is in a low-income census tract. The branches closed in LMI tracts were in geographies that are reasonably served by other branches. In the state of Michigan, Comerica's record of opening and closing branches has not adversely affected the accessibility of its delivery systems. Table 12 depicts the distribution of the Michigan banking offices and full-service ATMs by income level of geographies.

**Table 12**

<b>Branch and Full-Service ATM Locations Michigan Assessment Areas</b>							
<b>Tract Income</b>	<b>% of Geographies</b>	<b>% of Households</b>	<b>% of Businesses</b>	<b>Branches</b>		<b>Full-Service ATMs</b>	
				<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	8.7	7.1	5.9	9	5.1	18	6.5
Moderate	23.6	22.8	20.3	36	20.3	62	22.3
Middle	33.9	37.5	35.5	61	34.5	88	31.8
Upper	28.2	31.4	36.1	64	36.2	90	32.5
Unknown	5.6	1.2	2.2	7	4.0	19	6.9
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>177</b>	<b>100.0</b>	<b>277</b>	<b>100.0</b>

The bank's products, services, and business hours do not vary in a way that inconveniences LMI geographies and/or individuals in the AAs. Moreover, Comerica's operations and product and service offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Services section of this evaluation.

### ***Community Development Services***

Comerica is a leader in providing CD services in its Michigan AAs. While this conclusion is consistent with the bank's Southeast Michigan Metropolitan AA, Comerica provides a relatively high level of CD services in its Ann Arbor MSA AA. Bank representatives provided 3,481 CD services, totaling 11,235 hours, to 429 unique organizations within the state of Michigan. This represents approximately 49.7 percent of the bank's total CD services. Details regarding CD services can be found in the respective Conclusions with Respect to Performance Tests section for each AA.

**SOUTHEAST MICHIGAN METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SOUTHEAST MICHIGAN METROPOLITAN ASSESSMENT AREA**

- The bank's Southeast Michigan Metropolitan AA consists of Livingston, Oakland, Macomb, Lapeer, and Wayne counties in Michigan. These counties represent part of the Detroit-Warren-Dearborn, MI MSA, with St. Clair County excluded from the AA. See Appendix A for an AA map and Appendix B for additional demographic data.
- The AA is comprised of 1,305 census tracts, of which 9.3 percent are designated as low-income, 25.6 percent are moderate-income, 29.3 percent are middle-income, 29.4 percent are upper-income, and 6.4 percent are designated as unknown-income.
- Following the 2020 U.S. Census, 54 new census tracts were drawn within the AA, representing a 4.3 percent increase in the AA geographies. Census tracts designated as LMI decreased by 6.6 percent.
- The bank operates 126 full-service branches in the AA, including eight branches in low-income, 23 in moderate-income, 37 in middle-income, 52 in upper-income, and six in unknown-income census tracts.
- According to the June 30, 2022, FDIC Market Share Report, the bank had a 17.3 percent market share, ranking 2<sup>nd</sup> out of 37 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 20<sup>th</sup> out of 683 HMDA reporters in the AA with 1,462 HMDA originations and purchases, and 12<sup>th</sup> out of 198 CRA reporters with 1,908 CRA small business loans.
- Community contacts indicated a shortage of affordable housing, a need for small business loans given the conclusion of the SBA's PPP, and job creation and retention. Additionally, community contacts indicated a need for activities that promote revitalization and stabilization and support for small businesses, as the AA is still recovering from significant population decline experienced in the 1970s.

**Table 13**

<b>Population Change</b>			
<b>Assessment Area: Southeast Michigan Metropolitan</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percentage Change</b>
Southeast Michigan Metropolitan AA	4,135,987	4,231,658	2.3
Lapeer County, MI	88,235	88,619	0.4
Livingston County, MI	184,591	193,866	5.0
Macomb County, MI	854,689	881,217	3.1
Oakland County, MI	1,229,503	1,274,395	3.7
Wayne County, MI	1,778,969	1,793,561	0.8
Detroit-Dearborn-Livonia, MI MD*	1,778,969	1,793,561	0.8
Warren-Troy-Farmington Hills, MI MD	2,517,447	2,598,480	3.2
Michigan	9,900,571	10,077,331	1.8
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey * The Detroit-Dearborn-Livonia, MI Metropolitan Division (MD) is solely comprised by Wayne County, MI.			

- The AA population moderately grew from 2015 to 2020, primarily driven by the growth experienced in Livingston, Macomb, and Oakland counties. The AA population growth is similar the statewide growth rate. A community contacted noted growth in the Macomb area as a result of the revitalization of the automobile manufacturing industry in recent years.
- The Detroit-Warren-Dearborn, MI MSA represents a significant portion of the statewide population, making it the 14<sup>th</sup> largest MSA in the United States as identified by the 2020 U.S. Census.
- A community contact noted that the AA is still recovering from historical population decline from major automobile plants closing in the 1970s. The downtown area is undergoing a revitalization process that attracts young adults to the area. However, families who can afford to move to the suburbs, move given the poor quality of urban neighborhoods.

**Table 14**

<b>Median Family Income Change</b>			
<b>Assessment Area: Southeast Michigan Metropolitan</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percentage Change</b>
Southeast Michigan Metropolitan AA	73,531	81,067	10.2
Lapeer County, MI	67,575	74,675	10.5
Livingston County, MI	93,625	100,663	7.5
Macomb County, MI	74,060	80,371	8.5
Oakland County, MI	95,290	106,060	11.3
Wayne County, MI	57,615	63,896	10.9
Detroit-Dearborn-Livonia, MI MD*	57,615	63,896	10.9
Warren-Troy-Farmington Hills, MI MD	83,843	92,419	10.2
Michigan	68,010	75,470	11.0
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey			
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			
* The Detroit-Dearborn-Livonia, MI Metropolitan Division (MD) is solely comprised by Wayne County, MI.			

- The AA MFI grew at a comparable rate to that of the state of Michigan. The AA growth is mostly driven by the population growth experienced in Oakland and Wayne counties.
- According to FFIEC Census Data, 13.3 percent of households in the AA lived below the poverty level.
- A community contact noted an increase in the cost of living within the AA, such as groceries, daycare, and car insurance, yet wages have not been able to keep pace.

**Table 15**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Southeast Michigan Metropolitan</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Southeast Michigan Metropolitan AA	75.2	35.1	44.2	62.6	28.0	19.4
Lapeer County, MI	69.8	20.3	44.0	62.0	24.9	18.6
Livingston County, MI	72.7	19.5	38.5	61.3	28.1	17.6
Macomb County, MI	80.3	36.2	43.6	64.1	29.1	18.9
Oakland County, MI	77.6	45.4	38.9	70.0	36.5	18.1
Wayne County, MI	73.2	29.8	47.7	58.9	23.0	21.1
Detroit-Dearborn-Livonia, MI MD*	73.2	29.8	47.7	58.9	23.0	21.1
Warren-Troy-Farmington Hills, MI MD	77.7	38.9	40.8	65.8	31.0	18.4
Michigan	74.2	31.3	43.2	61.7	26.5	18.2

*Cost burden is housing cost that equals 30 percent or more of household income.*  
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy  
\* The Detroit-Dearborn-Livonia, MI Metropolitan Division (MD) is solely comprised by Wayne County, MI.

- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on homeowners at any other level. A community contact stated that families living under the poverty level in the AA cannot afford reasonably priced housing. Additionally, the community contact noted that many landlords delay housing repairs due to cost, which contributes to blight.
- Overall, the cost burden for homeowners and renters in the AA is greater than the housing cost burden for homeowners and renters statewide.
- With a median housing age of 60 years, the AA housing stock is aging. Community contacts indicated that much of the AA is comprised of blighted or abandoned housing. Additionally, a community contact identified the Highland Park neighborhood, a suburb within the Detroit area, as particularly comprised of abandoned and aging housing stock.
- The AA median housing value is \$180,383, which exceeds the state's median housing value, at \$162,600.
- A community contact also noted that there is a shortage of affordable rental properties.

**Table 16**

<b>Unemployment Rates</b>					
<b>Assessment Area: Southeast Michigan Metropolitan</b>					
<b>Region</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Southeast Michigan Metropolitan AA	4.3	4.2	11.5	6.2	3.9
Lapeer County, MI	5.2	5.3	12.2	6.1	4.1
Livingston County, MI	3.3	3.2	8.6	4.2	2.9
Macomb County, MI	4.1	4.2	11.8	5.9	3.7
Oakland County, MI	3.4	3.4	9.1	4.7	3.0
Wayne County, MI	5.2	5.0	13.5	8.0	4.6
Detroit-Dearborn-Livonia, MI MD*	5.2	5.0	13.5	8.0	4.6
Warren-Troy-Farmington Hills, MI MD	3.7	3.8	10.2	5.2	3.3
Michigan	4.2	4.1	10.0	5.9	4.2

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*  
\* The Detroit-Dearborn-Livonia, MI Metropolitan Division (MD) is solely comprised by Wayne County, MI.

- Unemployment rates in the AA are comparable to the statewide rates between 2018 and 2022.
- Unemployment rates more than doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2022, the AA unemployment rate stabilized and returned to pre-pandemic levels.
- Major employment industries within the AA include manufacturing, healthcare and social services, retail trade, and professional and technical services.
- The AA employment industry is primarily dominated by the domestic automobile sector, as it is the home of Ford Motor Company, General Motors Company, and Fiat Chrysler Automobiles (collectively the “Big Three.”)

Table 17 details selected characteristics of the AA.

**Table 17**

2022 Combined Demographics								
Assessment Area: Southeast Michigan Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	121	9.3	66,823	6.4	24,062	36.0	224,058	21.6
Moderate	334	25.6	244,745	23.5	40,114	16.4	176,534	17.0
Middle	382	29.3	341,826	32.9	23,825	7.0	206,769	19.9
Upper	384	29.4	380,227	36.6	12,019	3.2	432,326	41.6
Unknown	84	6.4	6,066	0.6	2,470	40.7	0	0.0
Total AA	1,305	100.0	1,039,687	100.0	102,490	9.9	1,039,687	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by	% by	#	% by unit	#	% by unit
Low	166,190	49,868	4.3	30.0	80,494	48.4	35,828	21.6
Moderate	489,835	245,791	21.4	50.2	176,244	36.0	67,800	13.8
Middle	581,341	392,450	34.2	67.5	151,152	26.0	37,739	6.5
Upper	579,941	453,744	39.6	78.2	95,993	16.6	30,204	5.2
Unknown	21,262	5,399	0.5	25.4	9,598	45.1	6,265	29.5
Total AA	1,838,569	1,147,252	100.0	62.4	513,481	27.9	177,836	9.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	13,299	6.6	11,881	6.4	1,332	8.3	86	5.4
Moderate	44,166	21.8	40,401	21.8	3,459	21.5	306	19.3
Middle	62,368	30.8	57,429	31.0	4,470	27.8	469	29.6
Upper	78,252	38.6	71,782	38.8	5,795	36.1	675	42.6
Unknown	4,611	2.3	3,562	1.9	1,000	6.2	49	3.1
Total AA	202,696	100.0	185,055	100.0	16,056	100.0	1,585	100.0
Percentage of Total Businesses:				91.3		7.9		0.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	39	3.3	38	3.3	1	3.2	0	0.0
Moderate	222	18.7	218	18.8	4	12.9	0	0.0
Middle	514	43.3	501	43.3	13	41.9	0	0.0
Upper	403	33.9	391	33.8	12	38.7	0	0.0
Unknown	10	0.8	9	0.8	1	3.2	0	0.0
Total AA	1,188	100.0	1,157	100.0	31	100.0	0	0.0
Percentage of Total Farms:				97.4		2.6		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding								



## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in the Southeast Michigan Metropolitan AA is excellent. Comerica's retail lending performance was bolstered by the bank's substantial efforts to meet AA needs through CD lending. For this evaluation, small business lending generally carried more weight, as it comprised the largest volume of lending in the AA. Additionally, multifamily, other purpose closed/exempt, and loan purpose not applicable lending were not separately reviewed in the evaluation of the bank's home mortgage lending.

Details of Comerica's 2020 mortgage and small business lending as well as aggregate data can be found in Appendix C.

### **Lending Activity**

The bank's lending activity in the Southeast Michigan Metropolitan AA reflects excellent responsiveness to AA credit needs. Comerica makes extensive use of innovative and/or flexible lending practices through its participation in numerous industry-recognized, government-guaranteed programs, including FHA, VA, and SBA loans. During the review period, the bank extended 7,993 SBA loans and 1,657 small business micro loans in the AA and actively partnered with the National Faith HomeBuyers Program to provide flexible lending and downpayment assistance for first-time home buyers in the area. The bank's level of lending to these programs demonstrates Comerica's excellent record of serving the credit needs of low-income individuals and very small businesses.

Comerica extended 4,455 home mortgage and 12,169 small business loans between January 1, 2020, and December 31, 2022. The loan products and origination volumes are responsive to the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

### ***Geographic Distribution of Loans***

The geographic distribution of small business and home mortgage lending, including both originations and purchases, was compared with available demographic and aggregate lending data. The bank's geographic distribution of loans reflects excellent penetration throughout the AA. There were no significant gaps or lapses in contiguous geographies noted.

### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage loans in the AA is good. The distribution of 2021 and 2022 home mortgage loans among low-income census tracts is comparable to aggregate data and the demographic figure. Among moderate-income census tracts, the bank's performance is below the demographic figure, but comparable to aggregate lending. Aggregate lending serves as a better proxy for loan demand than the demographic figure when evaluating the bank's geographic distribution of HMDA lending.

The bank's 2020 lending performance reflected penetration levels similar to those of 2021 and 2022, with a distribution of loans to LMI tracts that was comparable to aggregate data but below the demographic figure.

### *Home Purchase Lending*

The geographic distribution of home purchase lending in the AA is excellent. Among low-income census tracts, the bank's 2021 home purchase lending performance level is slightly below aggregate data, as well as below the demographic figure. In 2022, Comerica's performance in low-income geographies is above aggregate data and comparable to the demographic figure.

Comerica's 2021 and 2022 distribution of home purchase loans among moderate-income tracts is notably above aggregate lending and exceeds the percentage of owner-occupied units. The number of home purchase loans originated by the bank within LMI census tracts almost doubled from 2020 to 2021 (with 23 and 41 originations, respectively) and remained elevated in 2022, with 42 loans, which reflects favorably on the bank's responsiveness to credit needs of these geographies. During the same period, the percentage of owner-occupied housing units located in LMI census tracts grew by only 0.2 percent (growing from 25.5 percent in 2020 to 25.7 percent in 2021). This is particularly noteworthy as a community contact the difficulty homebuyers face when securing financing options, often leveraging predatory lending options or entering into land contracts at much higher interest rates.

The bank's lending performance for 2020 reflects penetration levels below those of 2021 and 2022, with a distribution of loans to LMI tracts that is below aggregate data and the demographic figure. This further validates the improvement in the bank's overall performance despite rising interest rates.

### *Home Refinance Lending*

The geographic distribution of home refinance lending is good. The distribution of 2021 home refinance loans among low-income census tracts is above aggregate data and comparable to the demographic figure. The distribution of 2022 home refinance lending reflects comparable performance to both figures.

The penetration level of the bank's 2022 home refinance lending among moderate-income census tracts is below the aggregate data and the demographic figure, while the bank performed slightly above aggregate data in 2021.

The bank's 2020 lending performance reflects penetration levels consistent with 2021 and 2022, with a distribution of loans to LMI tracts that is comparable to aggregate data but below the demographic figure. A community contact emphasized the significant role refinance loans played in meeting the needs of the community. The bank's lending performance of home refinances in the AA is responsive as these loans predominantly helped LMI in the AA.

### *Home Improvement Lending*

The geographic distribution of home improvement lending is good. The distribution of 2021 and 2022 home improvement loans among LMI census tracts is comparable to the level of aggregate data but below the demographic figure. The bank's performance improved between 2021 and 2022 among moderate-income census tracts, though it declined by a similar margin among low-income tracts.

The bank's lending performance in 2020 reflected penetration levels consistent with 2021 and 2022 with a distribution of loans to LMI tracts that is slightly above aggregate data but below the demographic figure.

*Other Purpose Lines of Credit Lending*

The geographic distribution of other purpose lines of credit is good. The bank's 2021 performance reflects a distribution among LMI census tracts that is comparable to the aggregate data but below the percentage of owner occupied. While the bank's 2022 performance in low-income geographies declined slightly, it remained comparable to aggregate lending. Notably, among moderate-income census tracts, Comerica's 2022 other purpose lines of credit lending increased from the 2021 level, outperforming aggregate data, but remaining below the demographic figure.

The bank's 2020 lending performance is consistent with the 2021 and 2022 levels, with a distribution of loans to LMI tracts that is slightly above aggregate data but below the demographic figure.

Tables 18A and 18B provide details about the bank's 2021 and 2022 home mortgage lending by income level of geography within the AA.

**Table 18A**

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Southeast Michigan Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	2	1.4	3.8	306	0.9	2.1	6	4.5	3.5	974	2.9	1.8	4.3
Moderate	39	26.7	17.6	7,297	21.9	11.4	36	26.9	20.6	6,133	18.5	13.6	21.4
Middle	52	35.6	38.3	9,475	28.4	34.3	46	34.3	36.4	8,720	26.3	31.9	34.2
Upper	53	36.3	40.2	16,234	48.7	52.2	46	34.3	39.2	17,391	52.4	52.6	39.6
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.3	0	0.0	0.2	0.5
Total	146	100.0	100.0	33,312	100.0	100.0	134	100.0	100.0	33,218	100.0	100.0	100.0
Refinance Loans													
Low	29	4.2	1.6	2,043	1.6	0.8	12	2.4	2.3	2,126	2.1	1.3	4.3
Moderate	103	14.8	11.9	10,163	7.7	8.0	69	13.7	17.9	7,126	7.1	12.6	21.4
Middle	230	33.0	37.4	35,165	26.7	32.0	166	33.0	37.4	26,001	26.0	33.2	34.2
Upper	335	48.1	49.2	84,151	64.0	59.2	253	50.3	42.2	64,592	64.6	52.8	39.6
Unknown	0	0.0	0.0	0	0.0	0.0	3	0.6	0.2	168	0.2	0.2	0.5
Total	697	100.0	100.0	131,522	100.0	100.0	503	100.0	100.0	100,013	100.0	100.0	100.0
Home Improvement Loans													
Low	17	4.0	2.4	661	1.5	1.4	9	2.0	2.3	452	0.9	1.3	4.3
Moderate	50	11.8	11.6	2,585	5.9	8.1	73	16.0	14.3	5,693	10.9	10.1	21.4
Middle	129	30.4	35.8	10,377	23.8	31.7	141	30.9	34.2	14,102	27.0	29.5	34.2
Upper	227	53.4	50.1	29,872	68.6	58.7	232	50.8	49.1	31,938	61.1	58.9	39.6
Unknown	2	0.5	0.1	32	0.1	0.0	2	0.4	0.2	90	0.2	0.1	0.5
Total	425	100.0	100.0	43,527	100.0	100.0	457	100.0	100.0	52,275	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	12.7	0	0.0	4.4	2	25.0	11.4	1,219	4.0	8.8	
Moderate	0	0.0	34.3	0	0.0	16.7	0	0.0	37.1	0	0.0	32.1	
Middle	0	0.0	32.1	0	0.0	49.1	2	25.0	30.1	28,858	93.9	18.4	
Upper	0	0.0	20.9	0	0.0	29.8	4	50.0	18.0	665	2.2	38.9	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	3.3	0	0.0	1.8	
Total	0	0.0	100.0	0	0.0	100.0	8	100.0	100.0	30,742	100.0	100.0	
Total Home Mortgage Loans													Owner Occupied Units %
Low	58	3.6	2.4	3,681	1.4	1.4	34	2.3	2.9	5,010	1.9	2.1	
Moderate	227	14.2	13.8	22,429	8.6	9.6	243	16.6	18.8	24,718	9.3	14.4	
Middle	512	32.0	37.6	67,084	25.6	33.5	482	33.0	36.4	90,936	34.2	31.0	
Upper	801	50.0	46.2	168,329	64.3	55.4	698	47.7	41.7	145,211	54.6	52.1	
Unknown	3	0.2	0.0	80	0.0	0.0	5	0.3	0.3	258	0.1	0.3	
Total	1,601	100.0	100.0	261,603	100.0	100.0	1,462	100.0	100.0	266,133	100.0	100.0	
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table 18B**

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Southeast Michigan Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	8	2.6	2.1	530	1.3	1.1	4	1.2	1.4	189	0.5	0.8	4.3
Moderate	31	10.0	9.9	2,081	5.0	6.3	55	16.6	12.9	4,411	10.5	8.1	21.4
Middle	94	30.3	34.8	10,518	25.2	28.6	118	35.5	34.1	12,397	29.5	29.6	34.2
Upper	176	56.8	53.2	28,516	68.4	64.0	155	46.7	51.4	24,968	59.5	61.5	39.6
Unknown	1	0.3	0.1	48	0.1	0.0	0	0.0	0.1	0	0.0	0.1	0.5
Total	310	100.0	100.0	41,693	100.0	100.0	332	100.0	100.0	41,965	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	2	8.7	3.7	141	1.2	1.7	1	3.6	3.3	50	0.6	2.8	4.3
Moderate	4	17.4	16.8	303	2.6	8.5	10	35.7	20.6	1,355	17.1	12.4	21.4
Middle	7	30.4	36.9	1,549	13.4	27.1	9	32.1	34.8	858	10.8	25.8	34.2
Upper	10	43.5	42.5	9,556	82.7	62.7	8	28.6	41.0	5,657	71.4	58.6	39.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	0	0.0	0.4	0.5
Total	23	100.0	100.0	11,549	100.0	100.0	28	100.0	100.0	7,920	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.8	0	0.0	2.2	0	0.0	5.7	0	0.0	6.6	4.3
Moderate	0	0.0	21.3	0	0.0	15.8	0	0.0	21.2	0	0.0	18.4	21.4
Middle	0	0.0	44.0	0	0.0	42.6	0	0.0	46.8	0	0.0	41.5	34.2
Upper	0	0.0	30.9	0	0.0	39.3	0	0.0	26.1	0	0.0	33.5	39.6
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0.5
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Source: 2022 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

### Small Business Lending

Comerica's geographic distribution of small business loans reflects excellent penetration throughout the AA. As noted on Table 19, the bank's small business lending among LMI census tracts in 2021 exceeds aggregate data and the percentage of businesses located in such geographies. In 2022, the bank's performance remains above aggregate data but comparable to the demographic figure.

The bank's lending performance among low-income census tracts is above aggregate data in 2022 but comparable in 2021. Comerica's lending performance among moderate-income census tracts in 2022 is comparable to aggregate data but slightly above in 2021.

The bank's 2020 distribution of small business loans among LMI census tracts exceeds aggregate data while comparable to the demographic figure. A community contact noted the need for small business loans within the AA to help small businesses retain and create jobs. Another contact identified a need for lending to small businesses to recover from the 2008 recession and the COVID-19 pandemic. The bank has sustained performance levels despite the rising interest rates, economic environment, and the SBA's PPP conclusion.

**Table 19**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Southeast Michigan Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	394	10.2	7.5	75,334	11.1	7.9	179	9.4	5.7	52,475	10.4	6.6	6.6
Moderate	916	23.6	20.4	172,636	25.4	20.9	414	21.7	20.3	111,161	22.1	19.8	21.8
Middle	981	25.3	30.5	165,875	24.4	28.0	510	26.7	30.8	124,656	24.7	29.3	30.8
Upper	1,535	39.6	40.8	250,995	36.9	42.2	707	37.1	40.9	180,606	35.8	40.5	38.6
Unknown	53	1.4	0.5	15,707	2.3	0.9	98	5.1	2.0	34,984	6.9	3.7	2.3
Total	3,879	100.0	100.0	680,547	100.0	100.0	1,908	100.0	100.0	503,882	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's distribution of lending to borrowers reflects good penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

### ***Residential Real Estate (HMDA) Lending***

Home mortgage lending by borrower income in the AA is excellent when compared to demographic data and the performance of aggregate HMDA lenders. As shown on Tables 20A and 20B, the dispersion of home mortgage loans among low-income borrowers exceeds the 2021 and 2022 aggregate data but is below the percentage of AA families classified as low-income. It is often more difficult for low-income borrowers to qualify for mortgages, especially in a rising interest rate environment, as noted in 2022. Despite the increase in mortgage costs, the bank outperformed aggregate lending in 2022 by a larger margin than it did in 2021, reflecting very favorably on its willingness to extend credit to low-income borrowers. Additionally, the bank's performance among moderate-income borrowers exceeds than the demographic figure and is comparable to aggregate data.

The bank's performance in 2020 is consistent with that of 2021 and 2022, with a distribution of loans to LMI borrowers that exceeds aggregate data.

**Table 20A**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Southeast Michigan Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	16	11.0	11.3	2,366	7.1	6.1	17	12.7	11.0	1,808	5.4	5.6	21.6
Moderate	33	22.6	23.0	5,791	17.4	16.8	44	32.8	23.4	7,984	24.0	16.6	17.0
Middle	27	18.5	22.8	6,679	20.0	21.6	22	16.4	22.5	4,893	14.7	21.2	19.9
Upper	49	33.6	30.1	13,677	41.1	42.9	34	25.4	28.9	14,804	44.6	41.9	41.6
Unknown	21	14.4	12.8	4,799	14.4	12.5	17	12.7	14.1	3,729	11.2	14.8	0.0
Total	146	100.0	100.0	33,312	100.0	100.0	134	100.0	100.0	33,218	100.0	100.0	100.0
Refinance Loans													
Low	104	14.9	8.5	8,793	6.7	4.7	105	20.9	14.1	9,906	9.9	8.6	21.6
Moderate	139	19.9	18.5	16,061	12.2	13.3	129	25.6	24.0	14,857	14.9	19.0	17.0
Middle	118	16.9	23.6	17,053	13.0	21.0	83	16.5	23.8	14,472	14.5	22.4	19.9
Upper	266	38.2	37.0	76,721	58.3	48.2	160	31.8	28.8	48,559	48.6	39.6	41.6
Unknown	70	10.0	12.5	12,894	9.8	12.7	26	5.2	9.3	12,219	12.2	10.3	0.0
Total	697	100.0	100.0	131,522	100.0	100.0	503	100.0	100.0	100,013	100.0	100.0	100.0
Home Improvement Loans													
Low	57	13.4	8.2	2,882	6.6	5.9	62	13.6	9.3	3,676	7.0	6.0	21.6
Moderate	84	19.8	16.7	5,282	12.1	12.9	85	18.6	18.9	7,030	13.4	13.8	17.0
Middle	94	22.1	24.3	8,540	19.6	20.4	117	25.6	25.6	12,077	23.1	21.7	19.9
Upper	174	40.9	49.0	25,478	58.5	58.9	165	36.1	44.5	27,440	52.5	56.8	41.6
Unknown	16	3.8	1.8	1,345	3.1	1.9	28	6.1	1.7	2,052	3.9	1.7	0.0
Total	425	100.0	100.0	43,527	100.0	100.0	457	100.0	100.0	52,275	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	221	13.8	9.3	16,796	6.4	5.3	239	16.4	11.7	18,650	7.9	6.5	21.6
Moderate	299	18.7	19.7	30,838	11.8	14.5	318	21.9	22.7	34,948	14.8	17.0	17.0
Middle	310	19.4	23.2	40,077	15.3	21.1	296	20.4	23.3	38,357	16.3	21.4	19.9
Upper	655	40.9	35.3	153,671	58.7	46.5	509	35.0	31.3	123,871	52.6	42.3	41.6
Unknown	116	7.2	12.4	20,221	7.7	12.6	92	6.3	11.1	19,565	8.3	12.9	0.0
Total	1,601	100.0	100.0	261,603	100.0	100.0	1,454	100.0	100.0	235,391	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

**Table 20B**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Southeast Michigan Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	38	12.3	8.3	2,214	5.3	5.6	51	15.4	9.1	3,027	7.2	5.6	21.6
Moderate	41	13.2	14.8	3,497	8.4	10.4	53	16.0	19.1	4,280	10.2	13.8	17.0
Middle	69	22.3	21.3	7,275	17.4	17.2	70	21.1	24.7	6,635	15.8	19.8	19.9
Upper	155	50.0	53.2	28,060	67.3	64.8	137	41.3	44.6	26,458	63.0	58.7	41.6
Unknown	7	2.3	2.4	647	1.6	2.0	21	6.3	2.5	1,565	3.7	2.1	0.0
Total	310	100.0	100.0	41,693	100.0	100.0	332	100.0	100.0	41,965	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	6	26.1	12.6	541	4.7	6.2	4	14.3	12.4	233	2.9	7.2	21.6
Moderate	2	8.7	19.2	207	1.8	12.8	7	25.0	21.2	797	10.1	14.1	17.0
Middle	2	8.7	22.0	530	4.6	15.7	4	14.3	25.4	280	3.5	17.8	19.9
Upper	11	47.8	41.2	9,735	84.3	59.5	13	46.4	35.3	6,610	83.5	51.2	41.6
Unknown	2	8.7	4.9	536	4.6	5.8	0	0.0	5.8	0	0.0	9.7	0.0
Total	23	100.0	100.0	11,549	100.0	100.0	28	100.0	100.0	7,920	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.2	0	0.0	0.1	0	0.0	0.9	0	0.0	0.9	21.6
Moderate	0	0.0	0.3	0	0.0	0.3	0	0.0	0.5	0	0.0	0.3	17.0
Middle	0	0.0	0.3	0	0.0	0.1	0	0.0	0.6	0	0.0	0.8	19.9
Upper	0	0.0	0.1	0	0.0	0.0	0	0.0	0.4	0	0.0	0.5	41.6
Unknown	0	0.0	99.1	0	0.0	99.5	0	0.0	97.6	0	0.0	97.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

Comerica's borrower distribution of small business lending by revenue size of businesses is adequate despite the sharp reduction in volume and steady decline in performance when compared to the aggregate lenders' performance year after year. Table 21 shows the distribution of 2022 small business loans to businesses with revenues of \$1 million or less is below aggregate data and well below the percentage of small businesses in the AA. The bank's distribution of loans to small businesses in 2021 exceeds the 2022 performance and is slightly below to aggregate data. This is reasonable as Comerica made significantly more small business loans in 2021 than in 2022, and aggregate data serves as a better proxy for loan demand than the demographic figure.

The bank's 2020 small business lending to businesses with revenues of \$1 million or less exceeds the 2021 and 2022 performance, with a distribution of loans to small businesses greater than the aggregate data.



**Table 21**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Southeast Michigan Metropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	1,633	42.1	46.1	150,849	22.2	26.4	666	34.9	50.9	111,547	22.1	31.4	91.3
Over \$1 Million	1,297	33.4		420,131	61.7		1,010	52.9		341,998	67.9		7.9
Revenue Unknown	949	24.5		109,567	16.1		232	12.2		50,337	10.0		0.8
Total	3,879	100.0		680,547	100.0		1,908	100.0		503,882	100.0		100.0
By Loan Size													
\$100,000 or Less	2,316	59.7	91.8	95,179	14.0	35.0	818	42.9	95.2	49,493	9.8	41.9	
\$100,001 - \$250,000	749	19.3	4.7	134,653	19.8	19.1	443	23.2	2.5	86,215	17.1	14.3	
\$250,001 - \$1 Million	814	21.0	3.5	450,715	66.2	45.8	647	33.9	2.3	368,174	73.1	43.7	
Total	3,879	100.0	100.0	680,547	100.0	100.0	1,908	100.0	100.0	503,882	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	1,258	77.0		49,094	32.5		398	59.8		24,278	21.8		
\$100,001 - \$250,000	251	15.4		42,696	28.3		153	23.0		27,953	25.1		
\$250,001 - \$1 Million	124	7.6		59,059	39.2		115	17.3		59,316	53.2		
Total	1,633	100.0		150,849	100.0		666	100.0		111,547	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

## Community Development Lending

The bank is a leader in making CD loans in the AA. Comerica originated 402 qualified CD loans totaling \$1.5 billion in the AA, which represents 29.8 percent of the bank's total CD loan volume and 27.6 percent of the total dollar amount of CD loan originations. The dollar amount of the bank's CD lending activity in the AA grew by 70.1 percent since the previous evaluation, even as the number volume dropped by 21.0 percent. Comerica made a concerted effort to increase CD lending to fill the void left by the cessation of the SBA's PPP in May 2021, with a specific focus on promoting economic development through small business financing and permanent job creation, retention, or improvement impacting LMI persons or LMI geographies. Loans for this purpose comprised the largest portion of the bank's qualified CD lending during the review period. Examples of Comerica's CD lending activities that were considered responsive to the credit needs of the AA include:

- A \$13.5 million loan to support the business operations of a metal stamping small business located in Detroit, Michigan. The loan allows the business to continue operating in the AA, employing skilled trade workers, who are mostly LMI individuals living in the LMI geographies.
- A \$7 million construction loan, in conjunction with an \$8 million CD investment, for a 30-unit housing project that includes 11 subsidized units set expressly aside to provide housing and wrap-around services for chronically homeless individuals in the AA.
- A \$36 million line of credit to an organization providing tuition-free education for children in the AA, of which 63 percent qualify for free or reduced-price lunch.

Table 22 summarizes the CD loans extended in the AA during the review period.

**Table 22**

<b>Community Development Lending Assessment Area: Southeast Michigan Metropolitan</b>		
<b>Purpose</b>	<b>#</b>	<b>\$000s</b>
Affordable Housing	11	89,890
Community Services	37	51,771
Economic Development	273	1,193,942
Revitalization and Stabilization	81	137,813
<b>Total</b>	<b>402</b>	<b>1,473,416</b>

## INVESTMENT TEST

The bank's performance under the Investment Test in the AA is excellent. Comerica is often in a leadership position given its excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors. The dollar amount of CD investments and grants made in the AA grew by 48.6 percent since the previous evaluation. Though Comerica makes occasional use of innovative and/or complex investments, it exhibits good responsiveness to credit and CD needs of the AA.

Table 23 illustrates the breakdown of the bank's CD investments and donations within the AA, including prior period investments that remain on Comerica's ledger, current period investments purchased during the review period, and CD donations made since the previous evaluation. Examples of CD investment and donation activities include:

- An \$8 million LIHTC equity investment, in conjunction with a \$7 million CD loan, for a 30-unit new housing construction project that includes 11 subsidized units set expressly aside for chronically homeless individuals in the AA. The project also includes a provision of wrap-around services including mental health services, employment training, and financial literacy education. This investment is particularly responsive given the shortage of affordable housing, as indicated by community contacts.
- A \$250,000 deposit with a minority-owned depository institution to support the institution with a mentor-protégé relationship focused on capacity building and developing community engagement opportunities for the bank.
- A \$100,000 donation to an organization providing assistance to technology startups and local businesses through entrepreneurship training, business-focused financial education, and networking events. This donation demonstrates the bank's commitment to serving the credit needs of the AA, as a community contact noted that AA small businesses require support and investments to help revitalize the AA.

**Table 23**

Investment, Grants, and Donations Assessment Area: Southeast Michigan Metropolitan								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	42	63,342	19	98,625	9	77	70	162,044
Community Services	0	0	0	0	362	3,761	362	3,761
Economic Development	1	443	2	5,205	26	815	29	6,463
Revitalization and Stabilization	0	0	0	0	10	81	10	81
<b>Total</b>	<b>43</b>	<b>63,785</b>	<b>21</b>	<b>103,830</b>	<b>407</b>	<b>4,734</b>	<b>471</b>	<b>172,349</b>
<sup>1</sup> Book value of investment								
<sup>2</sup> Original market value of investment								

## SERVICE TEST

The bank's Service Test performance is excellent.

### Retail Services

Comerica's delivery systems are readily accessible to the bank's geographies and individuals of different income levels in the AA. The distribution of the bank's 126 branch offices and 213 ATMs as of April 1, 2023, was compared to the distribution of the households and businesses among the tract categories within the AA. Table 24 summarizes the bank's retail locations in the AA.

**Table 24**

Branch and Full-Service ATM Locations Assessment Area: Southeast Michigan Metropolitan							
Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	9.3	7.8	6.5	8	6.4	17	8.0
Moderate	25.6	25.4	21.8	23	18.3	44	20.7
Middle	29.3	32.7	30.8	37	29.4	61	28.6
Upper	29.4	33.1	38.6	52	41.3	76	35.7
Unknown	6.4	0.9	2.3	6	4.8	15	7.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>126</b>	<b>100.0</b>	<b>213</b>	<b>100.0</b>

Comerica has a large presence in the AA, with more than 10 percent of the 1,305 AA census tracts containing either a branch or full-service ATM. Additionally, a large percentage of the LMI census tracts in the AA are congregated in the region stretching north from downtown Detroit just inland from Lake St. Claire. This region includes more than 35 of the bank's branches, which appropriately service the area.

The bank opened two branches (one in a middle-income and one in an upper-income census tract) and closed 11 branches (two located in moderate-income, four located in middle-income, and five in upper-income census tracts) in the AA. Each of the branches closed served an area that is sufficiently serviced by another location. Therefore, the bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI

geographies or LMI individuals. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals.

### ***Community Development Services***

The bank is a leader in providing CD services in the AA. Comerica's employees served in various capacities for 314 organizations offering CD services targeted toward LMI individuals. During the review period, bank employees provided 2,470 CD services totaling 8,171 hours. This represents a substantial increase from the previous evaluation, with the number of qualified CD services growing by 234.2 percent and total hours by 107.2 percent. The bank's efforts in providing qualified services throughout the AA reflect very favorably on Comerica's commitment to addressing the AA needs by giving more than just dollars. Examples of services performed by bank employees include:

- Forty-three bank employees helped facilitate pop-up financial education simulations in partnership with an organization that focuses on elevating young innovators beyond societal constraints. The simulations taught budgeting, savings, credit, and career readiness to students and other young people, more than 75 percent of which were LMI.
- Eighty-three bank employees in the AA provided more than 350 hours of qualified service through a non-profit which empowers high school and college students through targeted education and mentorships with local business professionals. The employees provided education to LMI students regarding financial literacy, goal setting, and career preparedness.
- Bank employees served an organization that provides home ownership tools and services, including downpayment assistance, to LMI individuals in the AA. Services rendered include providing financial education to the organization's beneficiaries and providing counsel on marketing and strategic planning to help organization grow and increase its impact across the area.

**ANN ARBOR MSA ASSESSEMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE ANN ARBOR MSA ASSESSMENT AREA**

- Comerica's Ann Arbor MSA AA consists of the entirety of Washtenaw County, which is also the Ann Arbor, MI MSA. See Appendix A for an AA map and Appendix B for additional demographic data.
- The AA is comprised of 107 census tracts, of which 12.1 percent are designated as low-income, 12.1 percent as moderate-income, 37.4 percent as middle-income, 28.0 percent as upper-income, and 10.3 percent as unknown-income.
- Following the 2020 U.S. Census, seven new census tracts were drawn within the AA, decreasing the number of LMI geographies by 23.1 percent.
- The bank operates nine full-service branches in the AA, including one branch in a low-income, one in a moderate-income, four in middle-income, three in upper-income census tracts.
- According to the June 30, 2022, FDIC Market Share Report, Comerica had a 8.5 percent market share, ranking 5<sup>th</sup> out of 16 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 28<sup>th</sup> out of 352 HMDA reporters in the AA with 97 HMDA originations and purchases, and 11<sup>th</sup> out of 92 CRA reporters with 133 CRA small business and small farm loans.

**Table 25**

<b>Population Change</b>			
<b>Assessment Area: Ann Arbor MSA</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percentage Change</b>
Ann Arbor MSA AA	354,092	372,258	5.1
Michigan	9,900,571	10,077,331	1.8
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- Ann Arbor is the 5<sup>th</sup> largest city in Michigan.
- The AA population grew significantly between 2015 and 2020, more than doubling the statewide growth rate. The rapid growth rate is primarily attributed to the University of Michigan, which has an annual enrollment of 50,000 students, and technology companies drawn to the area by the university's research and development infrastructure.

**Table 26**

<b>Median Family Income Change</b>			
<b>Assessment Area: Ann Arbor MSA</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percentage Change</b>
Ann Arbor MSA AA	95,416	105,224	10.3
Michigan	68,010	75,470	11.0
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey			
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- The AA MFI grew at a rate comparable to the statewide. It is noteworthy that the AA MFI in 2020 is 39.4 percent higher than the MFI for the state of Michigan.
- According to FFIEC Census data, 6.3 percent of families in the AA lived below the poverty level, which is lower than the 9.2 percent at the state level.

**Table 27**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Ann Arbor MSA</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Ann Arbor MSA AA	75.5	25.0	44.6	64.6	29.5	18.4
Michigan	74.2	31.3	43.2	61.7	26.5	18.2

*Cost burden is housing cost that equals 30 percent or more of household income.*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy*

- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on owners at any other level.
- The AA median age of housing stock is 47 years, points to an aging housing stock. However, the AA median age of housing stock is similar to the statewide, at 49 years.
- Despite the aging housing stock in the AA, the median housing value, at \$278,480 is 71.3 percent higher than the statewide, at \$162,600.

**Table 28**

<b>Unemployment Rates</b>					
<b>Assessment Area: Ann Arbor MSA</b>					
<b>Region</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Ann Arbor MSA AA	3.1	2.9	6.7	4.3	3.6
Michigan	4.2	4.1	10.0	5.9	4.2

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- Generally, the AA unemployment rates are low, trailing the statewide rates between 2018 and 2022. In 2020, the unemployment rates more than doubled due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2022, the unemployment rates stabilized and returned to pre-pandemic levels.
- Major employment industries within the AA include healthcare and social assistance, retail trade, professional and technical services, and accommodation and food services.
- A community contact indicated that the University of Michigan in Ann Arbor significantly shapes the AA economy as it employs a substantial number of workers in the AA. The university's impact to the state of Michigan is \$12.1 billion<sup>1</sup>.
- Many technology companies serve as top employers in the AA including JSTOR, ProQuest, and Truven Health Analytics.

Table 29 details selected characteristics of the AA.

<sup>1</sup> Per the Facts & Figures provided by the University of Michigan's website – <https://umich.edu/facts-figures/>.

**Table 29**

2022 Combined Demographics Assessment Area: Ann Arbor MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	13	12.1	6,681	8.2	1,746	26.1	16,915	20.8
Moderate	13	12.1	8,250	10.1	1,081	13.1	14,355	17.7
Middle	40	37.4	35,113	43.2	1,354	3.9	17,415	21.4
Upper	30	28.0	30,648	37.7	772	2.5	32,607	40.1
Unknown	11	10.3	600	0.7	169	28.2	0	0.0
<b>Total AA</b>	<b>107</b>	<b>100.0</b>	<b>81,292</b>	<b>100.0</b>	<b>5,122</b>	<b>6.3</b>	<b>81,292</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by	% by	#	% by unit	#	% by unit
Low	18,022	4,152	4.7	23.0	12,606	69.9	1,264	7.0
Moderate	18,144	7,606	8.6	41.9	9,361	51.6	1,177	6.5
Middle	61,211	41,259	46.9	67.4	16,959	27.7	2,993	4.9
Upper	47,883	34,598	39.3	72.3	10,746	22.4	2,539	5.3
Unknown	6,493	323	0.4	5.0	5,430	83.6	740	11.4
<b>Total AA</b>	<b>151,753</b>	<b>87,938</b>	<b>100.0</b>	<b>57.9</b>	<b>55,102</b>	<b>36.3</b>	<b>8,713</b>	<b>5.7</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,285	7.4	1,170	7.4	107	7.7	8	5.5
Moderate	1,479	8.5	1,394	8.8	78	5.6	7	4.8
Middle	7,272	41.8	6,617	41.7	581	42.1	74	51.0
Upper	6,789	39.0	6,189	39.0	546	39.5	54	37.2
Unknown	582	3.3	511	3.2	69	5.0	2	1.4
<b>Total AA</b>	<b>17,407</b>	<b>100.0</b>	<b>15,881</b>	<b>100.0</b>	<b>1,381</b>	<b>100.0</b>	<b>145</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.2</b>		<b>7.9</b>		<b>0.8</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	7	2.0	7	2.1	0	0.0	0	0.0
Moderate	9	2.6	9	2.6	0	0.0	0	0.0
Middle	226	65.7	223	65.6	3	100.0	0	0.0
Upper	102	29.7	101	29.7	0	0.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>344</b>	<b>100.0</b>	<b>340</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.8</b>		<b>0.9</b>		<b>0.3</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in the AA is good. Comerica's small business lending generally carried more weight when assessing performance, as this product represents the highest volume of lending in the AA during the review period. Additionally, only home refinance and home improvement loans were evaluated separately, as the other home mortgage lending products did not have sufficient volume to conduct a meaningful analysis.

Details of the bank's 2020 mortgage and small business lending and aggregate data can be found in Appendix C.

#### **Lending Activity**

Comerica's lending activity reflects good responsiveness to the AA credit needs. The bank makes use of innovative and/or flexible lending practices through its participation in numerous industry-recognized, government-guaranteed programs. During the review period, Comerica originated 460 SBA loans and 79 small business micro loans, for a combined total of \$89.9 million.

The bank extended 296 home mortgage and 719 small business loans between January 1, 2020, and December 31, 2022. The loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

#### ***Geographic Distribution of Loans***

The geographic distribution of lending reflects adequate penetration throughout the AA. The bank's small business and home mortgage lending performance among geographies of different income levels is consistent with the overall performance. The distribution of Comerica's lending in middle- and upper-income geographies did not affect conclusions about the bank's lending performance in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

#### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage lending reflects adequate penetration throughout the AA. The 2021 and 2022 distribution of home mortgage lending among low-income census tracts is comparable to aggregate data and the percentage of owner-occupied units. Among moderate-income census tracts, the bank performed below aggregate data but comparable to the demographic figure.

The bank's 2020 lending performance is consistent with Comerica's 2021 and 2022 performance, with penetration levels slightly below aggregate data and the demographic figure in LMI geographies.



### *Home Refinance Lending*

Comerica's geographic distribution of home refinance lending is adequate. Distribution of 2021 home refinance loans among LMI census tracts in the AA is comparable to aggregate lending performance and the demographic figure. In 2022, the bank made no home refinance loans in low-income census tracts; however, the distribution among moderate-income geographies is comparable to aggregate data and the demographic figure. The lack of home refinance loans in low-income areas aligns with the overall decrease in the number of originations in 2022. The sharp decrease is primarily due to rising interest rates.

The bank's 2020 lending performance is consistent with its 2021 and 2022 performance, with a distribution of loans in LMI census tracts comparable to aggregate data but below the demographics.

### *Home Improvement Lending*

The geographic distribution of home improvement lending is good. The 2021 and 2022 distribution of home improvement loans among low-income census tracts is comparable aggregate data and the demographic figure. In moderate-income census tracts, the bank's 2021 and 2022 home improvement lending performance is below aggregate data and the demographic figure. Despite increases in interest rates and a 23.1 percent decrease of LMI geographies in the AA, Comerica sustained its lending levels in 2022.

The bank's 2020 lending performance in low-income tracts is below aggregate and demographic data while in moderate-income geographies, Comerica's performance exceeds aggregate data and is comparable to demographics.

Table 30A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Ann Arbor MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans													
Low	0	0.0	8.4	0	0.0	5.0	1	16.7	6.9	260	19.5	4.0	4.7
Moderate	2	33.3	14.1	417	26.7	10.4	2	33.3	10.5	439	33.0	6.2	8.6
Middle	1	16.7	45.6	165	10.6	43.3	3	50.0	50.9	632	47.5	46.6	46.9
Upper	3	50.0	31.2	979	62.7	40.7	0	0.0	31.1	0	0.0	42.1	39.3
Unknown	0	0.0	0.6	0	0.0	0.7	0	0.0	0.7	0	0.0	1.1	0.4
Total	6	100.0	100.0	1,561	100.0	100.0	6	100.0	100.0	1,331	100.0	100.0	100.0
Refinance Loans													
Low	1	2.0	4.8	75	0.7	3.0	0	0.0	5.0	0	0.0	2.8	4.7
Moderate	4	8.2	10.8	497	4.8	7.6	3	10.3	11.3	499	7.3	7.1	8.6
Middle	26	53.1	46.2	5,769	55.3	41.9	11	37.9	47.5	2,246	33.0	42.3	46.9
Upper	18	36.7	38.0	4,092	39.2	47.2	15	51.7	35.4	4,069	59.7	46.2	39.3
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.7	0	0.0	1.6	0.4
Total	49	100.0	100.0	10,433	100.0	100.0	29	100.0	100.0	6,814	100.0	100.0	100.0
Home Improvement Loans													
Low	2	6.9	4.8	108	2.7	4.2	2	5.7	3.3	110	2.4	1.6	4.7
Moderate	1	3.4	10.4	100	2.5	6.0	1	2.9	6.3	100	2.2	4.5	8.6
Middle	12	41.4	40.3	1,375	34.7	37.3	18	51.4	48.8	2,242	48.3	41.9	46.9
Upper	14	48.3	44.5	2,374	60.0	52.4	14	40.0	41.5	2,191	47.2	51.9	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.4
Total	29	100.0	100.0	3,957	100.0	100.0	35	100.0	100.0	4,643	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	54.0	0	0.0	42.0	0	0.0	18.4	0	0.0	15.9	25.3
Moderate	0	0.0	10.0	0	0.0	13.5	0	0.0	18.4	0	0.0	38.7	17.7
Middle	0	0.0	22.0	0	0.0	23.0	1	33.3	22.4	22,600	85.1	7.2	27.0
Upper	1	100.0	12.0	425	100.0	16.3	1	33.3	20.4	1,250	4.7	31.9	19.4
Unknown	0	0.0	2.0	0	0.0	5.2	1	33.3	20.4	2,700	10.2	6.3	10.7
Total	1	100.0	100.0	425	100.0	100.0	3	100.0	100.0	26,550	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	5	4.8	6.1	328	1.7	7.7	4	4.1	5.8	420	1.0	5.6	4.7
Moderate	7	6.7	11.9	1,014	5.4	9.1	6	6.2	10.1	1,038	2.4	11.6	8.6
Middle	47	45.2	45.7	8,492	45.1	40.3	44	45.4	49.5	29,460	67.9	38.8	46.9
Upper	45	43.3	36.0	8,980	47.7	41.9	41	42.3	33.9	9,286	21.4	41.9	39.3
Unknown	0	0.0	0.3	0	0.0	0.9	2	2.1	0.7	3,200	7.4	2.1	0.4
Total	104	100.0	100.0	18,814	100.0	100.0	97	100.0	100.0	43,404	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table 30B**

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Ann Arbor MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	2	11.1	1.4	145	6.5	0.7	0	0.0	3.5	0	0.0	1.8	4.7
Moderate	0	0.0	9.1	0	0.0	8.3	0	0.0	5.4	0	0.0	3.4	8.6
Middle	7	38.9	45.9	980	43.8	38.6	11	47.8	50.2	1,740	43.3	45.3	46.9
Upper	9	50.0	43.6	1,110	49.7	52.5	11	47.8	40.7	1,776	44.2	49.1	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	1	4.3	0.2	500	12.5	0.3	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	18	100.0	100.0	2,235	100.0	100.0	23	100.0	100.0	4,016	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	6.1	0	0.0	5.0	1	100.0	4.2	50	100.0	1.8	4.7
Moderate	0	0.0	11.1	0	0.0	5.3	0	0.0	11.5	0	0.0	6.0	8.6
Middle	1	100.0	41.7	203	100.0	31.3	0	0.0	51.0	0	0.0	37.3	46.9
Upper	0	0.0	40.0	0	0.0	55.2	0	0.0	32.3	0	0.0	52.0	39.3
Unknown	0	0.0	1.1	0	0.0	3.2	0	0.0	1.0	0	0.0	2.9	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	203	100.0	100.0	1	100.0	100.0	50	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	26.9	0	0.0	17.9	0	0.0	10.3	0	0.0	6.0	4.7
Moderate	0	0.0	17.3	0	0.0	15.6	0	0.0	15.4	0	0.0	7.0	8.6
Middle	0	0.0	42.3	0	0.0	48.9	0	0.0	38.5	0	0.0	24.7	46.9
Upper	0	0.0	13.5	0	0.0	17.6	0	0.0	30.8	0	0.0	41.9	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	5.1	0	0.0	20.4	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

The geographic distribution of small business loans reflects adequate penetration throughout the AA. The 2021 and 2022 distribution of small business loans among low-income census tracts is comparable to aggregate data as well as the percentage of businesses in these tracts. Comerica's 2021 small business lending in moderate-income census tracts is below aggregate data and the demographic figure, while the 2022 performance is comparable to aggregate lending and the demographic figure.

The bank's 2020 lending performance is consistent with that of 2021 and 2022, with the bank performing comparable to aggregate data in LMI census tracts.

**Table 31**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography													
Assessment Area: Ann Arbor MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Low	16	6.8	8.4	3,505	9.0	7.5	8	6.1	6.6	1,503	4.8	4.4	7.4
Moderate	12	5.1	9.4	1,529	3.9	6.0	10	7.6	8.5	3,268	10.5	8.1	8.5
Middle	118	49.8	45.5	17,582	45.3	45.4	59	45.0	44.1	16,156	51.7	44.6	41.8
Upper	80	33.8	31.7	14,039	36.2	32.4	47	35.9	38.7	8,221	26.3	39.5	39.0
Unknown	11	4.6	4.7	2,140	5.5	8.7	7	5.3	1.7	2,090	6.7	3.2	3.3
Total	237	100.0	100.0	38,795	100.0	100.0	131	100.0	100.0	31,238	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's distribution of lending to borrowers reflects a good penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

#### ***Residential Real Estate (HMDA) Lending***

Home mortgage lending by borrower income in the AA is excellent when compared to demographic characteristics and the performance of aggregate HMDA lenders. The 2021 and 2022 dispersion of home mortgage loans among LMI borrowers in the AA exceeds the aggregate lenders' performance and is comparable to the demographic figure. Aggregate data serves as a better proxy for loan demand than the demographic figure.

The bank's home mortgage lending to low-income borrowers in the Ann Arbor MSA AA was greater than the performance of aggregate lenders in both 2021 and 2022 by a consistent margin. Though the bank's performance was below the percentage of families in the AA categorized as low-income, it reflects favorably on the bank's responsiveness to the credit needs of low-income borrowers in the AA while also operating in a safe and sound manner. Among moderate-income borrowers, the bank also outperformed aggregate HMDA lenders by a steady margin, though in this demographic, the bank also performed above the percentage of AA families categorized as moderate-income.

Comerica's 2020 lending performance is consistent with that of 2021 and 2022, with a distribution of loans to LMI borrowers that exceeds aggregate data and is below to the demographic figure.

**Table 32A**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Ann Arbor MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans													
Low	0	0.0	11.3	0	0.0	5.6	0	0.0	10.9	0	0.0	5.0	20.8
Moderate	2	33.3	21.9	402	25.8	16.0	3	50.0	20.3	735	55.2	14.4	17.7
Middle	3	50.0	22.2	902	57.8	21.2	1	16.7	21.6	156	11.7	20.6	21.4
Upper	1	16.7	33.5	257	16.5	46.0	1	16.7	34.0	260	19.5	48.0	40.1
Unknown	0	0.0	11.0	0	0.0	11.2	1	16.7	13.2	180	13.5	12.0	0.0
Total	6	100.0	100.0	1,561	100.0	100.0	6	100.0	100.0	1,331	100.0	100.0	100.0
Refinance Loans													
Low	11	22.4	10.3	1,391	13.3	5.7	7	24.1	16.7	600	8.8	9.8	20.8
Moderate	10	20.4	20.2	1,960	18.8	14.8	4	13.8	25.8	555	8.1	20.2	17.7
Middle	12	24.5	23.3	2,876	27.6	21.4	8	27.6	21.2	1,904	27.9	20.6	21.4
Upper	15	30.6	36.0	4,131	39.6	47.7	9	31.0	27.9	3,305	48.5	40.0	40.1
Unknown	1	2.0	10.2	75	0.7	10.4	1	3.4	8.4	450	6.6	9.4	0.0
Total	49	100.0	100.0	10,433	100.0	100.0	29	100.0	100.0	6,814	100.0	100.0	100.0
Home Improvement Loans													
Low	1	3.4	9.4	50	1.3	6.2	7	20.0	9.5	535	11.5	6.2	20.8
Moderate	9	31.0	17.5	670	16.9	12.6	9	25.7	22.5	959	20.7	18.1	17.7
Middle	5	17.2	24.9	260	6.6	20.8	7	20.0	24.1	712	15.3	20.7	21.4
Upper	13	44.8	46.5	2,879	72.8	57.1	10	28.6	43.2	2,041	44.0	54.0	40.1
Unknown	1	3.4	1.7	98	2.5	3.3	2	5.7	0.7	396	8.5	1.0	0.0
Total	29	100.0	100.0	3,957	100.0	100.0	35	100.0	100.0	4,643	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	15	14.6	10.6	1,721	9.4	5.7	15	16.0	12.2	1,264	7.5	6.2	20.8
Moderate	23	22.3	20.6	3,097	16.8	15.2	24	25.5	22.1	3,254	19.3	16.0	17.7
Middle	26	25.2	22.9	4,691	25.5	21.3	23	24.5	22.0	3,958	23.5	20.6	21.4
Upper	37	35.9	35.6	8,707	47.3	47.3	28	29.8	33.6	7,352	43.6	46.4	40.1
Unknown	2	1.9	10.2	173	0.9	10.6	4	4.3	10.1	1,026	6.1	10.8	0.0
Total	103	100.0	100.0	18,389	100.0	100.0	94	100.0	100.0	16,854	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

**Table 32B**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Ann Arbor MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Other Purpose Lines of Credit													
Low	3	16.7	7.8	280	12.5	6.2	1	4.3	8.3	129	3.2	4.6	20.8
Moderate	2	11.1	18.2	65	2.9	12.5	8	34.8	21.3	1,005	25.0	14.4	17.7
Middle	5	27.8	24.7	450	20.1	22.7	6	26.1	28.5	1,136	28.3	27.5	21.4
Upper	8	44.4	48.3	1,440	64.4	58.1	8	34.8	40.1	1,746	43.5	51.7	40.1
Unknown	0	0.0	1.0	0	0.0	0.6	0	0.0	1.9	0	0.0	1.8	0.0
Total	18	100.0	100.0	2,235	100.0	100.0	23	100.0	100.0	4,016	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	13.9	0	0.0	6.1	0	0.0	13.5	0	0.0	5.2	20.8
Moderate	0	0.0	22.8	0	0.0	13.6	0	0.0	24.5	0	0.0	16.7	17.7
Middle	1	100.0	23.3	203	100.0	17.8	1	100.0	21.4	50	100.0	15.7	21.4
Upper	0	0.0	36.7	0	0.0	59.0	0	0.0	34.9	0	0.0	52.5	40.1
Unknown	0	0.0	3.3	0	0.0	3.6	0	0.0	5.7	0	0.0	9.9	0.0
Total	1	100.0	100.0	203	100.0	100.0	1	100.0	100.0	50	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.9	0	0.0	0.7	0	0.0	2.6	0	0.0	1.0	20.8
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.7
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.4
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	40.1
Unknown	0	0.0	98.1	0	0.0	99.3	0	0.0	97.4	0	0.0	99.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

Comerica's borrower distribution of small business loans by revenue size of business is adequate. The 2021 and 2022 loan distribution to businesses with revenues of \$1 million or less is below the percentage of small businesses in the AA as well as aggregate lending. Aggregate data serves as a better proxy for loan demand than the demographic figure; therefore, being below the demographic figure does not reflect poorly on the bank's performance. Given the conclusion of the SBA's PPP in 2021 and rising interests in 2022, Comerica's sustained performance is favorably viewed in light of significant decline in the number of small business loans extended. Moreover, the bank's 2022 performance by dollar amount is comparable to aggregate data, which is an improvement from 2021 and reflects Comerica's willingness to extend larger dollar amount loans to small businesses.

The bank's 2020 small business lending performance among businesses with revenues of \$1 million or less is above aggregate data.

**Table 33**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses												
Assessment Area: Ann Arbor MSA												
	Bank and Aggregate Loans by Year											
	2021						2022					
	Bank			Agg			Bank			Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%
By Revenue												
\$1 Million or Less	95	40.1	45.3	7,150	18.4	27.1	46	35.1	50.2	10,311	33.0	33.2
Over \$1 Million	83	35.0		23,757	61.2		73	55.7		18,959	60.7	
Revenue Unknown	59	24.9		7,888	20.3		12	9.2		1,968	6.3	
Total	237	100.0		38,795	100.0		131	100.0		31,238	100.0	
By Loan Size												
\$100,000 or Less	150	63.3	90.1	5,884	15.2	30.9	62	47.3	95.1	3,888	12.4	44.3
\$100,001 - \$250,000	40	16.9	5.6	7,147	18.4	20.3	29	22.1	2.8	5,828	18.7	16.8
\$250,001 - \$1 Million	47	19.8	4.3	25,764	66.4	48.8	40	30.5	2.1	21,522	68.9	38.9
Total	237	100.0	100.0	38,795	100.0	100.0	131	100.0	100.0	31,238	100.0	100.0
By Loan Size and Revenues \$1 Million or Less												
\$100,000 or Less	76	80.0		2,695	37.7		23	50.0		1,415	13.7	
\$100,001 - \$250,000	13	13.7		2,175	30.4		9	19.6		1,790	17.4	
\$250,001 - \$1 Million	6	6.3		2,280	31.9		14	30.4		7,106	68.9	
Total	95	100.0		7,150	100.0		46	100.0		10,311	100.0	
Source: 2022 FFIEC Census Data												
2022 Dun & Bradstreet Data												
2016-2020 U.S. Census Bureau: American Community Survey												
Note: Percentages may not total 100.0 percent due to rounding.												

### Community Development Lending

The bank is a leader in making CD loans in the AA. During the review period, Comerica originated 35 qualified CD loans totaling \$197.0 million. Since the previous evaluation, the number of CD loans in the AA grew by 45.8 percent by number volume and 323.8 percent by dollar amount.

Comerica made efforts to fill the void left by the cessation of the SBA's PPP in May 2021, with a specific focus on promoting economic development through small business financing and permanent job creation, retention, or improvement impacting LMI persons or LMI geographies. Examples of the bank's CD lending activities that were considered responsive to the credit needs of the AA include:

- A \$25 million line of credit to support an organization providing evidence-based counseling and virtual access to doctors for patients suffering from substance abuse, of which the majority receives Medicaid and are considered LMI individuals.
- A \$22.6 million loan for the purchase of a 184-unit LIHTC apartment complex to provide affordable housing in the bank's AA.
- A \$5 million line of credit to meet the cash flow needs of an organization that provides education and significant after-school programming for charter school students, of which 90 percent come from LMI families.

**Table 34**

<b>Community Development Lending Assessment Area: Ann Arbor MSA</b>		
<b>Purpose</b>	<b>#</b>	<b>\$000s</b>
Affordable Housing	1	22,600
Community Services	8	43,860
Economic Development	22	126,307
Revitalization and Stabilization	4	4,194
<b>Total</b>	<b>35</b>	<b>196,961</b>

## INVESTMENT TEST

The bank's performance under the Investment Test in the AA is good. The bank is occasionally in a leadership position given the significant level of qualified CD investments and grants, particularly those not routinely provided by private investors. The dollar amount of CD investments and grants made in the AA grew by 12.5 percent since the previous evaluation. Though the bank makes rare use of innovative and/or complex investments, Comerica exhibits good responsiveness to credit and CD needs of the AA.

Table 35 illustrates the breakdown of the bank's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the review period, and CD donations made since the previous evaluation. An example of a CD investment that is notably responsive to the AA is a \$3 million LIHTC equity investment in a newly constructed 50-unit apartment complex specifically targeted to serve families, including those with special needs. The development includes discounted rents as well as 30 units that will be fully subsidized to target the chronically homeless.

**Table 35**

<b>Investment, Grants, and Donations Assessment Area: Ann Arbor MSA</b>								
<b>Community Development Purpose</b>	<b>Prior Period Investments<sup>1</sup></b>		<b>Current Investments<sup>2</sup></b>		<b>Donations</b>		<b>Total</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	7	5,043	2	4,600	3	25	12	9,668
Community Services	0	0	0	0	16	63	16	63
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	1	5	1	5
<b>Total</b>	<b>7</b>	<b>5,043</b>	<b>2</b>	<b>4,600</b>	<b>20</b>	<b>93</b>	<b>29</b>	<b>9,736</b>

<sup>1</sup> Book value of investment

<sup>2</sup> Original market value of investment

## SERVICE TEST

The bank's Service Test performance is good.

### *Retail Services*

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in the AA. The distribution of Comerica's nine branches and 13 ATMs as of April



1, 2023, was compared to the distribution of the households and businesses among the income tract categories. Table 36 summarizes the bank's retail locations in the AA.

**Table 36**

<b>Branch and Full-Service ATM Locations Assessment Area: Ann Arbor MSA</b>							
<b>Tract Income</b>	<b>% of Geographies</b>	<b>% of Households</b>	<b>% of Businesses</b>	<b>Branches</b>		<b>Full-Service ATMs</b>	
				<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	12.1	11.7	7.3	1	11.1	1	7.7
Moderate	12.1	11.9	8.4	1	11.1	1	7.7
Middle	37.4	40.7	42.2	4	44.4	6	46.2
Upper	28.0	31.7	38.8	3	33.3	4	30.8
Unknown	10.3	4.0	3.3	0	0.0	1	7.7
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>

The bank did not open or close any branches in the AA during the review period. Banking services and hours of operations are basically the same throughout the AA; thus, they do not vary in a way that inconveniences LMI geographies or LMI individuals.

### ***Community Development Services***

The bank provides a relatively high level of CD services in the AA. Comerica's employees served in various capacities for organizations offering CD services targeted toward LMI individuals. During the review period, bank employees provided 47 CD services totaling 125 hours, representing an 80.8 percent increase in number volume since the previous evaluation. Examples of services performed by bank employees include:

- An employee serving on the board of directors for an organization that supports homeless families by providing housing as well as career training and financial education.
- Bank employees provided financial education and resources to small business owners and aspiring entrepreneurs as part of a program that actively facilitates, educates, and advocates for small businesses in the AA.

## **METROPOLITAN ASSESSMENT AREAS (LIMITED-SCOPE REVIEW)**

### **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE MICHIGAN METROPOLITAN ASSESSMENT AREAS**

The bank's branch operations and deposit market share for each metropolitan AA receiving a limited-scope review were determined as of April 1, 2023, and June 30, 2022, respectively.

- **Battle Creek, MI MSA AA**

- The Battle Creek, MI MSA AA is comprised of the entirety of Calhoun County, which is coterminous with the Battle Creek, MI MSA.
- The AA is comprised of 40 census tracts, including three low-, 13 moderate-, 15 middle-, and nine upper-income tracts.
- Based upon 2020 ACS data, the AA population was 134,310, which reflects a 0.4 percent decrease from the 2015 ACS data.
- The AA includes 33,314 families, 21.9 percent are low-, 17.2 percent moderate-, 19.8 percent middle-, and 41.2 percent are upper-income.
- The bank operated four branches, representing 1.0 percent of its total branches.
- Comerica held \$259.3 million in deposits, representing a market share of 17.7 percent and 0.3 percent of the bank's total deposits.

- **Flint, MI MSA AA**

- The Flint, MI MSA AA is comprised of the entirety of Genesee County, which is coterminous with the Flint, MI MSA.
- The AA is comprised of 134 census tracts, which includes 16 low-, 33 moderate-, 41 middle-, 39 upper-, and five unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 406,211, which reflects a 2.3 percent decrease from the 2015 ACS data.
- The AA includes 108,430 families, 21.3 percent are low-, 17.5 percent moderate-, 20.8 percent middle-, and 40.5 percent are upper-income.
- The bank operated one branch, representing 0.2 percent of its total branches.
- Comerica held \$57.6 million in deposits, representing a market share of 1.0 percent and 0.1 percent of the bank's total deposits.

- **Grand Rapids-Kentwood Metropolitan AA**

- The Grand Rapids-Kentwood Metropolitan AA is comprised of the entirety of Ottawa and Kent counties which, along with Ionia and Montcalm counties (excluded from the delineation) make up the Grand Rapids-Kentwood, MI MSA.
- The AA is comprised of 210 census tracts, including 11 low-, 38 moderate-, 104 middle-, 53 upper-, and four unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 954,174, which reflects a 6.5 percent increase from the 2015 ACS data.
- The AA includes 237,965 families, 18.0 percent are low-, 17.9 percent moderate-, 23.2 percent middle-, and 40.9 percent are upper-income.
- The bank operated 11 branches, representing 2.7 percent of its total branches.
- Comerica held \$646.6 million in deposits, representing a market share of 2.2 percent and 0.8 percent of the bank's total deposits.

- **Jackson, MI MSA AA**

- The Jackson, MI MSA AA is comprised of the entirety of Jackson County, which is coterminous with the Jackson, MI MSA.
- The AA is comprised of 46 census tracts, including three low-, 14 moderate-, 15 middle-, 12 upper-, and two unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 160,366, which reflects a 0.4 percent increase from the 2015 ACS data.
- The AA includes 39,908 families, 18.7 percent are low-, 19.0 percent moderate-, 21.0 percent middle-, and 41.3 percent are upper-income.
- The bank operated seven branches, representing 1.7 percent of its total branches.
- Comerica held \$550.9 million in deposits, representing a market share of 19.5 percent and 0.7 percent of the bank's total deposits.

- **Kalamazoo-Portage, MI MSA AA**

- The Kalamazoo, MI MSA AA is comprised of the entirety of Kalamazoo County, which is coterminous with the Kalamazoo-Portage, MI MSA.
- The AA is comprised of 68 census tracts, which include six low-, 17 moderate-, 23 middle-, 21 upper-, and one unknown-income tract.
- Based upon 2020 ACS data, the AA population was 261,752, which reflects a 1.9 percent increase from the 2015 ACS data.
- The AA includes 62,664 families, 21.5 percent are low-, 18.3 percent moderate-, 19.7 percent middle-, and 40.5 percent are upper-income.
- The bank operated six branches, representing 1.5 percent of its total branches.
- Comerica held \$324.4 million in deposits, representing a market share of 6.9 percent and 0.4 percent of the bank's total deposits.

- **Lansing-East Lansing Metropolitan AA**

- The Lansing-East Lansing Metropolitan AA is comprised of the entirety of Eaton, Clinton, and Ingham counties which, along with Shiawassee County (excluded from the delineation) make up the Lansing-East Lansing, MI MSA.
- The AA is comprised of 136 census tracts, including seven low-, 26 moderate-, 57 middle-, 34 upper-, and 12 unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 473,203, which reflects a 1.0 percent increase from the 2015 ACS data.
- The AA includes 111,157 families, 20.0 percent are low-, 17.0 percent moderate-, 21.8 percent middle-, and 41.2 percent are upper-income.
- The bank operated six branches, representing 1.5 percent of its total branches.
- Comerica held \$649.0 million in deposits, representing a market share of 6.1 percent and 0.8 percent of the bank's total deposits.

- **Midland, MI MSA AA**

- The Midland, MI MSA AA is comprised of the entirety of Midland County, which is coterminous with the Midland, MI MSA.
- The AA is comprised of 21 census tracts, including one low-, four moderate-, 12 middle-, and four upper-income tracts.
- Based upon 2020 ACS data, the AA population was 83,494, which reflects a 0.2 percent decrease from the 2015 ACS data.
- The AA includes 23,057 families, 19.8 percent are low-, 18.1 percent moderate-, 22.0 percent middle-, and 40.0 percent are upper-income.
- The bank operated two branches, representing 0.5 percent of its total branches.

- Comerica held \$130.8 million in deposits, representing a market share of 11.3 percent and 0.2 percent of the bank's total deposits.
- **Muskegon, MI MSA AA**
  - The Muskegon, MI MSA AA is comprised of the entirety of Muskegon County, which is coterminous with the Muskegon, MI MSA.
  - The AA is comprised of 46 census tracts, including five low-, eight moderate-, 21 middle-, 11 upper-, and one unknown-income tracts.
  - Based upon 2020 ACS data, the AA population was 175,824, which reflects a 2.5 percent increase from the 2015 ACS data.
  - The AA includes 44,390 families, 20.4 percent are low-, 18.7 percent moderate-, 21.2 percent middle-, and 39.8 percent are upper-income.
  - The bank operated four branches, representing 1.0 percent of its total branches.
  - Comerica held \$234.3 million in deposits, representing a market share of 10.6 percent and 0.3 percent of the bank's total deposits.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Appendix D contains detailed performance and demographic information reviewed for the limited-scope AAs. Table 37 discusses conclusions regarding the bank's performance.

**Table 37**

Assessment Area	Lending Test	Investment Test	Service Test
Battle Creek, MI MSA AA	Consistent	Below	Consistent
Flint, MI MSA AA	Below	Below	Below
Grand Rapids-Kentwood Metropolitan AA	Consistent	Consistent	Consistent
Jackson, MI MSA AA	Consistent	Consistent	Consistent
Kalamazoo-Portage MSA AA	Consistent	Consistent	Consistent
Lansing-East Lansing Metropolitan AA	Consistent	Consistent	Consistent
Midland, MI MSA AA	Below	Below	Below
Muskegon, MI MSA AA	Consistent	Consistent	Consistent

The institution's lending, investment, service performance in the AAs is generally consistent with the overall state performance.

## NONMETROPOLITAN AREA (LIMITED-SCOPE REVIEW)

### DESCRIPTION OF OPERATIONS

- **Lenawee County Nonmetropolitan AA**
  - The Lenawee County Nonmetropolitan AA is comprised of the entirety of Lenawee County.
  - The AA is comprised of 25 census tracts, including five moderate-, 14 middle-, and six upper-income tracts.
  - Based upon 2020 ACS data, the AA population was 99,423, which reflects a 0.5 percent increase from the 2015 ACS data.
  - The AA includes 25,851 families, 15.7 percent are low-, 19.0 percent moderate-, 21.6 percent middle-, and 43.8 percent are upper-income.
  - As of April 1, 2023, the bank operated one branch, representing 0.2 percent of its total branches.
  - As of June 30, 2022, Comerica held \$45.1 million in deposits, representing a market share of 3.1 percent and 0.1 percent of the bank's total deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Appendix E contains detailed performance and demographic information reviewed for the limited-scope AAs. Table 38 discusses conclusions regarding the bank's performance.

**Table 38**

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Lenawee County Nonmetropolitan AA	Below	Below	Below

The institution's lending, investment, and service performance in the AA is below Comerica's lending, investment, and service performance in the state; however, it does not impact the assessed rating.

## STATE OF TEXAS

### CRA RATING FOR TEXAS:

The Lending Test is Rated:	<b>Outstanding</b>
The Investment Test is Rated:	Outstanding
The Service Test is Rated:	Outstanding

Major factors supporting the institution's rating include:

- Lending activity reflects excellent responsiveness and record of serving the AAs' credit needs, including low-income individuals, low-income areas, and very businesses.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels, including LMI individuals, and businesses and farms of different sizes is good.
- Comerica is a leader in making CD loans.
- The bank makes use of innovative and/or flexible lending practices in serving AAs' needs.
- Comerica is often in a leadership position given its excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors.
- The bank makes significant use of innovative and/or complex investments to support CD initiatives.
- Comerica exhibits good responsiveness to credit and CD needs.
- Delivery systems are accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services that do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- Comerica provides a relatively high level of CD services.

### SCOPE OF THE EVALUATION

The scope of the review for the state of Texas is consistent with the overall scope for the institution, including evaluations under the Lending, Investment, and Service tests. The time period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

The two of the five AAs in the state of Texas were reviewed using full-scope procedures.

- Dallas-Fort Worth Metropolitan AA
- San Antonio Metropolitan AA

The remaining three AAs received limited-scope reviews.

- Austin Metropolitan AA
- Houston Metropolitan AA
- Bank of the Hills Nonmetropolitan AA

AAs were selected for full-scope reviews based on the strategic importance of the AA, considering volume of lending, number of branches, and percentage of total deposits, as well as the length of time since the AA last received a full-scope review. Overall, approximately 45.5 percent of lending activity (by number of loans), 57.0 percent of deposits, and 53.0 percent of total branches within Texas were evaluated through the full-scope reviews. The bank's performance in the Dallas Fort Worth Metropolitan AA was given greater consideration as it represents the majority of Comerica's activity in the state and is a strategic focus of the institution.

## **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN TEXAS**

The bank delineates five of its 27 AAs and operates 115 of its 409 branches in the state of Texas. As of June 30, 2022, Comerica had \$12.8 billion in deposits in the state, representing 16.6 percent of total deposits. According to the June 30, 2022, FDIC Summary of Deposits, the bank had a deposit market share of 0.9 percent and ranked 13<sup>th</sup> out of 247 FDIC-insured financial institutions across the state.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in the state of Texas is Outstanding. The Lending Test performance in the Dallas-Fort Worth Metropolitan AA is excellent, which is consistent with the overall state rating, while the bank's performance in the San Antonio Metropolitan AA is considered good. Overall, Comerica's performance in the AAs receiving limited-scope reviews supports the rating for the state.

### **Lending Activity**

Comerica's lending levels reflect excellent responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs through participation in government-guaranteed programs, small business initiatives, and affordable housing projects.

As outlined in Table 39, this evaluation considered 12,153 loans totaling \$2.7 billion extended between January 1, 2020 and December 31, 2022. The loan products and origination volumes are consistent with the credit needs of the Texas AAs and the bank's business strategy. The number of small business and HMDA loans extended by the bank was compared against the number of loans originated by aggregate lenders. Comerica ranked 51<sup>st</sup> out of 239 CRA reporters and 88<sup>th</sup> of 978 HMDA reporters in its Texas AAs.

**Table 39**

<b>Summary of Lending Activity – January 1, 2020 through December 31, 2022 Texas Assessment Areas</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$000s</b>	<b>%</b>
Home Purchase	228	1.9	78,901	2.9
Refinancing	1,674	13.8	411,100	15.3
Home Improvement	853	7.0	127,719	4.8
Multifamily	10	0.1	285,399	10.6
Other Purpose Lines of Credit	900	7.4	160,585	6.0
Other Purpose Closed/Exempt	38	0.3	31,915	1.2
<b>Total HMDA-Related</b>	<b>3,703</b>	<b>30.5</b>	<b>1,095,619</b>	<b>40.8</b>
<b>Total Small Business</b>	<b>8,324</b>	<b>68.5</b>	<b>1,582,239</b>	<b>59.0</b>
<b>Total Small Farm</b>	<b>126</b>	<b>1.0</b>	<b>5,736</b>	<b>0.2</b>
<b>TOTAL LOANS</b>	<b>12,153</b>	<b>100.0</b>	<b>2,683,594</b>	<b>100.0</b>

### Geographic Distribution of Loans

The overall geographic distribution of lending reflects excellent penetration throughout the bank's Texas AAs. This performance is consistent across Comerica's Dallas-Fort Worth Metropolitan and San Antonio Metropolitan AAs.

### Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's overall lending reflects good penetration among individuals of different income levels and businesses of different revenue sizes. This performance is consistent across the bank's Dallas-Fort Worth Metropolitan and San Antonio Metropolitan AAs. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each AA.

### Community Development Lending

Comerica is a leader in making CD loans in the state of Texas. As reflected in Table 40, the bank originated 309 CD loans totaling approximately \$1.0 billion within the state, which comprises 22.9 percent of overall bank-wide CD loan volume by number and 18.8 percent by dollar amount. The level of CD lending is excellent in the Dallas-Fort Worth Metropolitan and San Antonio Metropolitan AAs.

The bank's Texas CD loans increased notably since the previous evaluation. While the number of qualified loans decreased by 24.8 percent, the dollar amount increased by 45.0 percent since the prior evaluation. This growth occurred despite the substantial decrease in loans originated through the SBA's PPP, which made up approximately 40.9 percent of the bank's CD loans at the previous evaluation.

CD loans originated by the bank during the evaluation period were extended for a variety of purposes, as noted in Table 40. Specific details regarding the CD lending can be found in the Conclusions with Respect to Performance Tests section for each AA.



**Table 40**

<b>Community Development Lending Texas Assessment Areas</b>		
<b>Purpose</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	5	90,795
Community Services	22	21,247
Economic Development	194	713,873
Revitalization and Stabilization	88	178,264
<b>Total</b>	<b>309</b>	<b>1,004,179</b>

**INVESTMENT TEST**

The bank's performance under the Investment Test in the state of Texas is Outstanding. The Investment Test conclusions in the Dallas-Fort Worth Metropolitan AA is considered excellent and consistent with the overall state rating. The bank's performance under the Investment Test in the San Antonio Metropolitan AA is adequate. Greater weight was given to the Dallas-Fort Worth Metropolitan AA, as 48.0 percent by number volume and 47.4 percent by dollar amount of the bank's CD investments in the state of Texas occurred in that AA. Conversely, the CD investments in the San Antonio Metropolitan AA represented 5.1 percent by number volume and 15.8 percent by dollar amount of the total CD investments in the state of Texas. Generally, the bank's performance in the AAs that received limited-scope reviews is consistent with the performance in the state of Texas.

Comerica has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors, often in a leadership position. The bank's occasional use of innovative and/or complex investments exhibits good responsiveness to the credit and CD needs of its AAs. Specific details regarding CD qualified investments and donations within the bank's Texas AAs can be found in the Conclusions with Respect to Performance Tests section for each AA.

In addition to the activity within its delineated AAs, the bank also made five qualified CD investments in the broader statewide region. These investments totaled \$6.6 million, including a \$4 million investment in a Small Business Investment Company that promotes economic development across the region through the financing of small businesses. Comerica also made a sizeable donation in a minority-owned financial institution that serves LMI geographies within the state.

**Table 41**

<b>Investments, Grants, and Donations Texas Assessment Areas</b>								
<b>Community Development Purpose</b>	<b>Prior Period Investments<sup>1</sup></b>		<b>Current Investments<sup>2</sup></b>		<b>Donations</b>		<b>Total</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	48	47,738	13	67,325	19	215	80	115,278
Community Services	0	0	0	0	257	3,619	257	3,619
Economic Development	4	4,176	11	20,454	37	862	52	25,492
Revitalization and Stabilization	0	0	0	0	3	30	3	30
<b>Total</b>	<b>52</b>	<b>51,914</b>	<b>24</b>	<b>87,779</b>	<b>316</b>	<b>4,726</b>	<b>392</b>	<b>144,419</b>

<sup>1</sup> Book value of investment<sup>2</sup> Original market value of investment

**SERVICE TEST**

The bank's performance under the Service Test in the state of Texas is Outstanding. The Service Test conclusions in the Dallas-Fort Worth Metropolitan and San Antonio Metropolitan AAs are considered excellent and consistent with the overall state rating. Generally, Comerica's performance in the AAs that received limited-scope reviews is consistent with the performance in the state of Texas.

**Retail Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in each AA. Of Comerica's 115 full-service branches and 158 full-service ATMs in the state of Texas, 34 branches and 39 ATMs are located in LMI tracts. Refer to Table 42 for the distribution of Texas branches and full-service ATMs by income level of geographies.

The bank's delivery systems in the state of Texas are accessible to the geographies and individuals of different income levels in Comerica's AAs. The bank's record of opening or closing branches in the state has not adversely affected the accessibility of its delivery systems. Banking services and hours of operations do not vary in a way that inconveniences the state, particularly LMI geographies or LMI individuals. Moreover, Comerica's operations and product and service offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Banking Services section of this evaluation.

**Table 42**

<b>Branch and Full-Service ATM Locations Texas Assessment Areas</b>							
<b>Tract Income</b>	<b>% of Geographies</b>	<b>% of Households</b>	<b>% of Businesses</b>	<b>Branches</b>		<b>Full-Service ATMs</b>	
				<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	10.8	9.3	6.5	10	8.7	14	8.9
Moderate	26.1	25.0	19.8	24	20.9	25	15.8
Middle	28.1	30.0	28.0	30	26.1	45	28.5
Upper	32.6	34.5	44.3	47	40.9	70	44.3
Unknown	2.4	1.2	1.4	4	3.5	4	2.5
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>115</b>	<b>100</b>	<b>158</b>	<b>100</b>

**Community Development Services**

The bank is a leader in providing CD services in the state of Texas. While the San Antonio Metropolitan AA is adequate in providing CD services, greater weight was given to the Dallas-Fort Worth Metropolitan AA. Bank representatives provided 1,778 services, totaling 5,617 hours, to 248 organizations within its Texas AAs. The bank's directors, officers, and personnel are involved with numerous organizations that extend CD services to LMI individuals and/or geographies. The bank significantly increased the hours and more than doubled the number of organizations served since the previous evaluation. The bank's significant efforts to promote CD are noted through board participation, financial literacy, and entrepreneurship training. Details of the bank's explicit CD services AA can be found in the Conclusions with Respect to Performance Tests section for each AA.

**DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA**

- The Dallas-Fort Worth Metropolitan AA consists of the entirety of six of the eleven counties that make up the Dallas-Fort Worth-Arlington, TX MSA: Collin, Dallas, Denton, Ellis, Rockwall, and Tarrant counties. Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- The AA is made up of 1,572 census tracts, of which 9.5 percent are designated as low-income, 26.0 percent as moderate-income, 28.9 percent as middle-income, 34.0 percent as upper-income, and the remaining 1.5 percent as unknown-income.
- The 2020 U.S. Census added 355 new census tracts within the AA, resulting in an increase of 29.2 percent. The number of geographies designated as LMI increased by 14.5 percent, with low-income census tracts decreasing by 9.1 percent and moderate-income tracts increasing by 30.7 percent.
- The bank operates 55 full-service branches in the AA, including seven branches in low-income, eight in moderate-income, 19 branches in middle-income, and 21 branches in upper-income census tracts.
- According to the June 30, 2022, FDIC Market Share Report, the bank had a 0.8 percent market share, ranking 11<sup>th</sup> out of 160 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 72<sup>nd</sup> out of 1,064 HMDA reporters in the AA with 571 HMDA originations and purchases, and 23<sup>rd</sup> out of 309 CRA reporters with 740 CRA small business loans.
- Community contacts indicated a significant need for affordable housing, access to homeownership and credit for LMI individuals, as well as buydown interest rate programs and small businesses lending.

**Table 43**

<b>Population Change</b>			
<b>Assessment Area: Dallas-Fort Worth Metropolitan</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percentage Change</b>
Dallas-Fort Worth Metropolitan AA	6,236,189	6,995,340	12.2
Collin County, TX	862,215	1,064,465	23.5
Dallas County, TX	2,485,003	2,613,539	5.2
Denton County, TX	731,851	906,422	23.9
Ellis County, TX	157,058	192,455	22.5
Rockwall County, TX	85,536	107,819	26.1
Tarrant County, TX	1,914,526	2,110,640	10.2
Dallas-Plano-Irving, TX MD	4,519,004	5,129,966	13.5
Fort Worth-Arlington-Grapevine, TX MD	2,252,637	2,507,421	11.3
Texas	26,538,614	29,145,505	9.8
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- Population trends between 2015 and 2020 reflect significant growth throughout the AA. Four of the six counties reporting population growth exhibit increases of 20 percent or more. With the exception of Dallas County, the population growth in every AA county exceeded the statewide and national growth rates, at 9.8 percent and 1.6 percent, respectively.
- A community contact noted that significant population growth can be attributed to employment opportunities offered by the nearly 24 Fortune 500 companies headquartered in the AA. Some of these companies include American Airlines, Southwest Airlines, AT&T, Texas Instruments, and ExxonMobil.
- According to U.S. Census Bureau estimates, four of the 15 cities with the largest increase in population between July 1, 2020, and July 1, 2021, are located inside of the AA.

**Table 44**

<b>Median Family Income Change</b>			
<b>Assessment Area: Dallas-Fort Worth Metropolitan</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percentage Change</b>
Dallas-Fort Worth Metropolitan AA	77,599	86,033	10.9
Collin County, TX	110,174	118,341	7.4
Dallas County, TX	61,072	69,689	14.1
Denton County, TX	99,628	111,436	11.9
Ellis County, TX	78,280	89,870	14.8
Rockwall County, TX	104,958	113,658	8.3
Tarrant County, TX	76,367	82,856	8.5
Dallas-Plano-Irving, TX MD	77,736	88,315	13.6
Fort Worth-Arlington-Grapevine, TX MD	75,758	82,649	9.1
Texas	68,523	76,073	11.0
Source: 2011-2015 U.S. Census Bureau: American Community Survey			
2016-2020 U.S. Census Bureau: American Community Survey			
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- The AA MFI grew at a rate comparable to the state MFI, with half of the AA counties reporting 2020 MFIs greater than \$100,000.
- Collin County has the lowest MFI growth between 2015 and 2020; however, it has maintained the highest 2020 MFI at \$118,341.
- According to the FFIEC Census data, 8.2 percent of AA families live below the poverty level. Dallas County has the highest rate of families living below the poverty level, at 11.4 percent, which slightly exceeds the statewide rate, at 10.9 percent.

**Table 45**

<b>Housing Cost Burden</b> <b>Assessment Area: Dallas-Fort Worth Metropolitan</b>						
Area	Cost Burden - Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Dallas-Fort Worth Metropolitan AA	80.5	44.2	42.2	63.8	35.8	20.2
Collin County, TX	83.4	65.5	40.2	69.7	51.4	19.3
Dallas County, TX	78.9	37.3	42.4	61.4	30.4	22.6
Denton County, TX	84.3	52.5	41.3	71.5	46.9	19.2
Ellis County, TX	79.2	35.9	42.3	55.6	25.2	15.5
Rockwall County, TX	80.8	61.0	39.5	70.7	44.3	18.9
Tarrant County, TX	81.5	43.9	43.2	63.9	34.2	19.2
Dallas-Plano-Irving, TX MD	79.9	43.8	41.9	63.1	35.9	20.7
Fort Worth-Arlington-Grapevine, TX MD	80.7	42.5	42.7	62.1	32.3	18.9
Texas	77.4	42.4	42.4	57.5	30.9	19.2
<i>Cost burden is housing cost that equals 30 percent or more of household income.</i> <i>Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy</i>						

- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on homeowners at any other level.
- Overall, the cost burden for homeowners and renters in the AA is greater than the housing cost burden for homeowners and renters statewide.
- The AA median housing value is \$241,896 while the statewide median housing value is \$187,200. Moreover, the AA median age of housing stock is 38 years, with Rockwall County reporting it at 18 years. In comparison, the state of Texas' median age of housing stock is 33 years.
- A community contact reported a shortage of affordable housing in the AA, noting that housing affordability is a significant issue impacting LMI households.

**Table 46**

<b>Unemployment Rates</b> <b>Assessment Area: Dallas-Fort Worth Metropolitan</b>					
Region	2018	2019	2020	2021	2022
Dallas-Fort Worth Metropolitan AA	3.6	3.3	7.2	5.1	3.5
Collin County, TX	3.4	3.1	6.3	4.3	3.2
Dallas County, TX	3.8	3.5	7.8	5.6	3.7
Denton County, TX	3.2	3.0	6.4	4.4	3.2
Ellis County, TX	3.3	3.1	6.0	4.5	3.5
Rockwall County, TX	3.3	3.1	5.9	4.3	3.3
Tarrant County, TX	3.5	3.3	7.4	5.3	3.6
Dallas-Plano-Irving, TX MD	3.6	3.3	7.0	5.0	3.5
Fort Worth-Arlington-Grapevine, TX MD	3.5	3.3	7.2	5.2	3.6
Texas	3.9	3.5	7.7	5.7	3.9
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- Unemployment rates for the AA and its counties between 2018 and 2022 are comparable to the statewide rate.
- Unemployment rates almost doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off employees due to the statewide stay at home and social distancing

orders. The impact of the COVID-19 pandemic in the Dallas and Tarrant counties' unemployment rate was significant, driving the AA unemployment rate in 2020. In 2022, the AA and statewide unemployment rates stabilized to pre-pandemic levels.

- Major employment industries within the AA include healthcare and social assistance, accommodation and food services, and retail trade.

Table 47 details selected characteristics of the AA.

Table 47

2022 Combined Demographics								
Assessment Area: Dallas-Fort Worth Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	150	9.5	133,215	8.0	34,671	26.0	364,225	22.0
Moderate	409	26.0	393,808	23.8	54,122	13.7	285,539	17.2
Middle	454	28.9	503,984	30.4	29,654	5.9	318,348	19.2
Upper	535	34.0	618,103	37.3	16,723	2.7	689,234	41.6
Unknown	24	1.5	8,236	0.5	1,272	15.4	0	0.0
<b>Total AA</b>	<b>1,572</b>	<b>100.0</b>	<b>1,657,346</b>	<b>100.0</b>	<b>136,442</b>	<b>8.2</b>	<b>1,657,346</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by	% by	#	% by unit	#	% by unit
Low	249,345	62,642	4.4	25.1	159,061	63.8	27,642	11.1
Moderate	650,771	276,691	19.6	42.5	320,530	49.3	53,550	8.2
Middle	793,625	447,020	31.7	56.3	295,959	37.3	50,646	6.4
Upper	884,505	618,809	43.9	70.0	215,382	24.4	50,314	5.7
Unknown	23,757	5,212	0.4	21.9	15,068	63.4	3,477	14.6
<b>Total AA</b>	<b>2,602,003</b>	<b>1,410,374</b>	<b>100.0</b>	<b>54.2</b>	<b>1,006,000</b>	<b>38.7</b>	<b>185,629</b>	<b>7.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	21,228	5.4	19,487	5.3	1,588	6.5	153	3.1
Moderate	76,498	19.4	70,112	19.2	5,717	23.4	669	13.4
Middle	120,385	30.5	111,662	30.5	7,492	30.6	1,231	24.7
Upper	173,412	43.9	161,248	44.1	9,275	37.9	2,889	58.1
Unknown	3,493	0.9	3,062	0.8	397	1.6	34	0.7
<b>Total AA</b>	<b>395,016</b>	<b>100.0</b>	<b>365,571</b>	<b>100.0</b>	<b>24,469</b>	<b>100.0</b>	<b>4,976</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.5</b>		<b>6.2</b>		<b>1.3</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	78	2.5	77	2.5	1	2.9	0	0.0
Moderate	385	12.5	379	12.5	6	17.1	0	0.0
Middle	1,038	33.8	1,029	33.9	9	25.7	0	0.0
Upper	1,557	50.6	1,536	50.6	19	54.3	2	100.0
Unknown	17	0.6	17	0.6	0	0.0	0	0.0
<b>Total AA</b>	<b>3,075</b>	<b>100.0</b>	<b>3,038</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.8</b>		<b>1.1</b>		<b>0.1</b>
Source: 2022 FFIEC Census Data								
2022 Dun & Bradstreet Data								
2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

Comerica's Lending Test performance in the AA is excellent. The bank's small business lending generally carried more weight as this product comprised the largest volume of lending in the AA. Additionally, a separate evaluation of multifamily loans, other purpose closed/exempt, and loan purpose not applicable was not performed due to insufficient volume of originations during the review period to conduct a meaningful analysis.

Details of the bank's 2020 mortgage and small business lending and corresponding aggregate data can be found in Appendix C.

### **Lending Activity**

The bank's lending activity in the AA reflects good responsiveness to AA credit needs. Comerica makes use of innovative and/or flexible lending practices to serve AA credit needs, including LMI borrowers. The bank originated 1,808 home mortgage and 3,824 small business loans in the AA between January 1, 2020, and December 31, 2022. Comerica sustained the volume of home mortgage lending between 2020 and 2022; however, the volume of small business lending significantly decreased year after year. The reduction in small business lending is primarily attributed to the cessation of the SBA's PPP in May 2021 and rising interest rates in 2022. It is noteworthy that the level of home mortgage lending has not been adversely impacted by the interest rate hikes. This level of lending reflects favorably on the bank as it aligns with the bank's strategic focus on small business lending.

### ***Geographic Distribution of Loans***

The geographic distribution of lending reflects excellent penetration throughout the AA. Comerica's home mortgage and small business lending reflects excellent penetration among geographies of different income levels, especially LMI geographies. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions about Comerica's performance in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage lending reflects excellent penetration throughout the AA. The bank's 2021 and 2022 distribution of home mortgage loans by number volume among low-income census tracts is comparable to aggregate data and demographic figure. The penetration in moderate-income census tracts exceeds aggregate data in 2021 and is comparable 2022. In 2022, Comerica's home mortgage lending to LMI census tracts by dollar amount is comparable aggregate and slightly below the demographic figure.

The bank's 2020 loan distribution in LMI geographies is comparable with 2021 and 2022.



### *Home Purchase Lending*

The geographic distribution of home purchase lending is excellent. The distribution of 2022 home purchase loans among low-income census tracts doubles the aggregate data and exceeds the demographic figure, which is noteworthy given the decrease of low-income geographies in the AA. While Comerica did not extend any home purchase loans in low-income geographies in 2021, its 2020 and 2021 lending performance is comparable to aggregate data.

The distribution of the bank's home purchase loans among moderate-income census tracts in 2021 and 2022 also exceeds aggregate data, though Comerica's lending is comparable to aggregate lending in 2020. The bank's performance in 2020, 2021, and 2022 is below the demographic figure, which does not adversely impact the bank's overall performance given that aggregate data serves as a better proxy for loan demand.

### *Home Refinance Lending*

The geographic distribution of home refinance lending is excellent. The distribution of 2020 and 2021 home refinance loans among low-income census tracts exceeds aggregate data and the demographic figure, though it is slightly lower in 2022. The bank's lending in moderate-income census tracts significantly exceeds aggregate data and is comparable to the demographic figure.

The bank's lending performance in 2020 reflected penetration levels consistent with 2021 and 2022 performance, with a distribution of loans in LMI census tracts above aggregate data.

### *Home Improvement Lending*

The geographic distribution of home improvement lending is excellent. The bank's 2021 and 2022 distribution of home improvement loans among low-income census tracts exceeds aggregate data and the demographic figure. However, the bank's 2021 and 2022 home improvement lending in moderate-income tracts significantly exceeds aggregate data but is slightly below the demographic figure.

Lending in LMI census tracts increased since the prior evaluation. The bank's 2020 lending performance in LMI geographies is consistent with its 2021 and 2022 loan distribution, with Comerica's performance in LMI census tracts exceeding aggregate data.

### *Other Purpose Lines of Credit Lending*

The geographic distribution of other purpose lines of credit is excellent. The bank's 2020 and 2021 lending performance in low-income census tracts exceeds aggregate lenders and is comparable to the percentage of owner-occupied units in these tracts. The 2022 loan distribution among low-income census tracts is comparable to aggregate data and slightly below the demographic figure. Aggregate data serves as a better proxy for loan demand than the demographic figure.

Table 48A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Dallas-Fort Worth Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	3.9	0	0.0	2.5	3	9.4	4.3	498	3.6	2.0	4.4
Moderate	6	16.7	13.4	1,296	11.6	9.4	6	18.8	14.0	1,038	7.4	9.2	19.6
Middle	5	13.9	33.8	1,125	10.1	28.2	6	18.8	34.9	1,573	11.3	29.3	31.7
Upper	25	69.4	48.7	8,758	78.3	59.6	17	53.1	46.3	10,854	77.7	59.0	43.9
Unknown	0	0.0	0.3	0	0.0	0.3	0	0.0	0.4	0	0.0	0.5	0.4
Total	36	100.0	100.0	11,179	100.0	100.0	32	100.0	100.0	13,963	100.0	100.0	100.0
Refinance Loans													
Low	15	5.5	2.0	2,507	3.4	1.4	4	1.9	2.6	528	0.9	1.5	4.4
Moderate	53	19.4	9.7	7,966	10.7	6.5	38	18.2	14.0	6,637	11.6	8.9	19.6
Middle	61	22.3	28.0	10,655	14.4	22.1	49	23.4	33.4	11,676	20.4	26.1	31.7
Upper	144	52.7	60.3	53,112	71.5	69.6	118	56.5	49.6	38,437	67.1	63.1	43.9
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.4	0	0.0	0.5	0.4
Total	273	100.0	100.0	74,240	100.0	100.0	209	100.0	100.0	57,278	100.0	100.0	100.0
Home Improvement Loans													
Low	7	4.8	2.1	731	3.1	1.3	9	5.3	1.8	777	3.1	1.2	4.4
Moderate	22	15.1	8.8	2,268	9.7	6.2	28	16.6	9.2	3,176	12.7	6.7	19.6
Middle	30	20.5	22.5	3,794	16.2	17.5	38	22.5	24.2	5,285	21.1	19.1	31.7
Upper	86	58.9	66.4	16,487	70.5	74.9	92	54.4	64.4	15,110	60.3	72.6	43.9
Unknown	1	0.7	0.1	101	0.4	0.1	2	1.2	0.4	690	2.8	0.4	0.4
Total	146	100.0	100.0	23,381	100.0	100.0	169	100.0	100.0	25,038	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	23.7	0	0.0	17.8	0	0.0	16.8	0	0.0	9.7	
Moderate	0	0.0	32.6	0	0.0	24.0	0	0.0	35.3	0	0.0	25.8	
Middle	0	0.0	26.0	0	0.0	30.5	0	0.0	23.6	0	0.0	33.5	
Upper	1	100.0	17.3	13,839	100.0	26.9	2	100.0	22.3	104,000	100.0	29.1	
Unknown	0	0.0	0.3	0	0.0	0.8	0	0.0	1.9	0	0.0	1.8	
Total	1	100.0	100.0	13,839	100.0	100.0	2	100.0	100.0	104,000	100.0	100.0	
Total Home Mortgage Loans													Owner Occupied Units %
Low	26	4.5	2.9	3,690	2.4	3.0	18	3.2	3.8	2,010	0.9	3.0	
Moderate	101	17.6	11.5	14,105	9.3	9.0	92	16.1	13.9	13,500	5.8	11.3	
Middle	115	20.0	30.5	17,661	11.6	25.4	136	23.8	33.8	24,747	10.6	28.9	
Upper	332	57.7	54.9	116,446	76.6	62.4	323	56.6	48.0	192,044	82.4	56.0	
Unknown	1	0.2	0.2	101	0.1	0.2	2	0.4	0.5	690	0.3	0.7	
Total	575	100.0	100.0	152,003	100.0	100.0	571	100.0	100.0	232,991	100.0	100.0	
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table 48B**

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Dallas-Fort Worth Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	4	3.5	1.6	452	1.9	0.9	1	0.7	0.8	50	0.2	0.4	4.4
Moderate	20	17.5	8.2	2,575	10.9	5.1	17	11.5	6.5	2,180	7.7	4.1	19.6
Middle	17	14.9	17.8	1,693	7.2	10.3	40	27.0	22.6	5,728	20.1	14.8	31.7
Upper	73	64.0	72.2	18,927	80.0	83.6	90	60.8	69.6	20,515	72.1	80.3	43.9
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.6	0	0.0	0.5	0.4
Total	114	100.0	100.0	23,647	100.0	100.0	148	100.0	100.0	28,473	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.5	0	0.0	1.0	1	9.1	3.0	157	3.7	1.3	4.4
Moderate	0	0.0	13.4	0	0.0	6.1	3	27.3	11.3	469	11.1	5.6	19.6
Middle	2	40.0	24.4	394	6.9	13.3	3	27.3	28.2	485	11.4	15.3	31.7
Upper	3	60.0	59.4	5,323	93.1	79.2	4	36.4	57.0	3,128	73.8	77.0	43.9
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.6	0	0.0	0.8	0.4
Total	5	100.0	100.0	5,717	100.0	100.0	11	100.0	100.0	4,239	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	4.9	0	0.0	3.6	0	0.0	11.4	0	0.0	10.2	4.4
Moderate	0	0.0	26.0	0	0.0	24.3	0	0.0	30.4	0	0.0	15.5	19.6
Middle	0	0.0	39.0	0	0.0	31.7	0	0.0	38.4	0	0.0	46.4	31.7
Upper	0	0.0	30.0	0	0.0	40.3	0	0.0	18.8	0	0.0	21.0	43.9
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	1.0	0	0.0	6.9	0.4
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Small Business Lending**

The geographic distribution of small business loans reflects excellent penetration throughout the AA when compared to demographics and the performance of the aggregate lenders. The bank's distribution of small business loans among LMI census tracts during the review period consistently exceeds aggregate data and the demographic figure. This performance reflects favorably on the bank's responsiveness to the credit needs of small businesses in the AA given the cessation of the SBA's PPP in 2021 and rising interest rates in 2022.

**Table 49**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Dallas-Fort Worth Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	166	14.1	7.2	37,819	15.7	8.4	70	9.5	7.3	20,105	9.9	8.7	5.4
Moderate	315	26.7	18.5	74,642	31.0	21.2	192	25.9	18.8	52,492	25.9	21.1	19.4
Middle	252	21.4	25.3	45,017	18.7	23.7	224	30.3	24.9	62,671	30.9	23.8	30.5
Upper	418	35.5	47.8	75,563	31.3	45.2	249	33.6	47.9	65,858	32.5	44.6	43.9
Unknown	28	2.4	0.6	8,054	3.3	1.3	5	0.7	0.7	1,715	0.8	1.5	0.9
Total	1,179	100.0	100.0	241,095	100.0	100.0	740	100.0	100.0	202,841	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's distribution of lending to individuals of different income levels and businesses of revenue different sizes is good. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

### ***Residential Real Estate (HMDA) Lending***

Home mortgage lending by borrower income in the AA is excellent when compared to demographic characteristics and the performance of aggregate HMDA lenders in the AA. The bank's 2021 and 2022 lending to low-income borrowers significantly exceeds the performance of aggregate lenders. In 2022, lending to moderate-income borrowers also exceeds aggregate lending data, though the bank's performance to moderate-income borrowers decreased.

The shift in performance toward higher income borrowers occurred as interest rates began to rise from historic lows in early 2022, making mortgage loans more expensive and pricing some lower-income borrowers out of the market. However, the bank's lending to low-income borrowers for home refinance loans and other purpose lines of credit was noteworthy, as the bank lent these products at levels above aggregate lenders.

The bank's lending performance in 2020 is consistent with that of 2021 and 2022, with a distribution of loans to LMI borrowers that is comparable to aggregate data but below the demographic figure.

**Table 50A**

Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Dallas-Fort Worth Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	##%	##%	\$(000)	##%	##%	#	##%	##%	\$(000)	##%	##%	
Home Purchase Loans													
Low	1	2.8	2.8	174	1.6	1.3	2	6.3	1.9	1,114	8.0	0.8	22.0
Moderate	3	8.3	14.4	886	7.9	9.7	5	15.6	11.4	700	5.0	6.8	17.2
Middle	6	16.7	19.8	1,249	11.2	17.0	3	9.4	20.2	605	4.3	16.1	19.2
Upper	17	47.2	40.7	5,154	46.1	52.2	18	56.3	43.4	9,546	68.4	52.5	41.6
Unknown	9	25.0	22.3	3,716	33.2	19.8	4	12.5	23.0	1,998	14.3	23.9	0.0
Total	36	100.0	100.0	11,179	100.0	100.0	32	100.0	100.0	13,963	100.0	100.0	100.0
Refinance Loans													
Low	35	12.8	3.3	6,575	8.9	1.6	19	9.1	7.7	2,062	3.6	3.8	22.0
Moderate	41	15.0	11.1	6,283	8.5	6.8	40	19.1	16.7	6,660	11.6	10.6	17.2
Middle	62	22.7	17.5	12,276	16.5	13.6	33	15.8	20.9	8,502	14.8	16.6	19.2
Upper	115	42.1	46.2	43,757	58.9	55.8	107	51.2	41.3	34,656	60.5	54.1	41.6
Unknown	20	7.3	22.0	5,349	7.2	22.1	10	4.8	13.5	5,398	9.4	14.9	0.0
Total	273	100.0	100.0	74,240	100.0	100.0	209	100.0	100.0	57,278	100.0	100.0	100.0
Home Improvement Loans													
Low	15	10.3	3.8	1,345	5.8	2.1	22	13.0	4.5	2,120	8.5	2.8	22.0
Moderate	23	15.8	8.9	2,421	10.4	6.1	27	16.0	8.6	2,889	11.5	5.3	17.2
Middle	25	17.1	14.8	3,887	16.6	11.7	33	19.5	15.9	4,086	16.3	11.0	19.2
Upper	75	51.4	69.7	14,509	62.1	76.4	82	48.5	68.2	15,417	61.6	77.1	41.6
Unknown	8	5.5	2.7	1,219	5.2	3.8	5	3.0	2.8	526	2.1	3.8	0.0
Total	146	100.0	100.0	23,381	100.0	100.0	169	100.0	100.0	25,038	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	67	11.7	3.1	9,424	6.8	1.5	57	10.0	3.7	6,670	5.2	1.5	22.0
Moderate	77	13.4	12.4	10,901	7.9	8.2	92	16.2	12.5	12,718	9.9	7.5	17.2
Middle	113	19.7	18.3	19,214	13.9	15.2	92	16.2	19.9	18,317	14.2	15.9	19.2
Upper	277	48.3	43.8	87,756	63.5	54.1	299	52.5	43.7	82,245	63.8	53.4	41.6
Unknown	40	7.0	22.4	10,869	7.9	21.1	29	5.1	20.2	9,041	7.0	21.7	0.0
Total	574	100.0	100.0	138,164	100.0	100.0	569	100.0	100.0	128,991	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.													

**Table 50B**

Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Dallas-Fort Worth Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	16	14.0	5.0	1,330	5.6	2.6	12	8.1	3.4	1,056	3.7	2.1	22.0
Moderate	8	7.0	9.0	880	3.7	4.5	18	12.2	7.5	2,211	7.8	4.1	17.2
Middle	20	17.5	12.9	1,802	7.6	7.6	20	13.5	16.2	2,576	9.0	9.9	19.2
Upper	67	58.8	68.9	19,050	80.6	81.0	90	60.8	67.6	21,911	77.0	79.0	41.6
Unknown	3	2.6	4.3	585	2.5	4.3	8	5.4	5.3	719	2.5	4.9	0.0
Total	114	100.0	100.0	23,647	100.0	100.0	148	100.0	100.0	28,473	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	6.4	0	0.0	2.3	2	18.2	7.7	318	7.5	3.6	22.0
Moderate	2	40.0	13.0	431	7.5	5.1	2	18.2	13.3	258	6.1	6.3	17.2
Middle	0	0.0	15.4	0	0.0	7.3	3	27.3	18.0	2,548	60.1	8.7	19.2
Upper	3	60.0	56.3	5,286	92.5	75.0	2	18.2	55.6	715	16.9	70.3	41.6
Unknown	0	0.0	8.9	0	0.0	10.3	2	18.2	5.4	400	9.4	11.1	0.0
Total	5	100.0	100.0	5,717	100.0	100.0	11	100.0	100.0	4,239	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.9	0	0.0	0.4	0	0.0	0.8	0	0.0	0.4	22.0
Moderate	0	0.0	0.7	0	0.0	0.6	0	0.0	0.4	0	0.0	0.3	17.2
Middle	0	0.0	0.4	0	0.0	0.4	0	0.0	0.2	0	0.0	0.2	19.2
Upper	0	0.0	0.4	0	0.0	0.6	0	0.0	0.3	0	0.0	0.7	41.6
Unknown	0	0.0	97.6	0	0.0	98.0	0	0.0	98.4	0	0.0	98.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

Comerica's borrower distribution of small business loans by revenue size of businesses is adequate. The distribution of 2020 loan originations to businesses with revenues of \$1 million or less is slightly above the performance of aggregate lenders. The percentage of the bank's 2021 and 2022 lending originated to businesses with revenues of \$1 million or less is lower than the percentage reflected in aggregate lending data. However, in 2022 the bank lent a larger percentage of the dollar amount of small business loans to businesses with revenues of \$1 million or less than reflected by aggregate data. This is reflective of the bank's willingness to lend larger sums to small businesses.

**Table 51**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Dallas-Fort Worth Metropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	474	40.2	43.0	66,430	27.6	27.1	220	29.7	37.6	40,667	20.0	24.3	92.5
Over \$1 Million	446	37.8		146,792	60.9		440	59.5		145,379	71.7		6.2
Revenue Unknown	259	22.0		27,873	11.6		80	10.8		16,795	8.3		1.3
Total	1,179	100.0		241,095	100.0		740	100.0		202,841	100.0		100.0
By Loan Size													
\$100,000 or Less	613	52.0	92.5	25,825	10.7	37.2	281	38.0	87.9	16,888	8.3	33.2	
\$100,001 - \$250,000	279	23.7	4.1	51,268	21.3	17.3	191	25.8	6.9	37,826	18.6	19.9	
\$250,001 - \$1 Million	287	24.3	3.4	164,002	68.0	45.5	268	36.2	5.2	148,127	73.0	46.9	
Total	1,179	100.0	100.0	241,095	100.0	100.0	740	100.0	100.0	202,841	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	313	66.0		12,386	18.6		129	58.6		6,946	17.1		
\$100,001 - \$250,000	87	18.4		15,498	23.3		43	19.5		8,606	21.2		
\$250,001 - \$1 Million	74	15.6		38,546	58.0		48	21.8		25,115	61.8		
Total	474	100.0		66,430	100.0		220	100.0		40,667	100.0		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

## Community Development Lending

Comerica is a leader in making CD loans in the AA. During the review period, the bank originated a total of 168 qualifying CD loans, totaling \$685.5 million, which represents an increase of 69.2 percent since the prior evaluation. This increase is reflective of the bank's strategic focus on identifying and responding to CD opportunities and LMI needs. During the earliest portion of the review period, the bank was heavily involved with the SBA's PPP. When the program ended in May 2021, Comerica remained committed to responding to identify credit and community development needs of small business by engaging in activities that promote economic development through the financing of small businesses in the AA. To that end, the bank dramatically increased its lending in this area, originating 116 loans for a total of \$484.2 million, representing a 38.8 percent increase by number volume and a 127.5 percent by dollar amount. Examples of the bank's CD lending activities that were considered responsive to the AA credit needs include:

- Lines of credit to support ongoing operations of small businesses (e.g. wholesale egg company, wholesale boot company, and a textile manufacturer) that provide permanent employment to LMI individuals.
- A \$27.5 million line of credit to a small business that partners with a local municipality in the AA to develop an industrial building park. The development will promote economic development, by stimulating commerce, creating employment opportunities, and generating tax revenue.

**Table 52**

<b>Community Development Lending</b>		
<b>Assessment Area: Dallas-Fort Worth Metropolitan</b>		
<b>Purpose</b>	<b>#</b>	<b>\$000s</b>
Affordable Housing	3	71,700
Community Services	8	7,801
Economic Development	116	484,242
Revitalization and Stabilization	41	121,785
<b>Total</b>	<b>168</b>	<b>685,528</b>

**INVESTMENT TEST**

Comerica is often in a leadership position given its excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors. Despite the 25.7 percent decrease in the number of CD investments and grants since the previous evaluation, the dollar amount increased by 102.6 percent. The bank makes extensive use of innovative and/or complex investments to support CD initiatives, including significant work with CDFIs and unique and creative affordable housing projects, and exhibits excellent responsiveness to credit and CD needs. Comerica's investments primarily focused on affordable housing, which reflects favorably on the bank since multiple community contacts emphasized the need for affordable housing in the AA. Additionally, housing cost burden data from the U.S. Department of Housing and Urban Development (HUD) demonstrated a significant need for affordable housing.

Table 53 illustrates the breakdown of the bank's CD investments, grants, and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the current evaluation period, and CD donations made since the previous evaluation. Examples of notable investment and donation activities made by the bank include:

- Nineteen investments totaling \$18.2 million in LIHTC-eligible funds for the construction or preservation of rent-restricted units for LMI individuals in the AA. This investment is particularly responsive given community contacts indicated a significant shortage of affordable housing in the AA.
- A \$500,000 equity investment to a CDFI that provides access to capital for small businesses located in the AA.

**Table 53**

<b>Investment, Grants, and Donations</b>								
<b>Assessment Area: Dallas-Fort Worth Metropolitan</b>								
<b>Community Development Purpose</b>	<b>Prior Period Investments<sup>1</sup></b>		<b>Current Investments<sup>2</sup></b>		<b>Donations</b>		<b>Total</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	15	18,213	5	38,163	9	66	29	56,442
Community Services	0	0	0	0	137	2,640	137	2,640
Economic Development	0	0	3	8,922	18	467	21	9,389
Revitalization and Stabilization	0	0	0	0	1	20	1	20
<b>Total</b>	<b>15</b>	<b>18,213</b>	<b>8</b>	<b>47,085</b>	<b>165</b>	<b>3,193</b>	<b>188</b>	<b>68,491</b>

<sup>1</sup> Book value of investment<sup>2</sup> Original market value of investment



## SERVICE TEST

The bank's Service Test performance is excellent.

## Retail Services

Comerica's delivery systems are accessible to the bank's geographies and individuals of different income levels in the AA. The distribution of the bank's 55 branch offices and 89 ATMs as of April 1, 2023, was compared to the distribution of the households and businesses among the AA census tract income categories. Table 54 summarizes the bank's retail locations in the AA.

**Table 54**

Branch and Full-Service ATM Locations Assessment Area: Dallas-Fort Worth Metropolitan							
Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	9.5	9.2	5.4	7	12.7	10	11.2
Moderate	26.0	24.7	19.3	8	14.6	9	10.1
Middle	28.9	30.7	30.5	19	34.6	33	37.1
Upper	34.0	34.5	44.0	21	38.2	37	41.6
Unknown	1.5	0.8	0.9	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>89</b>	<b>100.0</b>

The bank opened one branch in an upper-income census tract and closed one branch in moderate-income census tract. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations do not vary in the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are consistent throughout the AA.

## Community Development Services

Comerica is a leader in providing CD services in the AA. The bank's employees served in 148 organizations offering 1,243 CD services that aid LMI individuals for a total of 3,655 hours. The bank demonstrates significant responsiveness to AA CD needs, by increasing the number of community service hours served since the previous evaluation by 121.4 percent.

Comerica employees devoted over 800 hours serving nonprofit organizations in various capacities, demonstrating the bank's significant commitment to the well-being of LMI individuals and geographies. In addition to the significant community service hours noted, Comerica BusinessHQ opened in early 2023 to support small businesses in the AA. This \$5 million proof-of-concept collaborative space has served more than 400 individuals, providing approximately \$4,500 worth of no-cost coworking and tailored technical assistance by bank employees at the location. In response to the overwhelming success of the location and the development of new avenues to serve the area created through Comerica BusinessHQ, the bank intends to extend the concept to other AAs. This commitment to serving the bank's AA through such a program, despite it not fitting within established definitions of qualified CD activity, reflects very favorably on the bank's responsiveness and innovation to the needs of its communities.

**SAN ANTONIO METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SAN ANTONIO ASSESSMENT AREA**

- The San Antonio Metropolitan AA is comprised of Bexar and Kendall counties, which represent a portion of the San Antonio-New Braunfels, TX MSA. The AA excludes the following MSA counties: Atascosa, Bandera, Comal, Guadalupe, Medina, and Wilson. Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- The AA consists of 384 census tracts, of which 9.1 percent are designated as low-income, 35.7 percent as moderate-income, 26.8 percent as middle-income, 27.3 percent as upper-income, and 1.0 percent as unknown-income.
- The 2020 U.S. Census added 12 new census tracts within the AA, resulting in an increase of 3.2 percent. The number of geographies designated as LMI increased by 4.7 percent.
- The bank operates six full-service branches in the AA: three branches in moderate-income, two branches in middle-income, and one branch in an upper-income census tract.
- According to the June 30, 2022, FDIC Market Share Report, Comerica had a 0.1 percent market share, ranking 19<sup>th</sup> out of 49 of FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 146<sup>th</sup> out of 719 HMDA reporters in the AA with 26 HMDA originations and purchases, and 40<sup>th</sup> out of 189 CRA reporters with 74 CRA small business loans.
- A community contact noted a significant need for affordable housing, mortgage payment assistance, and access to credit for LMI individuals and families as well as small businesses and entrepreneurs. The community contact also noted that financial institutions should continue to invest in CDFIs, as they support small business by providing financing and technical support.

**Table 55**

<b>Population Change</b>			
<b>Assessment Area: San Antonio Metropolitan</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percentage Change</b>
San Antonio Metropolitan AA	1,862,863	2,053,603	10.2
Bexar County, TX	1,825,502	2,009,324	10.1
Kendall County, TX	37,361	44,279	18.5
San Antonio-New Braunfels, TX MSA	2,286,702	2,558,143	11.9
Texas	26,538,614	29,145,505	9.8
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- The AA population growth between 2015 and 2020 is comparable to the statewide rate. While population growth in Bexar County mirrors the AA and the statewide rates, Kendall County experienced a significant increase in population, at a 18.5 percent, during the same period.

**Table 56**

<b>Median Family Income Change</b> <b>Assessment Area: San Antonio Metropolitan</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percentage Change</b>
San Antonio Metropolitan AA	65,503	70,666	7.9
Bexar County, TX	64,842	70,280	8.4
Kendall County, TX	96,812	117,734	21.6
San Antonio-New Braunfels, TX MSA	67,989	74,284	9.3
Texas	68,523	76,073	11.0
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey</i> <i>2016-2020 U.S. Census Bureau: American Community Survey</i> <i>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

- While the AA's MFI increased at a lower rate than the state of Texas' MFI between 2015 and 2020, Bexar County's MFI grew at a comparable rate. Conversely, Kendall County's MFI grew significantly, at a 21.6 percent, almost doubling the statewide percentage change during the same period.
- The 2020 MFI in Kendall County exceeds the MFI for the AA and the state by at least \$40,000. It is noteworthy that only 2.6 percent of the AA families reside in Kendall County, limiting the impact in the AA MFI.
- According to 2020 FFIEC data, 11.6 percent of AA families live below the poverty level. In contrast, only 3.0 percent of Kendall County's families live below the poverty level.

**Table 57**

<b>Housing Cost Burden</b> <b>Assessment Area: San Antonio Metropolitan</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
San Antonio Metropolitan AA	77.7	46.5	44.2	58.3	34.3	20.4
Bexar County, TX	77.9	46.9	44.3	58.4	34.6	20.4
Kendall County, TX	64.1	22.3	35.1	55.0	25.1	18.5
San Antonio-New Braunfels, TX MSA	76.8	46.5	43.0	57.2	32.6	19.4
Texas	77.4	42.4	42.4	57.5	30.9	19.2
<i>Cost burden is housing cost that equals 30 percent or more of household income.</i> <i>Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy</i>						

- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on homeowners at any other level.
- The cost burden for LMI renters is lower in Kendall County, with a median gross rent of \$1,278, than the Bexar County and the statewide cost burden.
- The AA median housing value, at \$173,821, is below the statewide, at \$187,200. Kendall County's median housing value, at \$378,500, significantly exceeds the AA and state of Texas housing values.

**Table 58**

<b>Unemployment Rates</b>					
<b>Assessment Area: San Antonio Metropolitan</b>					
<b>Region</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
San Antonio Metropolitan AA	3.4	3.1	7.6	5.3	5.3
Bexar County, TX	3.4	3.2	7.6	5.4	5.4
Kendall County, TX	2.9	2.7	5.1	3.8	3.8
San Antonio-New Braunfels, TX MSA	3.3	3.1	7.3	5.2	5.2
Texas	3.9	3.5	7.7	5.7	3.9
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- Unemployment rates for the AA and Bexar County between 2018 and 2021 are comparable to the statewide rate. However, Kendall County's unemployment rates are consistently below the statewide during the same period.
- Unemployment rates almost doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off employees due to the statewide stay at home and social distancing orders. While AA unemployment rates stabilized in 2021 and 2022, they have not reached pre-pandemic rates levels. The statewide unemployment rates reached pre-pandemic levels in 2022.
- Major employment industries within the AA include accommodation and food services, healthcare and social assistance, and retail trade.

Table 59 details selected characteristics of the AA.

Table 59

2022 Combined Demographics								
Assessment Area: San Antonio Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	35	9.1	28,772	6.6	9,445	32.8	101,893	23.5
Moderate	137	35.7	140,036	32.4	25,471	18.2	76,516	17.7
Middle	103	26.8	124,152	28.7	10,430	8.4	84,401	19.5
Upper	105	27.3	139,762	32.3	4,957	3.5	169,912	39.3
Unknown	4	1.0	0	0.0	0	0.0	0	0.0
Total AA	384	100.0	432,722	100.0	50,303	11.6	432,722	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by	% by	#	% by unit	#	% by unit
Low	52,666	18,604	4.8	35.3	28,356	53.8	5,706	10.8
Moderate	249,019	112,263	28.9	45.1	114,098	45.8	22,658	9.1
Middle	200,364	116,544	30.0	58.2	71,184	35.5	12,636	6.3
Upper	214,085	140,883	36.3	65.8	57,418	26.8	15,784	7.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	716,134	388,294	100.0	54.2	271,056	37.8	56,784	7.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	5,350	6.1	4,736	5.8	572	10.9	42	4.6
Moderate	23,250	26.4	21,469	26.2	1,637	31.3	144	15.9
Middle	22,482	25.6	21,062	25.7	1,232	23.5	188	20.8
Upper	36,692	41.7	34,414	42.1	1,749	33.4	529	58.4
Unknown	181	0.2	136	0.2	42	0.8	3	0.3
Total AA	87,955	100.0	81,817	100.0	5,232	100.0	906	100.0
Percentage of Total Businesses:				93.0		5.9		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	13	1.4	13	1.4	0	0.0	0	0.0
Moderate	149	16.2	147	16.1	2	25.0	0	0.0
Middle	193	21.0	191	20.9	2	25.0	0	0.0
Upper	565	61.4	561	61.5	4	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	920	100.0	912	100.0	8	100.0	0	0.0
Percentage of Total Farms:				99.1		0.9		0.0
Source: 2022 FFIEC Census Data								
2022 Dun & Bradstreet Data								
2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

Comerica's Lending Test performance in the AA is good. The bank's small business lending generally carried more weight, as this product comprised the largest volume of lending in the AA. The bank's home mortgage lending activity was evaluated as a whole given the insufficient volume by sub-products to conduct a meaning analysis.

Details of the bank's 2020 mortgage and small business lending and corresponding aggregate data can be found in Appendix C.

#### **Lending Activity**

The bank's lending activity in the San Antonio Metropolitan AA reflects good responsiveness to AA credit needs. Comerica makes use of innovative and/or flexible lending practices to serve AA credit needs, including LMI borrowers. The bank originated 84 home mortgage and 351 small business loans in the AA between January 1, 2020, and December 31, 2022. These volumes represent 2.7 percent of the HMDA-reportable loans and 4.2 percent of the CRA-reportable loans in the state of Texas during the review period. Comerica sustained a constant volume of home mortgage lending between 2020 and 2022; however, the volume of small business lending significantly decreased year after year. The reduction in small business lending is primarily attributed to the cessation of the SBA's PPP in May 2021 and rising interest rates in 2022. It is noteworthy that the level of home mortgage lending has not been adversely impacted by the interest rate hikes. This level of lending reflects favorably on the bank as it aligns with the bank's strategic focus on small business lending.

#### **Geographic Distribution of Loans**

Comerica's geographic distribution of lending reflects excellent penetration throughout the AA. The distribution of home mortgage and small business lending is consistent with the overall conclusion, reflecting excellent penetration among geographies of different income levels, especially LMI census tracts. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions about the bank's performance in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

#### *Residential Real Estate (HMDA) Lending*

The geographic distribution of home mortgage lending reflects excellent penetration throughout the AA. The distribution of 2020 and 2021 home mortgage loans among low-income census tracts exceeds aggregate data and the demographic figure, though the bank did not make any loans in low-income census tracts in 2022. The distribution of the bank's home mortgage lending in moderate-income census tracts is also well above aggregate data and comparable to demographic figures in each year of the review period.

Table 60A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: San Antonio Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans													
Low	0	0.0	1.9	0	0.0	1.3	0	0.0	2.3	0	0.0	1.4	4.8
Moderate	0	0.0	15.3	0	0.0	10.6	0	0.0	18.1	0	0.0	12.4	28.9
Middle	0	0.0	34.3	0	0.0	28.1	0	0.0	34.1	0	0.0	27.9	30.0
Upper	1	100.0	48.5	190	100.0	59.9	1	100.0	45.5	100	100.0	58.3	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	190	100.0	100.0	1	100.0	100.0	100	100.0	100.0	100.0
Refinance Loans													
Low	1	12.5	1.1	310	22.9	0.8	0	0.0	2.3	0	0.0	1.3	4.8
Moderate	3	37.5	11.7	487	36.0	7.6	1	12.5	19.8	121	5.8	13.3	28.9
Middle	2	25.0	28.3	126	9.3	22.5	1	12.5	32.2	60	2.9	25.9	30.0
Upper	2	25.0	58.9	429	31.7	69.1	6	75.0	45.7	1,893	91.3	59.5	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	8	100.0	100.0	1,352	100.0	100.0	8	100.0	100.0	2,074	100.0	100.0	100.0
Home Improvement Loans													
Low	2	25.0	2.5	134	16.7	1.6	0	0.0	2.4	0	0.0	1.6	4.8
Moderate	2	25.0	19.0	120	15.0	14.4	4	66.7	17.6	237	60.6	13.6	28.9
Middle	2	25.0	23.1	89	11.1	18.0	1	16.7	24.3	80	20.5	18.6	30.0
Upper	2	25.0	55.4	459	57.2	66.1	1	16.7	55.7	74	18.9	66.2	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.0
Total	8	100.0	100.0	802	100.0	100.0	6	100.0	100.0	391	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	9.4	0	0.0	5.8	0	0.0	7.8	0	0.0	5.4	10.0
Moderate	0	0.0	46.3	0	0.0	37.8	0	0.0	45.2	0	0.0	37.5	40.7
Middle	0	0.0	23.1	0	0.0	25.7	0	0.0	28.9	0	0.0	32.9	24.1
Upper	0	0.0	21.3	0	0.0	30.6	2	100.0	18.1	79,670	100.0	24.2	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	79,670	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	4	14.3	1.6	484	12.4	1.4	0	0.0	2.3	0	0.0	1.9	4.8
Moderate	9	32.1	14.0	1,060	27.2	11.6	8	30.8	18.7	565	0.7	15.6	28.9
Middle	5	17.9	31.5	350	9.0	25.7	3	11.5	33.3	258	0.3	28.0	30.0
Upper	10	35.7	52.8	2,008	51.5	61.2	15	57.7	45.7	82,643	99.0	54.5	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	28	100.0	100.0	3,902	100.0	100.0	26	100.0	100.0	83,466	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table 60B**

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: San Antonio Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	1	9.1	2.1	40	2.6	1.6	0	0.0	1.0	0	0.0	0.5	4.8
Moderate	4	36.4	13.9	453	29.1	7.7	2	25.0	10.6	140	12.0	8.3	28.9
Middle	1	9.1	20.6	135	8.7	14.3	1	12.5	22.2	118	10.1	16.1	30.0
Upper	5	45.5	63.4	930	59.7	76.4	5	62.5	66.2	906	77.8	75.0	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	1,558	100.0	100.0	8	100.0	100.0	1,164	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.6	0	0.0	1.9	0	0.0	2.4	0	0.0	1.5	4.8
Moderate	0	0.0	23.6	0	0.0	13.1	1	100.0	21.9	67	100.0	14.1	28.9
Middle	0	0.0	27.8	0	0.0	16.7	0	0.0	26.5	0	0.0	19.4	30.0
Upper	0	0.0	45.0	0	0.0	68.3	0	0.0	49.2	0	0.0	65.0	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	67	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.5	0	0.0	2.1	0	0.0	3.5	0	0.0	3.8	4.8
Moderate	0	0.0	27.1	0	0.0	19.7	0	0.0	30.8	0	0.0	23.4	28.9
Middle	0	0.0	41.0	0	0.0	38.9	0	0.0	45.8	0	0.0	39.7	30.0
Upper	0	0.0	28.4	0	0.0	39.3	0	0.0	19.9	0	0.0	33.1	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the AA when compared to demographics and the performance of the aggregate lenders. While the volume of small business lending decreased year after year during the review period, the distribution of small business loans among low-income census tracts consistently exceeds aggregate data and the demographic figure. Additionally, the bank's small business lending in moderate-income census tracts generally exceeds aggregate data and the demographic figure. Comerica's 2021 performance in moderate-income tracts declined slightly but remained comparable to both figures. This performance reflects favorably on the bank's responsiveness to the credit needs of small businesses in the AA.



**Table 61**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: San Antonio Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	17	14.8	4.3	3,912	15.4	5.7	8	10.8	5.6	1,628	7.8	8.1	6.1
Moderate	26	22.6	21.8	5,365	21.1	21.5	24	32.4	23.4	7,281	34.9	24.0	26.4
Middle	26	22.6	26.5	4,218	16.6	27.4	16	21.6	23.8	5,189	24.9	20.5	25.6
Upper	46	40.0	46.8	11,955	47.0	44.9	26	35.1	46.6	6,756	32.4	46.7	41.7
Unknown	0	0.0	0.3	0	0.0	0.3	0	0.0	0.2	0	0.0	0.5	0.2
Total	115	100.0	100.0	25,450	100.0	100.0	74	100.0	100.0	20,854	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's distribution of lending to borrowers reflects a good penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

#### ***Residential Real Estate (HMDA) Lending***

Home mortgage lending by borrower income in the AA is excellent when compared to demographic characteristics and the performance of aggregate lenders. The bank's 2021 and 2022 lending to low-income borrowers significantly exceeds aggregate data and is comparable to the demographic figure, reflecting improvement from its 2020 performance.

The bank's lending to moderate-income borrowers improved year after year. In 2020, the bank's performance is below aggregate and demographic data. While Comerica's 2021 performance is comparable to aggregate and demographic data, it significantly exceeds both figures in 2022. The shift in performance is especially notable given the rising interest rate environment in 2022.

The bank's 2020 lending performance exceeds aggregate data and is significantly below the demographic figure. However, this has limited impact in rating the bank's performance, as aggregate data serves as a better proxy for loan demand.

**Table 62A**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: San Antonio Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	2.5	0	0.0	1.3	0	0.0	2.1	0	0.0	1.0	23.5
Moderate	0	0.0	14.8	0	0.0	10.5	0	0.0	14.1	0	0.0	9.9	17.7
Middle	0	0.0	21.8	0	0.0	19.3	0	0.0	21.4	0	0.0	19.0	19.5
Upper	1	100.0	33.4	190	100.0	43.3	1	100.0	35.3	100	100.0	44.9	39.3
Unknown	0	0.0	27.5	0	0.0	25.6	0	0.0	27.0	0	0.0	25.2	0.0
Total	1	100.0	100.0	190	100.0	100.0	1	100.0	100.0	100	100.0	100.0	100.0
Refinance Loans													
Low	2	25.0	2.7	126	9.3	1.2	0	0.0	6.5	0	0.0	3.4	23.5
Moderate	1	12.5	9.2	161	11.9	5.7	2	25.0	18.3	226	10.9	12.5	17.7
Middle	2	25.0	15.3	189	14.0	11.5	0	0.0	20.6	0	0.0	17.4	19.5
Upper	3	37.5	34.7	876	64.8	40.7	6	75.0	37.1	1,848	89.1	48.4	39.3
Unknown	0	0.0	38.2	0	0.0	40.9	0	0.0	17.4	0	0.0	18.2	0.0
Total	8	100.0	100.0	1,352	100.0	100.0	8	100.0	100.0	2,074	100.0	100.0	100.0
Home Improvement Loans													
Low	3	37.5	6.1	113	14.1	3.3	2	33.3	6.3	32	8.2	3.4	23.5
Moderate	1	12.5	13.0	30	3.7	8.1	4	66.7	15.3	359	91.8	10.1	17.7
Middle	1	12.5	19.0	100	12.5	15.1	0	0.0	19.8	0	0.0	15.4	19.5
Upper	2	25.0	59.7	459	57.2	69.7	0	0.0	55.4	0	0.0	68.0	39.3
Unknown	1	12.5	2.3	100	12.5	3.8	0	0.0	3.3	0	0.0	3.1	0.0
Total	8	100.0	100.0	802	100.0	100.0	6	100.0	100.0	391	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	25.0	2.6	403	10.3	1.3	5	20.8	3.4	202	5.3	1.5	23.5
Moderate	4	14.3	12.1	471	12.1	8.4	7	29.2	15.0	675	17.8	10.3	17.7
Middle	5	17.9	18.6	528	13.5	15.9	2	8.3	20.8	318	8.4	18.5	19.5
Upper	11	39.3	34.0	2,400	61.5	42.2	10	41.7	36.3	2,601	68.5	45.8	39.3
Unknown	1	3.6	32.7	100	2.6	32.1	0	0.0	24.5	0	0.0	23.8	0.0
Total	28	100.0	100.0	3,902	100.0	100.0	24	100.0	100.0	3,796	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.													

**Table 62B**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: San Antonio Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	2	18.2	6.2	164	10.5	4.3	2	25.0	6.1	103	8.8	4.4	23.5
Moderate	2	18.2	14.9	280	18.0	8.8	1	12.5	13.8	90	7.7	10.7	17.7
Middle	2	18.2	18.0	239	15.3	12.6	2	25.0	17.6	318	27.3	11.8	19.5
Upper	5	45.5	57.2	875	56.2	70.8	3	37.5	57.6	653	56.1	68.1	39.3
Unknown	0	0.0	3.6	0	0.0	3.5	0	0.0	4.9	0	0.0	5.0	0.0
Total	11	100.0	100.0	1,558	100.0	100.0	8	100.0	100.0	1,164	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	9.1	0	0.0	4.2	1	100.0	9.5	67	100.0	5.1	23.5
Moderate	0	0.0	18.4	0	0.0	9.0	0	0.0	18.0	0	0.0	11.6	17.7
Middle	0	0.0	21.0	0	0.0	12.0	0	0.0	19.5	0	0.0	13.9	19.5
Upper	0	0.0	45.9	0	0.0	65.9	0	0.0	49.2	0	0.0	63.1	39.3
Unknown	0	0.0	5.5	0	0.0	8.9	0	0.0	3.7	0	0.0	6.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	67	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.4	0	0.0	0.2	0	0.0	2.1	0	0.0	1.2	23.5
Moderate	0	0.0	0.9	0	0.0	0.7	0	0.0	1.2	0	0.0	1.1	17.7
Middle	0	0.0	0.5	0	0.0	0.6	0	0.0	0.2	0	0.0	0.5	19.5
Upper	0	0.0	0.6	0	0.0	1.4	0	0.0	0.1	0	0.0	0.2	39.3
Unknown	0	0.0	97.6	0	0.0	97.1	0	0.0	96.4	0	0.0	97.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

The borrower distribution of small business loans by revenue size of businesses is good. The 2022 loan distribution to businesses with revenues of \$1 million or less is below the percentage of small businesses in the AA and aggregate data by number of originations; however, Comerica's performance by dollar amount is comparable to aggregate data. This is reflective of the bank's willingness to lend larger sums to small businesses. Moreover, aggregate data serves as a better indicator for loan demand than the demographic figure.

In 2021, the bank's lending to businesses with annual revenues of \$1 million or less is comparable to aggregate lending performance, but well below the demographic figure. Conversely, Comerica's lending performance in 2020 reflected penetration levels greater than 2021 and 2022, originating a significantly larger portion of small business loans to businesses with revenues of \$1 million or less than aggregate lenders. It is noteworthy that Comerica's number volume of small business loans has decreased by 69.1 percent between 2020 and 2022, but only 23.8 percent by dollar amount. This declining performance is primarily attributed to the cessation of the SBA's PPP in May 2021 and rising interest rates in 2022.

**Table 63**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: San Antonio Metropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	47	40.9	43.8	7,498	29.5	27.5	25	33.8	46.4	6,871	32.9	29.4	93.0
Over \$1 Million	48	41.7		15,281	60.0		43	58.1		12,469	59.8		5.9
Revenue Unknown	20	17.4		2,671	10.5		6	8.1		1,514	7.3		1.0
Total	115	100.0		25,450	100.0		74	100.0		20,854	100.0		100.0
By Loan Size													
\$100,000 or Less	58	50.4	91.0	2,713	10.7	33.8	29	39.2	93.2	1,575	7.6	35.1	
\$100,001 - \$250,000	23	20.0	5.0	3,872	15.2	18.7	18	24.3	3.5	3,583	17.2	16.0	
\$250,001 - \$1 Million	34	29.6	4.0	18,865	74.1	47.5	27	36.5	3.3	15,696	75.3	48.9	
Total	115	100.0	100.0	25,450	100.0	100.0	74	100.0	100.0	20,854	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	31	66.0		1,322	17.6		12	48.0		589	8.6		
\$100,001 - \$250,000	8	17.0		1,339	17.9		5	20.0		1,100	16.0		
\$250,001 - \$1 Million	8	17.0		4,837	64.5		8	32.0		5,182	75.4		
Total	47	100.0		7,498	100.0		25	100.0		6,871	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

## Community Development Lending

The bank makes a relatively high level of CD loans in the AA, originating a total of 14 qualifying CD loans, totaling \$47.5 million. Since the previous evaluation, the bank substantially increased the dollar amount of CD loans by 90.9 percent. The majority of the CD loans were extended for the purpose of economic development, focusing on financing small businesses and supporting permanent job creation or retention or improvement for LMI persons or in LMI geographies. Examples of the bank's CD lending activities that were considered responsive to the credit needs in the AA include:

- A \$15 million line of credit extended to a small business that processes and distributes nuts, seeds, dried fruit, and snack mixes. Funds expected to support ongoing business operations and permanent jobs for LMI employees.
- A \$638,000 line of credit extended to a small business to expand its car wash operations and support permanent jobs for LMI employees.

**Table 64**

Community Development Lending Assessment Area: San Antonio Metropolitan		
Purpose	#	\$000s
Affordable Housing	0	0
Community Services	2	1,000
Economic Development	8	43,065
Revitalization and Stabilization	4	3,392
<b>Total</b>	<b>14</b>	<b>47,457</b>

## INVESTMENT TEST

The bank's performance under the Investment Test in the AA is good. Comerica is occasionally in a leadership position given its significant level of qualified CD investments and grants, particularly those not routinely provided by private investors. The bank makes significant use of innovative or complex investments to support CD initiatives and exhibits good responsiveness to AA needs. The bank's overall dollar amount of CD investments and grants significantly increased by 28.7 percent since the previous evaluation while the number volume decreased by 31.0 percent. Comerica's investments primarily focused on affordable housing, which reflects good responsiveness as community contacts emphasized the need for affordable housing in the AA.

Table 65 illustrates the breakdown of the bank's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the review period, and CD donations made since the previous evaluation. Examples of notable investment and donation activities that reflect Comerica's efforts to meet the CD and credit needs of the AA include:

- A \$250,000 equity investment to a CDFI that provides access to capital for small businesses in the AA.
- A \$5.9 million investment in LIHTC-eligible funds for the construction or preservation of rent-restricted units for LMI individuals.

**Table 65**

Investment, Grants, and Donations Assessment Area: San Antonio Metropolitan								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	8	8,578	3	9,185	0	0	11	17,763
Community Services	0	0	0	0	3	15	3	15
Economic Development	1	665	2	4,282	3	30	6	4,977
Revitalization and Stabilization	0	0	0	0	0	0	0	0
<b>Total</b>	<b>9</b>	<b>9,243</b>	<b>5</b>	<b>13,467</b>	<b>6</b>	<b>45</b>	<b>20</b>	<b>22,755</b>
<sup>1</sup> Book value of investment								
<sup>2</sup> Original market value of investment								

## SERVICE TEST

The bank's Service Test performance is good.

### **Retail Services**

Comerica's delivery systems are accessible to the bank's geographies and individuals of different income levels in the AA. The distribution of the bank's six branch offices and six ATMs as of April 1, 2023, was compared to the distribution of the households and businesses among the income tract categories within the AA. Table 66 summarizes the bank's retail locations in the AA.

**Table 66**

Branch and Full-Service ATM Locations Assessment Area: San Antonio Metropolitan							
Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	9.1	7.1	6.0	0	0.0	0	0.0
Moderate	35.7	34.3	26.3	3	50.0	3	50.0
Middle	26.8	28.5	25.5	2	33.3	2	33.3
Upper	27.3	30.1	41.9	1	16.7	1	16.7
Unknown	1.0	0.0	0.2	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>

The bank did not open or close any branches in the AA during the review period. Banking services and hours of operations do not vary the AA, particularly in LMI geographies or to LMI individuals.

### Community Development Services

The bank provides an adequate level of CD services in the AA. Comerica's employees served six organizations, offering 22 community services that aided LMI individuals for a total of 67 hours. This level of CD services represents an improvement from the previous evaluation, with an 146.3 percent increase in the number of hours rendered. Examples of services performed by bank employees include:

- Serving on the board of directors of a nonprofit that unites communities to identify and solve relevant CD issues, such as financial education and affordable housing.
- Providing over 17 hours of financial education to LMI youth.

## METROPOLITAN ASSESSMENT AREAS (LIMITED-SCOPE REVIEW)

### DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE TEXAS METROPOLITAN ASSESSMENT AREAS

The bank's branch operations and deposit market share for each metropolitan AA receiving a limited-scope review were determined as of April 1, 2023, and June 30, 2022, respectively.

- **Austin Metropolitan AA**

- The Austin Metropolitan AA is comprised of the entirety of Travis and Williamson counties which, along with Bastrop, Caldwell, and Hays counties (excluded from the AA) make up the Austin-Round Rock-Georgetown, TX MSA.
- The AA is comprised of 425 census tracts, including 27 low-, 100 moderate-, 142 middle-, 140 upper-, and 16 unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 1,899,205, which reflects a 19.1 percent increase from the 2015 ACS data.
- The AA includes 416,236 families, 20.4 percent are low-, 16.8 percent moderate-, 20.8 percent middle-, and 42.0 percent are upper-income.
- The bank operated ten branches, representing 2.5 percent of its branches.
- Comerica held \$1.5 billion in deposits, representing a market share of 2.2 percent and 1.9 percent of the bank's total deposits.

- **Houston Metropolitan AA**

- The Houston Metropolitan AA is comprised of the entirety of Brazoria, Fort Bend, Galveston, Harris, and Montgomery counties which, along with Austin, Chambers, Liberty, and Waller counties (excluded from the AA) make up the Houston-The Woodlands-Sugarland, TX MSA.
- The AA is comprised of 1,562 census tracts, including 215 low-, 385 moderate-, 408 middle-, 505 upper-, and 49 unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 6,897,080, which reflects a 12.0 percent increase from the 2015 ACS data.
- The AA includes 1,650,859 families, 23.6 percent of which are low-, 16.6 percent moderate-, 17.8 percent middle-, and 42.0 percent are upper-income.
- The bank operated 41 branches, representing 10.0 percent of its branches.
- Comerica held \$3.9 billion in deposits, representing a market share of 1.0 percent and 5.3 percent of the bank's total deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Appendix D contains detailed performance and demographic information reviewed for the limited-scope AAs. Table 67 discusses conclusions regarding the bank's performance.

**Table 67**

Assessment Area	Lending Test	Investment Test	Service Test
Austin Metropolitan AA	Consistent	Below	Consistent
Houston Metropolitan AA	Consistent	Consistent	Consistent

The institution's lending, investment, and service performance in the areas is generally consistent with Comerica's lending, investment, and service performance in the state.

## NONMETROPOLITAN ASSESSMENT AREA (LIMITED-SCOPE REVIEW)

### DESCRIPTION OF OPERATIONS

- **Bank of the Hills Nonmetropolitan AA**
  - The Bank of the Hills Nonmetropolitan AA is comprised of the entirety of Kerr County.
  - The AA is comprised of 14 census tracts, including two moderate-, six middle-, and six upper-income tracts.
  - Based upon 2020 ACS data, the AA population was 52,598, which reflects a 4.9 percent increase from the 2015 ACS data.
  - The AA includes 14,712 families, 17.6 percent are low-, 17.8 percent moderate-, 19.0 percent middle-, and 45.6 percent are upper-income.
  - As of April 1, 2023, the bank operated three branches, representing 0.7 percent of its branches.
  - As of June 30, 2022, Comerica held \$193.2 million in deposits, representing a market share of 10.7 percent and 0.3 percent of the bank's total deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Appendix E contains detailed performance and demographic information reviewed for the limited-scope AAs. Table 68 summarized the conclusions regarding the bank's performance.

**Table 68**

Assessment Area	Lending Test	Investment Test	Service Test
Bank of the Hills Nonmetropolitan AA	Below	Below	Below

The institution's lending, investment, and service performance in the AA is below Comerica's performance in the state; however, it does not affect the rating for the state.



## STATE OF CALIFORNIA

<b>CRA RATING FOR CALIFORNIA:</b>	<b>Satisfactory</b>
The Lending Test is Rated:	High Satisfactory
The Investment Test is Rated:	Outstanding
The Service Test is Rated:	High Satisfactory

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness to the AAs credit needs.
- The geographic distribution of loans reflects good penetration throughout the AAs.
- The distribution of loans among individuals of different income levels and businesses of different revenue sizes is adequate.
- Comerica is a leader in making CD loans.
- The bank has a good record of serving the credit needs of low-income individuals and areas as well as very small businesses.
- The bank makes use of innovative and/or flexible lending practices in serving AAs' needs.
- Comerica is often in a leadership position given its excellent level of qualified CD investments and grants.
- The bank makes occasional use of innovative and/or complex investments to support CD initiatives.
- Comerica exhibits good responsiveness to credit and CD needs.
- Delivery systems are reasonably accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- Comerica provides a relatively high level of CD services.

## SCOPE OF THE EVALUATION

The scope of the review for the state of California is consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. The time period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

Three of the eight AAs in the state of California were reviewed using full-scope procedures.

- Greater Los Angeles AA
- Salinas MSA AA
- San Jose Metropolitan AA

The remaining five AAs received limited-scope reviews.

- Inland Empire MSA AA
- San Diego MSA AA
- San Francisco Bay Metropolitan AA
- Santa Cruz MSA AA
- Ventura MSA AA

AAs were selected for full-scope reviews based on the strategic importance of the AA, considering volume of lending, number of branches, and percentage of total deposits, as well as the length of time since the AA last received a full-scope review. Overall, approximately 58.8 percent of the bank's lending activity by number of loans, 62.5 percent of the total deposits, and 56.5 percent of total branches within the state of California were evaluated through the full-scope reviews. The bank's performance in the Greater Los Angeles AA was given greater consideration as it is a strategic focus of the institution and represents the majority of the bank's activity in the state. The Salinas MSA AA was given the least consideration based upon the AA's size and the bank's limited presence and activity in the AA relative to other full-scope AAs.

## **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN CALIFORNIA**

The bank delineates eight of its 27 AAs and operates 92 of its 409 branches in the state of California. As of June 30, 2022, the bank had approximately \$25.2 billion in deposits in the state, representing 32.8 percent of total deposits. According to the June 30, 2022, FDIC Summary of Deposits, the bank had a deposit market share of 1.2 percent and ranked 13<sup>th</sup> out of 183 FDIC-insured financial institutions across the state.

Of the 20,205 HMDA-reportable loans and 35,231 small business loans originated and purchased by Comerica during the review period, 7,520 HMDA-reportable loans (37.2 percent) and 7,193 small business loans (20.4 percent) were extended in the California AAs.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's lending test performance in the state of California is High Satisfactory. The lending test conclusions in the Greater Los Angeles MSA and San Jose Metropolitan AAs are considered good, which is consistent with the overall state rating, while the Lending Test conclusion in the Salinas Metropolitan AA is adequate. Overall, Comerica's performance in the AAs receiving limited-scope reviews support the state rating.

### **Lending Activity**

The bank's lending activities in the state of California reflect good responsiveness to the credit needs of its AAs. The bank makes use of innovative and/or flexible lending programs through its participation in numerous industry-recognized, government-guaranteed programs, including the origination of 5,026 SBA loans and 1,266 small business micro loans within the state of California.

As outlined in Table 69, this evaluation considered 14,887 loans totaling \$4.4 billion. The loan products and origination volumes appear consistent with the credit needs of the bank's California AAs. The number of small business and HMDA loans extended by the bank was compared against the number of loans made by aggregate lenders in the area during the review period. The bank ranked 38<sup>th</sup> out of 353 CRA reporters in its California AAs and 53<sup>rd</sup> of 1,035 HMDA reporters.

**Table 69**

<b>Summary of Lending Activity – January 1, 2020 through December 31, 2022 California Assessment Areas</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$000s</b>	<b>%</b>
Home Purchase	304	2.0	211,861	4.8
Refinancing	1,535	10.3	848,692	19.3
Home Improvement	3,675	24.7	833,452	18.9
Multifamily	29	0.2	404,131	9.2
Other Purpose Lines of Credit	1,932	13.0	514,044	11.7
Other Purpose Closed-End/Exempt	45	0.3	122,896	2.8
<b>Total HMDA-Related</b>	<b>7,520</b>	<b>50.5</b>	<b>2,935,076</b>	<b>66.7</b>
<b>Total Small Business</b>	<b>7,193</b>	<b>48.3</b>	<b>1,451,923</b>	<b>33.0</b>
<b>Total Small Farm</b>	<b>174</b>	<b>1.2</b>	<b>14,796</b>	<b>0.3</b>
<b>TOTAL LOANS</b>	<b>14,887</b>	<b>100.0</b>	<b>4,401,795</b>	<b>100.0</b>

### ***Geographic Distribution of Loans***

The overall geographic distribution of lending within the state of California reflects good penetration throughout the bank's AAs. This performance is consistent across the bank's Greater Los Angeles and San Jose Metropolitan AAs, while the geographic distribution of lending in the Salinas Metropolitan AA is adequate.

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's overall lending reflects adequate penetration among individuals of different income levels and businesses of different sizes. This performance is consistent across the bank's Greater Los Angeles, Salinas Metropolitan, and San Jose Metropolitan AAs. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each AA.

### ***Community Development Lending***

The bank is a leader in making CD loans in the state of California. As reflected in Table 70, the bank originated 361 CD loans totaling approximately \$1.9 billion within the state, which comprises 26.8 percent of overall bank-wide CD loan volume by number and 35.0 percent by dollar amount. The level of CD lending was excellent in the Greater Los Angeles MSA AA, adequate in the Salinas MSA AA, and good in the San Jose Metropolitan AA. Additionally, it is noted that approximately 30 percent of the bank's CD lending occurred in the California AAs that received a limited-scope review at this evaluation.

The bank's total California CD loans increased notably since the previous evaluation. Overall, the number of qualified loans grew by 36.7 percent since the previous evaluation, while the dollar amount of CD lending grew by more than 233.3 percent. This growth occurred despite the substantial decrease in loans originated through the SBA's PPP, which made up approximately half of the bank's CD loans during the previous evaluation period.

CD loans originated by the bank during the evaluation period were extended for a variety of purposes, as noted in the table below. Specific details regarding the CD lending can be found in the Conclusions with Respect to Performance Tests section for each AA.

**Table 70**

<b>Community Development Lending California Assessment Areas</b>		
<b>Purpose</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	57	215,347
Community Services	36	97,208
Economic Development	223	1,521,675
Revitalization and Stabilization	45	36,061
<b>Total</b>	<b>361</b>	<b>1,870,291</b>

## INVESTMENT TEST

The bank's performance under the Investment Test in the state of California is Outstanding. The investment test conclusions in the bank's Greater Los Angeles MSA AA are considered excellent, which is consistent with the overall state rating. In the bank's San Jose Metropolitan AA, the bank's performance is good, and in the Salinas MSA AA, the bank's investment test performance is adequate. Generally, the bank's performance in its AAs that received limited-scope reviews is consistent with the overall performance in the state of California.

The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. While Comerica makes occasional use of innovative and/or complex investments, the bank exhibits good responsiveness to the credit and CD needs of its AAs. As illustrated in Table 71, the bank maintains an increased balance of prior period investments, the substantial majority of which are comprised of Low-Income Housing Tax Credit funds, compared to current period investments. While the level of the bank's CD investments and donations to area organizations that support community services for LMI individuals represent a smaller dollar amount, the breadth of impact reflects favorably on the bank's responsiveness to this category of CD needs. In the state of California, the bank made qualifying CD donations to more than 140 distinct community organizations across its delineated AAs, each of which serves a unique subset of individuals and extending the reach of the bank's CD funds.

Details regarding investments and donations in each of the bank's California AAs can be found in the Conclusions with Respect to Performance Tests section for each AA. In addition to the investments made within the bank's delineated AAs, the bank also made several investments in the broader statewide or regional area. These investments included, notably, more than \$5 million worth of deposits in minority-owned financial institutions serving the region.

**Table 71**

<b>Investments, Grants, and Donations California Assessment Areas</b>								
<b>Community Development Purpose</b>	<b>Prior Period Investments<sup>1</sup></b>		<b>Current Investments<sup>2</sup></b>		<b>Donations</b>		<b>Total</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	157	114,910	27	101,200	20	265	204	216,375
Community Services	0	0	0	0	200	2,629	200	2,629
Economic Development	1	19	13	16,748	52	1,327	66	18,094
Revitalization and Stabilization	0	0	0	0	0	0	0	0
<b>Total</b>	<b>158</b>	<b>114,929</b>	<b>40</b>	<b>117,948</b>	<b>272</b>	<b>4,221</b>	<b>470</b>	<b>237,098</b>

<sup>1</sup> Book value of investment

<sup>2</sup> Original market value of investment

## SERVICE TEST

The bank's performance under the Service Test in the state of California is High Satisfactory. While the Service Test conclusion in the Greater Los Angeles MSA is excellent, Comerica's performance in the Salinas MSA and the San Jose Metropolitan AAs are good, which is consistent with the overall state rating. Generally, the bank's performance in its AAs that received limited-scope reviews is consistent with the performance in the full-scope review areas and the state.

### Retail Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in each AA. Of the bank's 92 full-service offices in the state of California, 17 are located in LMI tracts. Additionally, the bank operates 22 of its 108 full-service ATMs in LMI tracts. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals.

Refer to Table 72 below for the distribution of California banking offices and full-service ATMs by income level of geographies.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. The bank's operations and product and service offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Banking Services section of this evaluation.

**Table 72**

Branch and Full-Service ATM Locations California Assessment Areas							
Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	6.2	5.3	4.0	2	2.2	2	1.9
Moderate	25.9	24.4	19.2	15	16.3	20	18.5
Middle	32.9	33.9	31.7	32	34.8	39	36.1
Upper	32.7	35.3	42.9	41	44.6	45	41.7
Unknown	2.3	1.1	2.2	2	2.1	2	1.8
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>92</b>	<b>100.0</b>	<b>108</b>	<b>100.0</b>

### Community Development Services

The bank provides a relatively high level of CD services in its California AAs. This conclusion is consistent across all California AAs. Bank representatives provided 1,199 CD services, totaling 3,880 hours, to 122 unique organizations within the state of California. This represents approximately 17.1 percent of the bank's total CD services, while 14.6 percent of the bank's 7,382 employees are located in California. Details regarding CD services can be found in the respective Conclusions with Respect to Performance Tests section for each AA.

**GREATER LOS ANGELES MSA ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE GREATER LOS ANGELES MSA ASSESSMENT AREA**

- The bank's Greater Los Angeles MSA AA consists of the entirety of the Los Angeles-Long Beach-Anaheim, CA MSA. Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- The AA is made up of 3,112 census tracts, of which 5.7 percent are designated as low-income, 27.5 percent are moderate-income, 29.8 percent are middle-income, 34.4 percent are upper-income, and 2.6 percent are designated as unknown-income.
- Following the 2020 U.S. Census, 183 new census tracts were drawn within the AA, representing a 6.2 percent increase. Additionally, the income level designations of many existing census tracts changed, resulting in a reduction of LMI geographies of 5.1 percent between 2021 and 2022. It is noteworthy that the number of low-income geographies decreased by 33.1 percent.
- The bank operates 36 full-service branches in the AA, including six branches in moderate-income, ten in middle-income, 19 in upper-income census tracts, and one branch in an unknown-income tract.
- According to the June 30, 2022, FDIC Market Share Report, the bank had a 1.3 percent market share, ranking 15<sup>th</sup> out of 109 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 46<sup>th</sup> out of 881 HMDA reporters in the AA with 1,217 HMDA originations and purchases, and 42<sup>nd</sup> out of 286 CRA reporters with 549 CRA small business loans.
- Community contacts identified affordable housing, homelessness, small business lending, and small business financial literacy as credit and CD needs in the AA.

**Table 73**

<b>Population Change</b>			
<b>Assessment Area: Greater Los Angeles MSA</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percentage Change</b>
Greater Los Angeles MSA AA	13,154,457	13,200,998	0.4
Los Angeles-Long Beach-Glendale, CA MD <i>Los Angeles County</i>	10,038,388	10,014,009	-0.2
Anaheim-Santa Ana-Irvine, CA MD <i>Orange County</i>	3,116,069	3,186,989	2.3
California	38,421,464	39,538,223	2.9
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- The AA population between 2015 and 2020 remain similar despite the overall growth noted in the state, at 2.9 percent.
- These population trends have continued, with the U.S. Census Bureau estimating a decline exceeding 3.0 percent in the city of Los Angeles of between 2020 and 2023.

**Table 74**

<b>Median Family Income Change</b>			
<b>Assessment Area: Greater Los Angeles MSA</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percentage Change</b>
Greater Los Angeles MSA AA	74,040	85,544	15.5
Los Angeles-Long Beach-Glendale, CA MD <i>Los Angeles County</i>	68,508	80,317	17.2
Anaheim-Santa Ana-Irvine, CA MD <i>Orange County</i>	93,965	106,451	13.3
California	77,267	89,798	16.2
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey			
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- The AA MFI grew at a rate comparable to the state, with Orange County reflecting an MFI greater than \$100,000 in 2020.
- Los Angeles County has the lowest MFI between 2015 and 2020; however, it reported the largest growth at 17.2 percent.

**Table 75**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Greater Los Angeles MSA</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Greater Los Angeles MSA AA	81.1	47.1	52.7	66.7	47.5	32.7
Los Angeles-Long Beach-Glendale, CA MD <i>Los Angeles County</i>	80.9	45.4	52.8	68.0	48.0	33.7
Anaheim-Santa Ana-Irvine, CA MD <i>Orange County</i>	82.4	53.3	51.9	63.3	46.1	30.0
California	80.6	50.9	50.0	65.9	46.8	29.5
Cost burden is housing cost that equals 30 percent or more of household income.						
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

- Overall, the cost burden for homeowners and renters in the AA is higher than the statewide rates for all LMI segments other than moderate-income renters, which is comparable. While housing affordability within the AA is a noted problem, this is especially true for low-income renters who face substantially greater burden than homeowners at any other level.
- The AA median housing value is \$641,000 and the median rent is \$1,625. Moreover, 45.7 percent of the housing units in the AA are owner-occupied and 48.1 percent are rental. Conversely, the state of California has more owner-occupied units, at 51.0 percent, and less rental units, at 41.3 percent.
- A community contact indicated that the AA is significantly impacted by homelessness and housing-overcrowding, which occurs when the number of occupants exceeds the capacity of the dwelling. The overcrowding issue, which is attributed to a unique combination of low-wage jobs and high-cost housing, has impacted the AA for over three decades.

**Table 76**

<b>Unemployment Rates</b> <b>Assessment Area: Greater Los Angeles MSA</b>					
<b>Region</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Greater Los Angeles AA	4.2	4.0	11.5	8.2	4.5
Los Angeles-Long Beach-Glendale, CA MD <i>Los Angeles County</i>	4.6	4.4	12.3	8.9	4.9
Anaheim-Santa Ana-Irvine, CA MD <i>Orange County</i>	3.0	2.8	9.0	6.0	3.2
California	4.3	4.1	10.2	7.3	4.2
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- Unemployment rates almost tripled in 2020 due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2022, the AA unemployment rate stabilized and returned to pre-pandemic levels.
- A community contact noted that a substantial number of small businesses within the AA with less than 20 employees were adversely impacted by the COVID-19 pandemic.
- Major employment industries within the AA include healthcare and social assistance, professional and technical services, and retail trade.

Table 77 details selected characteristics of the AA.



**Table 77**

2022 Combined Demographics Assessment Area: Greater Los Angeles MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	178	5.7	142,545	4.8	39,818	27.9	699,400	23.7
Moderate	856	27.5	792,186	26.8	125,169	15.8	486,097	16.5
Middle	926	29.8	905,587	30.7	73,556	8.1	529,772	17.9
Upper	1,071	34.4	1,098,658	37.2	43,367	3.9	1,238,213	41.9
Unknown	81	2.6	14,506	0.5	1,991	13.7	0	0.0
<b>Total AA</b>	<b>3,112</b>	<b>100.0</b>	<b>2,953,482</b>	<b>100.0</b>	<b>283,901</b>	<b>9.6</b>	<b>2,953,482</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	225,201	29,216	1.4	13.0	183,218	81.4	12,767	5.7
Moderate	1,184,434	364,211	17.1	30.7	758,418	64.0	61,805	5.2
Middle	1,388,988	672,356	31.6	48.4	643,632	46.3	73,000	5.3
Upper	1,803,716	1,056,633	49.6	58.6	613,113	34.0	133,970	7.4
Unknown	58,695	7,284	0.3	12.4	44,424	75.7	6,987	11.9
<b>Total AA</b>	<b>4,661,034</b>	<b>2,129,700</b>	<b>100.0</b>	<b>45.7</b>	<b>2,242,805</b>	<b>48.1</b>	<b>288,529</b>	<b>6.2</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	24,565	3.5	22,190	3.4	2,244	4.2	131	2.9
Moderate	137,050	19.3	124,054	19.1	12,320	23.0	676	15.1
Middle	198,587	28.0	181,575	27.9	15,911	29.7	1,101	24.6
Upper	331,000	46.7	308,033	47.3	20,530	38.3	2,437	54.4
Unknown	17,876	2.5	15,185	2.3	2,560	4.8	131	2.9
<b>Total AA</b>	<b>709,078</b>	<b>100.0</b>	<b>651,037</b>	<b>100.0</b>	<b>53,565</b>	<b>100.0</b>	<b>4,476</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.8</b>		<b>7.6</b>		<b>0.6</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	43	1.8	43	1.9	0	0.0	0	0.0
Moderate	368	15.4	345	14.9	23	27.7	0	0.0
Middle	573	24.0	552	23.9	21	25.3	0	0.0
Upper	1,365	57.1	1,326	57.4	39	47.0	0	0.0
Unknown	43	1.8	43	1.9	0	0.0	0	0.0
<b>Total AA</b>	<b>2,392</b>	<b>100.0</b>	<b>2,309</b>	<b>100.0</b>	<b>83</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>96.5</b>		<b>3.5</b>		<b>0.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in the Greater Los Angeles MSA AA is good. For this evaluation, the bank's home mortgage and small business lending carried equal weight, as Comerica extended a similar volume of these products during the review period. Additionally, multifamily, other purpose closed/exempt, and loan purpose not applicable lending products were not evaluated separately from the evaluation of the bank's home mortgage lending.

Details of the bank's 2020 mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix C.

### **Lending Activity**

The bank's lending activity in the Greater Los Angeles MSA AA reflects good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending practices to serve AA credit needs, including LMI borrowers. During the review period, the bank demonstrated flexible lending practices through its participation in numerous industry-recognized, government-guaranteed lending programs. It is noteworthy that Comerica extended \$767 million through 2,252 SBA loans and 588 small business micro loans.

During the review period, the bank originated 3,357 home mortgage and 3,072 small business loans. While the number of home mortgage loans increased year after year between 2020 and 2022, the volume of small business loans decreased by 64.1 percent during the same period of time. The significant reduction in small business lending is primarily due to the conclusion of the SBA's PPP in May 2021 and rising interest rate environment. Loan products and origination volumes are consistent with the credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

### ***Geographic Distribution of Loans***

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared to available demographic and aggregate data. Aggregate lending serves as a better proxy for loan demand than the demographic figure when evaluating the bank's geographic distribution. The bank's geographic distribution of loans reflects good penetration throughout the AA. There were no significant gaps or lapses in contiguous geographies noted.

### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage loans in the AA is adequate. The distribution of 2021 and 2022 home mortgage loans among low-income census tracts is comparable to aggregate data and the percentage of owner-occupied units in these tracts. The penetration of the bank's HMDA lending in moderate-income census tracts is below aggregate data and the demographic figure.

The bank's lending performance for 2020 reflected penetration levels consistent with those of 2021 and 2022, with a distribution of loans to LMI tracts that was comparable to aggregate data but below the demographic figure.

### *Home Purchase Lending*

The geographic distribution of home purchase lending is excellent. The distribution of these loans by number among low-income census tracts was above aggregate data and the demographic figure in 2021 and comparable to both data points in 2022. Distribution of home purchase loans among moderate-income census tracts was significantly above the aggregate data and the demographic figure in 2021 and 2022. The bank originated almost double the percentage of home purchase loans in moderate-income census tracts compared to the performance of aggregate data.

The bank's lending performance by number volume in 2020 reflected penetration levels consistent with 2021 and 2022 performance in LMI census tracts, though performance in 2020 by dollar amount was below the aggregate.

### *Home Refinance Lending*

The geographic distribution of home refinance lending is good. The distribution of 2021 and 2022 home refinance loans among low-income census tracts is comparable to aggregate data and the demographic figure. The penetration level of the bank's 2022 home refinance lending among moderate-income census tracts is comparable to the aggregate data and the demographic figure, while in 2021, the bank performed well above aggregate data. Opportunities for home refinance lending, particularly in low-income census tracts, were limited due to the substantial increase in interest rates in 2022.

### *Home Improvement Lending*

The geographic distribution of home improvement lending is adequate. The distribution of home improvement loans among low-income census tracts is comparable to aggregate data and the demographic figure. The bank's performance improved between 2021 and 2022 but remained close to aggregate performance.

In moderate-income census tracts, the distribution of the bank's 2021 home improvement lending is comparable to aggregate lending performance, but below the demographic figure. The bank's performance declined slightly between 2021 and 2022, with the distribution level of 2022 home improvement loans below both the aggregate data and the demographic figure.

The bank's lending performance for 2020 reflected penetration levels consistent with 2022, with a distribution of loans to low-income tracts that was comparable to aggregate data and a distribution of loans to moderate-income tracts that was below the aggregate.

### *Other Purpose Lines of Credit Lending*

The geographic distribution of other purpose lines of credit is adequate. The 2021 loan distribution among low-income census tracts is comparable to aggregate data but below the percentage of owner-occupied units in these tracts, while the 2022 loan distribution in these tracts is above aggregate data and comparable to the demographic figure. The bank's 2020 performance in low-income tracts is comparable to both aggregate and demographic data.

In moderate-income census tracts, the loan distribution is slightly below the aggregate data, with the bank's performance decreasing in 2022 after being comparable in 2020 and 2021. However, the bank's performance in the three years is below the demographic figure. Greater weight was placed on the bank's performance in comparison to aggregate lenders', as aggregate data is a better indicator of loan demand.

Table 78A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Greater Los Angeles MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	2	4.9	2.8	915	2.1	1.9	1	1.4	1.8	300	0.7	1.3	1.4
Moderate	11	26.8	16.6	3,858	9.1	11.4	26	37.7	17.2	11,589	26.1	11.5	17.1
Middle	7	17.1	26.4	4,640	10.9	20.8	12	17.4	30.7	5,890	13.3	24.1	31.6
Upper	21	51.2	53.1	33,154	77.9	64.8	29	42.0	49.7	25,125	56.6	62.4	49.6
Unknown	0	0.0	1.1	0	0.0	1.1	1	1.4	0.6	1,500	3.4	0.7	0.3
Total	41	100.0	100.0	42,567	100.0	100.0	69	100.0	100.0	44,404	100.0	100.0	100.0
Refinance Loans													
Low	4	2.2	2.4	949	1.2	1.8	0	0.0	1.7	0	0.0	1.3	1.4
Moderate	38	20.7	15.9	11,289	14.1	11.8	31	13.1	17.7	8,661	8.5	12.0	17.1
Middle	34	18.5	27.1	10,900	13.6	22.1	56	23.6	31.2	15,393	15.2	23.2	31.6
Upper	107	58.2	54.3	56,505	70.5	63.8	149	62.9	49.0	74,871	73.8	63.2	49.6
Unknown	1	0.5	0.3	462	0.6	0.4	1	0.4	0.4	2,516	2.5	0.4	0.3
Total	184	100.0	100.0	80,105	100.0	100.0	237	100.0	100.0	101,441	100.0	100.0	100.0
Home Improvement Loans													
Low	3	0.5	1.4	250	0.2	1.3	8	1.3	0.7	1,912	1.4	0.7	1.4
Moderate	58	9.7	11.7	9,559	7.1	10.0	46	7.6	11.1	7,783	5.5	8.2	17.1
Middle	126	21.2	24.8	24,401	18.2	20.7	153	25.2	29.9	32,456	22.9	23.0	31.6
Upper	406	68.2	61.8	98,846	73.8	67.6	397	65.5	58.0	98,967	70.0	67.8	49.6
Unknown	2	0.3	0.3	800	0.6	0.4	2	0.3	0.3	332	0.2	0.4	0.3
Total	595	100.0	100.0	133,856	100.0	100.0	606	100.0	100.0	141,450	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	15.0	0	0.0	12.7	0	0.0	11.1	0	0.0	8.0	8.8
Moderate	1	25.0	37.2	1,625	29.2	30.1	2	20.0	37.9	26,883	13.8	30.0	30.7
Middle	1	25.0	22.1	1,838	33.0	27.0	4	40.0	24.8	79,014	40.4	27.7	27.1
Upper	2	50.0	25.0	2,110	37.9	29.2	2	20.0	24.0	76,580	39.2	32.0	30.5
Unknown	0	0.0	0.6	0	0.0	1.1	2	20.0	2.1	13,016	6.7	2.3	2.9
Total	4	100.0	100.0	5,573	100.0	100.0	10	100.0	100.0	195,493	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	12	1.0	2.6	2,720	0.7	2.5	13	1.1	1.8	3,102	0.5	2.0	1.4
Moderate	133	11.5	16.1	30,044	8.2	12.7	121	9.9	16.9	59,896	10.2	13.7	17.1
Middle	238	20.6	26.7	57,103	15.6	21.9	288	23.7	30.5	149,399	25.4	23.7	31.6
Upper	770	66.6	54.1	273,964	75.0	62.4	788	64.7	50.3	357,813	60.8	59.7	49.6
Unknown	3	0.3	0.5	1,262	0.3	0.6	7	0.6	0.5	17,864	3.0	0.8	0.3
Total	1,156	100.0	100.0	365,093	100.0	100.0	1,217	100.0	100.0	588,074	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table 78B**

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Greater Los Angeles MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	3	0.9	1.0	606	0.8	0.6	4	1.4	0.7	890	0.9	0.4	1.4
Moderate	25	7.9	8.5	3,713	4.8	5.5	15	5.2	9.9	4,333	4.6	5.9	17.1
Middle	69	21.7	21.3	14,324	18.6	15.0	63	21.7	27.5	16,646	17.6	19.3	31.6
Upper	221	69.5	68.9	58,284	75.8	78.4	207	71.4	61.8	72,115	76.3	74.1	49.6
Unknown	0	0.0	0.3	0	0.0	0.4	1	0.3	0.2	500	0.5	0.2	0.3
Total	318	100.0	100.0	76,927	100.0	100.0	290	100.0	100.0	94,484	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.7	0	0.0	0.6	0	0.0	0.7	0	0.0	0.3	1.4
Moderate	0	0.0	12.3	0	0.0	4.3	1	20.0	12.4	647	6.0	3.9	17.1
Middle	1	7.1	21.8	1,000	3.8	9.0	0	0.0	25.1	0	0.0	9.4	31.6
Upper	13	92.9	63.8	25,065	96.2	85.7	4	80.0	61.3	10,155	94.0	85.9	49.6
Unknown	0	0.0	0.4	0	0.0	0.3	0	0.0	0.4	0	0.0	0.5	0.3
Total	14	100.0	100.0	26,065	100.0	100.0	5	100.0	100.0	10,802	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	5.7	0	0.0	4.2	0	0.0	2.9	0	0.0	1.8	1.4
Moderate	0	0.0	29.3	0	0.0	20.7	0	0.0	31.0	0	0.0	41.6	17.1
Middle	0	0.0	31.6	0	0.0	35.1	0	0.0	36.3	0	0.0	27.4	31.6
Upper	0	0.0	33.3	0	0.0	39.8	0	0.0	29.6	0	0.0	29.1	49.6
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.0	0.3
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the Greater Los Angeles MSA AA. The distribution of 2022 small business loans among LMI census tracts are above aggregate data and the percentage of businesses located in these tracts. While the 2021 lending in low-income census tracts mirrors the 2022 performance, the lending in moderate-income census tracts is comparable to aggregate data and the demographic figure.

The bank's lending performance for 2020 reflected penetration levels that were below 2021 and 2022 performance, with distribution among low-income census tracts comparable to aggregate data and the demographic figure, and distribution among moderate-income census tracts below both metrics. The improvement in the bank's performance in LMI geographies in 2021 and 2022 is attributed to Comerica's strategic focus on leveraging its commercial lending expertise to meet the needs of small businesses in the AA even through interest rates hikes.

**Table 79**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Greater Los Angeles MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	70	7.1	4.8	15,050	7.2	5.4	27	4.9	3.3	5,527	3.9	3.9	3.5
Moderate	163	16.4	19.9	36,739	17.7	20.6	134	24.4	19.9	31,190	22.0	21.1	19.3
Middle	248	25.0	25.4	60,353	29.0	27.0	186	33.9	28.5	47,400	33.4	28.2	28.0
Upper	482	48.6	48.1	88,950	42.8	44.2	181	33.0	45.9	51,018	36.0	43.3	46.7
Unknown	29	2.9	1.5	6,836	3.3	2.7	21	3.8	2.2	6,610	4.7	3.4	2.5
Total	992	100.0	100.0	207,928	100.0	100.0	549	100.0	100.0	141,745	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's distribution of lending to borrowers reflects an adequate penetration among individuals of different income levels and businesses of different sizes. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

#### ***Residential Real Estate (HMDA) Lending***

Home mortgage lending by borrower income in the Greater Los Angeles MSA AA is adequate. The bank's 2021 and 2022 lending to LMI borrowers is slightly below aggregate data and well below the demographic figure. The bank's lending performance in 2020 is consistent with that of 2021 and 2022.

The bank's performance decreased slightly in 2022, coinciding with hikes in interest rates which made mortgage loans more expensive. Additionally, 2022 median housing values were substantially higher than the national median values, further exacerbating difficulties faced by lower-income borrowers in qualifying for mortgage loans. As a result, neither then bank's performance nor aggregate data aligns with the demographic figures.

**Table 80A**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Greater Los Angeles MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	1.9	0	0.0	1.2	1	1.4	1.4	772	1.7	1.0	23.7
Moderate	3	7.3	4.3	627	1.5	1.9	2	2.9	3.6	1,128	2.5	1.4	16.5
Middle	5	12.2	13.6	1,826	4.3	8.3	12	17.4	12.0	4,483	10.1	6.8	17.9
Upper	28	68.3	63.5	21,432	50.3	72.0	53	76.8	63.4	36,521	82.2	71.0	41.9
Unknown	5	12.2	16.8	18,682	43.9	16.7	1	1.4	19.6	1,500	3.4	19.8	0.0
Total	41	100.0	100.0	42,567	100.0	100.0	69	100.0	100.0	44,404	100.0	100.0	100.0
Refinance Loans													
Low	6	3.3	3.4	1,282	1.6	2.1	3	1.3	7.6	451	0.4	5.2	23.7
Moderate	20	10.9	9.0	4,192	5.2	5.3	15	6.3	11.4	4,124	4.1	6.1	16.5
Middle	22	12.0	17.8	6,256	7.8	13.2	29	12.2	18.3	6,766	6.7	12.2	17.9
Upper	130	70.7	53.2	55,971	69.9	62.7	181	76.4	47.0	69,716	68.7	57.6	41.9
Unknown	6	3.3	16.5	12,404	15.5	16.8	9	3.8	15.7	20,384	20.1	18.9	0.0
Total	184	100.0	100.0	80,105	100.0	100.0	237	100.0	100.0	101,441	100.0	100.0	100.0
Home Improvement Loans													
Low	3	0.5	4.5	301	0.2	3.8	5	0.8	2.5	375	0.3	2.6	23.7
Moderate	13	2.2	5.9	1,196	0.9	4.2	17	2.8	6.6	2,219	1.6	3.7	16.5
Middle	58	9.7	14.2	7,790	5.8	10.7	65	10.7	16.7	9,642	6.8	10.8	17.9
Upper	513	86.2	69.0	119,649	89.4	69.5	511	84.3	68.4	126,954	89.8	74.0	41.9
Unknown	8	1.3	6.5	4,920	3.7	11.9	8	1.3	5.8	2,260	1.6	8.9	0.0
Total	595	100.0	100.0	133,856	100.0	100.0	606	100.0	100.0	141,450	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	13	1.1	3.1	4,949	1.4	1.9	12	1.0	4.4	1,962	0.5	2.8	23.7
Moderate	44	3.8	7.8	7,790	2.2	4.2	40	3.3	7.4	8,408	2.1	3.4	16.5
Middle	121	10.5	16.6	20,990	5.8	11.5	123	10.2	15.3	23,983	6.1	9.0	17.9
Upper	952	82.6	55.9	286,085	79.6	65.4	1,006	83.3	56.6	307,994	78.5	65.5	41.9
Unknown	22	1.9	16.4	39,706	11.0	16.9	26	2.2	16.3	50,234	12.8	19.2	0.0
Total	1,152	100.0	100.0	359,520	100.0	100.0	1,207	100.0	100.0	392,581	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													



Table 80B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Greater Los Angeles MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	3	0.9	4.0	566	0.7	4.7	3	1.0	2.4	364	0.4	2.7	23.7
Moderate	7	2.2	4.1	775	1.0	2.3	6	2.1	5.1	937	1.0	2.4	16.5
Middle	36	11.3	11.3	5,118	6.7	5.9	17	5.9	14.7	3,092	3.3	7.6	17.9
Upper	270	84.9	73.7	68,343	88.8	76.5	258	89.0	68.2	72,076	76.3	75.5	41.9
Unknown	2	0.6	7.0	2,125	2.8	10.6	6	2.1	9.5	18,015	19.1	11.9	0.0
Total	318	100.0	100.0	76,927	100.0	100.0	290	100.0	100.0	94,484	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	7.1	5.4	2,800	10.7	2.5	0	0.0	6.5	0	0.0	3.3	23.7
Moderate	1	7.1	7.8	1,000	3.8	2.3	0	0.0	7.4	0	0.0	2.3	16.5
Middle	0	0.0	12.5	0	0.0	5.7	0	0.0	13.2	0	0.0	3.4	17.9
Upper	11	78.6	62.2	20,690	79.4	67.5	3	60.0	58.9	2,727	25.2	67.0	41.9
Unknown	1	7.1	12.1	1,575	6.0	22.0	2	40.0	13.9	8,075	74.8	24.1	0.0
Total	14	100.0	100.0	26,065	100.0	100.0	5	100.0	100.0	10,802	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	23.7
Moderate	0	0.0	0.5	0	0.0	0.1	0	0.0	0.4	0	0.0	0.2	16.5
Middle	0	0.0	0.3	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	17.9
Upper	0	0.0	0.7	0	0.0	0.3	0	0.0	0.2	0	0.0	0.0	41.9
Unknown	0	0.0	98.3	0	0.0	99.4	0	0.0	99.2	0	0.0	99.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

Comerica's borrower distribution of small business loans to businesses of different revenue size is adequate. The 2021 and 2022 loan distribution to businesses with annual revenues of \$1 million or less by volume of originations is below the aggregate data and significantly below the percentage of small businesses in the AA. Though the percentage of originations to small businesses in 2021 was below aggregate, the dollar amount of loans was comparable to aggregate data, which is reflective of Comerica's willingness to lend larger sums to small businesses.

The bank's lending performance in 2020 reflected penetrations levels greater than 2021 and 2022, originating a larger portion to businesses with revenues of \$1 million or less than aggregate lenders. Comerica's originations of small business loans decline year after year between 2020 and 2022, as well as the volume of originations to borrowers with unknown revenue. The decline in small business loan originations is partly attributed to the rise of interest rates.

**Table 81**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Greater Los Angeles MSA													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	368	37.1	45.3	51,015	24.5	23.6	168	30.6	51.9	24,722	17.4	32.6	91.8
Over \$1 Million	361	36.4		125,437	60.3		288	52.5		101,296	71.5		7.6
Revenue Unknown	263	26.5		31,476	15.1		93	16.9		15,727	11.1		0.6
Total	992	100.0		207,928	100.0		549	100.0		141,745	100.0		100.0
By Loan Size													
\$100,000 or Less	520	52.4	93.8	22,432	10.8	41.5	236	43.0	96.2	12,508	8.8	51.1	
\$100,001 - \$250,000	225	22.7	3.6	40,441	19.4	17.2	140	25.5	2.2	28,167	19.9	14.0	
\$250,001 - \$1 Million	247	24.9	2.6	145,055	69.8	41.3	173	31.5	1.6	101,070	71.3	34.9	
Total	992	100.0	100.0	207,928	100.0	100.0	549	100.0	100.0	141,745	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	238	64.7		9,689	19.0		105	62.5		4,764	19.3		
\$100,001 - \$250,000	83	22.6		14,328	28.1		36	21.4		7,240	29.3		
\$250,001 - \$1 Million	47	12.8		26,998	52.9		27	16.1		12,718	51.4		
Total	368	100.0		51,015	100.0		168	100.0		24,722	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

## Community Development Lending

The bank is a leader in making CD loans in the AA. During the review period, Comerica originated 166 CD loans totaling \$1.1 billion in the Greater Los Angeles MSA AA, making up 12.3 percent of bank-wide CD loan volume by number and 19.9 percent by dollar amount. The number and dollar amount of CD loans originated in the AA increased significantly by 45.6 percent and 330.0 percent, respectively, since the previous evaluation. Despite the substantial decrease in loans originated through the SBA's PPP since the prior evaluation, this substantive increase in number and dollar amount is reflective of the bank's focus on identifying CD opportunities and being responsive through qualified activities.

The largest portion of the bank's CD lending in the AA is comprised of loans that promote economic development by financing small businesses and supporting permanent job creation, retention, or improvement for LMI persons or in LMI geographies. Examples of the bank's CD lending activities that are responsive to the AA credit needs include:

- A \$60 million line of credit to an apparel manufacturer, providing for the retention and improvement of more than 300 LMI jobs.
- A \$25 million line of credit to the largest after-school program in southern California, which delivers nationally recognized expanded learning and school improvement programs through more than 400 schools to over 200,000 students, 80 percent of which are LMI.
- A \$17 million loan for the construction of 53 studio apartments serving special needs, homeless veterans, and chronically homeless individuals. The program serves low-income individuals, earning less than 30 percent of the area median income, providing a full range of supportive services including employment training, educational services, and

transportation. This loan was originated in conjunction with a LIHTC investment provided by the bank, increasing the overall financial commitment. This loan particularly reflects favorably on the bank, as community contacts noted housing over-crowding and housing affordability as a significant need in the AA.

- Twenty-five loans totaling \$20.9 million originated through the SBA's PPP in response to the ongoing effects of the COVID-19 pandemic, which continued to impact the nation during the early portion of the review period for this evaluation.

**Table 82**

<b>Community Development Lending</b>		
<b>Assessment Area: Greater Los Angeles MSA</b>		
<b>Purpose</b>	<b>#</b>	<b>\$000s</b>
Affordable Housing	34	115,123
Community Services	3	27,768
Economic Development	104	898,231
Revitalization and Stabilization	25	20,914
<b>Total</b>	<b>166</b>	<b>1,062,036</b>

## INVESTMENT TEST

Comerica's performance under the Investment Test in the Greater Los Angeles MSA AA is excellent. The bank has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors, which often positions it as a leader in the AA. Since the prior evaluation, the dollar amount of CD investments and grants made in the AA has increased by 30.4 percent despite the number of individual investments and grants decreasing by 43.4 percent. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to the AA credit and CD needs.

Table 83 illustrates the breakdown of the bank's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the current evaluation period, and CD donations made since the previous evaluation. Examples of CD investment and donation activities include:

- A \$2 million investment in a small business investment company, with funds targeted to serve low-income communities within the bank's Greater Los Angeles MSA AA, as well as women- and minority-owned small businesses. This investment reflects favorably on the bank, as a community contact noted a need for financial institutions to invest in intermediaries who extend loans to eligible small businesses.
- A \$500,000 investment in a business development center serving the AA through flexible business solutions including targeted education and small business loan programs.
- A \$7.5 million LIHTC investment in the construction of 53 studio apartments serving special needs, homeless veterans and chronically homeless individuals, a project for which the bank also provided a \$17 million loan.
- Three recurring donations totaling \$300,000 to a local organization's Emergency Economic Fund and Workforce Emergency Response Fund. The economic fund provides food vouchers, housing support, and technology to the most vulnerable AA families, while the workforce fund provides direct training to low-income workers who were negatively impacted by the COVID-19 pandemic.

**Table 83**

Investment, Grants, and Donations Assessment Area: Greater Los Angeles MSA								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	38	33,017	8	35,210	9	90	55	68,317
Community Services	0	0	0	0	104	1,431	104	1,431
Economic Development	1	19	6	8,829	27	766	34	9,614
Revitalization and Stabilization	0	0	0	0	0	0	0	0
<b>Total</b>	<b>39</b>	<b>33,036</b>	<b>14</b>	<b>44,039</b>	<b>140</b>	<b>2,287</b>	<b>193</b>	<b>79,362</b>
<sup>1</sup> Book value of investment								
<sup>2</sup> Original market value of investment								

## SERVICE TEST

The bank's Service Test performance is excellent.

### Retail Services

Comerica's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the AA. The distribution of the bank's 36 branch offices and 41 ATMs as of April 1, 2023, was compared to the distribution of the population and businesses among the tract categories within the AA. Table 84 summarizes the bank's retail locations in Greater Los Angeles MSA AA.

**Table 84**

Branch and Full-Service ATM Locations Assessment Area: Greater Los Angeles MSA							
Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	5.7	4.9	3.5	0	0.0	0	0.0
Moderate	27.5	25.7	19.3	6	16.7	8	19.5
Middle	29.8	30.1	28.0	10	27.8	13	31.7
Upper	34.4	38.2	46.7	19	52.8	19	46.3
Unknown	2.6	1.2	2.5	1	2.8	1	2.4
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>

The bank closed two branches in the AA: one in a middle-income census tract and one in an unknown-income geography. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations are tailored to the convenience and needs of the AA, particularly in LMI geographies or to LMI individuals.

Products and services are uniformly offered in all branches within the AA. Hours of operation for AA branches vary slightly, based upon transaction volume and demographic needs. Of the six branches located in moderate income census tracts, four offer extended and/or weekend hours of operation to better serve the community. Branches in middle- and upper-income census tracts

follow a similar pattern, with the majority offering extended hours and approximately half offering weekend hours.

### ***Community Development Services***

The bank is a leader in providing CD services in the Greater Los Angeles MSA AA. The bank's employees served in various capacities, including boards of directors and as trustees, for 64 organizations offering CD services targeted toward LMI individuals. This represents a broadening of the bank's approach to providing CD services in the AA, as the bank provided services to more than twice as many community organizations than during the previous evaluation. During the review period, bank employees provided 723 CD services totaling 2,179 hours. Examples of services performed by bank employees include:

- Several bank representatives provided services to an organization which provides life skills training to LMI individuals with developmental disabilities. The organization provides job development and college preparation programs as well as providing access to affordable housing.
- Bank employees provided a significant volume of financial education to LMI individuals through partnerships with several organizations, including a local community health network serving underrepresented individuals, and an organization focused on serving women who grew up in foster care, have been homeless, or escaped from domestic violence or trafficking.
- A bank employee served on the board of directors of an organization with an express mission of improving California's economic future by teaching economics and financial literacy to Title 1 students. The Every Student Succeeds Act defines Title 1 schools, as those that provide financial assistance to children who are from low-income families to help ensure that all children meet academic standards.

**SALINAS MSA ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SALINAS MSA ASSESSMENT AREA**

The bank's Salinas MSA AA consists of the entirety of Monterey County, which is coterminous with the Salinas, CA MSA. See Appendix A for an AA map and Appendix B for additional demographic data.

- The AA is made up of 104 census tracts, of which 3.9 percent are designated as low-income, 25.0 percent are moderate-income, 32.7 percent are middle-income, 34.6 percent are upper-income, and 3.8 percent are designated as unknown-income.
- Following the 2020 U.S. Census, ten new census tracts were drawn within the AA, representing a 10.6 percent increase. In addition, the number of geographies designated as LMI increased by 20.0 percent.
- The bank operates three full-service branches in the AA, including one branch in a moderate-income census tract and two in upper-income tracts.
- According to the June 30, 2022, FDIC Market Share Report, the bank had a 2.7 percent market share, ranking 8<sup>th</sup> out of 14 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 32<sup>nd</sup> out of 388 HMDA reporters in the AA with 51 HMDA originations and purchases, and 31<sup>st</sup> out of 88 CRA reporters with 18 CRA small business and small farm loans.
- Community contacts identified the following as credit and CD needs in the AA: financial literacy and resources for the underbanked and unbanked communities (particularly in rural areas); capital for small businesses; affordable housing for low-income individuals and families; financial institutions' participation in loan guarantee programs that benefit small businesses; and volunteering on the loan committees of CD organizations. A community contact indicated that the AA has a significant shortage of affordable housing for low-income individuals and families due to population growth. Additionally, the contact stated that low paying wages hinder homeownership. Lastly, the community noted that financial institutions have limited opportunities to participate in CD programs and financing of housing projects given the county's concerns with steering.

**Table 85**

<b>Population Change Assessment Area: Salinas MSA</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percentage Change</b>
Salinas MSA AA	428,441	439,035	2.5
California	38,421,464	39,538,223	2.9
<i>Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey</i>			

- Population between 2015 and 2020 grew 2.5 percent in the AA, which is comparable to the state population growth rate.
- The Salinas MSA AA consists of a small population compared to larger cities within the state of California.

**Table 86**

<b>Median Family Income Change Assessment Area: Salinas MSA</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percentage Change</b>
Salinas MSA AA	68,222	83,052	21.7
California	77,267	89,798	16.2
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

- The AA's MFI grew significantly, at 21.7 percent, which is higher than the 16.2 percent state level change.
- According to the 2022 FFIEC Census data, 13,242 households out of the 128,003 total households in the AA live below the poverty level. Additionally, 28.8 percent of households within the AA are LMI.
- A community contact characterized the families in the local community as either very wealthy or very poor.

**Table 87**

<b>Housing Cost Burden Assessment Area: Salinas MSA</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Salinas MSA AA	82.6	55.2	50.7	67.3	48.0	30.3
California	80.6	50.9	50.0	65.9	46.8	29.5
<i>Cost burden is housing cost that equals 30 percent or more of household income. Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy</i>						

- The AA housing cost burden is comparable to the state of California. The housing cost burden has a greater impact on renters than homeowners.
- The AA lacks affordable housing, as noted by the community contact, with the median housing value being \$559,000. The median housing value for the state of California, at \$539,000, is slightly more affordable but still challenging for LMI families.
- The AA's median age of housing stock is 53 years, which is slightly older than the median age of housing stock for state of California, at 45 years.
- A community contact noted a significant shortage of affordable housing for LMI due to population growth in the AA. Additionally, housing affordability is difficult for LMI to achieve due to low wage paying jobs and high housing costs.

**Table 88**

<b>Unemployment Rates Assessment Area: Salinas MSA</b>					
<b>Region</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Salinas MSA AA	6.4	6.4	11.2	8.3	6.0
California	4.3	4.1	10.2	7.3	4.2
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- During each of the most recent five years, the AA unemployment rate has been consistently higher than that of the state of California.
- Unemployment rates almost doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2022, the AA unemployment rate stabilized and returned to pre-pandemic levels.
- Employment within the AA is dominated by agriculture. Other major employment industries within the AA include accommodation and food services and healthcare and social assistance. A community contact noted that tourism also drives the local AA economy.
- A community contact indicated that the Salinas MSA AA economy was impacted by the COVID-19 pandemic and storms that occurred in late 2022. The storms caused flooding, mud slides, and widespread power outages that adversely impacted crops and employment.

Table 89 details selected characteristics of the AA.



Table 89

2022 Combined Demographics Assessment Area: Salinas MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	3.8	4,381	4.7	880	20.1	20,244	21.8
Moderate	26	25.0	24,191	26.0	3,520	14.6	16,285	17.5
Middle	34	32.7	34,272	36.9	2,669	7.8	19,082	20.5
Upper	36	34.6	30,100	32.4	1,127	3.7	37,337	40.2
Unknown	4	3.8	4	0.0	0	0.0	0	0.0
Total AA	104	100.0	92,948	100.0	8,196	8.8	92,948	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,375	1,109	1.7	20.6	3,962	73.7	304	5.7
Moderate	33,035	12,410	18.7	37.6	18,714	56.6	1,911	5.8
Middle	48,998	22,718	34.2	46.4	23,138	47.2	3,142	6.4
Upper	54,498	30,105	45.4	55.2	15,843	29.1	8,550	15.7
Unknown	4	4	0.0	100.0	0	0.0	0	0.0
Total AA	141,910	66,346	100.0	46.8	61,657	43.4	13,907	9.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	399	2.4	383	2.5	15	1.3	1	1.1
Moderate	2,915	17.6	2,695	17.6	205	18.1	15	15.8
Middle	5,168	31.2	4,737	30.9	395	34.8	36	37.9
Upper	8,026	48.4	7,482	48.8	503	44.3	41	43.2
Unknown	69	0.4	50	0.3	17	1.5	2	2.1
Total AA	16,577	100.0	15,347	100.0	1,135	100.0	95	100.0
Percentage of Total Businesses:				92.6		6.8		0.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	14	2.4	8	1.7	6	4.9	0	0.0
Moderate	119	20.5	85	18.6	34	27.9	0	0.0
Middle	270	46.6	213	46.5	57	46.7	0	0.0
Upper	173	29.8	151	33.0	22	18.0	0	0.0
Unknown	4	0.7	1	0.2	3	2.5	0	0.0
Total AA	580	100.0	458	100.0	122	100.0	0	0.0
Percentage of Total Farms:				79.0		21.0		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

Comerica's Lending Test performance in the Salinas MSA AA is adequate. For this evaluation, the bank's home mortgage and small business lending carried comparable weight, as they represented similar lending volume in the AA. Additionally, the volume of home mortgage sub products was insufficient to allow for a separate analysis.

Details of the bank's 2020 mortgage and small business lending and information regarding aggregate lenders' performance can be found in Appendix C.

### **Lending Activity**

The bank's lending activity in the Salinas MSA AA reflects good responsiveness to AA credit needs. Comerica makes use of innovative and/or flexible lending practices to meet such needs. During the review period, the bank demonstrated flexible lending practices through its participation in numerous industry-recognized, government-guaranteed lending programs, including 117 SBA loan originations and 15 small business micro loans.

Comerica originated 137 home mortgage and 139 small business loans in the AA between January 1, 2020, and December 31, 2022. The number of home mortgage loans slightly increased by 13.3 percent between 2020 and 2022, while the number small business loans decreased by 77.3 percent during the same period of time. The significant decrease in small business lending is primarily due to the conclusion of the SBA's PPP in May 2021 and rising interest rates. Loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

### ***Geographic Distribution of Loans***

The geographic distribution of lending reflects adequate penetration throughout the Salinas MSA AA. The bank's small business and home mortgage lending reflect adequate penetration among geographies of different income levels, especially LMI geographies. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions about Comerica's performance in LMI census tracts. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage lending reflects adequate penetration throughout the Salinas MSA AA. While the bank did not make any home mortgage loans in the AA's low-income census tracts, this is comparable to aggregate data as well as the demographic figure. Distribution of the bank's home mortgage lending among moderate-income census tracts in 2021 is comparable to aggregate data and below the demographic figure. Conversely, Comerica's 2022 lending is below aggregate lending but comparable to the demographic figure.

The bank's 2020 lending performance reflected penetration levels that exceeded Comerica's 2021 performance but was below the one in 2022. Nevertheless, the bank's overall performance was not adversely impacted.

**Table 90A**

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Salinas MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans													
Low	0	0.0	0.8	0	0.0	0.5	0	0.0	1.8	0	0.0	1.2	1.7
Moderate	1	50.0	17.5	81	6.2	12.2	0	0.0	28.1	0	0.0	22.6	18.7
Middle	0	0.0	34.0	0	0.0	26.9	0	0.0	30.4	0	0.0	25.4	34.2
Upper	1	50.0	47.7	1,225	93.8	60.3	3	100.0	39.0	1,059	100.0	50.2	45.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.6	0	0.0	0.7	0.0
Total	2	100.0	100.0	1,306	100.0	100.0	3	100.0	100.0	1,059	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.7	0	0.0	0.4	0	0.0	2.2	0	0.0	1.2	1.7
Moderate	3	15.8	14.1	808	11.2	10.2	3	37.5	18.6	626	26.0	12.2	18.7
Middle	6	31.6	35.9	1,683	23.4	29.3	2	25.0	33.9	1,180	49.1	26.8	34.2
Upper	10	52.6	49.3	4,704	65.4	60.0	3	37.5	45.2	598	24.9	59.8	45.4
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.0
Total	19	100.0	100.0	7,195	100.0	100.0	8	100.0	100.0	2,404	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.3	0	0.0	0.3	0	0.0	1.3	0	0.0	0.5	1.7
Moderate	0	0.0	11.0	0	0.0	7.5	2	9.1	12.6	114	2.8	12.0	18.7
Middle	2	16.7	23.3	206	7.6	15.3	6	27.3	31.9	903	22.2	21.6	34.2
Upper	10	83.3	65.4	2,489	92.4	76.9	14	63.6	54.1	3,047	75.0	65.9	45.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	12	100.0	100.0	2,695	100.0	100.0	22	100.0	100.0	4,064	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	1.6	0	0.0	1.0	0	0.0	14.8	0	0.0	4.5	7.3
Moderate	0	0.0	31.1	0	0.0	32.7	0	0.0	35.2	0	0.0	30.3	31.3
Middle	0	0.0	26.2	0	0.0	15.5	0	0.0	24.1	0	0.0	35.5	32.5
Upper	0	0.0	41.0	0	0.0	50.9	1	100.0	25.9	4,560	100.0	29.6	28.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	4,560	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.7	0	0.0	0.5	0	0.0	2.0	0	0.0	1.3	1.7
Moderate	5	12.2	14.7	977	7.5	11.0	8	15.7	21.6	1,100	7.1	17.8	18.7
Middle	9	22.0	35.0	2,237	17.3	27.6	13	25.5	31.8	3,295	21.3	25.3	34.2
Upper	27	65.9	49.6	9,752	75.2	60.9	30	58.8	44.3	11,064	71.6	55.2	45.4
Unknown	0	0.0	0.0	0	0.0	0.1	0	0.0	0.3	0	0.0	0.3	0.0
Total	41	100.0	100.0	12,966	100.0	100.0	51	100.0	100.0	15,459	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table 90B**

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Salinas MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	0	0.0	0.6	0	0.0	0.2	0	0.0	0.8	0	0.0	0.3	1.7
Moderate	1	12.5	4.0	88	5.0	1.5	3	17.6	8.6	360	10.7	4.9	18.7
Middle	1	12.5	21.3	348	19.7	10.2	5	29.4	32.2	1,212	35.9	17.2	34.2
Upper	6	75.0	74.1	1,334	75.4	88.1	9	52.9	58.4	1,800	53.4	77.6	45.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	1,770	100.0	100.0	17	100.0	100.0	3,372	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.7
Moderate	0	0.0	10.7	0	0.0	2.5	0	0.0	10.1	0	0.0	4.4	18.7
Middle	0	0.0	18.6	0	0.0	5.7	0	0.0	20.2	0	0.0	6.3	34.2
Upper	0	0.0	70.6	0	0.0	91.8	0	0.0	69.7	0	0.0	89.3	45.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.8	0	0.0	2.7	0	0.0	9.4	0	0.0	5.0	1.7
Moderate	0	0.0	20.8	0	0.0	17.8	0	0.0	15.6	0	0.0	11.5	18.7
Middle	0	0.0	41.5	0	0.0	44.0	0	0.0	37.5	0	0.0	38.0	34.2
Upper	0	0.0	34.0	0	0.0	35.5	0	0.0	37.5	0	0.0	45.5	45.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

The geographic distribution of small business loans reflects adequate penetration throughout the AA. The total number of small business loans in LMI census tracts between 2020 and 2022 decreased due to the conclusion of the SBA's PPP and increasing interest rates. Comerica did not extend any small business loans within the AA low-income census tracts in 2022; however, the distribution among moderate-income census tracts is comparable to aggregate and demographic data. In 2021, small business lending in low-income tracts is comparable to aggregate while the distribution of loans among moderate-income tracts is below aggregate data and the demographic figure.

The bank's 2020 lending performance is consistent with 2021. A community contact identified small businesses loans and access to capital as credit and CD needs in the AA. The bank's participation in the SBA's PPP in 2020 and 2021 demonstrates its efforts in meeting the needs of small businesses in the AA.

**Table 91**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Salinas MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	1	2.1	2.7	55	0.7	2.3	0	0.0	2.1	0	0.0	1.8	2.4
Moderate	2	4.3	12.9	1,058	13.9	10.6	3	17.6	18.5	1,110	23.3	16.4	17.6
Middle	12	25.5	31.7	2,499	32.8	35.0	6	35.3	34.1	2,249	47.2	37.1	31.2
Upper	32	68.1	49.1	4,006	52.6	50.7	8	47.1	42.6	1,410	29.6	42.6	48.4
Unknown	0	0.0	0.4	0	0.0	0.5	0	0.0	0.4	0	0.0	0.9	0.4
Total	47	100.0	100.0	7,618	100.0	100.0	17	100.0	100.0	4,769	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

### ***Lending to Borrowers of Different Income Levels***

The bank's borrower distribution of lending reflects an excellent penetration among individuals of different income levels. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

### ***Residential Real Estate (HMDA) Lending***

Comerica's borrower distribution of home mortgage lending in the AA is excellent when compared to the performance of aggregate HMDA lenders. The bank's 2021 and 2022 home mortgage lending among LMI borrowers is greater than the level of penetration reflected by aggregate data though below the demographic figure.

The bank's lending performance in 2020 is consistent with that of 2021 and 2022, with a distribution of loans to LMI borrowers that is materially greater than aggregate.

**Table 92A**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Salinas MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	0.5	0	0.0	0.4	0	0.0	0.4	0	0.0	0.3	21.8
Moderate	0	0.0	3.6	0	0.0	1.7	0	0.0	2.5	0	0.0	1.1	17.5
Middle	0	0.0	14.7	0	0.0	9.2	0	0.0	13.1	0	0.0	8.2	20.5
Upper	2	100.0	66.3	1,306	100.0	74.5	3	100.0	66.8	1,059	100.0	73.1	40.2
Unknown	0	0.0	14.9	0	0.0	14.2	0	0.0	17.1	0	0.0	17.3	0.0
Total	2	100.0	100.0	1,306	100.0	100.0	3	100.0	100.0	1,059	100.0	100.0	100.0
Refinance Loans													
Low	2	10.5	2.8	293	4.1	1.6	0	0.0	7.5	0	0.0	5.6	21.8
Moderate	3	15.8	9.6	570	7.9	5.7	2	25.0	12.1	376	15.6	7.1	17.5
Middle	5	26.3	20.2	1,819	25.3	15.3	1	12.5	21.2	200	8.3	14.4	20.5
Upper	9	47.4	52.2	4,513	62.7	60.6	5	62.5	45.7	1,828	76.0	54.3	40.2
Unknown	0	0.0	15.2	0	0.0	16.8	0	0.0	13.5	0	0.0	18.6	0.0
Total	19	100.0	100.0	7,195	100.0	100.0	8	100.0	100.0	2,404	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.8	0	0.0	1.6	2	9.1	2.1	117	2.9	1.1	21.8
Moderate	1	8.3	5.4	136	5.0	3.2	1	4.5	7.6	31	0.8	4.7	17.5
Middle	0	0.0	14.9	0	0.0	10.2	1	4.5	18.5	158	3.9	12.8	20.5
Upper	11	91.7	75.2	2,559	95.0	81.7	18	81.8	66.5	3,758	92.5	75.2	40.2
Unknown	0	0.0	2.7	0	0.0	3.3	0	0.0	5.2	0	0.0	6.2	0.0
Total	12	100.0	100.0	2,695	100.0	100.0	22	100.0	100.0	4,064	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	7.3	2.3	381	2.9	1.3	3	6.0	3.8	228	2.1	2.5	21.8
Moderate	4	9.8	8.1	706	5.4	4.3	4	8.0	7.3	495	4.5	3.6	17.5
Middle	10	24.4	18.7	2,851	22.0	13.1	4	8.0	16.9	627	5.8	10.4	20.5
Upper	24	58.5	55.9	9,028	69.6	65.1	39	78.0	57.6	9,549	87.6	66.0	40.2
Unknown	0	0.0	15.0	0	0.0	16.2	0	0.0	14.4	0	0.0	17.5	0.0
Total	41	100.0	100.0	12,966	100.0	100.0	50	100.0	100.0	10,899	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

**Table 92B**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Salinas MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	1	12.5	1.7	88	5.0	5.9	1	5.9	1.6	111	3.3	2.6	21.8
Moderate	0	0.0	4.0	0	0.0	1.1	1	5.9	3.3	88	2.6	3.0	17.5
Middle	5	62.5	10.9	1,032	58.3	5.2	2	11.8	11.4	269	8.0	5.6	20.5
Upper	2	25.0	79.9	650	36.7	86.4	13	76.5	75.5	2,904	86.1	84.4	40.2
Unknown	0	0.0	3.4	0	0.0	1.3	0	0.0	8.2	0	0.0	4.4	0.0
Total	8	100.0	100.0	1,770	100.0	100.0	17	100.0	100.0	3,372	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.0	0	0.0	0.9	0	0.0	4.3	0	0.0	2.3	21.8
Moderate	0	0.0	2.8	0	0.0	0.6	0	0.0	7.2	0	0.0	2.5	17.5
Middle	0	0.0	9.6	0	0.0	1.3	0	0.0	11.5	0	0.0	3.6	20.5
Upper	0	0.0	71.8	0	0.0	70.8	0	0.0	66.8	0	0.0	73.6	40.2
Unknown	0	0.0	11.9	0	0.0	26.4	0	0.0	10.1	0	0.0	18.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.8
Moderate	0	0.0	1.9	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.5
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	40.2
Unknown	0	0.0	98.1	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

Comerica's borrower distribution of small business loans by revenue size of businesses is adequate. Aggregate lending serves as a better proxy for loan demand than the total business figure when evaluating the borrower distribution of loans; as such, it carried more weight when rating the bank's performance.

The bank's 2022 small business lending distribution among businesses with annual revenues of \$1 million or less is below aggregate data by number volume and dollar amount. In 2021, the number volume of loans to businesses with revenues of \$1 million or less is comparable while exceeding it by dollar amount. The bank's lending performance in 2020 is consistent with its performance in 2021. Comerica's originations of small business loans decline year after year between 2020 and 2022, as well as the volume of originations to borrowers with unknown revenue, which primarily attributed to the end of the SBA's PPP in May 2021.

**Table 93**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Salinas MSA													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	23	48.9	46.9	2,978	39.1	23.4	8	47.1	54.6	1,529	32.1	36.0	92.6
Over \$1 Million	15	31.9		4,467	58.6		7	41.2		2,710	56.8		6.8
Revenue Unknown	9	19.1		173	2.3		2	11.8		530	11.1		0.6
Total	47	100.0		7,618	100.0		17	100.0		4,769	100.0		100.0
By Loan Size													
\$100,000 or Less	32	68.1	94.6	1,109	14.6	47.2	8	47.1	96.9	436	9.1	57.4	
\$100,001 - \$250,000	7	14.9	3.5	1,421	18.7	19.6	2	11.8	1.9	450	9.4	13.1	
\$250,001 - \$1 Million	8	17.0	1.8	5,088	66.8	33.2	7	41.2	1.2	3,883	81.4	29.5	
Total	47	100.0	100.0	7,618	100.0	100.0	17	100.0	100.0	4,769	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	18	78.3		606	20.3		5	62.5		346	22.6		
\$100,001 - \$250,000	3	13.0		634	21.3		1	12.5		200	13.1		
\$250,001 - \$1 Million	2	8.7		1,738	58.4		2	25.0		983	64.3		
Total	23	100.0		2,978	100.0		8	100.0		1,529	100.0		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

### Community Development Lending

Comerica makes an adequate level of CD loans in the Salinas MSA AA, with the bank originating three CD loans totaling \$26 million. The number of CD loan originations in the Salinas MSA AA decreased by 70.0 percent since the previous evaluation, which is partially attributable to the cessation of the SBA's PPP in May 2021. Despite this decrease in the number volume, the dollar amount of CD loans in the AA increased by 214.3 percent since from the previous evaluation, highlighting the bank's willingness to make sizable CD loans when the opportunity arises. Comerica's CD lending activities considered responsive to credit needs in the AA include:

- A \$25 million line of credit promoting economic development by financing a small business and supporting permanent retention of 126 LMI jobs.
- A \$500,000 line of credit to a local organization providing drug prevention education, residential housing assistance, and outpatient counseling services targeted at LMI individuals and families in the AA.

**Table 94**

Community Development Lending Assessment Area: Salinas MSA		
Purpose	#	\$000s
Affordable Housing	0	0
Community Services	2	1,000
Economic Development	1	25,000
Revitalization and Stabilization	0	0
<b>Total</b>	<b>3</b>	<b>26,000</b>



## INVESTMENT TEST

Comerica's performance under the Investment Test in the Salinas MSA AA is good. The bank has an adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors. The bank's overall number of CD investments and grants decreased since the previous evaluation, though the dollar amount increased substantially. While Comerica makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of the AA, it is rarely in a leadership position.

Table 95 illustrates the bank's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the current evaluation period, and CD donations made since the previous evaluation. The bank's qualified CD investments consist entirely of LIHTC investments, aiming for increasing affordable housing in the AA. On the other hand, the bank's CD donations were granted to organizations that provide community services targeted to LMI individuals and geographies.

**Table 95**

Investment, Grants, and Donations Assessment Area: Salinas MSA								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	3	855	2	22,840	0	0	5	23,695
Community Services	0	0	0	0	5	28	5	28
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
<b>Total</b>	<b>3</b>	<b>855</b>	<b>2</b>	<b>22,840</b>	<b>5</b>	<b>28</b>	<b>10</b>	<b>23,723</b>
<sup>1</sup> Book value of investment								
<sup>2</sup> Original market value of investment								

## SERVICE TEST

The bank's Service Test performance is good.

### **Retail Services**

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the AA. The distribution of the bank's three branch offices and three ATMs as of April 1, 2023, was compared to the distribution of the population and businesses among the tract categories within the AA. Table 96 summarizes the bank's retail locations in the Salinas MSA AA.

**Table 96**

Branch and Full-Service ATM Locations Assessment Area: Salinas MSA							
Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	3.8	4.0	2.4	0	0.0	0	0.0
Moderate	25.0	24.3	17.7	1	33.3	1	33.3
Middle	32.7	35.8	31.7	0	0.0	0	0.0
Upper	34.6	35.9	47.8	2	66.7	2	66.7
Unknown	3.8	0.0	0.4	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>

The bank's branches are located in the northern portion of the AA and are distributed among the cities of Salinas, Monterey, and Prunedale. The largest concentration of LMI census tracts in the AA are in the central and southern portions of Monterey County, where population groups are relatively distant from each other, and a large portion of the geography is a designated state park.

The bank closed one branch in the AA during the review period in an upper-income census tract. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are materially the same throughout the AA.

### ***Community Development Services***

The bank provides a relatively high level of CD services in the Salinas MSA AA. The bank's employees served in various capacities for three organizations offering CD services targeted toward LMI individuals. Overall, bank representatives provided nine CD services totaling 37 hours. Examples of services performed by bank employees include:

- Four bank employees provided financial education to LMI students and their families through two different organizations. In each instance, the education focused on saving, budgeting, and other tools vital for a student to build financial security as they approach graduation and beyond.
- A bank employee serves on the board of director for an organization that provides a wide array of services including alcohol and drug prevention, legal, financial, and clinical counseling, as well as temporary housing for low-income individuals and families.

**SAN JOSE METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SAN JOSE METROPOLITAN ASSESSMENT AREA**

- The San Jose Metropolitan AA consists of the entirety of Santa Clara County, which along with San Benito County (excluded from the AA) comprises the San Jose-Sunnyvale-Santa Clara, CA MSA. See Appendix A for an AA map and Appendix B for additional demographic data.
- The AA is comprised of 408 census tracts, of which 7.1 percent are designated as low-income, 21.8 percent are moderate-income, 40.4 percent are middle-income, 30.4 percent are upper-income, and 0.2 percent are designated as unknown-income.
- Following the 2020 U.S. Census, 36 new census tracts were drawn within the AA, representing a 9.7 percent increase. Geographies designated as LMI increased by 5.9 percent.
- The bank operates 13 full-service branches in the AA, including one branch in a moderate-income census tract, six in middle-income tracts, and six in upper-income tracts.
- According to the June 30, 2022, FDIC Market Share Report, the bank had a 3.3 percent market share, ranking 7<sup>th</sup> out of 42 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 30<sup>th</sup> out of 508 HMDA reporters in the AA with 246 HMDA originations and purchases, and 21<sup>st</sup> out of 149 CRA reporters with 217 CRA small business loans.
- A community contact indicated there is a shortage of affordable housing in the AA, and that there are many opportunities for financial institutions to participate in CD and other financing projects.

**Table 97**

<b>Population Change</b>			
<b>Assessment Area: San Jose Metropolitan</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percentage Change</b>
San Jose Metropolitan AA	1,868,149	1,936,259	3.6
San Jose-Sunnyvale-Santa Clara, CA MSA	1,925,706	2,000,468	3.9
California	38,421,464	39,538,223	2.9
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- Population trends during the review period reflect moderate growth throughout the AA, with a 3.6 percent increase. The AA population grew at a faster rate than that of the state of California, at 2.9 percent.

**Table 98**

<b>Median Family Income Change</b>			
<b>Assessment Area: San Jose Metropolitan</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percentage Change</b>
San Jose Metropolitan AA	118,694	148,065	24.7
San Jose-Sunnyvale-Santa Clara, CA MSA	117,043	145,548	24.4
California	77,267	89,798	16.2
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

- MFI reported throughout the AA exceeded the state MFI growth rate by 8.5 percent. It is noteworthy that the AA MFI between 2015 and 2020 is significantly higher than that of the state.
- The AA population is mostly affluent, with 42.4 percent of AA households considered as upper-income as well as 70.8 percent of the AA census tracts designated as middle- and upper-income geographies. Only 7.0 percent of households in the AA live below the poverty level.

**Table 99**

<b>Housing Cost Burden</b>						
<b>Assessment Area: San Jose Metropolitan</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
San Jose Metropolitan AA	80.0	52.3	42.7	61.8	44.0	26.4
San Jose-Sunnyvale-Santa Clara, CA MSA	79.9	52.3	42.7	62.0	44.5	26.6
California	80.6	50.9	50.0	65.9	46.8	29.5
<i>Cost burden is housing cost that equals 30 percent or more of household income.</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy</i>						

- The AA housing cost burden for low-income renters is a substantially greater than the burden on homeowners at any other level. However, the overall the cost burden for homeowners and renters in the AA is comparable to the statewide figures.
- The AA median housing value is \$1.0 million, with a median age of 52 years. The AA median housing value almost doubles the median housing value for the state of California is, at \$539,000.
- A community contact indicated that there is a shortage of affordable housing in the AA; thus, there are significant needs and opportunities for the development of affordable housing.

**Table 100**

<b>Unemployment Rates</b>					
<b>Assessment Area: San Jose Metropolitan</b>					
<b>Region</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
San Jose Metropolitan AA	2.7	2.5	7.2	4.7	2.7
San Jose-Sunnyvale-Santa Clara, CA MSA	2.7	2.6	7.3	4.8	2.7
California	4.3	4.1	10.2	7.3	4.2
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- In 2020, the unemployment rates almost tripled due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2022, the unemployment rates stabilized and returned to pre-pandemic levels.
- Major employment industries within the AA include professional and technical services, manufacturing, and healthcare and social assistance. The AA serves as a hub for many Fortune 500 technology companies, such as Adobe, PayPal, eBay, and Cisco, which provide significant employment opportunities.
- A community contact noted construction labor shortages in the AA.

Table 101 details selected characteristics of the AA.

Table 101

2022 Combined Demographics								
Assessment Area: San Jose Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	29	7.1	23,164	5.1	2,811	12.1	104,187	22.9
Moderate	89	21.8	86,385	19.0	6,015	7.0	73,264	16.1
Middle	165	40.4	192,933	42.5	6,893	3.6	84,970	18.7
Upper	124	30.4	151,198	33.3	3,914	2.6	191,728	42.2
Unknown	1	0.2	469	0.1	35	7.5	0	0.0
<b>Total AA</b>	<b>408</b>	<b>100.0</b>	<b>454,149</b>	<b>100.0</b>	<b>19,668</b>	<b>4.3</b>	<b>454,149</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	36,159	10,896	3.0	30.1	23,941	66.2	1,322	3.7
Moderate	126,678	56,817	15.9	44.9	64,237	50.7	5,624	4.4
Middle	290,650	149,262	41.7	51.4	126,184	43.4	15,204	5.2
Upper	214,379	140,898	39.3	65.7	62,130	29.0	11,351	5.3
Unknown	1,030	355	0.1	34.5	594	57.7	81	7.9
<b>Total AA</b>	<b>668,896</b>	<b>358,228</b>	<b>100.0</b>	<b>53.6</b>	<b>277,086</b>	<b>41.4</b>	<b>33,582</b>	<b>5.0</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,602	4.9	4,187	4.8	398	5.3	17	3.6
Moderate	17,040	18.0	15,071	17.4	1,908	25.4	61	13.1
Middle	36,852	39.0	33,926	39.2	2,745	36.5	181	38.8
Upper	35,816	37.9	33,154	38.3	2,457	32.7	205	44.0
Unknown	196	0.2	178	0.2	16	0.2	2	0.4
<b>Total AA</b>	<b>94,506</b>	<b>100.0</b>	<b>86,516</b>	<b>100.0</b>	<b>7,524</b>	<b>100.0</b>	<b>466</b>	<b>100.0</b>
Percentage of Total Businesses:				91.5		8.0		0.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	16	3.1	12	2.4	4	16.7	0	0.0
Moderate	98	18.7	90	18.0	8	33.3	0	0.0
Middle	230	43.9	224	44.8	6	25.0	0	0.0
Upper	180	34.4	174	34.8	6	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>524</b>	<b>100.0</b>	<b>500</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				95.4		4.6		0.0
Source: 2022 FFIEC Census Data								
2022 Dun & Bradstreet Data								
2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in the San Jose Metropolitan AA is good. For this evaluation, the bank's small business lending carried more weight, as it is a strategic focus for the bank in the AA and represents the largest volume of lending. Home refinance and home improvement lending, as well as other purpose lines of credit, received individual evaluation, as the other HMDA lending products did not have sufficient volume for a meaningful analysis.

Appendix C provides details of the bank's 2020 mortgage and small business lending, as well as corresponding aggregate data.

#### **Lending Activity**

Comerica's lending activity reflects good responsiveness to AA credit needs, as the bank makes use of innovative and/or flexible lending practices. The bank demonstrated flexible lending practices through its participation in numerous industry-recognized, government-guaranteed lending programs, including, 773 SBA loans and 157 small business micro loans in the AA during the review period.

For this evaluation, the total volume of loans in the AA included 751 home mortgage and 1,187 small business loans originated between January 1, 2020, and December 31, 2022. The loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

#### ***Geographic Distribution of Loans***

The geographic distribution of lending reflects good penetration throughout the AA. The bank's small business lending reflects excellent penetration among geographies of different income levels, especially LMI geographies, while home mortgage lending reflects adequate penetration. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions about the bank's performance in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

#### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage lending reflects adequate penetration throughout the AA. The distribution of 2021 and 2022 home mortgage lending among low-income census tracts is comparable to aggregate data and the demographic figure. Comerica's home mortgage lending in low-income census tracts declined in 2022, which aligns with the performance of aggregate lenders. This drop in performance correlates to lower demand due to the rising interest rate environment, which makes borrowing more expensive.

Lending in moderate-income census tracts is below aggregate lending data in 2021 and 2022. The bank's performance in 2022 is improved but remains slightly below the level of aggregate lending in these tracts as well as the demographic figure.

The bank's 2020 lending performance reflects penetration levels consistent with 2021 and 2022 performance, with penetration levels comparable to aggregate data and the demographic figure.

#### *Home Refinance Lending*

The geographic distribution of home refinance lending is poor. The distribution of 2022 home refinance loans among low-income census tracts is below aggregate data and the demographic figure. The bank's lending in moderate-income census tracts is well below that of aggregate lenders and the demographic figure.

The bank's lending performance for 2021 reflects penetration levels that were greater than that of 2022. Distribution of 2021 home refinance loans among low-income census tracts in the AA is below aggregate lending performance and the demographic figure, while lending in moderate-income census tracts is comparable to aggregate lending but below the demographic figure.

The bank's lending performance in 2020 reflected penetration levels consistent with 2021 and 2022 performance, with a distribution of loans in LMI census tracts below aggregate data.

#### *Home Improvement Lending*

The geographic distribution of home improvement lending is adequate. The distribution of 2021 home improvement loans among low-income census tracts is above aggregate data and the demographic figure. Distribution of 2022 home improvement loans is comparable to aggregate data and the demographic figure, declining slightly from the previous year's performance. In moderate-income census tracts, the bank's 2021 and 2022 home improvement lending performance is comparable to aggregate data and below the demographic figure. Additionally, greater weight was assigned to the bank's performance compared to aggregate lenders', as aggregate data is a better indicator of loan demand.

The bank's 2020 lending performance reflects penetration levels greater than that of 2021 and 2022, with a distribution of loans in LMI census tracts above aggregate data and comparable to the demographic figure.

#### *Other Purpose Lines of Credit Lending*

The geographic distribution of other purpose lines of credit is good. The 2021 distribution of other purpose lines of credit among LMI census tracts is comparable to aggregate data and below the percentage of owner-occupied units in these geographies. Among low-income census tracts, the bank's 2022 distribution matches aggregate data. The bank's performance in moderate-income census tracts is substantially exceeded the performance reflected by aggregate lenders and almost doubled the demographic figure.

The bank's 2020 lending performance reflects penetration levels comparable to that of 2021, with a distribution of lending in LMI census tracts similar to aggregate data and the demographic figure.



Table 102A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: San Jose Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	1	9.1	4.3	500	6.1	2.6	0	0.0	3.4	0	0.0	1.8	3.0
Moderate	2	18.2	17.2	375	4.6	11.5	1	14.3	17.0	270	10.2	11.8	15.9
Middle	4	36.4	42.6	1,298	15.9	36.0	3	42.9	46.1	998	37.8	39.9	41.7
Upper	4	36.4	35.8	5,996	73.4	50.0	3	42.9	33.5	1,375	52.0	46.4	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.1
Total	11	100.0	100.0	8,169	100.0	100.0	7	100.0	100.0	2,643	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.1	0	0.0	2.9	1	1.7	2.7	200	0.6	1.7	3.0
Moderate	4	8.0	14.9	1,274	4.2	11.2	1	1.7	15.8	500	1.5	10.9	15.9
Middle	18	36.0	37.8	7,116	23.3	33.8	31	51.7	40.6	10,626	32.7	34.5	41.7
Upper	28	56.0	43.1	22,109	72.5	52.1	27	45.0	40.7	21,161	65.1	52.9	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.1
Total	50	100.0	100.0	30,499	100.0	100.0	60	100.0	100.0	32,487	100.0	100.0	100.0
Home Improvement Loans													
Low	7	5.2	3.1	1,164	3.2	2.4	1	0.8	1.6	328	0.8	1.0	3.0
Moderate	11	8.1	11.6	1,561	4.2	8.2	9	7.4	11.8	2,313	5.7	8.5	15.9
Middle	50	37.0	37.7	13,555	36.7	33.9	58	47.9	43.5	16,881	41.8	36.9	41.7
Upper	67	49.6	47.5	20,614	55.9	55.4	53	43.8	43.0	20,847	51.6	53.5	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0.1
Total	135	100.0	100.0	36,894	100.0	100.0	121	100.0	100.0	40,369	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	21.6	0	0.0	9.8	0	0.0	15.3	0	0.0	10.3	8.7
Moderate	0	0.0	25.4	0	0.0	38.6	0	0.0	26.7	0	0.0	16.1	20.9
Middle	0	0.0	34.6	0	0.0	30.0	1	100.0	39.1	31,800	100.0	48.4	48.1
Upper	0	0.0	18.4	0	0.0	21.6	0	0.0	17.9	0	0.0	25.1	22.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.0	0	0.0	0.2	0.3
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	31,800	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	10	3.6	4.1	2,094	2.1	2.9	3	1.2	2.9	772	0.6	2.3	3.0
Moderate	23	8.3	15.2	4,538	4.5	11.6	27	11.0	15.7	6,589	5.2	11.5	15.9
Middle	103	37.3	38.6	30,301	30.1	34.1	112	45.5	43.3	66,349	52.2	38.1	41.7
Upper	140	50.7	42.0	63,715	63.3	51.4	104	42.3	37.9	53,364	42.0	48.1	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.1
Total	276	100.0	100.0	100,648	100.0	100.0	246	100.0	100.0	127,074	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table 102B**

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: San Jose Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	2	2.5	2.4	430	1.7	1.7	1	1.8	1.8	244	1.3	1.1	3.0
Moderate	6	7.5	10.3	1,328	5.3	6.4	16	28.6	12.8	3,506	18.9	8.1	15.9
Middle	31	38.8	36.7	8,332	33.2	29.5	19	33.9	41.9	6,044	32.6	33.8	41.7
Upper	41	51.3	50.5	14,996	59.8	62.4	20	35.7	43.6	8,738	47.2	57.0	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Total	80	100.0	100.0	25,086	100.0	100.0	56	100.0	100.0	18,532	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.1	0	0.0	1.6	0	0.0	2.6	0	0.0	0.9	3.0
Moderate	0	0.0	12.1	0	0.0	5.3	0	0.0	14.1	0	0.0	4.8	15.9
Middle	0	0.0	33.3	0	0.0	18.8	0	0.0	40.6	0	0.0	22.6	41.7
Upper	0	0.0	51.6	0	0.0	74.3	1	100.0	42.7	1,243	100.0	71.7	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	1,243	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	8.4	0	0.0	6.3	0	0.0	6.3	0	0.0	0.0	3.0
Moderate	0	0.0	26.1	0	0.0	28.5	0	0.0	21.9	0	0.0	28.8	15.9
Middle	0	0.0	28.6	0	0.0	22.8	0	0.0	56.3	0	0.0	45.8	41.7
Upper	0	0.0	37.0	0	0.0	42.4	0	0.0	15.6	0	0.0	25.4	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the AA. The distribution of 2021 and 2022 small business loans among low-income census tracts is greater than aggregate data as well as the percentage of businesses in these tracts (the demographic figure). The bank's small business lending in moderate-income census tracts is also above aggregate lending and the demographic figure in both years. This performance reflects favorably on the bank's responsiveness to the credit needs of small businesses in the AA.

The bank's 2020 lending performance reflects penetration levels consistent with 2021 and 2022 performance, with the lending levels comparable to aggregate data in low-income census tracts and above aggregate lenders in moderate-income tracts.

**Table 103**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: San Jose Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	36	9.6	6.4	7,445	8.9	6.3	14	6.5	5.8	2,106	3.6	6.5	4.9
Moderate	73	19.5	19.4	17,388	20.8	21.3	55	25.3	18.9	12,924	22.2	21.9	18.0
Middle	145	38.7	37.2	35,701	42.8	36.9	76	35.0	40.1	22,254	38.3	37.9	39.0
Upper	121	32.3	36.4	22,922	27.5	35.3	71	32.7	34.8	20,714	35.7	33.5	37.9
Unknown	0	0.0	0.0	0	0.0	0.0	1	0.5	0.1	100	0.2	0.1	0.2
Total	375	100.0	100.0	83,456	100.0	100.0	217	100.0	100.0	58,098	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's borrower loan distribution reflects an adequate penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers. Greater weight was given to home mortgage lending, as the bank originated more HMDA loans than small business loans in the AA.

#### ***Residential Real Estate (HMDA) Lending***

Home mortgage lending by borrower income in the AA is adequate when compared to demographic characteristics, as well as the performance of aggregate lenders. The dispersion of home mortgage loans in the AA among LMI borrowers was comparable to aggregate data, which is far below the percentage of families in the AA classified as LMI. This is indicative of the demand for home mortgage products among LMI borrowers in the AA, where median home values are more than double the average of the state of California.

The bank's 2020 lending performance is consistent with that of 2021 and 2022, with a distribution of loans to LMI borrowers that is comparable to aggregate data but below the demographic figure.

**Table 104A**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: San Jose Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	1.6	0	0.0	0.6	0	0.0	1.7	0	0.0	0.5	22.9
Moderate	1	9.1	6.9	386	4.7	3.2	0	0.0	7.5	0	0.0	3.0	16.1
Middle	2	18.2	18.6	650	8.0	12.1	2	28.6	16.0	700	26.5	10.0	18.7
Upper	8	72.7	64.2	7,133	87.3	76.6	5	71.4	64.9	1,943	73.5	78.0	42.2
Unknown	0	0.0	8.7	0	0.0	7.6	0	0.0	9.8	0	0.0	8.5	0.0
Total	11	100.0	100.0	8,169	100.0	100.0	7	100.0	100.0	2,643	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	5.6	0	0.0	3.1	1	1.7	10.9	167	0.5	6.6	22.9
Moderate	6	12.0	11.5	1,710	5.6	7.2	6	10.0	12.8	1,060	3.3	7.4	16.1
Middle	7	14.0	21.1	1,173	3.8	16.9	12	20.0	18.1	4,942	15.2	13.9	18.7
Upper	34	68.0	51.7	26,768	87.8	63.1	35	58.3	46.3	16,606	51.1	59.4	42.2
Unknown	3	6.0	10.0	848	2.8	9.7	6	10.0	11.9	9,712	29.9	12.7	0.0
Total	50	100.0	100.0	30,499	100.0	100.0	60	100.0	100.0	32,487	100.0	100.0	100.0
Home Improvement Loans													
Low	4	3.0	5.4	496	1.3	3.6	4	3.3	4.3	645	1.6	2.4	22.9
Moderate	11	8.1	10.4	1,978	5.4	7.4	13	10.7	11.5	2,359	5.8	6.8	16.1
Middle	37	27.4	21.9	7,407	20.1	17.5	19	15.7	21.4	4,642	11.5	15.7	18.7
Upper	82	60.7	58.5	26,549	72.0	65.5	83	68.6	59.3	32,323	80.1	71.6	42.2
Unknown	1	0.7	3.8	464	1.3	6.0	2	1.7	3.6	400	1.0	3.5	0.0
Total	135	100.0	100.0	36,894	100.0	100.0	121	100.0	100.0	40,369	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	6	2.2	4.9	849	0.8	2.4	9	3.7	5.9	1,729	1.8	2.9	22.9
Moderate	21	7.6	10.6	4,510	4.5	6.0	21	8.6	10.2	3,913	4.1	4.8	16.1
Middle	69	25.0	20.6	15,485	15.4	15.4	51	20.8	17.7	13,934	14.6	11.7	18.7
Upper	174	63.0	54.4	78,092	77.6	67.0	153	62.4	56.5	61,803	64.9	70.8	42.2
Unknown	6	2.2	9.6	1,712	1.7	9.1	11	4.5	9.7	13,895	14.6	9.8	0.0
Total	276	100.0	100.0	100,648	100.0	100.0	245	100.0	100.0	95,274	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

**Table 104B**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: San Jose Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	2	2.5	4.4	353	1.4	5.4	4	7.1	4.2	917	4.9	3.2	22.9
Moderate	3	3.8	8.5	436	1.7	4.3	2	3.6	9.9	494	2.7	5.5	16.1
Middle	23	28.8	20.1	6,255	24.9	14.0	18	32.1	21.1	3,650	19.7	15.3	18.7
Upper	50	62.5	61.5	17,642	70.3	68.5	30	53.6	58.4	10,931	59.0	68.8	42.2
Unknown	2	2.5	5.5	400	1.6	7.8	2	3.6	6.4	2,540	13.7	7.2	0.0
Total	80	100.0	100.0	25,086	100.0	100.0	56	100.0	100.0	18,532	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	9.1	0	0.0	4.1	0	0.0	11.3	0	0.0	7.0	22.9
Moderate	0	0.0	12.0	0	0.0	4.8	0	0.0	13.4	0	0.0	4.5	16.1
Middle	0	0.0	16.2	0	0.0	8.4	0	0.0	16.9	0	0.0	7.4	18.7
Upper	0	0.0	56.7	0	0.0	70.4	0	0.0	52.0	0	0.0	70.9	42.2
Unknown	0	0.0	6.0	0	0.0	12.3	1	100.0	6.4	1,243	100.0	10.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	1,243	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.9
Moderate	0	0.0	0.8	0	0.0	0.6	0	0.0	0.0	0	0.0	0.0	16.1
Middle	0	0.0	0.8	0	0.0	0.9	0	0.0	0.0	0	0.0	0.0	18.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	42.2
Unknown	0	0.0	98.3	0	0.0	98.5	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

Comerica's borrower distribution of small business loans by revenue size of businesses is poor. The distribution of 2022 loan originations to businesses with revenues of \$1 million or less is well below the percentage of small businesses in the AA as well as aggregate data by number and dollar amount of originations. The bank's 2021 small business loan distribution is also below the performance of aggregate lenders, though by a smaller margin than 2022.

The bank's 2020 small business lending distribution among businesses with annual revenues of \$1 million or less is slightly above the performance of aggregate lenders. Viewed in conjunction with 2021 and 2022 performance, it is notable that bank's performance declined each year, even as the performance of aggregate lenders improved during the same period of time.

**Table 105**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: San Jose Metropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	119	31.7	48.8	15,657	18.8	25.4	52	24.0	55.6	9,512	16.4	34.0	91.5
Over \$1 Million	153	40.8		50,518	60.5		139	64.1		42,256	72.7		8.0
Revenue Unknown	103	27.5		17,281	20.7		26	12.0		6,330	10.9		0.5
Total	375	100.0		83,456	100.0		217	100.0		58,098	100.0		100.0
By Loan Size													
\$100,000 or Less	192	51.2	93.2	9,191	11.0	40.7	98	45.2	96.5	5,490	9.4	52.9	
\$100,001 - \$250,000	82	21.9	4.1	15,689	18.8	18.5	50	23.0	2.0	10,066	17.3	13.9	
\$250,001 - \$1 Million	101	26.9	2.8	58,576	70.2	40.8	69	31.8	1.5	42,542	73.2	33.2	
Total	375	100.0	100.0	83,456	100.0	100.0	217	100.0	100.0	58,098	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	79	66.4		3,490	22.3		33	63.5		1,758	18.5		
\$100,001 - \$250,000	24	20.2		4,276	27.3		12	23.1		2,306	24.2		
\$250,001 - \$1 Million	16	13.4		7,891	50.4		7	13.5		5,448	57.3		
Total	119	100.0		15,657	100.0		52	100.0		9,512	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Community Development Lending

The bank makes a relatively high level of CD loans in the AA. The bank originated 56 CD loans totaling \$149.2 million, which comprised 4.2 percent of bank-wide CD loans by number volume and 2.8 percent by dollar amount. The number of CD loan originations in the AA decreased by 5.1 percent since the previous evaluation. This is attributable to the substantial decrease in loans originated through the SBA's PPP, which made up 52.5 percent of the bank's CD loans in the AA. Despite the decrease in number of CD loans, the dollar amount increased by 41.9 percent since the previous evaluation, highlighting the bank's willingness to make sizable CD loans when the opportunity arises.

The largest portion of the bank's CD lending in the AA promotes economic development through small business financing and permanent job creation, retention, or improvement impacting LMI persons or LMI geographies. Examples of the bank's CD lending activities that are considered responsive to credit needs in the AA include:

- A \$15 million line of credit to a manufacturer of industrial automation equipment securing 133 LMI jobs in the AA.
- A \$2.4 million loan to a SBA 504 Certified Development Company to support a qualified small business to replace its current rental property by purchasing commercial property.
- A \$17.6 million loan for a 115-unit LIHTC apartment project for households earning less than 80 percent of the area median income. Additionally, 25 percent of the units are set aside for individuals with intellectual and developmental disabilities. Given the affordable

housing shortage in the AA, as indicated by the community contact, the extension of this CD loan reflects favorably on the bank.

- A \$1 million line of credit to a local organization that focuses on building a community free from poverty for LMI children and providing community services, such as educational programs, food and housing assistance.

**Table 106**

<b>Community Development Lending Assessment Area: San Jose Metropolitan</b>		
<b>Purpose</b>	<b>#</b>	<b>\$000s</b>
Affordable Housing	7	50,364
Community Services	15	10,050
Economic Development	26	85,018
Revitalization and Stabilization	8	3,788
<b>Total</b>	<b>56</b>	<b>149,220</b>

## INVESTMENT TEST

Comerica's performance under the Investment Test in the AA is good. The bank has a significant level of qualified CD investments and grants, particularly those not routinely provided by private investors. Comerica is occasionally in a leadership position given its volume of CD investments. The bank's overall number of CD investments and grants decreased since the previous evaluation, though the dollar amount of qualified investments and services increased. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of the AA.

Table 107 illustrates the bank's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, investments purchased during the current evaluation period, and CD donations made since the previous evaluation. The bank's qualified CD investments consist entirely of LIHTC investments that provide affordable housing in the AA, while the bank's CD donations were provided for a wide array of qualified purposes. Examples of donations extended by the bank include:

- Three donations to an organization to support COVID-19 recovery efforts that provide wraparound services to clients who have experienced job loss, loss of healthcare, rent difficulties, and food scarcity. Approximately 98 percent of the organization's clients, including those benefitting directly from the donations, are LMI.
- A \$12,500 donation to a program providing essential financial education to an elementary school where 78 percent of students qualify for free or reduced-price lunches.

**Table 107**

Investment, Grants, and Donations Assessment Area: San Jose Metropolitan								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	23	29,375	4	26,700	1	5	28	56,080
Community Services	0	0	0	0	20	238	20	238
Economic Development	0	0	0	0	1	20	1	20
Revitalization and Stabilization	0	0	0	0	0	0	0	0
<b>Total</b>	<b>23</b>	<b>29,375</b>	<b>4</b>	<b>26,700</b>	<b>22</b>	<b>263</b>	<b>49</b>	<b>56,338</b>
<sup>1</sup> Book value of investment								
<sup>2</sup> Original market value of investment								

## SERVICE TEST

The bank's Service Test performance is good.

### Retail Services

Comerica's delivery systems are accessible throughout the AA geographies and to individuals of different income levels and businesses of different revenue size. The distribution of the bank's 13 branch offices and 15 ATMs as of April 1, 2023, was compared to the distribution of the households and businesses among the AA census tracts by income level. Table 108 below summarizes the bank's retail locations in the AA.

**Table 108**

Branch and Full-Service ATM Locations Assessment Area: San Jose Metropolitan							
Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	7.1	5.5	4.9	0	0.0	0	0.0
Moderate	21.8	19.1	18.0	1	7.7	1	6.7
Middle	40.4	43.4	39.0	6	46.2	7	46.7
Upper	30.4	32.0	37.9	6	46.2	7	46.7
Unknown	0.2	0.1	0.2	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>

The bank's branches are well distributed among the northwest portion of the AA. Though only a single branch is located within a moderate-income census tract, four additional branches are in very close proximity to and serve LMI geographies.

Comerica did not open or close any branches in the AA during the review period. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are materially the same throughout the AA.



### ***Community Development Services***

The bank provides a relatively high level of CD services in the AA. Comerica's employees served in various capacities for 17 organizations offering CD services targeted toward LMI individuals. The 118 CD services provided by bank representatives total approximately 481 hours. Examples of CD services performed include:

- A bank representative serving on the board of directors for an organization that provides transitional housing, career training, and mental and behavioral health support to formerly incarcerated individuals. A 100 percent of the individuals served are LMI.
- A bank employee serving on the board of directors for an organization that provides access to safe, stable, and affordable housing in an area of the AA where it is particularly difficult to acquire. The employee provides financial oversight and strategic planning services, aiding the organization in its ongoing efforts to address the lack of affordable housing in the area.

## METROPOLITAN AREAS (LIMITED-SCOPE REVIEW)

### DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE CALIFORNIA METROPOLITAN ASSESSMENT AREAS

The bank's branch operations and deposit market share for each metropolitan AA receiving a limited-scope review were determined as of April 1, 2023, and June 30, 2022, respectively.

- **Inland Empire MSA AA**

- The Inland Empire MSA AA is comprised of the entirety of San Bernadino and Riverside counties which make up the Riverside-San Bernadino-Ontario, CA MSA.
- The AA is comprised of 984 census tracts, including 48 low-, 282 moderate-, 362 middle-, 279 upper-, and 13 unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 4,599,839, which reflects a 4.7 percent increase from the 2015 ACS data.
- The AA includes 1,029,309 families, 21.8 percent are low-, 17.5 percent moderate-, 19.3 percent middle-, and 41.4 percent are upper-income.
- The bank operated three branches, representing 0.7 percent of its branches.
- Comerica held \$104.5 million in deposits, representing a market share of 0.1 percent and 0.1 percent of its total deposits.

- **San Diego MSA AA**

- The San Diego MSA AA is comprised of the entirety of San Diego County which is coterminous with the San Diego-Chula Vista-Carlsbad, CA MSA.
- The AA is comprised of 737 census tracts, including 46 low-, 167 moderate-, 262 middle-, 248 upper-, and 14 unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 3,298,634, which reflects a 2.3 percent increase from the 2015 ACS data.
- The AA includes 759,418 families, 22.8 percent are low-, 17.3 percent moderate-, 18.7 percent middle-, and 41.2 percent are upper-income.
- The bank operated 13 branches, representing 3.2 percent of its branches.
- Comerica held \$889.2 million in deposits, representing a market share of 0.6 percent and 1.2 percent of its total deposits.

- **San Francisco Bay Metropolitan AA**

- The San Francisco Bay Metropolitan AA is comprised of the entirety of Alameda, Contra Costa, San Francisco, and San Mateo counties which, along with Marin County (excluded from the AA) make up the San Francisco-Oakland-Berkeley, CA MSA.
- The AA is comprised of 1,039 census tracts, including 91 low-, 240 moderate-, 330 middle-, 337 upper-, and 41 unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 4,486,687, which reflects a 5.1 percent increase from the 2015 ACS data.
- The AA includes 1,022,205 families, 23.5 percent are low-, 16.4 percent moderate-, 18.7 percent middle-, and 41.4 percent are upper-income.
- The bank operated 17 branches, representing 4.2 percent of its branches.
- Comerica held \$3.4 billion in deposits, representing a market share of 0.6 percent and 4.4 percent of its total deposits.

- **Santa Cruz MSA AA**

- The Santa Cruz MSA AA is comprised of the entirety of Santa Cruz County, which is coterminous with the Santa Cruz-Watsonville, CA MSA.
- The AA is comprised of 70 census tracts, which includes five low-, 12 moderate-, 29 middle-, 23 upper-, and one unknown-income tract.
- Based upon 2020 ACS data, the AA population was 270,861, which reflects a 0.6 percent increase from the 2015 ACS data.
- The AA includes 60,870 families, 22.1 percent are low-, 16.7 percent moderate-, 19.3 percent middle-, and 42.0 percent are upper-income.
- The bank operated six branches, representing 1.5 percent of its branches.
- Comerica held \$853.6 million in deposits, representing a market share of 9.6 percent and 1.1 percent of its total deposits.

- **Ventura County MSA AA**

- The Ventura County MSA AA is comprised of the entirety of Ventura County, which is coterminous with the Oxnard-Thousand Oaks-Ventura, CA MSA.
- The AA is comprised of 190 census tracts, including nine low-, 46 moderate-, 77 middle-, 55 upper-, and three unknown-income tracts.
- Based upon 2020 ACS data, the AA population was 843,843, which reflects a 0.4 percent increase from the 2015 ACS data.
- The AA includes 196,312 families, 22.0 percent are low-, 16.5 percent moderate-, 20.8 percent middle-, and 40.7 percent are upper-income.
- The bank operated one branch, representing 0.2 percent of its branches.
- Comerica held \$58.1 million in deposits, representing a market share of 0.2 percent and 0.1 percent of its total deposits.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Appendix D contains detailed performance and demographic information reviewed for the limited-scope AAs. Table 109 discusses conclusions regarding the bank's performance.

**Table 109**

Assessment Area	Lending Test	Investment Test	Service Test
Inland Empire MSA AA	Consistent	Consistent	Consistent
San Diego MSA AA	Exceeds	Consistent	Exceeds
San Francisco Bay Metropolitan AA	Consistent	Consistent	Exceeds
Santa Cruz MSA AA	Below	Below	Below
Ventura County MSA AA	Consistent	Consistent	Consistent

The institution's lending, investment, service performance in the area is generally consistent with the institution's lending, investment, service performance in the state.

## **STATE OF FLORIDA**

### **CRA RATING FOR FLORIDA:**

### **Satisfactory**

The Lending Test is Rated:	High Satisfactory
The Investment Test is Rated:	High Satisfactory
The Service Test is Rated:	High Satisfactory

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness and record of serving the credit needs of the AAs' credit needs, including low-income individuals, low-income, and very small businesses.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels and businesses of different revenue sizes is good.
- The bank has a relatively high level of CD loans.
- Comerica makes use of innovative and/or flexible lending practices in serving the AAs' needs.
- The bank is occasionally in a leadership position given its significant level of qualified CD investments and grants, particularly those not routinely provided by private investors.
- Comerica makes occasional use of innovative and/or complex investments to support CD initiatives.
- The bank exhibits good responsiveness to credit and CD needs.
- Delivery systems are accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- Comerica provides a relatively high level of CD services.

## **SCOPE OF THE EVALUATION**

The scope of the review for the state of Florida is consistent with the overall scope for the institution, including evaluations under the Lending, Investment, and Service tests. The period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

Comerica has two delineated AAs in the state of Florida: Fort Lauderdale-West Palm Beach Metropolitan AA and Naples MSA AA. The Fort Lauderdale-West Palm Beach Metropolitan AA was reviewed using full-scope procedures while the Naples MSA AA received a limited-scope review. Factors considered to determine the AA receiving a full-scope review include strategic importance of the AA to the bank operations; volume of lending; number of branches; percentage of total deposits; and length of time since the AA last received a full-scope review. Approximately 88.9 percent of lending activity (by number of loans), 90.6 percent of the total deposits, and 75.0 percent of total branches within the state of Florida were evaluated through the full-scope review.

## DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN FLORIDA

The bank delineates two of its 27 AAs and operates eight of its 409 branches in the state of Florida. As of June 30, 2022, the bank had \$424.6 million in deposits in the state, representing 0.6 percent of total deposits. According to the June 30, 2022, FDIC Summary of Deposits, the bank had a deposit market share of 0.1 percent and ranked 97<sup>th</sup> out of 186 FDIC-insured financial institutions across the state.

Of the 20,205 HMDA-reportable loans and 35,231 small business loans originated and purchased by Comerica during the review period, 432 HMDA-reportable loans (2.1 percent) and 368 small business loans (1.0 percent) were extended in the Florida AAs.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

The bank's Lending Test performance in the state of Florida is High Satisfactory. The Lending Test conclusions in the Fort Lauderdale-West Palm Beach Metropolitan AA are good, which is consistent with the overall state rating. The bank's performance in Naples MSA AA supports the state rating.

### Lending Activity

The bank's lending activities in the state of Florida reflect good responsiveness to the credit needs of the AAs. Comerica makes use of innovative and/or flexible lending programs through its participation in numerous industry-recognized, government-guaranteed programs, including the origination of 207 SBA loans and 79 small business micro loans in the state of Florida.

As outlined in Table 110, Comerica extended 803 loans totaling \$329.0 million. The loan products and origination volumes appear consistent with the credit needs of the bank's AAs. The number of small business and HMDA loans extended by the bank was compared against the number of loans made by aggregate lenders during the review period. The bank ranked 56<sup>th</sup> out of 275 CRA reporters and 118<sup>th</sup> of 1,197 HMDA reporters in its Florida AAs.

**Table 110**

<b>Summary of Lending Activity – January 1, 2020 through December 31, 2022 Florida Assessment Areas</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$000s</b>	<b>%</b>
Home Purchase	127	15.8	61,218	18.6
Refinancing	148	18.4	86,950	26.4
Home Improvement	74	9.2	14,192	4.3
Multifamily	4	0.5	52,786	16.0
Other Purpose Lines of Credit	60	7.5	14,686	4.5
Other Purpose Closed/Exempt	19	2.4	21,058	6.4
<b>Total HMDA-Related</b>	<b>432</b>	<b>53.8</b>	<b>250,890</b>	<b>76.3</b>
<b>Total Small Business</b>	<b>368</b>	<b>45.8</b>	<b>77,827</b>	<b>23.7</b>
<b>Total Small Farm</b>	<b>3</b>	<b>0.4</b>	<b>235</b>	<b>0.1</b>
<b>TOTAL LOANS</b>	<b>803</b>	<b>100.0</b>	<b>328,952</b>	<b>100.0</b>

### ***Geographic Distribution of Loans***

The overall geographic distribution of lending within the state of Florida reflects excellent penetration throughout the bank's AAs. This performance is consistent across the bank's Fort Lauderdale-West Palm Beach Metropolitan AA.

### ***Lending to Borrowers of Different Income Levels and Businesses of Different Sizes***

The bank's overall lending reflects good penetration among individuals of different income levels and businesses of different sizes. This performance is consistent across the bank's AA. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each AA.

### ***Community Development Lending***

Comerica makes a relatively high level of CD loans, considering the bank's capacity and the need and availability of CD opportunities. As reflected in Table 111, the bank originated 16 CD loans totaling approximately \$38.6 million within the state, which comprises 1.2 percent of overall bank-wide CD loan volume by number and 0.7 percent by dollar amount.

While the number of qualified CD loans decreased slightly since the previous evaluation, the dollar amount of CD lending grew by 271.0 percent. This growth occurred despite the substantial decrease in loans originated through the SBA's PPP, which made up approximately 36.4 percent of the bank's CD loans at the previous evaluation.

Comerica extended CD loans for a variety of purposes, as noted in Table 111. Specific details regarding the CD lending can be found in the Conclusions with Respect to Performance Tests section for each AA.

**Table 111**

<b>Community Development Lending Florida Assessment Areas</b>		
<b>Purpose</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	5	1,602
Community Services	1	16,000
Economic Development	9	20,757
Revitalization and Stabilization	1	279
<b>Total</b>	<b>16</b>	<b>38,638</b>

## **INVESTMENT TEST**

The bank's Investment Test rating is High Satisfactory. The Investment Test conclusions in the bank's Fort Lauderdale-West Palm Beach Metropolitan AA are good, which is consistent with the overall state rating. The bank's performance in the AA that received a limited-scope review was below the performance in the full-scope review area and the state.

The bank is occasionally in a leadership position given its significant level of qualified CD investments and grants. While Comerica makes rare use of innovative and/or complex investments, the bank exhibits good responsiveness to the credit and CD needs of its AAs.

In addition to the investments made within the bank's AAs, Comerica also made three investments in a broader statewide area. The bank deposited \$250,000 in a minority-owned depository institution in conjunction with a mentor-protégé relationship focused on capacity building for the depository institution. The bank also made a large investment in a Small Business Investment Corporation, providing expertise, networking, and capital to help entrepreneurs build their small businesses to their full potential.

Specific details regarding CD investments and donations made within the bank's Florida AAs can be found in the Conclusions with Respect to Performance Tests section for each AA. In addition to the investments made within the bank's delineated AAs, the bank also made four investments totaling \$2.8 million in the border statewide area. These investments included \$1.3 million worth of deposits in minority-owned financial institutions and a \$1 million investment in a Small Business Investment Company that promotes economic development in the region by financing small businesses. As the bank was sufficiently responsive to the CD needs of its AAs, the qualified activity in which the bank engaged in the broader statewide area is favorably considered as representing the bank's overall responsiveness to CD needs.

**Table 112**

Investments, Grants, and Donations Florida Assessment Areas								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	10	15,429	2	1,400	7	22	19	16,851
Community Services	0	0	0	0	84	399	84	399
Economic Development	0	0	4	2,750	23	131	27	2,881
Revitalization and Stabilization	0	0	0	0	2	6	2	6
<b>Total</b>	<b>10</b>	<b>15,429</b>	<b>6</b>	<b>4,150</b>	<b>116</b>	<b>558</b>	<b>132</b>	<b>20,137</b>
<sup>1</sup> Book value of investment								
<sup>2</sup> Original market value of investment								

## SERVICE TEST

The bank's performance under the Service Test is High Satisfactory. The Service Test conclusions in the Fort Lauderdale-West Palm Beach Metropolitan AA are good, which is consistent with the overall state rating. The bank's performance in the Naples AA, which received a limited-scope review, is consistent with the performance in the full-scope review areas and the state.

## Retail Services

Comerica's delivery systems are accessible to the AAs geographies and individuals of different income levels. During the review period, the bank opened one branch within the delineated Naples MSA AA. While this new branch is located within an upper-income census tract, the bank's record of opening or closing branches in the state has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations do not vary in a way that inconveniences the state, particularly in LMI geographies or to LMI individuals.

Refer to Table 113 for the distribution of banking offices and full-service ATMs by income level of geographies.

**Table 113**

<b>Branch and Full-Service ATM Locations Florida Assessment Areas</b>							
<b>Tract Income</b>	<b>% of Geographies</b>	<b>% of Households</b>	<b>% of Businesses</b>	<b>Branches</b>		<b>Full-Service ATMs</b>	
				<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	5.9	4.8	3.2	0	0.0	0	0.0
Moderate	26.6	27.7	23.5	1	12.5	1	14.3
Middle	31.0	32.2	31.0	2	25.0	2	28.6
Upper	33.6	34.2	40.7	4	50.0	4	57.1
Unknown	2.9	1.1	1.6	1	12.5	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>

The bank also operates a mobile branch, which is located in its Naples Metropolitan AA. The mobile branch affords flexibility in providing retail banking services to customers in geographies not sufficiently served by the existing brick-and-mortar branches. As of April 1, 2023, the mobile branch is situated in an upper-income census tract, though the location is proximate to several moderate-income geographies that are reasonably served by the mobile branch.

### ***Community Development Services***

Comerica provides a relatively high level of CD services in its Florida AAs, which is consistent with its performance in the Fort Lauderdale-West Palm Beach Metropolitan AA. Bank representatives provided 466 CD services, totaling 1,166 hours, to 61 unique organizations within the state of Florida. This represents approximately 6.7 percent of Comerica's total CD services, despite only 1.0 percent of the bank's 7,382 employees are located in Florida. Details regarding CD services can be found in the respective Conclusions with Respect to Performance Tests section for each AA.



**FORT LAUDERDALE – WEST PALM BEACH METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE FORT LAUDERDALE-WEST PALM BEACH METROPOLITAN ASSESSMENT AREA**

- The Fort Lauderdale-West Palm Beach Metropolitan AA consists of Palm Beach and Broward counties. These counties, along with Miami Dade County, which is excluded from the AA, make up the Miami-Fort Lauderdale-Pompano Beach, FL MSA. See Appendix A for an AA map and Appendix B for additional demographic data.
- The AA is comprised of 790 census tracts, of which 5.7 percent are designated as low-income, 27.6 percent are moderate-income, 29.7 percent are middle-income, 34.1 percent are upper-income, and 2.9 percent are designated as unknown-income.
- As a result of the 2020 U.S. Census, the number of census tracts within the AA increase by 90 geographies (12.9 percent). Additionally, the income level designations of many existing census tracts changed, with census tracts designated as LMI increasing by 6.5 percent.
- Comerica operates six full-service branches in the AA, including one branch in moderate-income, two in middle-income, and three in upper-income census tracts.
- According to the June 30, 2022, FDIC Deposit Market Share Report, the bank had a 0.3 percent market share, ranking 29<sup>th</sup> out of 60 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 115<sup>th</sup> out of 1,047 HMDA reporters in the AA with 117 HMDA originations and purchases, and 52<sup>nd</sup> out of 244 CRA reporters with 89 CRA small business loans.
- A community contact indicated that affordable housing is scarce and a need for AA residents.

**Table 114**

<b>Population Change</b>			
<b>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percentage Change</b>
Fort Lauderdale-West Palm Beach Metropolitan AA	3,221,958	3,436,566	6.7
Broward County, FL	1,843,152	1,944,375	5.5
Palm Beach County, FL	1,378,806	1,492,191	8.2
Fort Lauderdale-Pompano Beach-Sunrise, FL MD	1,843,152	1,944,375	5.5
West Palm Beach-Boca Raton-Boynton Beach, FL MD	1,378,806	1,492,191	8.2
Florida	19,645,772	21,538,187	9.6
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- Population trends between 2015 and 2020 reflect moderate growth throughout the AA, with all of the counties reporting more than 5 percent of population growth. Nonetheless, the state of Florida experienced a higher population growth.

**Table 115**

Median Family Income Change Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percentage Change
Fort Lauderdale-West Palm Beach Metropolitan AA	69,282	76,223	10.0
Fort Lauderdale-Pompano Beach-Sunrise, FL MD <i>Broward County</i>	67,531	73,430	8.7
West Palm Beach-Boca Raton-Boynton Beach, FL MD <i>Palm Beach County</i>	72,016	79,785	10.8
Florida	62,828	69,670	10.9
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- The AA MFI grew at a rate comparable to the state MFI, with all of the AA counties and MDs reflecting MFIs greater than \$70,000 in 2020.
- Broward County and Fort Lauderdale-Pompano Beach-Sunrise, FL MD have slightly lower MFIs than other AA counties and MDs but exceed the state MFI.
- According to the 2022 FFIEC Census Data, 12 percent of AA households live below the poverty level. Additionally, a community contact stated that there are high poverty rates within the AA that adversely impact children and families.

**Table 116**

Housing Cost Burden Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan						
Area	Cost Burden – Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Fort Lauderdale-West Palm Beach Metropolitan AA	85.2	67.6	55.6	69.1	42.6	29.9
Fort Lauderdale-Pompano Beach-Sunrise, FL MD <i>Broward County</i>	86.4	69.1	56.7	69.6	44.3	31.3
West Palm Beach-Boca Raton-Boynton Beach, FL MD <i>Palm Beach County</i>	83.5	65.3	54.1	68.5	40.6	28.4
Florida	80.5	60.2	50.5	61.8	36.3	24.1
Cost burden is housing cost that equals 30 percent or more of household income. Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on homeowners at any other level.
- Overall, the cost burden for renters and homeowners in the AA is greater than the housing cost burden for statewide Florida renters.
- A community contact indicated that affordable housing is at a premium and that there is not much incentive for developing affordable housing in the AA.
- The AA median housing value is \$291,000, which exceeds the statewide median housing value, at \$232,000.

**Table 117**

<b>Unemployment Rates</b>					
<b>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan</b>					
<b>Region</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Fort Lauderdale-West Palm Beach Metropolitan AA	3.6	3.2	9.0	4.7	2.9
Fort Lauderdale-Pompano Beach-Sunrise, FL MD <i>Broward County</i>	3.5	3.1	9.6	4.9	2.9
West Palm Beach-Boca Raton-Boynton Beach, FL MD <i>Palm Beach County</i>	3.7	3.4	8.2	4.3	2.9
Florida	3.7	3.2	8.2	4.6	2.9
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- Unemployment rates more than doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2022, the AA unemployment rate stabilized and returned to below pre-pandemic levels.
- Major employment industries within the AA include retail trade, healthcare and social assistance, and accommodation and food services.

Table 118 details selected AA characteristics.

Table 118

2022 Combined Demographics								
Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	45	5.7	33,645	4.2	9,279	27.6	175,492	22.0
Moderate	218	27.6	217,683	27.2	31,226	14.3	143,372	17.9
Middle	235	29.7	246,788	30.9	17,102	6.9	146,276	18.3
Upper	269	34.1	293,725	36.7	12,330	4.2	334,200	41.8
Unknown	23	2.9	7,499	0.9	1,490	19.9	0	0.0
<b>Total AA</b>	<b>790</b>	<b>100.0</b>	<b>799,340</b>	<b>100.0</b>	<b>71,427</b>	<b>8.9</b>	<b>799,340</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	74,462	28,528	3.4	38.3	33,125	44.5	12,809	17.2
Moderate	431,917	198,311	23.8	45.9	166,501	38.5	67,105	15.5
Middle	462,879	262,957	31.5	56.8	133,231	28.8	66,691	14.4
Upper	529,008	336,753	40.4	63.7	97,695	18.5	94,560	17.9
Unknown	18,191	7,357	0.9	40.4	6,082	33.4	4,752	26.1
<b>Total AA</b>	<b>1,516,457</b>	<b>833,906</b>	<b>100.0</b>	<b>55.0</b>	<b>436,634</b>	<b>28.8</b>	<b>245,917</b>	<b>16.2</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	10,171	3.2	9,342	3.2	728	4.8	101	2.5
Moderate	76,369	24.4	71,095	24.2	4,531	29.8	743	18.5
Middle	92,998	29.7	88,123	29.9	3,837	25.2	1,038	25.8
Upper	128,822	41.1	121,372	41.2	5,400	35.5	2,050	50.9
Unknown	5,151	1.6	4,352	1.5	707	4.7	92	2.3
<b>Total AA</b>	<b>313,511</b>	<b>100.0</b>	<b>294,284</b>	<b>100.0</b>	<b>15,203</b>	<b>100.0</b>	<b>4,024</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.9</b>		<b>4.8</b>		<b>1.3</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	34	2.2	28	1.9	6	10.5	0	0.0
Moderate	240	15.8	227	15.5	13	22.8	0	0.0
Middle	469	30.9	456	31.2	13	22.8	0	0.0
Upper	762	50.2	739	50.6	23	40.4	0	0.0
Unknown	13	0.9	11	0.8	2	3.5	0	0.0
<b>Total AA</b>	<b>1,518</b>	<b>100.0</b>	<b>1,461</b>	<b>100.0</b>	<b>57</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>96.2</b>		<b>3.8</b>		<b>0.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's Lending Test performance in the AA is good. For this evaluation, the bank's home mortgage and small business lending carried similar weight. Additionally, home purchases and home refinance lending are the only home mortgage loan products to be separately evaluated, as the remaining products had insufficient volume to conduct a meaningful analysis.

Appendix C details the bank's 2020 mortgage and small business lending activity, as well as the corresponding aggregate data.

#### **Lending Activity**

The bank's lending activity in the AA reflects good responsiveness to credit needs. Comerica makes use of innovative and/or flexible lending practices through its participation in numerous industry-recognized, government-guaranteed programs, including the origination of 194 SBA loans and 73 small business micro loans.

For this evaluation, the total volume of loans in consisted of 368 home mortgage and 343 small business loans originated between January 1, 2020, and December 31, 2022. The loan products and origination volumes appear consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

#### ***Geographic Distribution of Loans***

For this analysis, the geographic distribution of small business lending and mortgage lending was compared with available demographic and aggregate data. Comerica's geographic distribution of loans reflects excellent penetration throughout the AA. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions about the bank's performance in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

#### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of home mortgage lending reflects excellent penetration throughout the AA. The 2021 and 2022 distribution of home mortgage loans among low-income census tracts is comparable to aggregate data and the demographic figure, while it substantially exceeded these figures in moderate-income census tracts. Comerica's significant level of home mortgage lending in LMI census tracts reflects the bank's targeted efforts to meet the AA credit needs.

The bank's 2020 lending performance is consistent with the 2021 and 2022 geographic distribution of loans, as it exceeded aggregate and demographic data.

#### ***Home Purchase Lending***

The geographic distribution of home purchase lending is excellent. The bank's 2021 and 2022 distribution of home purchase loans among low-income census tracts is greater than that of aggregate lending data and slightly above the percentage of owner-occupied housing units

located in these tracts (the demographic figure). Loan distribution among moderate-income geographies, is even better, as the bank originated a substantially higher percentage of home purchase loans in moderate-income census tracts than aggregate lenders. While moderate-income census tracts contained almost one quarter of the owner-occupied units in the AA, Comerica originated home purchase loans at a rate approximately three times higher than this figure.

The bank's 2020 lending performance is consistent with the 2021 and 2022 loan distribution, doubling aggregate data.

#### *Home Refinance Lending*

The geographic distribution of the bank's home refinance lending in the AA is excellent. The 2021 distribution of home refinance loans among low-income census tracts is above aggregate data and the demographic figure, though the 2022 distribution of lending is comparable to the aggregate data and below the demographic figure. Comerica's 2021 and 2022 distribution of home refinance lending among moderate-income census tracts is substantially greater than aggregate data and the demographic figure.

The bank's 2020 lending performance is consistent with its 2021 and 2022 distribution of loans, with comparable performance in low-income tracts to aggregate data and materially exceeding than the lending distribution of aggregate lenders in moderate-income geographies.

Table 119A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	3	7.5	3.2	656	4.2	2.1	2	5.4	3.0	292	1.6	1.6	3.4
Moderate	29	72.5	23.8	7,045	45.5	15.8	28	75.7	26.9	7,513	41.9	17.0	23.8
Middle	4	10.0	33.9	459	3.0	27.9	0	0.0	31.8	0	0.0	26.7	31.5
Upper	4	10.0	38.9	7,320	47.3	53.1	7	18.9	37.7	10,137	56.5	53.2	40.4
Unknown	0	0.0	0.1	0	0.0	1.1	0	0.0	0.7	0	0.0	1.5	0.9
Total	40	100.0	100.0	15,480	100.0	100.0	37	100.0	100.0	17,942	100.0	100.0	100.0
Refinance Loans													
Low	2	5.0	1.8	291	1.6	1.2	0	0.0	1.9	0	0.0	1.0	3.4
Moderate	14	35.0	17.4	3,049	16.4	12.2	10	32.3	21.5	2,731	17.9	13.4	23.8
Middle	12	30.0	34.0	2,846	15.3	28.2	5	16.1	32.6	3,920	25.7	25.7	31.5
Upper	12	30.0	46.8	12,377	66.7	57.8	16	51.6	43.3	8,596	56.4	57.8	40.4
Unknown	0	0.0	0.1	0	0.0	0.5	0	0.0	0.7	0	0.0	2.1	0.9
Total	40	100.0	100.0	18,563	100.0	100.0	31	100.0	100.0	15,247	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.6	0	0.0	1.1	0	0.0	1.2	0	0.0	0.7	3.4
Moderate	1	5.9	12.6	20	0.5	8.7	4	14.8	14.7	670	14.5	8.8	23.8
Middle	6	35.3	28.5	625	16.3	21.1	12	44.4	29.6	1,634	35.4	21.6	31.5
Upper	10	58.8	57.2	3,186	83.2	68.5	11	40.7	53.7	2,318	50.2	65.5	40.4
Unknown	0	0.0	0.1	0	0.0	0.5	0	0.0	0.7	0	0.0	3.4	0.9
Total	17	100.0	100.0	3,831	100.0	100.0	27	100.0	100.0	4,622	100.0	100.0	100.0
Multifamily Loans													Multi- Family Units %
Low	0	0.0	14.2	0	0.0	7.2	0	0.0	7.7	0	0.0	3.6	
Moderate	1	100.0	45.8	8,640	100.0	26.4	1	100.0	41.3	28,000	100.0	40.3	
Middle	0	0.0	21.3	0	0.0	34.7	0	0.0	24.3	0	0.0	28.4	
Upper	0	0.0	18.3	0	0.0	31.7	0	0.0	23.0	0	0.0	19.1	
Unknown	0	0.0	0.4	0	0.0	0.0	0	0.0	3.8	0	0.0	8.6	
Total	1	100.0	100.0	8,640	100.0	100.0	1	100.0	100.0	28,000	100.0	100.0	
Total Home Mortgage Loans													Owner Occupied Units %
Low	6	5.1	2.4	3,527	6.6	1.8	3	2.6	2.4	345	0.4	1.5	
Moderate	49	41.5	20.1	19,580	36.7	14.1	45	38.5	23.5	39,102	50.5	16.4	
Middle	27	22.9	33.6	5,047	9.5	27.6	25	21.4	31.6	8,863	11.5	25.6	
Upper	36	30.5	43.8	25,203	47.2	55.5	44	37.6	41.7	29,047	37.5	53.9	
Unknown	0	0.0	0.1	0	0.0	1.0	0	0.0	0.7	0	0.0	2.6	
Total	118	100.0	100.0	53,357	100.0	100.0	117	100.0	100.0	77,357	100.0	100.0	
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table 119B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	0	0.0	1.1	0	0.0	0.6	1	5.6	1.2	53	0.8	0.5	3.4
Moderate	0	0.0	10.6	0	0.0	6.3	1	5.6	13.9	133	2.1	7.2	23.8
Middle	3	27.3	28.2	259	16.9	18.5	8	44.4	29.5	3,309	52.8	20.8	31.5
Upper	8	72.7	60.1	1,270	83.1	74.6	8	44.4	54.5	2,775	44.3	70.3	40.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.9	0	0.0	1.2	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	1,529	100.0	100.0	18	100.0	100.0	6,270	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	11.1	1.4	2,580	48.6	0.7	0	0.0	1.7	0	0.0	0.2	3.4
Moderate	4	44.4	13.9	826	15.5	3.4	1	33.3	15.7	55	1.0	3.5	23.8
Middle	2	22.2	23.9	858	16.1	8.4	0	0.0	26.7	0	0.0	12.8	31.5
Upper	2	22.2	60.2	1,050	19.8	79.6	2	66.7	54.6	5,221	99.0	72.6	40.4
Unknown	0	0.0	0.6	0	0.0	8.0	0	0.0	1.3	0	0.0	10.8	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	5,314	100.0	100.0	3	100.0	100.0	5,276	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.7	0	0.0	2.2	0	0.0	1.5	0	0.0	0.9	3.4
Moderate	0	0.0	29.6	0	0.0	15.9	0	0.0	32.8	0	0.0	23.1	23.8
Middle	0	0.0	40.4	0	0.0	51.9	0	0.0	37.0	0	0.0	37.3	31.5
Upper	0	0.0	26.2	0	0.0	29.9	0	0.0	27.8	0	0.0	37.3	40.4
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	1.0	0	0.0	1.4	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

The geographic distribution of small business loans reflects good penetration throughout the AA. The distribution of 2021 small business loans among low-income census tracts is significantly greater than aggregate data and the demographic figure. Among moderate-income census tracts, the distribution of 2021 loans is comparable to the aggregate data and the percentage of businesses located in these tracts. Additionally, the bank's dispersion of 2022 small business loans among LMI census tracts is also comparable to both metrics.

Comerica's 2020 small business lending performance is consistent with the bank's performance in 2021 and 2022.



Table 120

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	12	13.3	5.6	2,127	11.4	7.5	3	3.4	3.3	941	4.2	4.0	3.2
Moderate	22	24.4	24.5	6,365	34.0	25.9	21	23.6	24.8	4,846	21.4	26.0	24.4
Middle	16	17.8	29.8	4,687	25.0	27.9	27	30.3	29.1	6,588	29.1	27.3	29.7
Upper	39	43.3	39.6	5,513	29.4	38.2	28	31.5	41.0	7,729	34.1	40.0	41.1
Unknown	1	1.1	0.2	37	0.2	0.4	10	11.2	1.5	2,554	11.3	2.6	1.6
Total	90	100.0	100.0	18,729	100.0	100.0	89	100.0	100.0	22,658	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of lending to individuals of different income levels and businesses of different revenue sizes is good. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

### Residential Real Estate (HMDA) Lending

Home mortgage lending by borrower income in the is good when compared to demographic and aggregate data. The 2021 distribution of the bank's home mortgage loans among low-income borrowers is comparable to aggregate data, while the bank's lending to moderate-income borrowers almost doubles aggregate data and exceeds the demographic figure. Aggregate data serves as a better proxy for loan demand than the demographic figure.

The distribution of the bank's lending among LMI borrowers decreased in 2022. Home mortgage lending among low-income borrowers was slightly below the aggregate data; however, lending to moderate-income borrowers was significantly below aggregated and demographic data. Given the scarcity of affordable housing in the AA and rising interest rates, the bank's performance is good.

The bank's 2020 lending performance is consistent with that of 2021, as the distribution of loans to LMI borrowers is comparable to aggregate data.

Table 121A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	2	5.0	2.9	221	1.4	1.0	0	0.0	2.7	0	0.0	0.9	22.0
Moderate	11	27.5	12.8	2,235	14.4	6.9	2	5.4	11.0	515	2.9	5.1	17.9
Middle	12	30.0	19.8	2,817	18.2	14.4	15	40.5	18.3	3,166	17.6	12.5	18.3
Upper	14	35.0	48.7	5,207	33.6	61.5	18	48.6	49.9	8,691	48.4	63.2	41.8
Unknown	1	2.5	15.9	5,000	32.3	16.3	2	5.4	18.0	5,570	31.0	18.3	0.0
Total	40	100.0	100.0	15,480	100.0	100.0	37	100.0	100.0	17,942	100.0	100.0	100.0
Refinance Loans													
Low	2	5.0	3.0	319	1.7	1.4	2	6.5	6.6	204	1.3	3.3	22.0
Moderate	14	35.0	11.8	2,588	13.9	6.8	4	12.9	15.2	791	5.2	8.4	17.9
Middle	5	12.5	19.4	938	5.1	14.6	7	22.6	21.0	1,145	7.5	14.8	18.3
Upper	18	45.0	47.9	14,498	78.1	58.8	17	54.8	42.9	12,357	81.0	55.1	41.8
Unknown	1	2.5	17.9	220	1.2	18.3	1	3.2	14.2	750	4.9	18.4	0.0
Total	40	100.0	100.0	18,563	100.0	100.0	31	100.0	100.0	15,247	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.2	0	0.0	2.1	0	0.0	3.7	0	0.0	1.8	22.0
Moderate	2	11.8	8.2	78	2.0	4.4	2	7.4	8.9	184	4.0	4.2	17.9
Middle	3	17.6	15.6	642	16.8	10.1	7	25.9	17.6	931	20.1	10.0	18.3
Upper	12	70.6	68.8	3,111	81.2	78.1	18	66.7	66.2	3,507	75.9	76.0	41.8
Unknown	0	0.0	4.1	0	0.0	5.3	0	0.0	3.7	0	0.0	7.9	0.0
Total	17	100.0	100.0	3,831	100.0	100.0	27	100.0	100.0	4,622	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	3.4	3.0	540	1.2	1.2	4	3.4	4.1	416	0.8	1.6	22.0
Moderate	30	25.6	12.0	5,223	11.7	6.6	8	6.9	11.9	1,490	3.0	5.9	17.9
Middle	24	20.5	19.2	5,129	11.5	13.9	30	25.9	18.8	5,302	10.7	12.4	18.3
Upper	56	47.9	49.0	26,025	58.2	60.7	70	60.3	49.7	35,329	71.6	61.8	41.8
Unknown	3	2.6	16.8	7,800	17.4	17.6	4	3.4	15.5	6,820	13.8	18.2	0.0
Total	117	100.0	100.0	44,717	100.0	100.0	116	100.0	100.0	49,357	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table 121B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	0	0.0	3.8	0	0.0	2.6	1	5.6	3.5	157	2.5	1.7	22.0
Moderate	2	18.2	9.8	247	16.2	4.7	0	0.0	9.0	0	0.0	4.1	17.9
Middle	1	9.1	16.0	100	6.5	8.8	1	5.6	17.0	60	1.0	9.4	18.3
Upper	8	72.7	66.8	1,182	77.3	81.4	15	83.3	65.0	5,553	88.6	79.3	41.8
Unknown	0	0.0	3.6	0	0.0	2.5	1	5.6	5.5	500	8.0	5.5	0.0
Total	11	100.0	100.0	1,529	100.0	100.0	18	100.0	100.0	6,270	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.8	0	0.0	1.0	1	33.3	6.2	55	1.0	1.5	22.0
Moderate	1	11.1	8.4	75	1.4	1.2	0	0.0	9.6	0	0.0	3.5	17.9
Middle	3	33.3	12.0	632	11.9	2.2	0	0.0	14.1	0	0.0	2.7	18.3
Upper	4	44.4	63.8	2,027	38.1	70.5	2	66.7	57.1	5,221	99.0	68.2	41.8
Unknown	1	11.1	10.9	2,580	48.6	25.1	0	0.0	13.0	0	0.0	24.1	0.0
Total	9	100.0	100.0	5,314	100.0	100.0	3	100.0	100.0	5,276	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.3	0	0.0	0.4	0	0.0	3.2	0	0.0	2.1	22.0
Moderate	0	0.0	1.4	0	0.0	0.6	0	0.0	1.3	0	0.0	1.2	17.9
Middle	0	0.0	1.4	0	0.0	1.3	0	0.0	1.0	0	0.0	1.2	18.3
Upper	0	0.0	0.4	0	0.0	0.3	0	0.0	0.5	0	0.0	0.8	41.8
Unknown	0	0.0	95.4	0	0.0	97.4	0	0.0	94.0	0	0.0	94.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

The borrower distribution of small business loans by revenue size of businesses is adequate. In 2021, the bank outperformed aggregate data by number and dollar amount of originations, though remained well below the large percentage of AA businesses reporting annual revenues of \$1 million or less. Aggregate data serves as a better proxy for loan demand than the demographic figure.

The distribution of 2022 loan originations to businesses with revenues of \$1 million or less is below the percentage of small businesses in the AA and aggregate data by number of originations. However, the bank exceeded aggregate data by dollar amount, which is reflective of Comerica's willingness to lend larger sums to small businesses.

The bank's 2020 lending performance exceed that of 2021 and 2022. The decline in performance is primarily attributed to the cessation of the SBA's PPP and rising interests.

Table 122

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	44	48.9	43.5	6,843	36.5	24.5	35	39.3	52.7	9,877	43.6	38.3	93.9
Over \$1 Million	28	31.1		9,897	52.8		39	43.8		9,086	40.1		4.8
Revenue Unknown	18	20.0		1,989	10.6		15	16.9		3,695	16.3		1.3
Total	90	100.0		18,729	100.0		89	100.0		22,658	100.0		100.0
By Loan Size													
\$100,000 or Less	51	56.7	94.7	2,213	11.8	47.8	46	51.7	96.1	1,818	8.0	52.9	
\$100,001 - \$250,000	16	17.8	3.4	2,947	15.7	18.6	15	16.9	2.4	2,937	13.0	15.4	
\$250,001 - \$1 Million	23	25.6	1.9	13,569	72.4	33.5	28	31.5	1.5	17,903	79.0	31.6	
Total	90	100.0	100.0	18,729	100.0	100.0	89	100.0	100.0	22,658	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	28	63.6		1,327	19.4		17	48.6		588	6.0		
\$100,001 - \$250,000	8	18.2		1,435	21.0		6	17.1		1,117	11.3		
\$250,001 - \$1 Million	8	18.2		4,081	59.6		12	34.3		8,172	82.7		
Total	44	100.0		6,843	100.0		35	100.0		9,877	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Community Development Lending

The bank makes a relatively high level of CD loans in the AA. Comerica originated 16 CD loans totaling \$38.6 million in the AA, making up 1.2 percent of bank-wide CD loan volume by number and 0.7 percent by dollar amount. The number volume of CD loans originated in the AA decreased by 11.1 percent since the previous evaluation, though the dollar amount increased by more than 310.4 percent. This growth occurred despite the substantial decrease in loans originated through the SBA's PPP, which represented 38.9 percent of CD loans in the AA at the previous evaluation.

The largest portion of the bank's CD lending in the AA promotes economic development through small business financing and permanent job creation, retention, or improvement impacting LMI persons or LMI geographies. Examples of the bank's CD lending activities that are considered responsive to credit needs in the AA include:

- A \$16 million line of credit to a certified home healthcare and senior care provider that provides essential medical care to Medicaid recipients in a variety of regions throughout the state of Florida, including the AA.
- A \$3.8 million line of credit for the construction of an apartment project in the AA where the city of Delray Beach requires 25 percent of the total units to be set aside for LMI residents, granting prorated CD qualification in the amount of \$952,000.

**Table 123**

<b>Community Development Lending</b>		
<b>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan</b>		
<b>Purpose</b>	<b>#</b>	<b>\$000s</b>
Affordable Housing	5	1,602
Community Services	1	16,000
Economic Development	9	20,757
Revitalization and Stabilization	1	279
<b>Total</b>	<b>16</b>	<b>38,638</b>

## INVESTMENT TEST

The bank's performance under the Investment Test in the AA is good. Comerica is occasionally in a leadership position, as its level of qualified CD investments and grants is significant, particularly those not routinely provided by private investors. The bank's overall level of CD qualified investments and donations decreased since the previous evaluation. While the bank makes rare use of innovative and/or complex investments to support CD initiatives, the bank's activity exhibits good responsiveness to identified needs in the AA. Comerica's qualified CD investments in the AA focus on the need for affordable housing and consist entirely of LIHTC investments; however, the donations were made for a variety of purposes. Examples of the bank's CD donations that were responsive to the AA needs include:

- A recurring donation totaling \$65,000 to an organization that facilitates financial education programs as well as business, entrepreneurship, and career workshops to students in more than 400 local schools where 85 percent of students qualify for free or reduced-price lunches.
- Donations totaling \$20,000 to an organization that responds to the current food crisis among LMI individuals, especially seniors and disabled individuals.
- Donations totaling \$20,000 to a CD corporation that serves the AA in a variety of ways, including providing financial education to LMI youth as well as organizing a small business program for businesses operating in and employing LMI residents.

**Table 124**

<b>Investment, Grants, and Donations</b>								
<b>Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan</b>								
<b>Community Development Purpose</b>	<b>Prior Period Investments<sup>1</sup></b>		<b>Current Investments<sup>2</sup></b>		<b>Donations</b>		<b>Total</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	10	15,429	1	400	4	19	15	15,848
Community Services	0	0	0	0	51	272	51	272
Economic Development	0	0	0	0	17	99	17	99
Revitalization and Stabilization	0	0	0	0	2	6	2	6
<b>Total</b>	<b>10</b>	<b>15,429</b>	<b>1</b>	<b>400</b>	<b>74</b>	<b>396</b>	<b>85</b>	<b>16,225</b>

<sup>1</sup> Book value of investment

<sup>2</sup> Original market value of investment

## SERVICE TEST

The bank's Service Test performance is good.

### *Retail Services*

Comerica's delivery systems are accessible to the AA geographies and individuals of different income levels. The distribution of the bank's six branch offices and five ATMs as of April 1, 2023, was compared to the distribution of the households and businesses among the tract categories within the AA. Table 125 below summarizes the bank's retail locations in the AA.

**Table 125**

Branch and Full-Service ATM Locations Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan							
Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	5.7	4.9	3.2	0	0.0	0	0.0
Moderate	27.6	28.7	24.3	1	16.7	1	20.0
Middle	29.7	31.2	29.7	2	33.3	2	40.0
Upper	34.1	34.2	41.1	3	50.0	2	40.0
Unknown	2.9	1.1	1.6	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>

The bank did not open or close any branches in the AA during the review period. Banking services and hours of operations do not vary in a way that inconveniences the AA, as the level of services and hours offered are materially the same throughout the AA.

### *Community Development Services*

The bank provides a relatively high level of CD services in the AA. Comerica's employees served in various capacities for 40 community organizations that offer CD services targeted to LMI individuals. During the review period, bank employees provided 228 CD services totaling 613 hours. Examples of services performed include:

- Several bank employees served as subject matter experts for an organization that provides financial education and professional counseling to LMI families in financial crisis.
- Bank employees provided technical assistance on behalf of Habitat for Humanity by underwriting loan applications submitted for affordable housing in the AA.
- A bank employee served on the board of directors of a nonprofit organization with a mission of providing essential products to underprivileged youth and LMI veterans

**METROPOLITAN ASSESSMENT AREA (LIMITED-SCOPE REVIEW)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE FLORIDA METROPOLITAN ASSESSMENT AREA**

- **Naples MSA AA**
  - The Naples MSA AA is comprised of the entirety of Collier County, which is coterminous with the Naples-Marco Island, FL MSA.
  - The AA is comprised of 109 census tracts, including eight low-, 21 moderate-, 44 middle-, 33 upper-, and three unknown-income tracts.
  - Based upon 2020 ACS data, the AA population was 375,752, which reflects a 10.2 percent increase from the 2015 ACS data.
  - The AA includes 98,121 families, 21.9 percent are low-, 18.0 percent moderate-, 19.6 percent middle-, and 40.5 percent are upper-income.
  - As of April 1, 2023, the bank operated two branches, representing 0.5 percent of its total branches.
  - As of June 30, 2022, the bank held \$39.8 million in deposits, representing a market share of 0.2 percent and approximately 0.1 percent of Comerica's total deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Appendix D contains detailed performance and demographic information reviewed for the AA. Table 126 discusses conclusions regarding the bank's performance.

**Table 126**

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Naples MSA AA	Below	Below	Consistent

The institution's lending and investment performance in the AA is below Comerica's performance in the state; however, it does not impact the assessed rating.

## **STATE OF ARIZONA**

### **CRA RATING FOR ARIZONA:**

### **Satisfactory**

The Lending Test is Rated:	High Satisfactory
The Investment Test is Rated:	High Satisfactory
The Service Test is Rated:	High Satisfactory

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness and record of serving the credit needs of its AA, including low-income individuals, low-income areas, and very small businesses.
- The geographic distribution of loans reflects good penetration throughout the sole AA in the state of Arizona.
- The bank's distribution of loans among individuals of different income levels and businesses of different revenue sizes is good.
- The bank is a leader in making CD loans.
- Comerica makes use of innovative and/or flexible lending practices in serving the AA's needs.
- The bank is occasionally in a leadership position given its significant level of qualified CD investments and donations, particularly those not routinely provided by private investors.
- Comerica makes occasional use of innovative and/or complex investments to support CD initiatives.
- The bank exhibits good responsiveness to credit and CD needs.
- Delivery systems are accessible to individuals of different income levels throughout the bank's AA.
- Comerica provides an adequate level of CD services that do not vary in a way that inconveniences the bank's AA, particularly LMI geographies and/or LMI individuals.

### **SCOPE OF THE EVALUATION**

The scope of the review for the state of Arizona is consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. The review period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

The bank designates the Phoenix Metropolitan AA, as its single AA in the state of Arizona. As such, the Phoenix Metropolitan AA was reviewed using full-scope examination procedures. Accordingly, the statewide rating is based on the CRA performance within this AA and any other investment or services that are provided on a broader, statewide basis.

### **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN ARIZONA**

Comerica delineates one of its 27 AAs and operates 17 of its 409 total branches in the state of Arizona. As of June 30, 2022, the bank held \$734.7 million in deposits in the state, representing approximately one percent of its total deposits. According to the June 30, 2022, Federal Deposit Insurance Corporation (FDIC) Summary of Deposits, the bank had a deposit market share of 0.3 percent and ranked 24<sup>th</sup> out of 67 FDIC-insured financial institutions across the state.



Of the 20,205 HMDA-reportable loans and 35,231 small business loans originated and purchased by Comerica during the review period, 1,050 HMDA-reportable loans (5.2 percent) and 703 small business loans (2.0 percent) were extended in the state of Arizona.

#### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Conclusions with respect to Comerica's performance in the state of Arizona are based upon the bank's performance in the only delineated AA within the state. See the Phoenix Metropolitan AA section below for information on the bank's CRA performance in the state of Arizona.

**PHOENIX METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE PHOENIX METROPOLITAN ASSESSMENT AREA**

- The bank's Phoenix Metropolitan AA is comprised of Maricopa County in its entirety, which represents a portion of the Phoenix-Mesa-Chandler, AZ MSA. Refer to Appendix A for an AA map.
- The AA is made up of 1,009 census tracts, of which 6.3 percent are designated as low-income, 25.7 percent are moderate-income, 31.1 percent are middle-income, 34.5 percent are upper-income, and 2.4 percent are designated as unknown-income.
- Since the previous evaluation and the issuance of the 2020 U.S. Census data, 93 new geographies were drawn within Maricopa County and the income level designations of many existing census tracts changed. The number of low-income census tracts in the AA decreased by 39.0 percent but LMI geographies increased by 3.7 percent. Refer to Appendix B for additional demographic data.
- The bank operates 17 full-service branches in the AA, including four branches in moderate-income, five in middle-income, and eight in upper-income census tracts.
- According to the June 30, 2022, FDIC Market Share Report, the bank had a 0.4 percent market share, ranking 20<sup>th</sup> out of 61 FDIC-insured depository institutions operating in the AA.
- In 2022, the bank ranked 88<sup>th</sup> out of 978 HMDA reporters in the AA with 417 HMDA originations and purchases, and 51<sup>st</sup> out of 239 CRA reporters with 110 CRA small business and small farm loans.
- A community contact shared that the AA has experienced significant population growth due to the influx of people from areas where the cost of living and housing are much higher. The community contact noted that housing availability for LMI individuals and families is limited, resulting in the rise of homelessness throughout the AA.

**Table 127**

<b>Population Change</b>			
<b>Assessment Area: Phoenix Metropolitan</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percentage Change</b>
Phoenix Metropolitan AA	4,018,143	4,420,568	10.0
Phoenix-Mesa-Chandler, AZ MSA	4,407,915	4,845,832	9.9
Arizona	6,641,928	7,151,502	7.7
Source: 2020 U.S. Census Bureau Decennial Census 2011 - 2015 U.S. Census Bureau: American Community Survey			

- The AA's population has grown substantially since 2015, exceeding the growth rate of the Phoenix-Mesa-Chandler, AZ MSA and the state of Arizona as a whole. The AA's suburban population has doubled in size in some areas.
- Phoenix, AZ is one of the fastest growing cities in the United States over the most recent decade, surpassing Philadelphia to be the fifth largest city by population in the country. This increase has been fueled by the migration of families, as a result of job opportunities related to the arrival of technology companies and lower cost of living than in other areas of the nation. A community contact shared that the population growth in the AA is primarily driven by AA's lower cost of living and housing in comparison to other metropolitan areas.

- Several colleges and universities are located in the AA, including Grand Canyon University and Phoenix College, with approximate enrollments of 64,000 and 17,000, respectively.

**Table 128**

Median Family Income Change Assessment Area: Phoenix Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percentage Change
Phoenix Metropolitan AA	70,745	80,161	13.3
Phoenix-Mesa-Chandler, AZ MSA	69,582	78,930	13.4
Arizona	64,986	73,456	13.0
Source: 2011 - 2015 U.S. Census Bureau: American Community Survey 2016 - 2020 U.S. Census Bureau: American Community Survey Note: Median family incomes have been adjusted for inflation and expressed in 2020 dollars.			

- The AA's median family income (MFI) has increased proportionally to the MFIs for the Phoenix-Mesa-Chandler, AZ MSA and the state of Arizona, at approximately 13 percent. The FFIEC estimates the MSA MFI to grow another 12.5 percent between 2020 and 2022.
- According to 2020 FFIEC data, approximately 9.1 percent of AA families live below the poverty level, which is similar to the 10.1 percent statewide figure.

**Table 129**

Housing Cost Burden Assessment Area: Phoenix Metropolitan						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Phoenix Metropolitan AA	79.9	48.3	43.2	61.2	36.7	20.4
Phoenix-Mesa-Chandler, AZ MSA	79.0	47.6	43.0	60.2	35.6	20.4
Arizona	78.6	46.9	42.8	57.9	34.5	20.3
Cost burden is housing cost that equals 30 percent or more of household income. Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

- Housing affordability within the AA varies among the income levels, with the burden on low-income renters and owners being substantially greater than the burden on renters and owners at any other income level.
- Overall, the cost burden for homeowners and renters in the AA is comparable to the housing cost burden for homeowners and renters statewide in Arizona.
- The median age of housing stock in the AA is 37 years, and the median housing value is \$278,687. Additionally, the average median gross rent in the AA is \$1,182.
- A community contact noted that affordable housing throughout the AA for LMI individuals and families is limited, resulting in the rise of homelessness.

**Table 130**

<b>Unemployment Rates</b>					
<b>Assessment Area: Phoenix Metropolitan</b>					
<b>Region</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Phoenix Metropolitan AA	4.1	4.2	7.2	4.5	3.3
Phoenix-Mesa-Chandler, AZ MSA	4.2	4.2	7.2	4.5	3.4
Arizona	4.8	4.9	7.7	4.9	3.8
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- Unemployment rates in the AA remained below the overall statewide figure from 2018 to 2022.
- Unemployment rates significantly increased in 2020 due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2021, the AA unemployment rate stabilized and returned to pre-pandemic levels. In 2022, the AA unemployment rate continued to improve, by 1.2 percent.
- Major employment industries in the AA include health care and social assistance, retail trade, and government. The top employers in the AA include the State of Arizona, City of Phoenix, Wal-Mart Stores, and the Banner Health system.

Table 131 details selected characteristics of the AA.

Table 131

2022 Combined Demographics								
Assessment Area: Phoenix Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	64	6.3	52,329	5.0	16,580	31.7	213,662	20.4
Moderate	259	25.7	249,837	23.8	39,265	15.7	187,650	17.9
Middle	314	31.1	346,377	33.1	25,076	7.2	209,528	20.0
Upper	348	34.5	396,593	37.8	13,719	3.5	437,059	41.7
Unknown	24	2.4	2,763	0.3	638	23.1	0	0.0
Total AA	1,009	100.0	1,047,899	100.0	95,278	9.1	1,047,899	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	94,740	26,498	2.6	28.0	58,759	62.0	9,483	10.0
Moderate	467,263	208,235	20.6	44.6	209,530	44.8	49,498	10.6
Middle	590,915	349,840	34.7	59.2	186,145	31.5	54,930	9.3
Upper	606,362	422,448	41.9	69.7	129,770	21.4	54,144	8.9
Unknown	6,600	1,466	0.1	22.2	4,093	62.0	1,041	15.8
Total AA	1,765,880	1,008,487	100.0	57.1	588,297	33.3	169,096	9.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	8,868	3.7	7,828	3.5	970	7.3	70	2.3
Moderate	44,104	18.4	39,928	17.9	3,706	27.8	470	15.5
Middle	70,047	29.2	65,965	29.5	3,398	25.5	684	22.5
Upper	115,178	48.0	108,397	48.5	4,980	37.3	1,801	59.3
Unknown	1,817	0.8	1,515	0.7	288	2.2	14	0.5
Total AA	240,014	100.0	223,633	100.0	13,342	100.0	3,039	100.0
Percentage of Total Businesses:				93.2		5.6		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	31	1.8	28	1.7	3	3.9	0	0.0
Moderate	214	12.2	197	11.7	17	22.1	0	0.0
Middle	516	29.3	493	29.3	23	29.9	0	0.0
Upper	990	56.3	956	56.8	34	44.2	0	0.0
Unknown	8	0.5	8	0.5	0	0.0	0	0.0
Total AA	1,759	100.0	1,682	100.0	77	100.0	0	0.0
Percentage of Total Farms:				95.6		4.4		0.0
Source: 2022 FFIEC Census Data								
2022 Dun & Bradstreet Data								
2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS****LENDING TEST**

The bank's lending test performance in the Phoenix Metropolitan AA is good. For this evaluation, the bank's home mortgage lending was generally given greater weight as these products represent the largest volume of lending in the AA during the review period. Additionally, multifamily, other purpose closed/exempt, and loan purpose not applicable lending products were not evaluated separately from the evaluation of the bank's home mortgage lending.

Details of the bank's 2020 mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix C.

***Lending Activity***

The bank's lending activity in the Phoenix Metropolitan AA reflects good responsiveness and use of innovative and/or flexible lending practices through its participation in numerous industry-recognized, government-guaranteed programs, including the origination of 535 SBA loans and 160 small business micro loans within the AA.

Comerica originated 1,050 home mortgage and 703 small business loans between January 1, 2020, and December 31, 2022. The volume of small business and home mortgage lending decreased primarily due to the increase in interest rates and the cessation of the SBA's PPP in May 2021. However, loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

**Table 132**

<b>Summary of Lending Activity – January 1, 2020 through December 31, 2022</b>				
<b>Assessment Area: Phoenix Metropolitan</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$000s</b>	<b>%</b>
Home Purchase	94	5.3	29,364	7.5
Refinancing	252	14.3	76,439	19.5
Home Improvement	435	24.6	59,597	15.2
Multifamily	4	0.2	72,200	18.5
Other Purpose Lines of Credit	254	14.4	35,632	9.1
Other Purpose Closed/Exempt	11	0.6	8,579	2.2
<b>Total HMDA-Related</b>	<b>1,050</b>	<b>59.5</b>	<b>281,811</b>	<b>72.0</b>
<b>Total Small Business</b>	<b>703</b>	<b>39.8</b>	<b>109,160</b>	<b>27.9</b>
<b>Total Small Farm</b>	<b>12</b>	<b>0.7</b>	<b>270</b>	<b>0.1</b>
<b>TOTAL LOANS</b>	<b>1,765</b>	<b>100.0</b>	<b>391,241</b>	<b>100.0</b>

***Geographic Distribution of Loans***

The geographic distribution of lending reflects excellent penetration throughout the AA. The bank's small business and home mortgage lending reflects excellent and good penetration among geographies of different income levels, respectively. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions about Comerica's performance

in LMI census tracts. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

*Residential Real Estate (HMDA) Lending*

The geographic distribution of home mortgage loans is good. The distribution of 2021 and 2022 home mortgage loans among low-income census tracts is comparable to aggregate data, though below the percentage of owner-occupied units in these tracts (the demographic figure). The penetration of the bank's HMDA lending in moderate-income census tracts is below aggregate data in 2022, though above aggregate data in 2021 by a similar margin. In both years, the bank's lending in moderate-income census tracts was below the demographic figure.

The bank's lending performance for 2020 reflected penetration levels similar than those of 2021 and 2022, with a distribution of loans to LMI tracts that was comparable to aggregate data but below the demographic figure.

*Home Purchase Lending*

The geographic distribution of home purchase lending is excellent. The distribution of 2021 and 2022 home purchase loans among low-income census tracts is significantly above the aggregate data. During both years, the bank's level of lending in low-income census tracts was more than twice that of aggregate lenders and the percentage of owner-occupied units in these tracts.

The distribution of the bank's home purchase loans among moderate-income census tracts is also substantially above both aggregate lending performance and the demographic figure. During the review period, almost half of home purchase loans originated by the bank in the Phoenix Metropolitan AA were in moderate-income census tracts, which contain less than 21 percent of owner-occupied units.

*Home Refinance Lending*

The geographic distribution of home refinance lending is excellent. The distribution of 2022 home refinance loans among low-income census tracts are comparable to aggregate data and the demographic figure. The bank's lending in moderate-income census tracts is above that of aggregate lenders and comparable to the demographic figure.

The bank's lending performance for 2021 reflected penetration levels that were above that of 2022. Distribution of 2021 home refinance loans among LMI census tracts in the Phoenix Metropolitan AA was significantly above aggregate lending performance and the demographic figure.

*Home Improvement Lending*

The geographic distribution of home improvement lending is adequate. The distribution of 2021 and 2022 home improvement loans among low-income census tracts is comparable to aggregate data and the demographic figure. Conversely, the bank's home improvement lending in moderate-income census tracts is below aggregate data and the demographic figure.

*Other Purpose Lines of Credit Lending*

The geographic distribution of other purpose lines of credit is adequate. The bank did not originate any other purpose lines of credit among low-income census tracts in 2021 or 2022, though this represents a level of performance that is comparable to aggregate data in each year. Among moderate-income census tracts, the bank's performance is comparable to aggregate data and below the percentage of owner-occupied units in these tracts, which could point to lack of loan demand.



Table 133A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Phoenix Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	6	18.8	5.3	1,172	10.2	3.3	2	6.7	2.5	815	10.4	1.7	2.6
Moderate	17	53.1	17.1	4,035	35.2	12.0	13	43.3	18.9	3,643	46.7	13.3	20.6
Middle	0	0.0	36.0	0	0.0	31.0	6	20.0	36.2	814	10.4	31.0	34.7
Upper	9	28.1	41.0	6,272	54.6	53.0	9	30.0	42.2	2,529	32.4	54.0	41.9
Unknown	0	0.0	0.6	0	0.0	0.7	0	0.0	0.1	0	0.0	0.1	0.1
Total	32	100.0	100.0	11,479	100.0	100.0	30	100.0	100.0	7,801	100.0	100.0	100.0
Refinance Loans													
Low	4	4.2	2.8	695	3.3	1.8	1	1.3	2.1	245	0.7	1.4	2.6
Moderate	30	31.3	13.3	4,565	21.9	9.5	17	22.7	19.2	3,616	10.5	13.7	20.6
Middle	21	21.9	34.7	4,761	22.8	29.5	24	32.0	37.1	3,722	10.8	31.6	34.7
Upper	39	40.6	48.7	10,476	50.2	58.6	31	41.3	41.5	26,656	77.2	53.2	41.9
Unknown	2	2.1	0.5	384	1.8	0.6	2	2.7	0.1	303	0.9	0.1	0.1
Total	96	100.0	100.0	20,881	100.0	100.0	75	100.0	100.0	34,542	100.0	100.0	100.0
Home Improvement Loans													
Low	4	2.9	2.1	491	2.9	1.7	0	0.0	1.4	0	0.0	1.0	2.6
Moderate	9	6.6	10.5	716	4.2	8.3	14	6.5	12.0	1,263	4.0	8.7	20.6
Middle	34	24.8	31.6	2,987	17.5	26.3	59	27.6	31.4	6,157	19.7	25.4	34.7
Upper	90	65.7	55.1	12,867	75.4	63.1	140	65.4	55.1	23,847	76.2	64.9	41.9
Unknown	0	0.0	0.6	0	0.0	0.6	1	0.5	0.0	12	0.0	0.0	0.1
Total	137	100.0	100.0	17,061	100.0	100.0	214	100.0	100.0	31,279	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	27.1	0	0.0	14.8	0	0.0	14.8	0	0.0	16.4	10.0
Moderate	0	0.0	39.8	0	0.0	32.4	0	0.0	41.9	0	0.0	33.1	35.9
Middle	1	50.0	18.3	19,750	59.8	25.1	0	0.0	27.1	0	0.0	28.2	29.9
Upper	1	50.0	13.8	13,300	40.2	26.6	1	100.0	16.0	12,250	100.0	21.8	23.3
Unknown	0	0.0	1.0	0	0.0	1.2	0	0.0	0.2	0	0.0	0.6	0.9
Total	2	100.0	100.0	33,050	100.0	100.0	1	100.0	100.0	12,250	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	14	3.9	3.6	2,358	2.3	2.9	3	0.7	2.2	1,060	1.1	3.0	2.6
Moderate	66	18.4	14.4	10,105	9.9	11.3	55	13.2	18.1	9,834	9.8	15.1	20.6
Middle	80	22.3	34.9	30,294	29.8	29.7	120	28.8	35.8	14,139	14.1	30.4	34.7
Upper	196	54.6	46.5	58,428	57.5	55.5	236	56.6	43.8	74,930	74.7	51.4	41.9
Unknown	3	0.8	0.5	417	0.4	0.7	3	0.7	0.1	315	0.3	0.1	0.1
Total	359	100.0	100.0	101,602	100.0	100.0	417	100.0	100.0	100,278	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table 133B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Phoenix Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	0	0.0	1.3	0	0.0	0.7	0	0.0	0.9	0	0.0	0.5	2.6
Moderate	10	11.2	8.9	789	6.3	5.5	8	8.9	10.9	805	6.0	6.6	20.6
Middle	24	27.0	30.4	2,796	22.2	23.0	30	33.3	29.0	3,296	24.5	19.6	34.7
Upper	54	60.7	58.8	8,961	71.2	70.5	52	57.8	59.1	9,378	69.6	73.2	41.9
Unknown	1	1.1	0.6	33	0.3	0.3	0	0.0	0.0	0	0.0	0.0	0.1
Total	89	100.0	100.0	12,579	100.0	100.0	90	100.0	100.0	13,479	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.4	0	0.0	1.0	0	0.0	1.4	0	0.0	0.5	2.6
Moderate	0	0.0	11.7	0	0.0	5.8	3	42.9	13.6	507	54.7	6.2	20.6
Middle	0	0.0	30.1	0	0.0	15.5	1	14.3	31.2	150	16.2	15.7	34.7
Upper	3	100.0	55.2	6,552	100.0	77.4	3	42.9	53.7	270	29.1	77.7	41.9
Unknown	0	0.0	0.6	0	0.0	0.3	0	0.0	0.1	0	0.0	0.0	0.1
Total	3	100.0	100.0	6,552	100.0	100.0	7	100.0	100.0	927	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	7.5	0	0.0	4.9	0	0.0	2.7	0	0.0	1.0	2.6
Moderate	0	0.0	22.7	0	0.0	17.5	0	0.0	26.4	0	0.0	24.4	20.6
Middle	0	0.0	42.7	0	0.0	37.9	0	0.0	46.4	0	0.0	33.4	34.7
Upper	0	0.0	26.9	0	0.0	39.3	0	0.0	24.5	0	0.0	41.2	41.9
Unknown	0	0.0	0.2	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the AA when compared to demographics and the performance of the aggregate lenders. The distribution of 2021 and 2022 small business loans among low-income census tracts is greater than aggregate data as well as the percentage of businesses in these tracts (the demographic figure). The bank's small business lending in moderate-income census tracts is also above aggregate lending, outpacing aggregate data by almost 10 percent in 2022. This performance reflects favorably on the bank's responsiveness to the credit needs of small businesses in the Phoenix Metropolitan AA.

Although the volume of small business lending has decreased, Comerica's performance in 2020 is consistent with the bank's performance in 2021 and 2022. The decrease is attributed to the conclusion of the SBA's PPP lending and the increase in interest rates.

Table 134

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Phoenix Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	20	10.2	6.5	5,069	18.1	9.3	8	7.3	3.6	2,088	7.0	5.1	3.7
Moderate	48	24.5	16.1	6,898	24.6	18.8	29	26.6	17.8	6,418	21.4	21.3	18.4
Middle	58	29.6	27.5	6,664	23.8	25.9	35	32.1	28.5	9,552	31.8	26.5	29.2
Upper	69	35.2	48.6	9,231	32.9	44.7	35	32.1	49.1	11,626	38.7	45.7	48.0
Unknown	1	0.5	0.6	160	0.6	1.1	2	1.8	0.7	350	1.2	1.3	0.8
Total	196	100.0	100.0	28,022	100.0	100.0	109	100.0	100.0	30,034	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

### Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's borrower distribution of lending reflects a good penetration among individuals of different income levels (including LMI) and businesses of revenue different sizes. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions about its performance to LMI borrowers.

### Residential Real Estate (HMDA) Lending

Home mortgage lending by borrower income in the Phoenix Metropolitan AA is good when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders. In 2021, the bank's lending to LMI borrowers was comparable to the performance of aggregate HMDA lenders. Lending to low-income borrowers was also comparable to aggregate performance in 2022, though the bank's performance to moderate-income borrowers decreased.

The shift in performance toward higher income borrowers occurred as interest rates began to rise from historic lows in early 2022, making mortgage loans more expensive and pricing some lower-income borrowers out of the market. However, the bank's lending to low-income borrowers for home refinance loans and other purpose lines of credit was noteworthy as Comerica lent these products at levels well above aggregate HMDA lenders.

The bank's lending performance in 2020 is consistent with that of 2021 and 2022, with a distribution of loans to LMI borrowers that is comparable to aggregate data but below the demographic figure.

**Table 135A**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Phoenix Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	3.2	0	0.0	1.6	1	3.3	3.3	58	0.7	1.4	20.4
Moderate	16	50.0	15.1	3,654	31.8	10.4	3	10.0	12.9	476	6.1	8.4	17.9
Middle	8	25.0	19.5	1,623	14.1	16.6	7	23.3	20.4	2,144	27.5	17.0	20.0
Upper	8	25.0	41.5	6,202	54.0	52.6	19	63.3	43.4	5,123	65.7	53.4	41.7
Unknown	0	0.0	20.7	0	0.0	18.8	0	0.0	19.9	0	0.0	19.7	0.0
Total	32	100.0	100.0	11,479	100.0	100.0	30	100.0	100.0	7,801	100.0	100.0	100.0
Refinance Loans													
Low	8	8.3	6.2	810	3.9	3.6	16	21.3	11.1	2,173	6.3	6.7	20.4
Moderate	19	19.8	16.6	3,067	14.7	11.9	13	17.3	20.7	2,518	7.3	15.5	17.9
Middle	18	18.8	20.3	3,039	14.6	17.9	9	12.0	21.2	1,868	5.4	19.4	20.0
Upper	49	51.0	37.9	12,466	59.7	47.2	33	44.0	32.0	7,693	22.3	41.6	41.7
Unknown	2	2.1	19.0	1,499	7.2	19.3	4	5.3	15.1	20,290	58.7	16.8	0.0
Total	96	100.0	100.0	20,881	100.0	100.0	75	100.0	100.0	34,542	100.0	100.0	100.0
Home Improvement Loans													
Low	4	2.9	4.1	259	1.5	2.9	2	0.9	10.1	176	0.6	7.3	20.4
Moderate	16	11.7	12.1	1,477	8.7	9.3	13	6.1	12.3	867	2.8	8.5	17.9
Middle	24	17.5	20.0	1,613	9.5	16.9	51	23.8	20.6	4,990	16.0	15.9	20.0
Upper	92	67.2	60.2	13,697	80.3	65.0	142	66.4	53.0	24,111	77.1	63.7	41.7
Unknown	1	0.7	3.6	15	0.1	6.0	6	2.8	4.0	1,135	3.6	4.6	0.0
Total	137	100.0	100.0	17,061	100.0	100.0	214	100.0	100.0	31,279	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	16	4.5	5.1	1,219	1.8	2.8	25	6.0	6.8	2,910	3.3	3.4	20.4
Moderate	61	17.1	15.8	9,054	13.2	11.2	39	9.4	15.6	4,570	5.2	10.7	17.9
Middle	64	17.9	20.0	7,532	11.0	17.3	81	19.5	20.6	9,997	11.4	17.5	20.0
Upper	213	59.7	40.1	49,233	71.8	49.7	260	62.5	40.5	49,076	55.8	50.2	41.7
Unknown	3	0.8	19.0	1,514	2.2	19.0	11	2.6	16.5	21,475	24.4	18.2	0.0
Total	357	100.0	100.0	68,552	100.0	100.0	416	100.0	100.0	88,028	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

**Table 135B**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Phoenix Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	4	4.5	4.0	150	1.2	3.3	5	5.6	4.0	407	3.0	3.0	20.4
Moderate	10	11.2	9.8	856	6.8	5.7	6	6.7	10.9	298	2.2	5.5	17.9
Middle	14	15.7	18.4	1,257	10.0	11.4	14	15.6	19.3	995	7.4	12.0	20.0
Upper	61	68.5	61.8	10,316	82.0	72.3	64	71.1	53.8	11,729	87.0	66.7	41.7
Unknown	0	0.0	6.0	0	0.0	7.4	1	1.1	12.0	50	0.4	12.8	0.0
Total	89	100.0	100.0	12,579	100.0	100.0	90	100.0	100.0	13,479	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	7.2	0	0.0	3.5	1	14.3	6.4	96	10.4	4.6	20.4
Moderate	0	0.0	11.1	0	0.0	5.2	4	57.1	13.3	411	44.3	5.8	17.9
Middle	0	0.0	17.2	0	0.0	7.7	0	0.0	20.1	0	0.0	8.5	20.0
Upper	3	100.0	55.3	6,552	100.0	70.3	2	28.6	49.8	420	45.3	65.9	41.7
Unknown	0	0.0	9.2	0	0.0	13.3	0	0.0	10.3	0	0.0	15.2	0.0
Total	3	100.0	100.0	6,552	100.0	100.0	7	100.0	100.0	927	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.5	0	0.0	0.2	0	0.0	0.6	0	0.0	0.3	20.4
Moderate	0	0.0	0.6	0	0.0	0.4	0	0.0	0.6	0	0.0	0.5	17.9
Middle	0	0.0	0.5	0	0.0	0.6	0	0.0	0.6	0	0.0	0.8	20.0
Upper	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	41.7
Unknown	0	0.0	98.1	0	0.0	98.5	0	0.0	97.7	0	0.0	98.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

### Small Business Lending

Comerica's lending distribution to businesses of different revenue size is adequate. The distribution of 2022 loan originations to businesses with revenues of \$1 million or less is below the percentage of small businesses in the AA and aggregate data by number of originations. Though the bank made a smaller percentage of loans to businesses with revenues of \$1 million or less than aggregate lenders by number volume, these loans represented a larger portion of the total dollar amount of the bank's total loans to small businesses than the comparable aggregate total loans, which reflects favorably on Comerica's willingness to lend larger sums to small businesses. In addition, Comerica's performance in comparison to aggregate lenders carried more weight as aggregate lending is a better indicator of loan demand than the percentage of small businesses in the AA.

In 2021, the bank's performance remained well below the large percentage of AA business reporting annual revenues of \$1 million or less, though the bank originated a larger percentage of small business loans to businesses with annual revenues of \$1 million or less than reflected by aggregate lending data. Conversely, Comerica's 2020 lending performance to businesses with

annual revenues of \$1 million or less significantly exceeded the volume of lending in 2021 and 2022 and outperformed aggregate lenders' performance.

**Table 136**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Phoenix Metropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	110	56.1	48.0	9,869	35.2	24.8	41	37.6	54.2	10,085	33.6	31.5	93.2
Over \$1 Million	47	24.0		14,164	50.5		59	54.1		18,009	60.0		5.6
Revenue Unknown	39	19.9		3,989	14.2		9	8.3		1,940	6.5		1.3
Total	196	100.0		28,022	100.0		109	100.0		30,034	100.0		100.0
By Loan Size													
\$100,000 or Less	125	63.8	93.5	4,389	15.7	38.7	45	41.3	95.5	2,794	9.3	45.4	
\$100,001 - \$250,000	39	19.9	3.5	6,606	23.6	16.3	26	23.9	2.4	5,009	16.7	13.8	
\$250,001 - \$1 Million	32	16.3	3.0	17,027	60.8	45.0	38	34.9	2.1	22,231	74.0	40.8	
Total	196	100.0	100.0	28,022	100.0	100.0	109	100.0	100.0	30,034	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	87	79.1		2,974	30.1		23	56.1		1,281	12.7		
\$100,001 - \$250,000	16	14.5		2,461	24.9		6	14.6		1,203	11.9		
\$250,001 - \$1 Million	7	6.4		4,434	44.9		12	29.3		7,601	75.4		
Total	110	100.0		9,869	100.0		41	100.0		10,085	100.0		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

### Community Development Lending

The bank is a leader in making CD loans in the Phoenix Metropolitan AA. Comerica originated 33 CD loans totaling \$171.9 million in the AA, which comprised 2.4 percent of bank-wide CD loans volume by number and 3.2 percent by dollar amount. Despite the substantial decrease in loans originated through the SBA's PPP, the number of CD loan originations in the AA increased by 83.3 percent since the previous evaluation, representing a substantial increase in the dollar amount of CD loans in the AA (697.4 percent). This is reflective of the bank's focus on identifying CD opportunities and responding through qualified activities.

The largest portion of the bank's CD lending in the AA was comprised of loans that promote economic development by financing small businesses and supporting permanent job creation, retention, or improvement for LMI persons or in LMI geographies. Examples of the bank's CD lending activities that were considered responsive to AA credit needs include:

- A \$7 million loan to a mid-sized bakery and an \$8.5 million loan to a local lighting manufacturer. Combined these loans provided for the retention and improvement of more than 350 LMI jobs.

- Four loans totaling \$15 million to a 24-hour urgent care center that provides behavioral health services to patients experiencing mental health crises and primarily serves local residents receiving Medicaid, which serves as a proxy for determining LMI status.
- A \$100,000 line of credit to a non-profit that provides food, shelter, basic education, and counseling needs to LMI residents of the AA.
- Four SBA PPP loans totaling \$786,000 in response to the ongoing effects of the COVID-19 pandemic, which impacted the nation during the early portion of the review period for this evaluation.

Table 137 details Comerica's CD lending activity during the review period.

**Table 137**

<b>Community Development Lending Assessment Area: Phoenix Metropolitan</b>		
<b>Purpose</b>	<b>#</b>	<b>\$000s</b>
Affordable Housing	0	0
Community Services	6	15,200
Economic Development	23	155,906
Revitalization and Stabilization	4	786
<b>Total</b>	<b>33</b>	<b>171,892</b>

## INVESTMENT TEST

The bank's performance under the Investment Test in the Phoenix Metropolitan AA is good. Although Comerica's overall dollar amount of CD investments and donations decreased since the previous evaluation, its volume is significant and occasionally positions the bank as a leader. The slight decrease in dollar amount of CD investments in the AA is attributed to the bank focusing on investments in the states in which the bank has majority of its branches, receives deposits, and originates loans. Comerica makes occasional use of innovative and/or complex investments, particularly those not routinely provided by private investors, and exhibits good responsiveness to credit and CD needs of the AA.

Table 138 illustrates the breakdown of Comerica's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the current evaluation period, and CD donations made since the previous evaluation. Examples of CD investment and donation activities include:

- A \$500,000 equity investment in a minority-led community development financial institution (CDFI), providing financing to small business owners and their underserved communities.
- A \$2.3 million LIHTC investment in a new construction project that consists of 43 townhomes reserved for households with incomes below 60 percent of area median income. This project will include a rent-to-own component allowing tenants to accumulate value over time toward the purchase of their unit, catalyzing wealth creation through homeownership.
- An annual donation, totaling \$73,000 over the review period, to support a CDFI serving LMI minority communities in the Southwest United States, including the bank's AA.

Table 138

Investment, Grants, and Donations Assessment Area: Phoenix Metropolitan								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	9	13,899	2	6,000	1	10	12	19,909
Community Services	0	0	0	0	22	163	22	163
Economic Development	0	0	1	500	8	137	9	637
Revitalization and Stabilization	0	0	0	0	0	0	0	0
<b>Total</b>	<b>9</b>	<b>13,899</b>	<b>3</b>	<b>6,500</b>	<b>31</b>	<b>310</b>	<b>43</b>	<b>20,709</b>
<sup>1</sup> Book value of investment								
<sup>2</sup> Original market value of investment								

## SERVICE TEST

The bank's Service Test performance is good.

### Retail Services

Comerica's delivery systems are accessible to the geographies and individuals of different income levels in the AA. The distribution of the bank's 17 branch offices and 21 ATMs as of April 1, 2023, was compared to the distribution of the population and businesses among the tract categories within the AA. Table 139 summarizes the bank's retail locations in the Phoenix Metropolitan AA.

Table 139

Branch and Full-Service ATM Locations Assessment Area: Phoenix Metropolitan							
Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	6.3	5.3	3.7	0	0.0	0	0.0
Moderate	25.7	26.2	18.4	4	23.5	4	19.0
Middle	31.1	33.6	29.2	5	29.4	8	38.1
Upper	34.5	34.6	48.0	8	47.1	9	42.9
Unknown	2.4	0.3	0.8	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>17</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>

The bank's branch offices in the AA are generally well distributed, with the exception of the city of Glendale, AZ, which contains no Comerica branches. Glendale contains approximately 8 percent of the total LMI census tracts in the AA and stands out as a corridor for which Comerica branches are not readily available. However, the 65 square miles that make up the city are well saturated with 47 branches from other financial institutions. Additionally, Comerica's branch locations are within five miles of Glendale's LMI census tracts and more than 90 percent of the 323 LMI geographies within the entire AA.

The bank did not open or close any branches in the AA during the review period. Banking services and hours of operations are materially the same and do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals.



*Community Development Services*

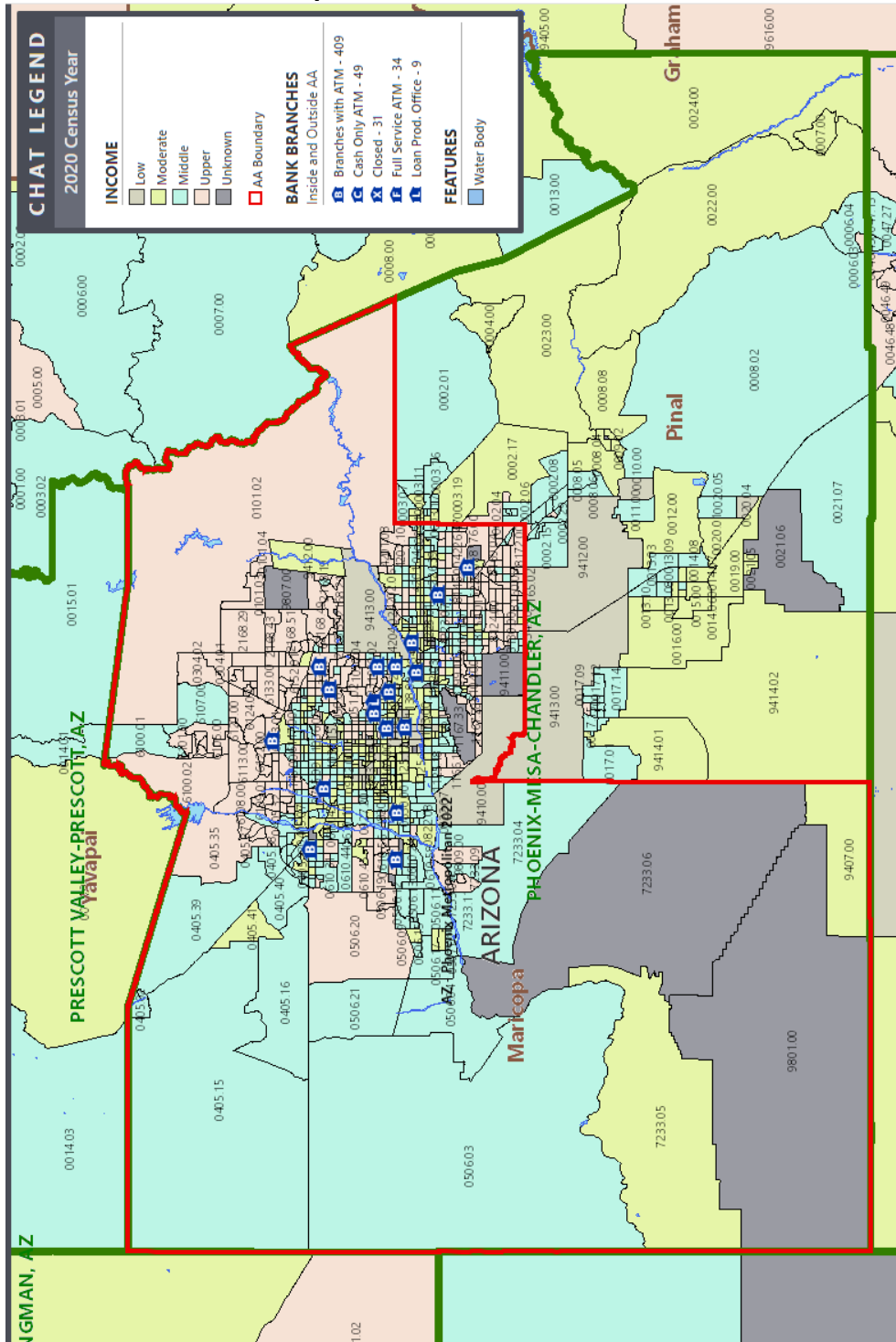
The bank provides an adequate level of CD services in the Phoenix Metropolitan AA. Comerica's employees served in various capacities, including boards of directors and as trustees, for 14 organizations offering CD services targeted toward LMI individuals. The 72 CD services provided by bank representatives during the review period total approximately 414 hours. Examples of services performed by bank employees include:

- Twenty-three bank representatives volunteer with a local organization to teach financial education at local schools where the majority of students qualify for free or reduced-price lunch. One bank employee also sits on the organization's board of directors.
- One bank representative serves as a director of a local organization that offers legal and financial services to minority-owned businesses, of which the substantial majority of owners are LMI individuals.

## APPENDICES

### APPENDIX A: FULL-SCOPE ASSESSMENT AREAS MAPS

#### Arizona - Phoenix Metropolitan AA



**CHAT LEGEND**

**2020 Census Year**

**INCOME**

- Low
- Moderate
- Middle
- Upper
- Unknown

**BANK BRANCHES**

- Branches with ATM - 409
- Cash Only ATM - 49
- Closed - 31
- Full Service ATM - 34
- Loan Prod. Office - 9

**FEATURES**

- Water Body

**CHAT LEGEND**

**2020 Census Year**

**INCOME**

- Low
- Moderate
- Middle
- Upper
- Unknown

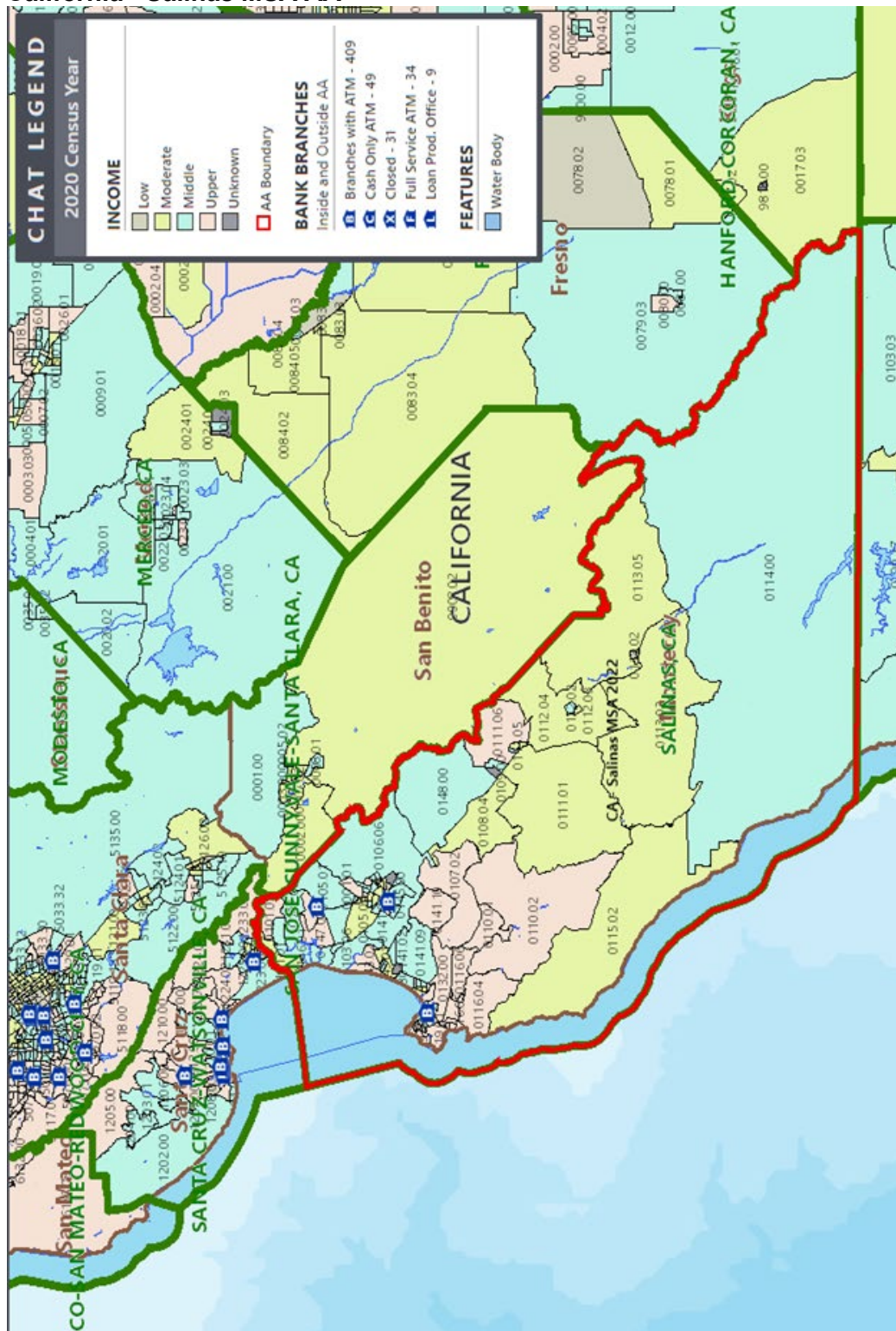
**BANK BRANCHES**

- Branches with ATM - 409
- Cash Only ATM - 49
- Closed - 31
- Full Service ATM - 34
- Loan Prod. Office - 9

**FEATURES**

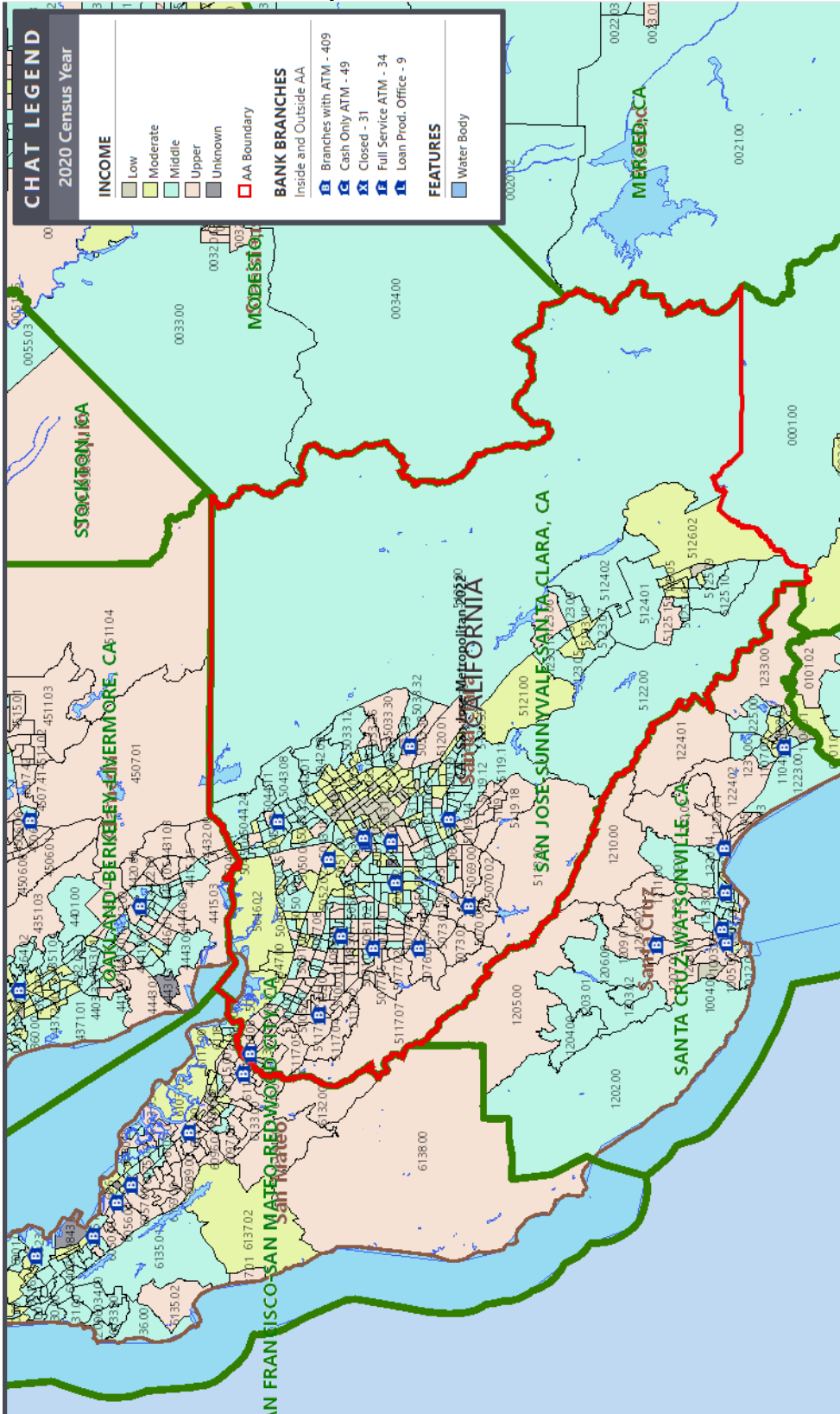
- Water Body

California - Salinas MSA AA

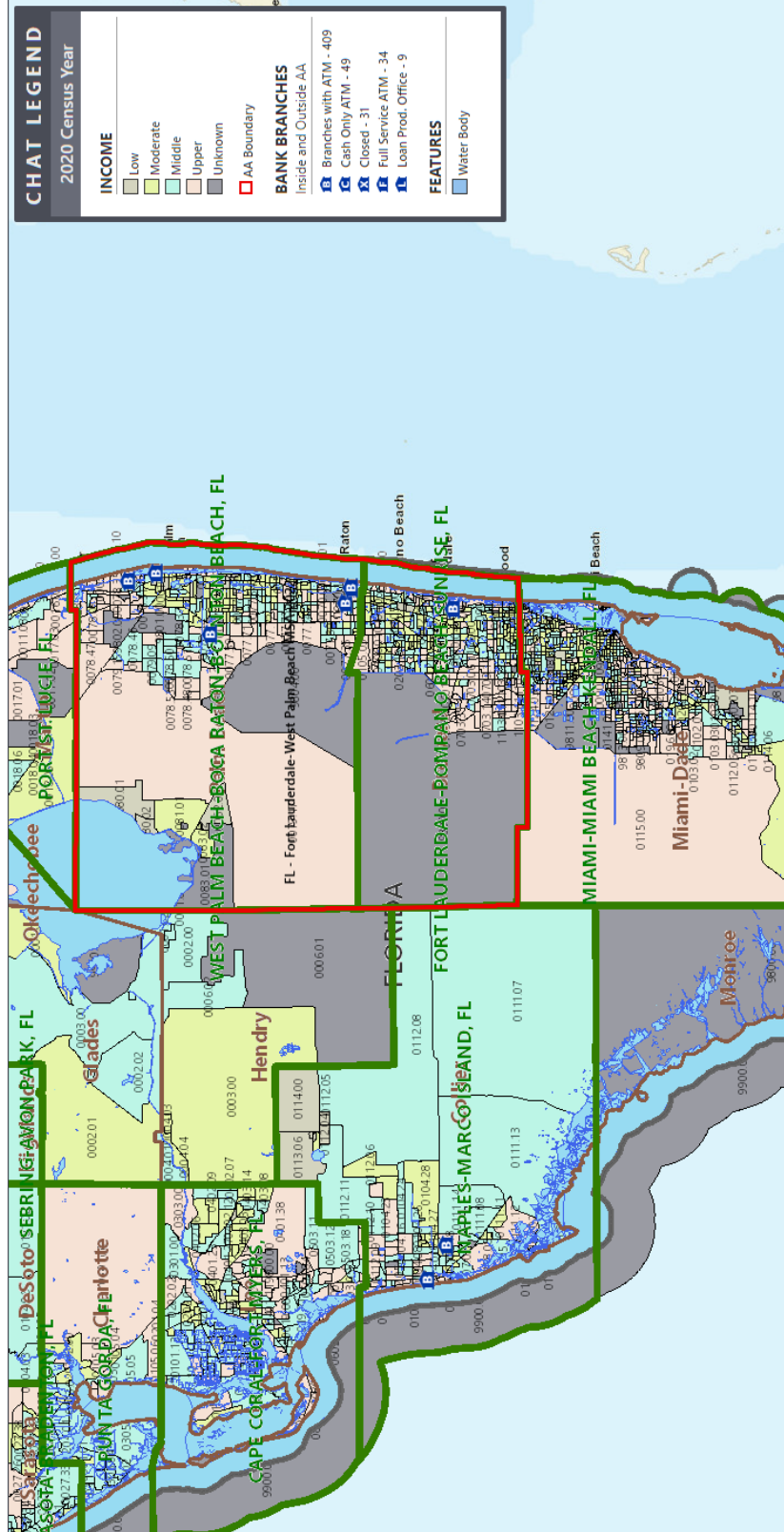




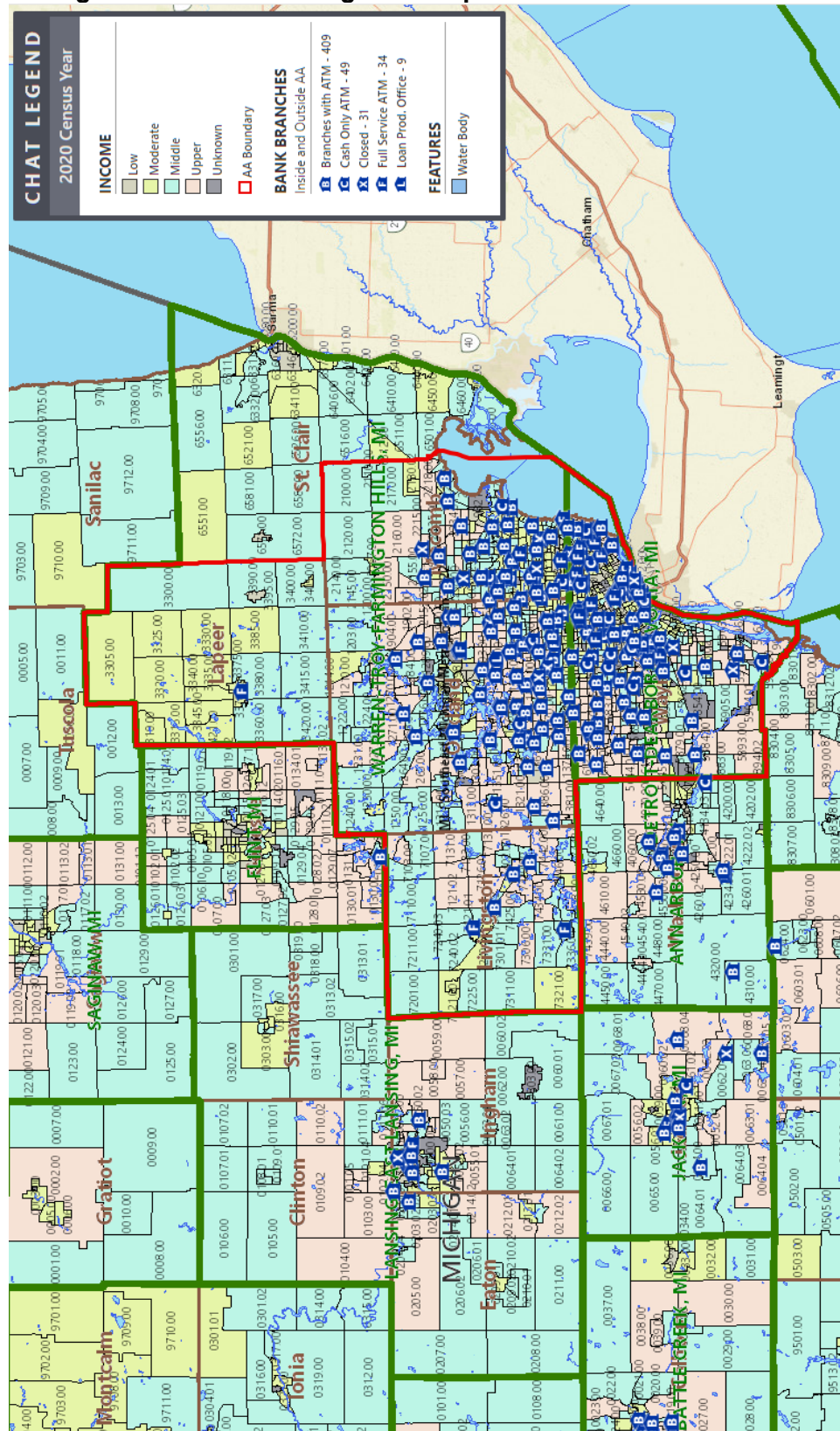
California - San Jose Metropolitan AA



Florida - Fort Lauderdale-West Palm Beach Metropolitan AA



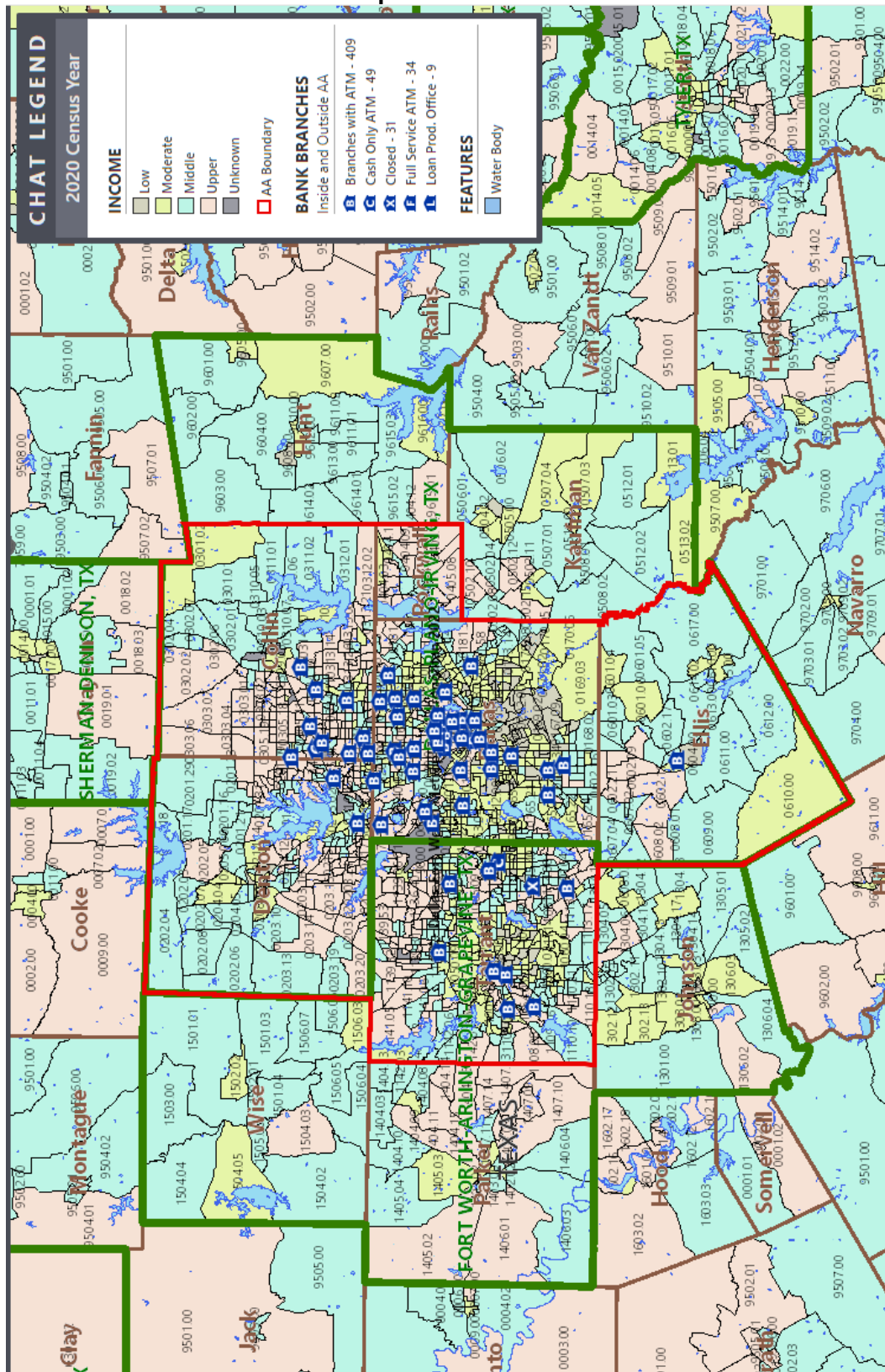
Michigan - Southeast Michigan Metropolitan AA



[illegible]



Texas - Dallas-Fort Worth Metropolitan AA



**CHAT LEGEND**

2020 Census Year

**INCOME**

- Low
- Moderate
- Middle
- Upper
- Unknown

**BANK BRANCHES**

- AA Boundary
- Branches with ATM - 409
- Cash Only ATM - 49
- Closed - 31
- Full Service ATM - 34
- Loan Prod. Office - 9

**FEATURES**

- Water Body

**APPENDIX B: FULL-SCOPE ASSESSMENT AREAS DEMOGRAPHIC INFORMATION**

**Table B1**

2021 Combined Demographics								
Assessment Area: Phoenix Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	105	11.5	85,067	9.0	36,258	42.6	205,737	21.8
Moderate	206	22.5	196,635	20.8	40,849	20.8	159,469	16.9
Middle	286	31.2	304,008	32.2	26,996	8.9	181,287	19.2
Upper	306	33.4	359,132	38.0	14,476	4.0	398,622	42.2
Unknown	13	1.4	273	0.0	66	24.2	0	0.0
Total AA	916	100.0	945,115	100.0	118,645	12.6	945,115	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	163,664	39,860	4.6	24.4	97,211	59.4	26,593	16.2
Moderate	389,700	164,966	18.8	42.3	166,953	42.8	57,781	14.8
Middle	555,842	303,545	34.7	54.6	177,191	31.9	75,106	13.5
Upper	557,288	366,734	41.9	65.8	124,339	22.3	66,215	11.9
Unknown	2,061	222	0.0	10.8	1,497	72.6	342	16.6
Total AA	1,668,555	875,327	100.0	52.5	567,191	34.0	226,037	13.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	15,923	6.6	13,829	6.2	1,860	13.8	234	8.0
Moderate	40,174	16.8	36,776	16.5	3,059	22.7	339	11.6
Middle	68,380	28.5	64,312	28.8	3,373	25.0	695	23.7
Upper	113,836	47.5	107,237	48.0	4,951	36.8	1,648	56.2
Unknown	1,352	0.6	1,113	0.5	225	1.7	14	0.5
Total AA	239,665	100.0	223,267	100.0	13,468	100.0	2,930	100.0
Percentage of Total Businesses:			93.2		5.6		1.2	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	65	3.6	56	3.3	9	11.7	0	0.0
Moderate	226	12.6	214	12.5	12	15.6	0	0.0
Middle	504	28.2	477	27.9	27	35.1	0	0.0
Upper	985	55.1	956	55.9	29	37.7	0	0.0
Unknown	8	0.4	8	0.5	0	0.0	0	0.0
Total AA	1,788	100.0	1,711	100.0	77	100.0	0	0.0
Percentage of Total Farms:			95.7		4.3		0.0	
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B2**

2020 Combined Demographics Assessment Area: Phoenix Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	105	11.5	85,067	9.0	36,258	42.6	205,737	21.8
Moderate	206	22.5	196,635	20.8	40,849	20.8	159,469	16.9
Middle	286	31.2	304,008	32.2	26,996	8.9	181,287	19.2
Upper	306	33.4	359,132	38.0	14,476	4.0	398,622	42.2
Unknown	13	1.4	273	0.0	66	24.2	0	0.0
<b>Total AA</b>	<b>916</b>	<b>100.0</b>	<b>945,115</b>	<b>100.0</b>	<b>118,645</b>	<b>12.6</b>	<b>945,115</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	163,664	39,860	4.6	24.4	97,211	59.4	26,593	16.2
Moderate	389,700	164,966	18.8	42.3	166,953	42.8	57,781	14.8
Middle	555,842	303,545	34.7	54.6	177,191	31.9	75,106	13.5
Upper	557,288	366,734	41.9	65.8	124,339	22.3	66,215	11.9
Unknown	2,061	222	0.0	10.8	1,497	72.6	342	16.6
<b>Total AA</b>	<b>1,668,555</b>	<b>875,327</b>	<b>100.0</b>	<b>52.5</b>	<b>567,191</b>	<b>34.0</b>	<b>226,037</b>	<b>13.5</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	16,059	6.6	13,961	6.2	1,880	13.8	218	7.6
Moderate	40,654	16.7	37,226	16.4	3,107	22.7	321	11.2
Middle	69,132	28.4	65,016	28.7	3,447	25.2	669	23.3
Upper	116,007	47.7	109,352	48.2	5,005	36.6	1,650	57.6
Unknown	1,351	0.6	1,114	0.5	228	1.7	9	0.3
<b>Total AA</b>	<b>243,203</b>	<b>100.0</b>	<b>226,669</b>	<b>100.0</b>	<b>13,667</b>	<b>100.0</b>	<b>2,867</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.2</b>		<b>5.6</b>		<b>1.2</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	65	3.6	56	3.2	9	11.7	0	0.0
Moderate	235	13.0	223	12.9	12	15.6	0	0.0
Middle	505	28.0	477	27.6	28	36.4	0	0.0
Upper	991	54.9	963	55.8	28	36.4	0	0.0
Unknown	8	0.4	8	0.5	0	0.0	0	0.0
<b>Total AA</b>	<b>1,804</b>	<b>100.0</b>	<b>1,727</b>	<b>100.0</b>	<b>77</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>95.7</b>		<b>4.3</b>		<b>0.0</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B3**

2021 Combined Demographics								
Assessment Area: Greater Los Angeles MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	266	9.1	221,796	7.6	78,727	35.5	709,610	24.4
Moderate	821	28.0	788,614	27.1	169,096	21.4	475,277	16.3
Middle	760	25.9	773,794	26.6	80,644	10.4	495,608	17.0
Upper	1,028	35.1	1,126,100	38.7	50,469	4.5	1,233,043	42.3
Unknown	54	1.8	3,234	0.1	609	18.8	0	0.0
Total AA	2,929	100.0	2,913,538	100.0	379,545	13.0	2,913,538	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	340,504	55,545	2.7	16.3	263,439	77.4	21,520	6.3
Moderate	1,171,395	366,014	17.6	31.2	739,185	63.1	66,196	5.7
Middle	1,187,608	572,472	27.5	48.2	549,469	46.3	65,667	5.5
Upper	1,822,595	1,086,537	52.2	59.6	622,692	34.2	113,366	6.2
Unknown	19,258	1,462	0.1	7.6	15,607	81.0	2,189	11.4
Total AA	4,541,360	2,082,030	100.0	45.8	2,190,392	48.2	268,938	5.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	35,548	5.1	32,165	5.0	3,234	6.0	149	4.0
Moderate	137,790	19.7	125,467	19.5	11,738	21.8	585	15.5
Middle	178,205	25.5	161,632	25.2	15,743	29.3	830	22.0
Upper	335,989	48.0	313,217	48.7	20,677	38.5	2,095	55.6
Unknown	12,482	1.8	10,038	1.6	2,337	4.3	107	2.8
Total AA	700,014	100.0	642,519	100.0	53,729	100.0	3,766	100.0
Percentage of Total Businesses:			91.8		7.7		0.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	63	2.6	62	2.7	1	1.2	0	0.0
Moderate	384	15.9	364	15.6	20	23.3	0	0.0
Middle	566	23.4	539	23.1	27	31.4	0	0.0
Upper	1,379	57.0	1,341	57.5	38	44.2	0	0.0
Unknown	27	1.1	27	1.2	0	0.0	0	0.0
Total AA	2,419	100.0	2,333	100.0	86	100.0	0	0.0
Percentage of Total Farms:			96.4		3.6		0.0	
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B4**

2020 Combined Demographics Assessment Area: Greater Los Angeles MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	178	5.7	142,545	4.8	39,818	27.9	699,400	23.7
Moderate	856	27.5	792,186	26.8	125,169	15.8	486,097	16.5
Middle	926	29.8	905,587	30.7	73,556	8.1	529,772	17.9
Upper	1,071	34.4	1,098,658	37.2	43,367	3.9	1,238,213	41.9
Unknown	81	2.6	14,506	0.5	1,991	13.7	0	0.0
<b>Total AA</b>	<b>3,112</b>	<b>100.0</b>	<b>2,953,482</b>	<b>100.0</b>	<b>283,901</b>	<b>9.6</b>	<b>2,953,482</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	225,201	29,216	1.4	13.0	183,218	81.4	12,767	5.7
Moderate	1,184,434	364,211	17.1	30.7	758,418	64.0	61,805	5.2
Middle	1,388,988	672,356	31.6	48.4	643,632	46.3	73,000	5.3
Upper	1,803,716	1,056,633	49.6	58.6	613,113	34.0	133,970	7.4
Unknown	58,695	7,284	0.3	12.4	44,424	75.7	6,987	11.9
<b>Total AA</b>	<b>4,661,034</b>	<b>2,129,700</b>	<b>100.0</b>	<b>45.7</b>	<b>2,242,805</b>	<b>48.1</b>	<b>288,529</b>	<b>6.2</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	24,565	3.5	22,190	3.4	2,244	4.2	131	2.9
Moderate	137,050	19.3	124,054	19.1	12,320	23.0	676	15.1
Middle	198,587	28.0	181,575	27.9	15,911	29.7	1,101	24.6
Upper	331,000	46.7	308,033	47.3	20,530	38.3	2,437	54.4
Unknown	17,876	2.5	15,185	2.3	2,560	4.8	131	2.9
<b>Total AA</b>	<b>709,078</b>	<b>100.0</b>	<b>651,037</b>	<b>100.0</b>	<b>53,565</b>	<b>100.0</b>	<b>4,476</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.8</b>		<b>7.6</b>		<b>0.6</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	43	1.8	43	1.9	0	0.0	0	0.0
Moderate	368	15.4	345	14.9	23	27.7	0	0.0
Middle	573	24.0	552	23.9	21	25.3	0	0.0
Upper	1,365	57.1	1,326	57.4	39	47.0	0	0.0
Unknown	43	1.8	43	1.9	0	0.0	0	0.0
<b>Total AA</b>	<b>2,392</b>	<b>100.0</b>	<b>2,309</b>	<b>100.0</b>	<b>83</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>96.5</b>		<b>3.5</b>		<b>0.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B5**

2021 Combined Demographics Assessment Area: Salinas MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	3.2	2,494	2.7	984	39.5	19,598	21.6
Moderate	21	22.3	21,872	24.1	5,327	24.4	16,276	17.9
Middle	31	33.0	32,783	36.1	3,861	11.8	16,962	18.7
Upper	35	37.2	33,753	37.1	1,667	4.9	38,078	41.9
Unknown	4	4.3	12	0.0	4	33.3	0	0.0
<b>Total AA</b>	<b>94</b>	<b>100.0</b>	<b>90,914</b>	<b>100.0</b>	<b>11,843</b>	<b>13.0</b>	<b>90,914</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,377	355	0.6	10.5	2,813	83.3	209	6.2
Moderate	28,652	9,451	15.3	33.0	17,692	61.7	1,509	5.3
Middle	47,200	20,920	33.9	44.3	23,200	49.2	3,080	6.5
Upper	60,522	31,009	50.2	51.2	19,919	32.9	9,594	15.9
Unknown	43	12	0.0	27.9	31	72.1	0	0.0
<b>Total AA</b>	<b>139,794</b>	<b>61,747</b>	<b>100.0</b>	<b>44.2</b>	<b>63,655</b>	<b>45.5</b>	<b>14,392</b>	<b>10.3</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	%
Low	614	3.7	565	3.7	42	3.7	7	8.0
Moderate	2,096	12.7	1,950	12.8	136	12.0	10	11.5
Middle	5,011	30.4	4,562	29.9	417	36.8	32	36.8
Upper	8,710	52.8	8,149	53.4	525	46.3	36	41.4
Unknown	64	0.4	48	0.3	14	1.2	2	2.3
<b>Total AA</b>	<b>16,495</b>	<b>100.0</b>	<b>15,274</b>	<b>100.0</b>	<b>1,134</b>	<b>100.0</b>	<b>87</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>92.6</b>		<b>6.9</b>		<b>0.5</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	%
Low	6	1.1	4	0.9	2	1.7	0	0.0
Moderate	99	17.6	61	13.8	38	31.4	0	0.0
Middle	267	47.4	207	46.8	60	49.6	0	0.0
Upper	187	33.2	169	38.2	18	14.9	0	0.0
Unknown	4	0.7	1	0.2	3	2.5	0	0.0
<b>Total AA</b>	<b>563</b>	<b>100.0</b>	<b>442</b>	<b>100.0</b>	<b>121</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>78.5</b>		<b>21.5</b>		<b>0.0</b>	
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B6**

2020 Combined Demographics Assessment Area: Salinas MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	3.2	2,494	2.7	984	39.5	19,598	21.6
Moderate	21	22.3	21,872	24.1	5,327	24.4	16,276	17.9
Middle	31	33.0	32,783	36.1	3,861	11.8	16,962	18.7
Upper	35	37.2	33,753	37.1	1,667	4.9	38,078	41.9
Unknown	4	4.3	12	0.0	4	33.3	0	0.0
Total AA	94	100.0	90,914	100.0	11,843	13.0	90,914	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,377	355	0.6	10.5	2,813	83.3	209	6.2
Moderate	28,652	9,451	15.3	33.0	17,692	61.7	1,509	5.3
Middle	47,200	20,920	33.9	44.3	23,200	49.2	3,080	6.5
Upper	60,522	31,009	50.2	51.2	19,919	32.9	9,594	15.9
Unknown	43	12	0.0	27.9	31	72.1	0	0.0
Total AA	139,794	61,747	100.0	44.2	63,655	45.5	14,392	10.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	631	3.8	585	3.8	41	3.5	5	6.1
Moderate	2,095	12.5	1,948	12.6	137	11.7	10	12.2
Middle	5,068	30.4	4,608	29.8	427	36.6	33	40.2
Upper	8,835	52.9	8,254	53.4	548	47.0	33	40.2
Unknown	65	0.4	50	0.3	14	1.2	1	1.2
Total AA	16,694	100.0	15,445	100.0	1,167	100.0	82	100.0
Percentage of Total Businesses:				92.5		7.0		0.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	7	1.2	5	1.1	2	1.5	0	0.0
Moderate	97	16.8	59	13.2	38	29.2	0	0.0
Middle	273	47.3	209	46.8	64	49.2	0	0.0
Upper	196	34.0	173	38.7	23	17.7	0	0.0
Unknown	4	0.7	1	0.2	3	2.3	0	0.0
Total AA	577	100.0	447	100.0	130	100.0	0	0.0
Percentage of Total Farms:				77.5		22.5		0.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



**Table B7**

2021 Combined Demographics Assessment Area: San Jose Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	34	9.1	34,983	7.8	7,016	20.1	106,442	23.8
Moderate	77	20.7	83,269	18.6	8,913	10.7	69,255	15.5
Middle	136	36.6	164,673	36.9	8,107	4.9	82,649	18.5
Upper	124	33.3	163,795	36.7	4,746	2.9	188,388	42.2
Unknown	1	0.3	14	0.0	4	28.6	0	0.0
Total AA	372	100.0	446,734	100.0	28,786	6.4	446,734	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	50,462	15,496	4.4	30.7	33,260	65.9	1,706	3.4
Moderate	124,428	54,515	15.5	43.8	65,318	52.5	4,595	3.7
Middle	243,890	129,315	36.7	53.0	105,120	43.1	9,455	3.9
Upper	227,325	153,510	43.5	67.5	64,849	28.5	8,966	3.9
Unknown	85	0	0.0	0.0	80	94.1	5	5.9
Total AA	646,190	352,836	100.0	54.6	268,627	41.6	24,727	3.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5,536	5.9	5,097	5.9	426	5.7	13	3.4
Moderate	17,422	18.5	15,493	18.0	1,858	24.9	71	18.3
Middle	33,627	35.8	30,658	35.6	2,841	38.1	128	33.0
Upper	37,271	39.7	34,764	40.4	2,331	31.2	176	45.4
Unknown	142	0.2	134	0.2	8	0.1	0	0.0
Total AA	93,998	100.0	86,146	100.0	7,464	100.0	388	100.0
Percentage of Total Businesses:				91.6		7.9		0.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	18	3.5	15	3.0	3	13.6	0	0.0
Moderate	102	19.6	95	19.0	7	31.8	0	0.0
Middle	178	34.2	172	34.5	6	27.3	0	0.0
Upper	223	42.8	217	43.5	6	27.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	521	100.0	499	100.0	22	100.0	0	0.0
Percentage of Total Farms:				95.8		4.2		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table B8

2020 Combined Demographics Assessment Area: San Jose Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	34	9.1	34,983	7.8	7,016	20.1	106,442	23.8
Moderate	77	20.7	83,269	18.6	8,913	10.7	69,255	15.5
Middle	136	36.6	164,673	36.9	8,107	4.9	82,649	18.5
Upper	124	33.3	163,795	36.7	4,746	2.9	188,388	42.2
Unknown	1	0.3	14	0.0	4	28.6	0	0.0
Total AA	372	100.0	446,734	100.0	28,786	6.4	446,734	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	50,462	15,496	4.4	30.7	33,260	65.9	1,706	3.4
Moderate	124,428	54,515	15.5	43.8	65,318	52.5	4,595	3.7
Middle	243,890	129,315	36.7	53.0	105,120	43.1	9,455	3.9
Upper	227,325	153,510	43.5	67.5	64,849	28.5	8,966	3.9
Unknown	85	0	0.0	0.0	80	94.1	5	5.9
Total AA	646,190	352,836	100.0	54.6	268,627	41.6	24,727	3.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5,673	5.9	5,213	6.0	450	5.8	10	2.7
Moderate	17,592	18.4	15,626	17.9	1,910	24.7	56	15.3
Middle	34,198	35.8	31,116	35.6	2,968	38.4	114	31.1
Upper	37,827	39.6	35,242	40.4	2,398	31.0	187	51.0
Unknown	146	0.2	139	0.2	7	0.1	0	0.0
Total AA	95,436	100.0	87,336	100.0	7,733	100.0	367	100.0
Percentage of Total Businesses:				91.5		8.1		0.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	14	2.7	10	2.0	4	17.4	0	0.0
Moderate	96	18.2	90	17.8	6	26.1	0	0.0
Middle	184	34.8	177	35.0	7	30.4	0	0.0
Upper	234	44.3	228	45.1	6	26.1	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	528	100.0	505	100.0	23	100.0	0	0.0
Percentage of Total Farms:				95.6		4.4		0.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B9**

2021 Combined Demographics								
Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	46	6.6	38,360	5.1	13,741	35.8	170,515	22.5
Moderate	200	28.6	198,146	26.1	35,130	17.7	131,423	17.3
Middle	209	29.9	243,260	32.1	21,589	8.9	139,003	18.3
Upper	232	33.1	277,881	36.6	12,156	4.4	317,464	41.9
Unknown	13	1.9	758	0.1	99	13.1	0	0.0
Total AA	700	100.0	758,405	100.0	82,715	10.9	758,405	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	84,408	23,483	3.0	27.8	43,165	51.1	17,760	21.0
Moderate	418,623	192,055	24.2	45.9	143,732	34.3	82,836	19.8
Middle	474,546	265,611	33.4	56.0	130,415	27.5	78,520	16.5
Upper	506,206	313,212	39.4	61.9	91,766	18.1	101,228	20.0
Unknown	1,988	851	0.1	42.8	599	30.1	538	27.1
Total AA	1,485,771	795,212	100.0	53.5	409,677	27.6	280,882	18.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	16,727	5.4	15,064	5.2	1,493	9.8	170	4.9
Moderate	71,890	23.3	67,293	23.2	4,031	26.5	566	16.3
Middle	93,985	30.5	89,148	30.8	3,962	26.1	875	25.3
Upper	124,790	40.5	117,353	40.5	5,600	36.9	1,837	53.1
Unknown	893	0.3	781	0.3	98	0.6	14	0.4
Total AA	308,285	100.0	289,639	100.0	15,184	100.0	3,462	100.0
Percentage of Total Businesses:				94.0		4.9		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	58	3.9	52	3.6	6	11.5	0	0.0
Moderate	239	15.9	225	15.5	14	26.9	0	0.0
Middle	458	30.4	448	30.8	10	19.2	0	0.0
Upper	745	49.5	723	49.8	22	42.3	0	0.0
Unknown	5	0.3	5	0.3	0	0.0	0	0.0
Total AA	1,505	100.0	1,453	100.0	52	100.0	0	0.0
Percentage of Total Farms:				96.5		3.5		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B10**

2020 Combined Demographics								
Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	46	6.6	38,360	5.1	13,741	35.8	170,515	22.5
Moderate	200	28.6	198,146	26.1	35,130	17.7	131,423	17.3
Middle	209	29.9	243,260	32.1	21,589	8.9	139,003	18.3
Upper	232	33.1	277,881	36.6	12,156	4.4	317,464	41.9
Unknown	13	1.9	758	0.1	99	13.1	0	0.0
<b>Total AA</b>	<b>700</b>	<b>100.0</b>	<b>758,405</b>	<b>100.0</b>	<b>82,715</b>	<b>10.9</b>	<b>758,405</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	84,408	23,483	3.0	27.8	43,165	51.1	17,760	21.0
Moderate	418,623	192,055	24.2	45.9	143,732	34.3	82,836	19.8
Middle	474,546	265,611	33.4	56.0	130,415	27.5	78,520	16.5
Upper	506,206	313,212	39.4	61.9	91,766	18.1	101,228	20.0
Unknown	1,988	851	0.1	42.8	599	30.1	538	27.1
<b>Total AA</b>	<b>1,485,771</b>	<b>795,212</b>	<b>100.0</b>	<b>53.5</b>	<b>409,677</b>	<b>27.6</b>	<b>280,882</b>	<b>18.9</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	16,312	5.3	14,642	5.1	1,517	9.8	153	4.6
Moderate	70,932	23.1	66,261	23.0	4,146	26.8	525	15.7
Middle	93,696	30.5	88,810	30.8	4,050	26.2	836	25.0
Upper	125,689	40.9	118,217	40.9	5,660	36.6	1,812	54.3
Unknown	886	0.3	779	0.3	94	0.6	13	0.4
<b>Total AA</b>	<b>307,515</b>	<b>100.0</b>	<b>288,709</b>	<b>100.0</b>	<b>15,467</b>	<b>100.0</b>	<b>3,339</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.9</b>		<b>5.0</b>		<b>1.1</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	64	4.2	58	3.9	6	11.5	0	0.0
Moderate	228	15.0	216	14.7	12	23.1	0	0.0
Middle	460	30.2	448	30.5	12	23.1	0	0.0
Upper	766	50.3	744	50.6	22	42.3	0	0.0
Unknown	5	0.3	5	0.3	0	0.0	0	0.0
<b>Total AA</b>	<b>1,523</b>	<b>100.0</b>	<b>1,471</b>	<b>100.0</b>	<b>52</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>96.6</b>		<b>3.4</b>		<b>0.0</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B11**

2021 Combined Demographics Assessment Area: Southeast Michigan Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	170	13.6	89,261	8.6	38,094	42.7	235,842	22.7
Moderate	315	25.2	224,494	21.6	49,928	22.2	171,317	16.5
Middle	385	30.8	355,029	34.2	29,622	8.3	194,851	18.8
Upper	357	28.5	367,439	35.4	14,878	4.0	435,805	42.0
Unknown	24	1.9	1,592	0.2	599	37.6	0	0.0
<b>Total AA</b>	<b>1,251</b>	<b>100.0</b>	<b>1,037,815</b>	<b>100.0</b>	<b>133,121</b>	<b>12.8</b>	<b>1,037,815</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	219,705	66,878	6.1	30.4	93,384	42.5	59,443	27.1
Moderate	455,152	213,581	19.4	46.9	161,487	35.5	80,084	17.6
Middle	594,357	399,322	36.3	67.2	148,286	24.9	46,749	7.9
Upper	543,945	418,763	38.1	77.0	93,215	17.1	31,967	5.9
Unknown	6,352	1,466	0.1	23.1	2,423	38.1	2,463	38.8
<b>Total AA</b>	<b>1,819,511</b>	<b>1,100,010</b>	<b>100.0</b>	<b>60.5</b>	<b>498,795</b>	<b>27.4</b>	<b>220,706</b>	<b>12.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	15,877	8.0	14,015	7.7	1,762	10.8	100	7.2
Moderate	42,283	21.3	37,975	21.0	4,027	24.8	281	20.1
Middle	61,517	31.0	57,012	31.5	4,103	25.2	402	28.8
Upper	77,948	39.2	71,239	39.3	6,104	37.5	605	43.4
Unknown	1,126	0.6	859	0.5	260	1.6	7	0.5
<b>Total AA</b>	<b>198,751</b>	<b>100.0</b>	<b>181,100</b>	<b>100.0</b>	<b>16,256</b>	<b>100.0</b>	<b>1,395</b>	<b>100.0</b>
Percentage of Total Businesses:				91.1		8.2		0.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	35	3.0	34	3.0	1	3.2	0	0.0
Moderate	229	19.4	224	19.5	5	16.1	0	0.0
Middle	534	45.3	523	45.6	11	35.5	0	0.0
Upper	381	32.3	366	31.9	14	45.2	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,179</b>	<b>100.0</b>	<b>1,147</b>	<b>100.0</b>	<b>31</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
Percentage of Total Farms:				97.3		2.6		0.1
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B12**

2020 Combined Demographics Assessment Area: Southeast Michigan Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	170	13.6	89,261	8.6	38,094	42.7	235,842	22.7
Moderate	315	25.2	224,494	21.6	49,928	22.2	171,317	16.5
Middle	385	30.8	355,029	34.2	29,622	8.3	194,851	18.8
Upper	357	28.5	367,439	35.4	14,878	4.0	435,805	42.0
Unknown	24	1.9	1,592	0.2	599	37.6	0	0.0
<b>Total AA</b>	<b>1,251</b>	<b>100.0</b>	<b>1,037,815</b>	<b>100.0</b>	<b>133,121</b>	<b>12.8</b>	<b>1,037,815</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	219,705	66,878	6.1	30.4	93,384	42.5	59,443	27.1
Moderate	455,152	213,581	19.4	46.9	161,487	35.5	80,084	17.6
Middle	594,357	399,322	36.3	67.2	148,286	24.9	46,749	7.9
Upper	543,945	418,763	38.1	77.0	93,215	17.1	31,967	5.9
Unknown	6,352	1,466	0.1	23.1	2,423	38.1	2,463	38.8
<b>Total AA</b>	<b>1,819,511</b>	<b>1,100,010</b>	<b>100.0</b>	<b>60.5</b>	<b>498,795</b>	<b>27.4</b>	<b>220,706</b>	<b>12.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	14,861	7.6	12,977	7.3	1,799	10.7	85	6.5
Moderate	40,252	20.6	35,866	20.2	4,121	24.6	265	20.2
Middle	60,986	31.2	56,378	31.8	4,238	25.3	370	28.1
Upper	78,383	40.1	71,482	40.3	6,314	37.7	587	44.6
Unknown	1,098	0.6	823	0.5	267	1.6	8	0.6
<b>Total AA</b>	<b>195,580</b>	<b>100.0</b>	<b>177,526</b>	<b>100.0</b>	<b>16,739</b>	<b>100.0</b>	<b>1,315</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.8</b>		<b>8.6</b>		<b>0.7</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	31	2.6	29	2.5	2	6.5	0	0.0
Moderate	229	19.1	224	19.2	5	16.1	0	0.0
Middle	553	46.1	542	46.4	11	35.5	0	0.0
Upper	387	32.3	373	31.9	13	41.9	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,200</b>	<b>100.0</b>	<b>1,168</b>	<b>100.0</b>	<b>31</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>97.3</b>		<b>2.6</b>		<b>0.1</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B13**

2021 Combined Demographics Assessment Area: Ann Arbor MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	16	16.0	8,921	11.2	2,461	27.6	18,032	22.7
Moderate	16	16.0	10,689	13.5	1,261	11.8	13,501	17.0
Middle	37	37.0	33,861	42.7	2,054	6.1	15,572	19.6
Upper	25	25.0	25,698	32.4	484	1.9	32,268	40.7
Unknown	6	6.0	204	0.3	67	32.8	0	0.0
Total AA	100	100.0	79,373	100.0	6,327	8.0	79,373	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	23,605	5,440	6.6	23.0	15,959	67.6	2,206	9.3
Moderate	21,049	9,873	12.0	46.9	9,787	46.5	1,389	6.6
Middle	60,457	36,901	44.7	61.0	19,025	31.5	4,531	7.5
Upper	40,983	30,117	36.5	73.5	8,317	20.3	2,549	6.2
Unknown	3,004	194	0.2	6.5	2,454	81.7	356	11.9
Total AA	149,098	82,525	100.0	55.3	55,542	37.3	11,031	7.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,545	8.9	1,415	8.9	124	8.9	6	5.3
Moderate	1,629	9.4	1,532	9.7	89	6.4	8	7.0
Middle	7,656	44.2	6,956	44.0	649	46.5	51	44.7
Upper	5,522	31.9	5,069	32.0	410	29.4	43	37.7
Unknown	983	5.7	854	5.4	123	8.8	6	5.3
Total AA	17,335	100.0	15,826	100.0	1,395	100.0	114	100.0
Percentage of Total Businesses:				91.3		8.0		0.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.3	1	0.3	0	0.0	0	0.0
Moderate	16	4.6	15	4.4	1	33.3	0	0.0
Middle	223	64.6	221	64.8	2	66.7	0	0.0
Upper	105	30.4	104	30.5	0	0.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	345	100.0	341	100.0	3	100.0	1	100.0
Percentage of Total Farms:				98.8		0.9		0.3
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table B14**

2020 Combined Demographics Assessment Area: Ann Arbor MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	16	16.0	8,921	11.2	2,461	27.6	18,032	22.7
Moderate	16	16.0	10,689	13.5	1,261	11.8	13,501	17.0
Middle	37	37.0	33,861	42.7	2,054	6.1	15,572	19.6
Upper	25	25.0	25,698	32.4	484	1.9	32,268	40.7
Unknown	6	6.0	204	0.3	67	32.8	0	0.0
<b>Total AA</b>	<b>100</b>	<b>100.0</b>	<b>79,373</b>	<b>100.0</b>	<b>6,327</b>	<b>8.0</b>	<b>79,373</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	23,605	5,440	6.6	23.0	15,959	67.6	2,206	9.3
Moderate	21,049	9,873	12.0	46.9	9,787	46.5	1,389	6.6
Middle	60,457	36,901	44.7	61.0	19,025	31.5	4,531	7.5
Upper	40,983	30,117	36.5	73.5	8,317	20.3	2,549	6.2
Unknown	3,004	194	0.2	6.5	2,454	81.7	356	11.9
<b>Total AA</b>	<b>149,098</b>	<b>82,525</b>	<b>100.0</b>	<b>55.3</b>	<b>55,542</b>	<b>37.3</b>	<b>11,031</b>	<b>7.4</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,525	8.7	1,381	8.6	139	9.7	5	4.5
Moderate	1,621	9.2	1,520	9.5	94	6.6	7	6.3
Middle	7,712	43.8	7,006	43.7	652	45.7	54	48.6
Upper	5,652	32.1	5,204	32.4	409	28.6	39	35.1
Unknown	1,078	6.1	938	5.8	134	9.4	6	5.4
<b>Total AA</b>	<b>17,588</b>	<b>100.0</b>	<b>16,049</b>	<b>100.0</b>	<b>1,428</b>	<b>100.0</b>	<b>111</b>	<b>100.0</b>
Percentage of Total Businesses:				91.2		8.1		0.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.3	1	0.3	0	0.0	0	0.0
Moderate	17	4.7	16	4.5	1	33.3	0	0.0
Middle	232	64.8	230	65.0	2	66.7	0	0.0
Upper	108	30.2	107	30.2	0	0.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>358</b>	<b>100.0</b>	<b>354</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
Percentage of Total Farms:				98.9		0.8		0.3
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



Table B15

2021 Combined Demographics Assessment Area: Dallas-Fort Worth Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	165	13.6	150,315	9.9	51,375	34.2	355,209	23.4
Moderate	313	25.7	348,387	23.0	66,076	19.0	247,628	16.3
Middle	324	26.6	437,370	28.8	36,242	8.3	272,854	18.0
Upper	408	33.5	578,925	38.2	20,318	3.5	640,794	42.3
Unknown	7	0.6	1,488	0.1	273	18.3	0	0.0
<b>Total AA</b>	<b>1,217</b>	<b>100.0</b>	<b>1,516,485</b>	<b>100.0</b>	<b>174,284</b>	<b>11.5</b>	<b>1,516,485</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	283,665	69,970	5.4	24.7	175,995	62.0	37,700	13.3
Moderate	571,437	250,644	19.4	43.9	270,664	47.4	50,129	8.8
Middle	685,807	383,994	29.7	56.0	256,343	37.4	45,470	6.6
Upper	832,452	585,856	45.4	70.4	201,381	24.2	45,215	5.4
Unknown	4,922	1,248	0.1	25.4	3,133	63.7	541	11.0
<b>Total AA</b>	<b>2,378,283</b>	<b>1,291,712</b>	<b>100.0</b>	<b>54.3</b>	<b>907,516</b>	<b>38.2</b>	<b>179,055</b>	<b>7.5</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	30,039	7.8	27,021	7.5	2,781	11.4	237	5.4
Moderate	74,142	19.2	67,463	18.8	6,126	25.1	553	12.5
Middle	103,498	26.7	96,355	26.9	6,149	25.2	994	22.5
Upper	176,923	45.7	165,523	46.2	8,808	36.1	2,592	58.7
Unknown	2,320	0.6	1,717	0.5	567	2.3	36	0.8
<b>Total AA</b>	<b>386,922</b>	<b>100.0</b>	<b>358,079</b>	<b>100.0</b>	<b>24,431</b>	<b>100.0</b>	<b>4,412</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.5</b>		<b>6.3</b>		<b>1.1</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	103	3.3	99	3.3	4	11.8	0	0.0
Moderate	333	10.8	328	10.8	5	14.7	0	0.0
Middle	954	31.0	949	31.2	5	14.7	0	0.0
Upper	1,679	54.5	1,657	54.5	19	55.9	3	100.0
Unknown	9	0.3	8	0.3	1	2.9	0	0.0
<b>Total AA</b>	<b>3,078</b>	<b>100.0</b>	<b>3,041</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.8</b>		<b>1.1</b>		<b>0.1</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table B16**

2020 Combined Demographics Assessment Area: Dallas-Fort Worth Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	165	13.6	150,315	9.9	51,375	34.2	355,209	23.4
Moderate	313	25.7	348,387	23.0	66,076	19.0	247,628	16.3
Middle	324	26.6	437,370	28.8	36,242	8.3	272,854	18.0
Upper	408	33.5	578,925	38.2	20,318	3.5	640,794	42.3
Unknown	7	0.6	1,488	0.1	273	18.3	0	0.0
<b>Total AA</b>	<b>1,217</b>	<b>100.0</b>	<b>1,516,485</b>	<b>100.0</b>	<b>174,284</b>	<b>11.5</b>	<b>1,516,485</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	283,665	69,970	5.4	24.7	175,995	62.0	37,700	13.3
Moderate	571,437	250,644	19.4	43.9	270,664	47.4	50,129	8.8
Middle	685,807	383,994	29.7	56.0	256,343	37.4	45,470	6.6
Upper	832,452	585,856	45.4	70.4	201,381	24.2	45,215	5.4
Unknown	4,922	1,248	0.1	25.4	3,133	63.7	541	11.0
<b>Total AA</b>	<b>2,378,283</b>	<b>1,291,712</b>	<b>100.0</b>	<b>54.3</b>	<b>907,516</b>	<b>38.2</b>	<b>179,055</b>	<b>7.5</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	28,887	7.6	25,851	7.4	2,832	11.4	204	4.9
Moderate	73,151	19.3	66,342	19.0	6,305	25.3	504	12.1
Middle	101,095	26.7	93,825	26.8	6,336	25.4	934	22.3
Upper	173,760	45.8	162,360	46.4	8,892	35.7	2,508	60.0
Unknown	2,234	0.6	1,630	0.5	573	2.3	31	0.7
<b>Total AA</b>	<b>379,127</b>	<b>100.0</b>	<b>350,008</b>	<b>100.0</b>	<b>24,938</b>	<b>100.0</b>	<b>4,181</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.3</b>		<b>6.6</b>		<b>1.1</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	107	3.4	100	3.2	7	19.4	0	0.0
Moderate	334	10.6	326	10.4	8	22.2	0	0.0
Middle	968	30.6	965	30.9	3	8.3	0	0.0
Upper	1,747	55.2	1,727	55.2	17	47.2	3	100.0
Unknown	9	0.3	8	0.3	1	2.8	0	0.0
<b>Total AA</b>	<b>3,165</b>	<b>100.0</b>	<b>3,126</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.8</b>		<b>1.1</b>		<b>0.1</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table B17**

2021 Combined Demographics Assessment Area: San Antonio Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	33	8.9	28,586	6.7	10,764	37.7	102,399	23.8
Moderate	131	35.2	135,059	31.5	28,860	21.4	75,626	17.6
Middle	94	25.3	117,189	27.3	12,655	10.8	82,128	19.1
Upper	110	29.6	148,558	34.6	6,006	4.0	169,251	39.4
Unknown	4	1.1	12	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>372</b>	<b>100.0</b>	<b>429,404</b>	<b>100.0</b>	<b>58,285</b>	<b>13.6</b>	<b>429,404</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	47,834	19,121	5.1	40.0	22,334	46.7	6,379	13.3
Moderate	229,217	100,677	27.1	43.9	105,396	46.0	23,144	10.1
Middle	192,965	101,728	27.4	52.7	76,061	39.4	15,176	7.9
Upper	219,934	150,148	40.4	68.3	56,906	25.9	12,880	5.9
Unknown	12	12	0.0	100.0	0	0.0	0	0.0
<b>Total AA</b>	<b>689,962</b>	<b>371,686</b>	<b>100.0</b>	<b>53.9</b>	<b>260,697</b>	<b>37.8</b>	<b>57,579</b>	<b>8.3</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,198	4.9	3,709	4.6	465	8.8	24	3.0
Moderate	19,624	22.8	18,203	22.7	1,310	24.9	111	13.9
Middle	24,449	28.4	22,608	28.2	1,664	31.6	177	22.2
Upper	37,727	43.8	35,466	44.3	1,779	33.8	482	60.5
Unknown	193	0.2	147	0.2	43	0.8	3	0.4
<b>Total AA</b>	<b>86,191</b>	<b>100.0</b>	<b>80,133</b>	<b>100.0</b>	<b>5,261</b>	<b>100.0</b>	<b>797</b>	<b>100.0</b>
Percentage of Total Businesses:				93.0		6.1		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	13	1.4	12	1.3	1	12.5	0	0.0
Moderate	108	11.5	107	11.5	1	12.5	0	0.0
Middle	233	24.9	231	24.9	2	25.0	0	0.0
Upper	582	62.2	578	62.3	4	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>936</b>	<b>100.0</b>	<b>928</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				99.1		0.9		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table B18

2020 Combined Demographics Assessment Area: San Antonio Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	33	8.9	28,586	6.7	10,764	37.7	102,399	23.8
Moderate	131	35.2	135,059	31.5	28,860	21.4	75,626	17.6
Middle	94	25.3	117,189	27.3	12,655	10.8	82,128	19.1
Upper	110	29.6	148,558	34.6	6,006	4.0	169,251	39.4
Unknown	4	1.1	12	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>372</b>	<b>100.0</b>	<b>429,404</b>	<b>100.0</b>	<b>58,285</b>	<b>13.6</b>	<b>429,404</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	47,834	19,121	5.1	40.0	22,334	46.7	6,379	13.3
Moderate	229,217	100,677	27.1	43.9	105,396	46.0	23,144	10.1
Middle	192,965	101,728	27.4	52.7	76,061	39.4	15,176	7.9
Upper	219,934	150,148	40.4	68.3	56,906	25.9	12,880	5.9
Unknown	12	12	0.0	100.0	0	0.0	0	0.0
<b>Total AA</b>	<b>689,962</b>	<b>371,686</b>	<b>100.0</b>	<b>53.9</b>	<b>260,697</b>	<b>37.8</b>	<b>57,579</b>	<b>8.3</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,243	5.0	3,748	4.7	475	8.8	20	2.6
Moderate	19,421	22.8	17,985	22.7	1,336	24.8	100	13.2
Middle	24,242	28.4	22,351	28.2	1,723	32.0	168	22.1
Upper	37,237	43.6	34,964	44.1	1,805	33.5	468	61.7
Unknown	201	0.2	153	0.2	45	0.8	3	0.4
<b>Total AA</b>	<b>85,344</b>	<b>100.0</b>	<b>79,201</b>	<b>100.0</b>	<b>5,384</b>	<b>100.0</b>	<b>759</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.8</b>		<b>6.3</b>		<b>0.9</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	10	1.1	9	1.0	1	14.3	0	0.0
Moderate	110	11.6	109	11.6	1	14.3	0	0.0
Middle	229	24.2	228	24.3	1	14.3	0	0.0
Upper	596	63.1	592	63.1	4	57.1	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>945</b>	<b>100.0</b>	<b>938</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>99.3</b>		<b>0.7</b>		<b>0.0</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

## APPENDIX C: FULL-SCOPE ASSESSMENT AREAS LENDING TABLES

Table C1A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Phoenix Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	1	3.1	4.5	280	2.8	2.8	4.6
Moderate	10	31.3	16.4	2,267	22.5	11.7	18.8
Middle	13	40.6	36.7	2,894	28.7	31.7	34.7
Upper	8	25.0	41.6	4,643	46.0	52.7	41.9
Unknown	0	0.0	0.9	0	0.0	1.0	0.0
Total	32	100.0	100.0	10,084	100.0	100.0	100.0
Refinance Loans							
Low	4	4.9	2.0	416	2.0	1.3	4.6
Moderate	19	23.5	11.3	4,039	19.2	8.1	18.8
Middle	15	18.5	32.9	3,037	14.5	28.1	34.7
Upper	43	53.1	53.2	13,524	64.4	61.8	41.9
Unknown	0	0.0	0.6	0	0.0	0.7	0.0
Total	81	100.0	100.0	21,016	100.0	100.0	100.0
Home Improvement Loans							
Low	1	1.2	2.0	39	0.3	1.5	4.6
Moderate	3	3.6	10.6	154	1.4	8.2	18.8
Middle	26	31.0	30.7	2,978	26.5	25.1	34.7
Upper	54	64.3	56.2	8,086	71.8	64.8	41.9
Unknown	0	0.0	0.4	0	0.0	0.3	0.0
Total	84	100.0	100.0	11,257	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	27.8	0	0.0	24.5	18.9
Moderate	0	0.0	34.6	0	0.0	22.8	30.7
Middle	0	0.0	23.4	0	0.0	32.2	30.9
Upper	1	100.0	13.2	26,900	100.0	20.3	19.0
Unknown	0	0.0	0.9	0	0.0	0.2	0.5
Total	1	100.0	100.0	26,900	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	7	2.6	2.9	767	1.0	2.6	4.6
Moderate	38	13.9	13.0	7,286	9.1	9.8	18.8
Middle	75	27.4	34.1	10,314	12.9	29.4	34.7
Upper	153	55.8	49.3	61,439	76.9	57.5	41.9
Unknown	1	0.4	0.7	125	0.2	0.8	0.0
Total	274	100.0	100.0	79,931	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table C1B**

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Phoenix Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	##%	##%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	1	1.3	1.6	32	0.3	0.8	4.6
Moderate	6	8.0	8.9	826	8.6	4.6	18.8
Middle	21	28.0	28.0	1,405	14.7	19.0	34.7
Upper	46	61.3	61.1	7,186	75.1	75.3	41.9
Unknown	1	1.3	0.5	125	1.3	0.2	0.0
Total	75	100.0	100.0	9,574	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.2	0	0.0	0.9	4.6
Moderate	0	0.0	11.3	0	0.0	5.5	18.8
Middle	0	0.0	30.8	0	0.0	17.5	34.7
Upper	1	100.0	55.4	1,100	100.0	76.0	41.9
Unknown	0	0.0	0.3	0	0.0	0.1	0.0
Total	1	100.0	100.0	1,100	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	5.9	0	0.0	3.7	4.6
Moderate	0	0.0	21.0	0	0.0	15.9	18.8
Middle	0	0.0	42.5	0	0.0	37.7	34.7
Upper	0	0.0	30.4	0	0.0	42.4	41.9
Unknown	0	0.0	0.2	0	0.0	0.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table C2**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Phoenix Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	39	9.8	6.7	5,075	9.9	10.2	6.6
Moderate	85	21.4	16.6	11,411	22.3	19.1	16.7
Middle	117	29.4	26.4	16,608	32.5	24.6	28.4
Upper	154	38.7	49.1	17,658	34.6	44.3	47.7
Unknown	3	0.8	0.7	352	0.7	1.3	0.6
Total	398	100.0	100.0	51,104	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table C3A**

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Phoenix Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	2	6.3	4.5	382	3.8	2.5	21.8
Moderate	15	46.9	19.8	3,433	34.0	14.3	16.9
Middle	4	12.5	21.4	872	8.6	19.1	19.2
Upper	10	31.3	40.9	5,117	50.7	51.2	42.2
Unknown	1	3.1	13.4	280	2.8	12.9	0.0
Total	32	100.0	100.0	10,084	100.0	100.0	100.0
Refinance Loans							
Low	8	9.9	4.6	1,080	5.1	2.6	21.8
Moderate	19	23.5	14.8	3,603	17.1	10.6	16.9
Middle	17	21.0	20.1	3,240	15.4	17.7	19.2
Upper	32	39.5	40.7	11,574	55.1	48.8	42.2
Unknown	5	6.2	19.7	1,519	7.2	20.4	0.0
Total	81	100.0	100.0	21,016	100.0	100.0	100.0
Home Improvement Loans							
Low	2	2.4	4.8	95	0.8	3.0	21.8
Moderate	8	9.5	13.7	600	5.3	11.0	16.9
Middle	16	19.0	21.9	1,178	10.5	18.9	19.2
Upper	56	66.7	56.0	9,134	81.1	61.3	42.2
Unknown	2	2.4	3.7	250	2.2	5.8	0.0
Total	84	100.0	100.0	11,257	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	16	5.9	4.6	1,890	3.6	2.5	21.8
Moderate	51	18.7	16.1	8,130	15.3	11.8	16.9
Middle	51	18.7	20.3	6,342	12.0	18.0	19.2
Upper	146	53.5	40.8	34,370	64.8	49.5	42.2
Unknown	9	3.3	18.2	2,299	4.3	18.2	0.0
Total	273	100.0	100.0	53,031	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

**Table C3B**

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Phoenix Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	##%	##%	\$(000)	\$\$%	\$\$%	
Other Purpose Lines of Credit							
Low	4	5.3	4.9	333	3.5	2.5	21.8
Moderate	9	12.0	12.5	494	5.2	7.7	16.9
Middle	14	18.7	17.6	1,052	11.0	11.6	19.2
Upper	47	62.7	60.9	7,445	77.8	73.2	42.2
Unknown	1	1.3	4.1	250	2.6	5.0	0.0
Total	75	100.0	100.0	9,574	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	7.2	0	0.0	3.5	21.8
Moderate	0	0.0	13.9	0	0.0	7.3	16.9
Middle	0	0.0	18.5	0	0.0	10.2	19.2
Upper	1	100.0	52.3	1,100	100.0	69.7	42.2
Unknown	0	0.0	8.0	0	0.0	9.2	0.0
Total	1	100.0	100.0	1,100	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.4	0	0.0	0.3	21.8
Moderate	0	0.0	0.6	0	0.0	0.6	16.9
Middle	0	0.0	0.6	0	0.0	0.6	19.2
Upper	0	0.0	0.3	0	0.0	0.4	42.2
Unknown	0	0.0	98.1	0	0.0	98.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



**Table C4**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Phoenix Metropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	241	60.6	40.1	19,496	38.1	21.9	93.2
Over \$1 Million	96	24.1		25,488	49.9		5.6
Revenue Unknown	61	15.3		6,120	12.0		1.2
Total	398	100.0		51,104	100.0		100.0
By Loan Size							
\$100,000 or Less	269	67.6	88.8	8,835	17.3	34.5	
\$100,001 - \$250,000	67	16.8	6.4	11,527	22.6	19.5	
\$250,001 - \$1 Million	62	15.6	4.8	30,742	60.2	46.0	
Total	398	100.0	100.0	51,104	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	195	80.9		5,780	29.6		
\$100,001 - \$250,000	27	11.2		4,081	20.9		
\$250,001 - \$1 Million	19	7.9		9,635	49.4		
Total	241	100.0		19,496	100.0		
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table C5A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Greater Los Angeles MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	1	1.9	2.7	381	0.8	1.9	2.7
Moderate	9	17.3	16.4	2,842	5.8	11.4	17.6
Middle	8	15.4	26.8	3,192	6.5	21.4	27.5
Upper	34	65.4	53.0	42,806	87.0	64.1	52.2
Unknown	0	0.0	1.1	0	0.0	1.2	0.1
Total	52	100.0	100.0	49,221	100.0	100.0	100.0
Refinance Loans							
Low	4	1.4	2.0	1,381	0.6	1.6	2.7
Moderate	57	20.4	14.4	15,300	6.4	11.2	17.6
Middle	47	16.8	27.2	16,369	6.8	23.2	27.5
Upper	170	60.9	56.2	204,477	85.5	63.7	52.2
Unknown	1	0.4	0.3	1,500	0.6	0.4	0.1
Total	279	100.0	100.0	239,027	100.0	100.0	100.0
Home Improvement Loans							
Low	2	0.6	1.4	365	0.5	1.3	2.7
Moderate	31	8.6	11.6	5,882	8.2	9.7	17.6
Middle	82	22.8	23.6	14,744	20.5	20.4	27.5
Upper	243	67.7	63.3	50,749	70.4	68.5	52.2
Unknown	1	0.3	0.2	302	0.4	0.1	0.1
Total	359	100.0	100.0	72,042	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	15.6	0	0.0	11.3	
Moderate	1	50.0	35.8	2,050	47.6	31.9	31.2
Middle	0	0.0	23.3	0	0.0	24.9	23.6
Upper	1	50.0	24.8	2,261	52.4	31.0	31.6
Unknown	0	0.0	0.5	0	0.0	0.8	1.2
Total	2	100.0	100.0	4,311	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	9	0.9	2.2	2,273	0.5	2.2	
Moderate	113	11.5	14.8	28,664	5.8	12.2	17.6
Middle	187	19.0	26.9	43,374	8.8	22.7	27.5
Upper	671	68.2	55.7	418,705	84.6	62.4	52.2
Unknown	4	0.4	0.4	2,150	0.4	0.5	0.1
Total	984	100.0	100.0	495,166	100.0	100.0	100.0

Source: 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table C5B**

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Greater Los Angeles MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit							
Low	2	0.7	0.9	146	0.2	0.5	2.7
Moderate	15	5.4	8.4	2,590	3.9	5.3	17.6
Middle	49	17.6	19.9	8,581	12.9	12.9	27.5
Upper	210	75.5	70.5	54,615	82.4	81.0	52.2
Unknown	2	0.7	0.3	348	0.5	0.3	0.1
Total	278	100.0	100.0	66,280	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.5	0	0.0	0.6	2.7
Moderate	0	0.0	11.2	0	0.0	3.7	17.6
Middle	1	7.1	22.2	488	0.8	8.4	27.5
Upper	13	92.9	64.8	63,797	99.2	87.1	52.2
Unknown	0	0.0	0.2	0	0.0	0.1	0.1
Total	14	100.0	100.0	64,285	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	5.2	0	0.0	3.5	2.7
Moderate	0	0.0	25.8	0	0.0	17.7	17.6
Middle	0	0.0	31.5	0	0.0	27.0	27.5
Upper	0	0.0	37.3	0	0.0	51.4	52.2
Unknown	0	0.0	0.2	0	0.0	0.4	0.1
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table C6**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Greater Los Angeles MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	86	5.6	5.1	15,575	5.8	5.1	5.1
Moderate	227	14.8	19.3	46,434	17.3	20.1	19.7
Middle	356	23.3	25.1	81,195	30.2	27.6	25.5
Upper	813	53.1	48.4	117,966	43.9	44.0	48.0
Unknown	49	3.2	1.7	7,443	2.8	2.8	1.8
<b>Total</b>	<b>1,531</b>	<b>100.0</b>	<b>100.0</b>	<b>268,613</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table C7A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Greater Los Angeles MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	1	1.9	1.4	155	0.3	0.8	24.4
Moderate	3	5.8	5.3	911	1.9	2.5	16.3
Middle	3	5.8	15.5	959	1.9	10.0	17.0
Upper	43	82.7	65.6	36,646	74.5	74.2	42.3
Unknown	2	3.8	12.2	10,550	21.4	12.5	0.0
Total	52	100.0	100.0	49,221	100.0	100.0	100.0
Refinance Loans							
Low	5	1.8	2.9	4,381	1.8	1.9	24.4
Moderate	12	4.3	7.8	2,565	1.1	4.8	16.3
Middle	39	14.0	18.1	14,565	6.1	14.0	17.0
Upper	201	72.0	56.4	145,172	60.7	63.7	42.3
Unknown	22	7.9	14.8	72,344	30.3	15.6	0.0
Total	279	100.0	100.0	239,027	100.0	100.0	100.0
Home Improvement Loans							
Low	1	0.3	2.6	94	0.1	2.0	24.4
Moderate	9	2.5	6.7	1,009	1.4	4.8	16.3
Middle	31	8.6	15.5	4,160	5.8	13.1	17.0
Upper	317	88.3	68.8	66,659	92.5	68.8	42.3
Unknown	1	0.3	6.4	120	0.2	11.4	0.0
Total	359	100.0	100.0	72,042	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	9	0.9	2.6	4,780	1.0	1.7	24.4
Moderate	33	3.4	7.3	6,158	1.3	4.2	16.3
Middle	96	9.8	17.4	22,940	4.7	12.9	17.0
Upper	811	82.6	58.0	366,974	74.8	65.8	42.3
Unknown	33	3.4	14.7	90,003	18.3	15.4	0.0
Total	982	100.0	100.0	490,855	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

**Table C7B**

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Greater Los Angeles MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit							
Low	2	0.7	3.5	150	0.2	2.6	24.4
Moderate	7	2.5	5.2	1,163	1.8	2.8	16.3
Middle	23	8.3	12.1	3,256	4.9	6.4	17.0
Upper	238	85.6	74.1	54,722	82.6	78.2	42.3
Unknown	8	2.9	5.0	6,989	10.5	10.0	0.0
Total	278	100.0	100.0	66,280	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	3.3	0	0.0	1.7	24.4
Moderate	2	14.3	7.9	510	0.8	2.5	16.3
Middle	0	0.0	13.3	0	0.0	4.6	17.0
Upper	12	85.7	64.9	63,775	99.2	69.6	42.3
Unknown	0	0.0	10.5	0	0.0	21.7	0.0
Total	14	100.0	100.0	64,285	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.1	0	0.0	0.0	24.4
Moderate	0	0.0	0.5	0	0.0	0.3	16.3
Middle	0	0.0	0.6	0	0.0	0.5	17.0
Upper	0	0.0	2.0	0	0.0	3.3	42.3
Unknown	0	0.0	96.8	0	0.0	95.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table C8

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Greater Los Angeles MSA							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	713	46.6	41.7	72,761	27.1	24.1	91.6
Over \$1 Million	483	31.5		152,934	56.9		7.9
Revenue Unknown	335	21.9		42,918	16.0		0.5
Total	1,531	100.0		268,613	100.0		100.0
By Loan Size							
\$100,000 or Less	921	60.2	90.1	35,183	13.1	38.1	
\$100,001 - \$250,000	296	19.3	5.8	52,642	19.6	19.4	
\$250,001 - \$1 Million	314	20.5	4.0	180,788	67.3	42.5	
Total	1,531	100.0	100.0	268,613	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	545	76.4		19,688	27.1		
\$100,001 - \$250,000	107	15.0		17,498	24.0		
\$250,001 - \$1 Million	61	8.6		35,575	48.9		
Total	713	100.0		72,761	100.0		
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table C9A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Salinas MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.5	0	0.0	0.3	0.6
Moderate	0	0.0	14.9	0	0.0	10.1	15.3
Middle	1	20.0	36.3	272	17.8	28.6	33.9
Upper	4	80.0	48.3	1,259	82.2	61.0	50.2
Unknown	0	0.0	0.1	0	0.0	0.1	0.0
Total	5	100.0	100.0	1,531	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.5	0	0.0	0.3	0.6
Moderate	0	0.0	12.5	0	0.0	9.5	15.3
Middle	4	30.8	35.6	773	19.3	30.8	33.9
Upper	9	69.2	51.4	3,227	80.7	59.3	50.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	13	100.0	100.0	4,000	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.7	0	0.0	1.1	0.6
Moderate	3	15.8	10.5	293	8.9	7.2	15.3
Middle	4	21.1	29.4	640	19.4	21.1	33.9
Upper	12	63.2	59.5	2,361	71.7	70.6	50.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	19	100.0	100.0	3,294	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	15.7	0	0.0	4.7	5.5
Moderate	0	0.0	21.6	0	0.0	30.0	27.9
Middle	0	0.0	31.4	0	0.0	31.9	36.1
Upper	0	0.0	31.4	0	0.0	33.4	30.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.5	0	0.0	0.4	0.6
Moderate	4	8.9	13.0	425	4.2	9.9	15.3
Middle	12	26.7	35.4	1,995	19.9	29.8	33.9
Upper	29	64.4	51.0	7,581	75.8	59.8	50.2
Unknown	0	0.0	0.0	0	0.0	0.1	0.0
Total	45	100.0	100.0	10,001	100.0	100.0	100.0

Source: 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table C9B**

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Salinas MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	0.0	0	0.0	0.0	0.6
Moderate	1	12.5	6.8	132	11.2	3.2	15.3
Middle	3	37.5	22.0	310	26.4	12.7	33.9
Upper	4	50.0	71.2	734	62.4	84.1	50.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	1,176	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.5	0	0.0	0.1	0.6
Moderate	0	0.0	13.5	0	0.0	4.1	15.3
Middle	0	0.0	23.0	0	0.0	11.1	33.9
Upper	0	0.0	63.0	0	0.0	84.8	50.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.5	0	0.0	0.3	0.6
Moderate	0	0.0	23.3	0	0.0	12.4	15.3
Middle	0	0.0	39.9	0	0.0	34.3	33.9
Upper	0	0.0	36.3	0	0.0	53.0	50.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



**Table C10**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Salinas MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	6	8.0	3.2	198	2.6	2.4	3.8
Moderate	10	13.3	12.6	1,536	20.0	11.7	12.5
Middle	20	26.7	30.2	2,268	29.5	34.0	30.4
Upper	39	52.0	50.9	3,696	48.0	48.6	52.9
Unknown	0	0.0	0.3	0	0.0	0.5	0.4
Total	75	100.0	100.0	7,698	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table C11A**

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Salinas MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	##	##	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.6	0	0.0	0.3	21.6
Moderate	0	0.0	4.8	0	0.0	2.4	17.9
Middle	1	20.0	18.2	272	17.8	12.0	18.7
Upper	3	60.0	66.7	996	65.1	75.5	41.9
Unknown	1	20.0	9.7	263	17.2	9.8	0.0
Total	5	100.0	100.0	1,531	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.2	0	0.0	1.4	21.6
Moderate	2	15.4	9.2	392	9.8	5.7	17.9
Middle	1	7.7	19.0	175	4.4	14.9	18.7
Upper	9	69.2	54.0	3,073	76.8	61.1	41.9
Unknown	1	7.7	15.6	360	9.0	17.0	0.0
Total	13	100.0	100.0	4,000	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.3	0	0.0	1.0	21.6
Moderate	4	21.1	6.2	623	18.9	4.1	17.9
Middle	3	15.8	18.0	464	14.1	16.0	18.7
Upper	12	63.2	70.3	2,207	67.0	75.8	41.9
Unknown	0	0.0	3.3	0	0.0	3.1	0.0
Total	19	100.0	100.0	3,294	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	1.9	0	0.0	1.1	21.6
Moderate	8	17.8	8.1	1,291	12.9	4.7	17.9
Middle	5	11.1	18.5	911	9.1	13.8	18.7
Upper	30	66.7	56.5	7,176	71.8	64.7	41.9
Unknown	2	4.4	14.9	623	6.2	15.6	0.0
Total	45	100.0	100.0	10,001	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table C11B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Salinas MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	4.5	0	0.0	6.1	21.6
Moderate	2	25.0	5.1	276	23.5	5.4	17.9
Middle	0	0.0	16.4	0	0.0	7.1	18.7
Upper	6	75.0	70.1	900	76.5	68.7	41.9
Unknown	0	0.0	4.0	0	0.0	12.7	0.0
Total	8	100.0	100.0	1,176	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	3.5	0	0.0	1.5	21.6
Moderate	0	0.0	6.0	0	0.0	2.1	17.9
Middle	0	0.0	13.0	0	0.0	3.8	18.7
Upper	0	0.0	69.0	0	0.0	75.9	41.9
Unknown	0	0.0	8.5	0	0.0	16.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	21.6
Moderate	0	0.0	0.5	0	0.0	0.3	17.9
Middle	0	0.0	0.0	0	0.0	0.0	18.7
Upper	0	0.0	2.1	0	0.0	6.6	41.9
Unknown	0	0.0	97.4	0	0.0	93.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table C12**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Salinas MSA							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	41	54.7	38.3	2,567	33.3	26.8	92.5
Over \$1 Million	16	21.3		4,841	62.9		7.0
Revenue Unknown	18	24.0		290	3.8		0.5
Total	75	100.0		7,698	100.0		100.0
By Loan Size							
\$100,000 or Less	60	80.0	91.4	1,792	23.3	45.6	
\$100,001 - \$250,000	8	10.7	5.8	1,426	18.5	20.6	
\$250,001 - \$1 Million	7	9.3	2.8	4,480	58.2	33.8	
Total	75	100.0	100.0	7,698	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	36	87.8		1,077	42.0		
\$100,001 - \$250,000	4	9.8		660	25.7		
\$250,001 - \$1 Million	1	2.4		830	32.3		
Total	41	100.0		2,567	100.0		
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table C13A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: San Jose Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	4.5	0	0.0	2.8	4.4
Moderate	2	18.2	17.1	938	18.5	11.8	15.5
Middle	4	36.4	43.2	1,595	31.4	36.9	36.7
Upper	5	45.5	35.2	2,540	50.1	48.4	43.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	11	100.0	100.0	5,073	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	4.0	0	0.0	3.2	4.4
Moderate	6	8.5	15.9	2,226	4.5	12.9	15.5
Middle	23	32.4	40.1	9,146	18.6	37.2	36.7
Upper	42	59.2	40.0	37,789	76.9	46.7	43.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	71	100.0	100.0	49,161	100.0	100.0	100.0
Home Improvement Loans							
Low	3	3.7	3.2	270	1.2	2.6	4.4
Moderate	13	16.0	12.4	3,090	13.2	9.5	15.5
Middle	24	29.6	37.0	6,339	27.1	32.1	36.7
Upper	41	50.6	47.4	13,661	58.5	55.8	43.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	81	100.0	100.0	23,360	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	22.1	0	0.0	17.3	12.1
Moderate	1	100.0	21.1	26,000	100.0	11.4	22.7
Middle	0	0.0	37.9	0	0.0	34.9	41.9
Upper	0	0.0	18.8	0	0.0	36.3	23.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	26,000	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	5	2.2	4.1	620	0.5	3.6	4.4
Moderate	28	12.2	15.9	34,152	27.9	12.5	15.5
Middle	70	30.6	40.3	21,534	17.6	36.8	36.7
Upper	126	55.0	39.7	65,944	53.9	47.1	43.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	229	100.0	100.0	122,250	100.0	100.0	100.0

Source: 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table C13B**

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: San Jose Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Other Purpose Lines of Credit							
Low	2	3.1	2.2	350	1.9	1.5	4.4
Moderate	6	9.2	10.1	1,898	10.2	6.6	15.5
Middle	19	29.2	34.2	4,454	23.9	27.9	36.7
Upper	38	58.5	53.5	11,954	64.1	64.0	43.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	65	100.0	100.0	18,656	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	4.1	0	0.0	2.3	4.4
Moderate	0	0.0	13.9	0	0.0	7.9	15.5
Middle	0	0.0	37.3	0	0.0	27.5	36.7
Upper	0	0.0	44.7	0	0.0	62.3	43.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	5.0	0	0.0	3.3	4.4
Moderate	0	0.0	17.6	0	0.0	10.3	15.5
Middle	0	0.0	33.0	0	0.0	29.8	36.7
Upper	0	0.0	44.3	0	0.0	56.7	43.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table C14**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: San Jose Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Low	40	6.7	7.1	7,086	5.6	6.0	5.9
Moderate	122	20.5	20.1	29,556	23.4	21.7	18.4
Middle	225	37.8	36.5	50,234	39.8	37.1	35.8
Upper	208	35.0	35.9	39,483	31.2	34.8	39.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Total	595	100.0	100.0	126,359	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table C15A**

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: San Jose Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	1	9.1	1.3	178	3.5	0.5	23.8
Moderate	0	0.0	6.9	0	0.0	3.2	15.5
Middle	2	18.2	19.0	695	13.7	13.0	18.5
Upper	7	63.6	65.9	3,382	66.7	77.4	42.2
Unknown	1	9.1	6.9	818	16.1	5.9	0.0
Total	11	100.0	100.0	5,073	100.0	100.0	100.0
Refinance Loans							
Low	3	4.2	4.2	472	1.0	2.5	23.8
Moderate	6	8.5	12.3	1,636	3.3	8.4	15.5
Middle	11	15.5	23.8	3,709	7.5	20.3	18.5
Upper	45	63.4	52.1	40,667	82.7	61.4	42.2
Unknown	6	8.5	7.5	2,677	5.4	7.4	0.0
Total	71	100.0	100.0	49,161	100.0	100.0	100.0
Home Improvement Loans							
Low	5	6.2	4.8	554	2.4	3.4	23.8
Moderate	8	9.9	10.0	1,339	5.7	7.5	15.5
Middle	11	13.6	19.5	2,016	8.6	16.3	18.5
Upper	56	69.1	62.5	19,051	81.6	67.9	42.2
Unknown	1	1.2	3.2	400	1.7	4.9	0.0
Total	81	100.0	100.0	23,360	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	9	3.9	3.8	1,204	1.3	2.1	23.8
Moderate	20	8.8	11.4	4,041	4.2	7.2	15.5
Middle	43	18.9	22.8	10,747	11.2	18.5	18.5
Upper	147	64.5	54.4	75,863	78.8	64.9	42.2
Unknown	9	3.9	7.6	4,395	4.6	7.4	0.0
Total	228	100.0	100.0	96,250	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table C15B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: San Jose Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	4.6	0	0.0	3.3	23.8
Moderate	6	9.2	9.1	1,066	5.7	5.4	15.5
Middle	19	29.2	18.0	4,327	23.2	12.4	18.5
Upper	39	60.0	64.4	12,763	68.4	72.8	42.2
Unknown	1	1.5	3.9	500	2.7	6.1	0.0
Total	65	100.0	100.0	18,656	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	6.1	0	0.0	2.3	23.8
Moderate	0	0.0	12.0	0	0.0	6.0	15.5
Middle	0	0.0	19.3	0	0.0	11.5	18.5
Upper	0	0.0	58.7	0	0.0	73.3	42.2
Unknown	0	0.0	3.8	0	0.0	6.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.2	0	0.0	0.0	23.8
Moderate	0	0.0	0.5	0	0.0	0.1	15.5
Middle	0	0.0	0.9	0	0.0	0.6	18.5
Upper	0	0.0	2.5	0	0.0	4.1	42.2
Unknown	0	0.0	95.9	0	0.0	95.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							



**Table C16**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: San Jose Metropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	274	46.1	44.3	33,691	26.7	25.7	91.5
Over \$1 Million	227	38.2		73,926	58.5		8.1
Revenue Unknown	94	15.8		18,742	14.8		0.4
Total	595	100.0		126,359	100.0		100.0
By Loan Size							
\$100,000 or Less	310	52.1	88.9	13,367	10.6	36.4	
\$100,001 - \$250,000	126	21.2	6.7	22,826	18.1	20.5	
\$250,001 - \$1 Million	159	26.7	4.4	90,166	71.4	43.1	
Total	595	100.0	100.0	126,359	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	188	68.6		7,353	21.8		
\$100,001 - \$250,000	48	17.5		8,026	23.8		
\$250,001 - \$1 Million	38	13.9		18,312	54.4		
Total	274	100.0		33,691	100.0		
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table C17A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	2	7.1	2.9	717	8.5	1.8	3.0
Moderate	12	42.9	23.5	2,764	32.9	16.4	24.2
Middle	7	25.0	33.8	1,685	20.1	28.7	33.4
Upper	7	25.0	39.7	3,233	38.5	52.5	39.4
Unknown	0	0.0	0.1	0	0.0	0.6	0.1
Total	28	100.0	100.0	8,399	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	1.5	0	0.0	1.0	3.0
Moderate	18	30.0	14.9	4,151	10.7	10.8	24.2
Middle	11	18.3	33.3	4,472	11.5	28.2	33.4
Upper	31	51.7	50.3	30,295	77.8	59.2	39.4
Unknown	0	0.0	0.1	0	0.0	0.7	0.1
Total	60	100.0	100.0	38,918	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.1	0	0.0	0.8	3.0
Moderate	2	8.7	13.5	216	5.1	8.3	24.2
Middle	4	17.4	29.9	470	11.0	22.6	33.4
Upper	17	73.9	55.5	3,576	83.9	68.2	39.4
Unknown	0	0.0	0.0	0	0.0	0.1	0.1
Total	23	100.0	100.0	4,262	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	20.1	0	0.0	9.6	
Moderate	0	0.0	40.2	0	0.0	37.9	33.9
Middle	0	0.0	22.4	0	0.0	33.6	32.2
Upper	1	100.0	16.7	2,146	100.0	18.9	27.2
Unknown	0	0.0	0.6	0	0.0	0.0	0.1
Total	1	100.0	100.0	2,146	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	2	1.5	2.1	717	1.2	1.6	
Moderate	34	25.6	18.8	7,351	12.8	14.0	24.2
Middle	29	21.8	33.4	7,181	12.5	28.1	33.4
Upper	68	51.1	45.5	42,368	73.5	55.2	39.4
Unknown	0	0.0	0.1	0	0.0	1.1	0.1
Total	133	100.0	100.0	57,617	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table C17B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	1.0	0	0.0	0.6	3.0
Moderate	1	5.3	11.9	60	1.7	6.6	24.2
Middle	6	31.6	29.5	366	10.3	19.8	33.4
Upper	12	63.2	57.5	3,118	88.0	70.6	39.4
Unknown	0	0.0	0.1	0	0.0	2.4	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	3,544	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.2	0	0.0	0.2	3.0
Moderate	1	50.0	15.2	160	46.0	2.8	24.2
Middle	1	50.0	26.8	188	54.0	8.5	33.4
Upper	0	0.0	54.7	0	0.0	67.5	39.4
Unknown	0	0.0	1.1	0	0.0	21.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	348	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	3.3	0	0.0	2.3	3.0
Moderate	0	0.0	28.8	0	0.0	20.9	24.2
Middle	0	0.0	39.0	0	0.0	35.6	33.4
Upper	0	0.0	28.9	0	0.0	41.2	39.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table C18**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Low</b>	10	6.1	5.9	1,957	6.0	8.2	5.3
<b>Moderate</b>	39	23.8	23.1	8,590	26.5	24.8	23.1
<b>Middle</b>	30	18.3	29.0	6,966	21.5	27.1	30.5
<b>Upper</b>	81	49.4	41.5	14,232	43.9	39.3	40.9
<b>Unknown</b>	4	2.4	0.3	702	2.2	0.4	0.3
<b>Total</b>	164	100.0	100.0	32,447	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table C19A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	3.3	0	0.0	1.3	22.5
Moderate	11	39.3	16.5	2,383	28.4	10.0	17.3
Middle	10	35.7	22.2	2,377	28.3	18.0	18.3
Upper	7	25.0	46.0	3,639	43.3	59.1	41.9
Unknown	0	0.0	11.9	0	0.0	11.7	0.0
Total	28	100.0	100.0	8,399	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.5	0	0.0	1.1	22.5
Moderate	8	13.3	10.3	1,479	3.8	6.1	17.3
Middle	11	18.3	18.7	2,482	6.4	14.3	18.3
Upper	33	55.0	50.8	14,964	38.5	60.1	41.9
Unknown	8	13.3	17.8	19,993	51.4	18.4	0.0
Total	60	100.0	100.0	38,918	100.0	100.0	100.0
Home Improvement Loans							
Low	1	4.3	4.2	70	1.6	1.9	22.5
Moderate	4	17.4	11.8	515	12.1	6.7	17.3
Middle	3	13.0	17.6	705	16.5	12.0	18.3
Upper	14	60.9	62.6	2,822	66.2	72.7	41.9
Unknown	1	4.3	3.8	150	3.5	6.7	0.0
Total	23	100.0	100.0	4,262	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	0.8	2.9	70	0.1	1.2	22.5
Moderate	24	18.2	12.8	4,437	8.0	7.7	17.3
Middle	29	22.0	19.7	6,145	11.1	15.5	18.3
Upper	67	50.8	48.1	24,523	44.2	59.1	41.9
Unknown	11	8.3	16.6	20,296	36.6	16.5	0.0
Total	132	100.0	100.0	55,471	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table C19B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	5.3	0	0.0	2.8	22.5
Moderate	1	5.3	10.9	60	1.7	5.2	17.3
Middle	4	21.1	15.8	421	11.9	8.5	18.3
Upper	12	63.2	64.5	2,910	82.1	79.7	41.9
Unknown	2	10.5	3.3	153	4.3	3.8	0.0
Total	19	100.0	100.0	3,544	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	4.7	0	0.0	0.9	22.5
Moderate	0	0.0	11.0	0	0.0	2.2	17.3
Middle	1	50.0	14.3	160	46.0	2.9	18.3
Upper	1	50.0	55.9	188	54.0	62.1	41.9
Unknown	0	0.0	14.1	0	0.0	32.0	0.0
Total	2	100.0	100.0	348	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.4	0	0.0	0.8	22.5
Moderate	0	0.0	2.4	0	0.0	2.0	17.3
Middle	0	0.0	2.1	0	0.0	2.3	18.3
Upper	0	0.0	1.5	0	0.0	2.2	41.9
Unknown	0	0.0	92.5	0	0.0	92.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table C20**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	89	54.3	41.0	10,690	32.9	24.3	93.9
Over \$1 Million	46	28.0		14,086	43.4		5.0
Revenue Unknown	29	17.7		7,671	23.6		1.1
Total	164	100.0		32,447	100.0		100.0
By Loan Size							
\$100,000 or Less	90	54.9	91.5	3,359	10.4	41.9	
\$100,001 - \$250,000	29	17.7	5.4	5,096	15.7	21.1	
\$250,001 - \$1 Million	45	27.4	3.1	23,992	73.9	37.0	
Total	164	100.0	100.0	32,447	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	63	70.8		2,289	21.4		
\$100,001 - \$250,000	12	13.5		1,980	18.5		
\$250,001 - \$1 Million	14	15.7		6,421	60.1		
Total	89	100.0		10,690	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table C21A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Southeast Michigan Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	4	2.3	3.1	322	0.8	1.6	6.1
Moderate	19	11.0	16.4	3,238	8.5	10.9	19.4
Middle	66	38.4	38.9	10,425	27.5	34.8	36.3
Upper	83	48.3	41.4	23,920	63.1	52.7	38.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	172	100.0	100.0	37,905	100.0	100.0	100.0
Refinance Loans							
Low	12	1.8	0.9	1,077	0.8	0.5	6.1
Moderate	74	11.3	9.1	9,089	6.9	6.0	19.4
Middle	206	31.4	35.4	33,659	25.4	30.4	36.3
Upper	365	55.6	54.6	88,797	67.0	63.0	38.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	657	100.0	100.0	132,622	100.0	100.0	100.0
Home Improvement Loans							
Low	11	3.5	2.1	694	2.2	1.2	6.1
Moderate	41	13.1	10.5	2,351	7.4	7.5	19.4
Middle	90	28.8	35.1	6,380	20.1	30.9	36.3
Upper	170	54.3	52.2	22,245	70.2	60.3	38.1
Unknown	1	0.3	0.0	21	0.1	0.0	0.1
Total	313	100.0	100.0	31,691	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	14.8	0	0.0	16.0	
Moderate	0	0.0	33.9	0	0.0	22.8	29.2
Middle	0	0.0	33.9	0	0.0	36.5	31.3
Upper	1	100.0	17.4	289	100.0	24.6	22.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.7
Total	1	100.0	100.0	289	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	32	2.3	1.7	2,257	0.9	1.2	
Moderate	159	11.4	11.5	16,509	6.7	7.9	19.4
Middle	436	31.3	36.5	58,343	23.8	31.9	36.3
Upper	764	54.9	50.3	167,675	68.5	58.9	38.1
Unknown	1	0.1	0.0	21	0.0	0.0	0.1
Total	1,392	100.0	100.0	244,805	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



**Table C21B**

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Southeast Michigan Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	5	2.1	1.2	164	0.5	0.8	6.1
Moderate	24	10.1	8.1	1,761	5.2	4.9	19.4
Middle	73	30.7	33.1	7,787	22.9	27.3	36.3
Upper	136	57.1	57.6	24,360	71.5	67.0	38.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	238	100.0	100.0	34,072	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	3.4	0	0.0	1.7	6.1
Moderate	1	9.1	14.9	70	0.9	8.2	19.4
Middle	1	9.1	36.0	92	1.1	25.1	36.3
Upper	9	81.8	45.6	8,064	98.0	64.9	38.1
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Total	11	100.0	100.0	8,226	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	4.5	0	0.0	2.4	6.1
Moderate	0	0.0	21.7	0	0.0	18.5	19.4
Middle	0	0.0	42.9	0	0.0	40.1	36.3
Upper	0	0.0	30.9	0	0.0	39.0	38.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table C22**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Southeast Michigan Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	669	10.5	6.8	106,472	11.5	7.6	7.6
Moderate	1,515	23.7	19.9	221,790	24.0	21.5	20.6
Middle	1,647	25.8	29.9	225,487	24.4	26.8	31.2
Upper	2,463	38.6	42.7	346,977	37.6	42.9	40.1
Unknown	88	1.4	0.5	22,843	2.5	1.1	0.6
Total	6,382	100.0	100.0	923,569	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Table C23A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Southeast Michigan Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	26	15.1	11.4	2,926	7.7	6.4	22.7
Moderate	36	20.9	23.7	5,902	15.6	17.8	16.5
Middle	29	16.9	23.4	4,958	13.1	22.3	18.8
Upper	58	33.7	31.1	18,991	50.1	43.4	42.0
Unknown	23	13.4	10.3	5,128	13.5	10.2	0.0
Total	172	100.0	100.0	37,905	100.0	100.0	100.0
Refinance Loans							
Low	76	11.6	5.8	6,746	5.1	3.1	22.7
Moderate	131	19.9	15.3	18,400	13.9	10.8	16.5
Middle	106	16.1	23.2	15,440	11.6	20.5	18.8
Upper	226	34.4	42.3	66,769	50.3	52.2	42.0
Unknown	118	18.0	13.4	25,267	19.1	13.4	0.0
Total	657	100.0	100.0	132,622	100.0	100.0	100.0
Home Improvement Loans							
Low	46	14.7	7.9	2,373	7.5	5.2	22.7
Moderate	55	17.6	15.9	4,107	13.0	12.0	16.5
Middle	73	23.3	22.7	6,008	19.0	18.7	18.8
Upper	117	37.4	51.2	16,905	53.3	60.6	42.0
Unknown	22	7.0	2.3	2,298	7.3	3.5	0.0
Total	313	100.0	100.0	31,691	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	185	13.3	7.5	14,409	5.9	4.1	22.7
Moderate	260	18.7	17.6	31,621	12.9	12.8	16.5
Middle	246	17.7	22.8	29,944	12.2	20.8	18.8
Upper	534	38.4	38.8	135,407	55.4	49.3	42.0
Unknown	166	11.9	13.3	33,135	13.6	13.0	0.0
Total	1,391	100.0	100.0	244,516	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Table C23B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Southeast Michigan Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	36	15.1	8.6	2,272	6.7	5.7	22.7
Moderate	36	15.1	15.1	3,013	8.8	10.8	16.5
Middle	38	16.0	19.9	3,538	10.4	15.4	18.8
Upper	125	52.5	55.0	24,807	72.8	66.8	42.0
Unknown	3	1.3	1.3	442	1.3	1.2	0.0
Total	238	100.0	100.0	34,072	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	9.1	9.9	92	1.1	5.6	22.7
Moderate	2	18.2	17.9	199	2.4	10.8	16.5
Middle	0	0.0	23.0	0	0.0	15.3	18.8
Upper	8	72.7	42.8	7,935	96.5	57.6	42.0
Unknown	0	0.0	6.3	0	0.0	10.7	0.0
Total	11	100.0	100.0	8,226	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.3	0	0.0	0.2	22.7
Moderate	0	0.0	0.6	0	0.0	0.5	16.5
Middle	0	0.0	0.4	0	0.0	0.4	18.8
Upper	0	0.0	0.4	0	0.0	0.6	42.0
Unknown	0	0.0	98.4	0	0.0	98.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table C24**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Southeast Michigan Metropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	3,496	54.8	41.5	262,022	28.4	24.4	90.8
Over \$1 Million	1,889	29.6		539,620	58.4		8.6
Revenue Unknown	997	15.6		121,927	13.2		0.7
Total	6,382	100.0		923,569	100.0		100.0
By Loan Size							
\$100,000 or Less	4,210	66.0	86.7	153,995	16.7	29.8	
\$100,001 - \$250,000	1,066	16.7	7.6	184,569	20.0	21.0	
\$250,001 - \$1 Million	1,106	17.3	5.7	585,005	63.3	49.2	
Total	6,382	100.0	100.0	923,569	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	2,866	82.0		97,349	37.2		
\$100,001 - \$250,000	434	12.4		71,054	27.1		
\$250,001 - \$1 Million	196	5.6		93,619	35.7		
Total	3,496	100.0		262,022	100.0		
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table C25A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Ann Arbor MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans							
Low	1	9.1	8.2	273	9.7	4.6	6.6
Moderate	2	18.2	13.9	593	21.0	10.3	12.0
Middle	4	36.4	45.5	653	23.1	43.4	44.7
Upper	4	36.4	32.0	1,306	46.2	41.3	36.5
Unknown	0	0.0	0.4	0	0.0	0.5	0.2
Total	11	100.0	100.0	2,825	100.0	100.0	100.0
Refinance Loans							
Low	1	1.9	3.4	2,000	14.3	2.1	6.6
Moderate	4	7.5	9.3	478	3.4	6.8	12.0
Middle	21	39.6	44.3	5,220	37.3	40.5	44.7
Upper	27	50.9	42.7	6,291	45.0	50.4	36.5
Unknown	0	0.0	0.2	0	0.0	0.2	0.2
Total	53	100.0	100.0	13,989	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.8	0	0.0	1.8	6.6
Moderate	2	11.8	8.0	150	5.6	6.8	12.0
Middle	6	35.3	40.3	384	14.4	34.0	44.7
Upper	9	52.9	47.4	2,139	80.0	56.8	36.5
Unknown	0	0.0	0.4	0	0.0	0.6	0.2
Total	17	100.0	100.0	2,673	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	46.2	0	0.0	23.1	
Moderate	0	0.0	13.5	0	0.0	22.6	18.6
Middle	1	100.0	28.8	2,100	100.0	41.0	34.6
Upper	0	0.0	7.7	0	0.0	9.9	11.8
Unknown	0	0.0	3.8	0	0.0	3.4	6.8
Total	1	100.0	100.0	2,100	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	2	2.1	4.9	2,273	9.7	4.3	
Moderate	8	8.4	10.6	1,221	5.2	8.9	12.0
Middle	39	41.1	44.4	9,483	40.6	41.2	44.7
Upper	46	48.4	39.9	10,402	44.5	45.0	36.5
Unknown	0	0.0	0.3	0	0.0	0.5	0.2
Total	95	100.0	100.0	23,379	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table C25B**

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Ann Arbor MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	2.7	0	0.0	1.0	6.6
Moderate	0	0.0	8.5	0	0.0	4.5	12.0
Middle	6	50.0	39.3	918	58.0	36.9	44.7
Upper	6	50.0	49.5	666	42.0	57.5	36.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	1,584	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	6.9	0	0.0	4.8	6.6
Moderate	0	0.0	7.8	0	0.0	2.4	12.0
Middle	1	100.0	45.7	208	100.0	35.0	44.7
Upper	0	0.0	38.8	0	0.0	56.2	36.5
Unknown	0	0.0	0.9	0	0.0	1.6	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	208	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	7.6	0	0.0	5.3	6.6
Moderate	0	0.0	15.6	0	0.0	15.0	12.0
Middle	0	0.0	38.4	0	0.0	45.9	44.7
Upper	0	0.0	38.4	0	0.0	33.8	36.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table C26**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Ann Arbor MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	31	8.8	7.6	4,541	8.7	5.9	8.7
Moderate	22	6.3	9.3	2,385	4.6	8.3	9.2
Middle	165	47.0	44.7	24,362	46.7	47.0	43.8
Upper	113	32.2	32.4	17,883	34.3	28.9	32.1
Unknown	20	5.7	5.9	3,039	5.8	9.8	6.1
Total	351	100.0	100.0	52,210	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Table C27A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Ann Arbor MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	1	9.1	11.4	71	2.5	5.9	22.7
Moderate	5	45.5	24.1	1,172	41.5	18.0	17.0
Middle	0	0.0	22.4	0	0.0	21.1	19.6
Upper	4	36.4	35.0	1,288	45.6	47.7	40.7
Unknown	1	9.1	7.1	294	10.4	7.2	0.0
Total	11	100.0	100.0	2,825	100.0	100.0	100.0
Refinance Loans							
Low	8	15.1	6.0	774	5.5	3.2	22.7
Moderate	10	18.9	19.2	1,568	11.2	13.6	17.0
Middle	15	28.3	24.6	3,349	23.9	22.5	19.6
Upper	16	30.2	41.3	5,932	42.4	51.7	40.7
Unknown	4	7.5	8.9	2,366	16.9	9.0	0.0
Total	53	100.0	100.0	13,989	100.0	100.0	100.0
Home Improvement Loans							
Low	1	5.9	7.8	50	1.9	4.0	22.7
Moderate	3	17.6	17.6	430	16.1	13.0	17.0
Middle	4	23.5	19.9	183	6.8	17.3	19.6
Upper	9	52.9	52.8	2,010	75.2	63.7	40.7
Unknown	0	0.0	1.9	0	0.0	2.0	0.0
Total	17	100.0	100.0	2,673	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	12	12.8	7.5	1,006	4.7	4.0	22.7
Moderate	20	21.3	20.2	3,413	16.0	14.8	17.0
Middle	24	25.5	23.5	4,089	19.2	21.9	19.6
Upper	33	35.1	39.7	10,111	47.5	50.5	40.7
Unknown	5	5.3	9.1	2,660	12.5	8.9	0.0
Total	94	100.0	100.0	21,279	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table C27B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Ann Arbor MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Other Purpose Lines of Credit							
Low	2	16.7	5.8	111	7.0	3.4	22.7
Moderate	1	8.3	16.9	35	2.2	12.6	17.0
Middle	5	41.7	21.4	557	35.2	18.6	19.6
Upper	4	33.3	54.2	881	55.6	64.0	40.7
Unknown	0	0.0	1.7	0	0.0	1.4	0.0
Total	12	100.0	100.0	1,584	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	8.6	0	0.0	3.4	22.7
Moderate	1	100.0	24.1	208	100.0	12.4	17.0
Middle	0	0.0	22.4	0	0.0	19.1	19.6
Upper	0	0.0	37.9	0	0.0	57.3	40.7
Unknown	0	0.0	6.9	0	0.0	7.9	0.0
Total	1	100.0	100.0	208	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.5	0	0.0	0.4	22.7
Moderate	0	0.0	0.5	0	0.0	0.0	17.0
Middle	0	0.0	0.0	0	0.0	0.0	19.6
Upper	0	0.0	0.0	0	0.0	0.0	40.7
Unknown	0	0.0	99.1	0	0.0	99.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							



**Table C28**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Ann Arbor MSA							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	#%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	200	57.0	39.1	15,528	29.7	23.6	91.2
Over \$1 Million	104	29.6		32,290	61.8		8.1
Revenue Unknown	47	13.4		4,392	8.4		0.6
Total	351	100.0		52,210	100.0		100.0
By Loan Size							
\$100,000 or Less	237	67.5	85.4	8,237	15.8	28.9	
\$100,001 - \$250,000	57	16.2	8.7	10,047	19.2	22.7	
\$250,001 - \$1 Million	57	16.2	5.9	33,926	65.0	48.4	
Total	351	100.0	100.0	52,210	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	167	83.5		5,625	36.2		
\$100,001 - \$250,000	21	10.5		3,760	24.2		
\$250,001 - \$1 Million	12	6.0		6,143	39.6		
Total	200	100.0		15,528	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table C29A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Dallas-Fort Worth Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	1	1.9	3.6	78	0.4	2.4	5.4
Moderate	6	11.1	12.6	1,304	6.0	9.0	19.4
Middle	12	22.2	33.5	2,796	12.9	28.1	29.7
Upper	34	63.0	50.1	17,162	79.1	60.2	45.4
Unknown	1	1.9	0.2	369	1.7	0.2	0.1
Total	54	100.0	100.0	21,709	100.0	100.0	100.0
Refinance Loans							
Low	21	6.0	1.8	2,743	3.1	1.5	5.4
Moderate	54	15.4	8.2	7,456	8.3	5.5	19.4
Middle	73	20.9	25.9	11,759	13.1	20.7	29.7
Upper	202	57.7	64.1	67,927	75.6	72.2	45.4
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Total	350	100.0	100.0	89,885	100.0	100.0	100.0
Home Improvement Loans							
Low	5	4.1	1.9	314	1.8	1.4	5.4
Moderate	14	11.4	8.6	1,196	6.7	6.5	19.4
Middle	32	26.0	22.3	4,335	24.3	18.2	29.7
Upper	72	58.5	67.1	11,959	67.2	73.8	45.4
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Total	123	100.0	100.0	17,804	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	22.1	0	0.0	17.1	
Moderate	1	100.0	36.6	85	100.0	25.9	27.7
Middle	0	0.0	24.4	0	0.0	27.1	26.2
Upper	0	0.0	16.7	0	0.0	29.9	23.1
Unknown	0	0.0	0.2	0	0.0	0.0	0.6
Total	1	100.0	100.0	85	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	34	5.1	2.6	3,848	2.4	2.7	
Moderate	92	13.9	10.6	12,069	7.6	8.2	19.4
Middle	151	22.8	29.4	23,553	14.8	24.3	29.7
Upper	384	58.0	57.1	119,783	75.0	64.7	45.4
Unknown	1	0.2	0.1	369	0.2	0.2	0.1
Total	662	100.0	100.0	159,622	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table C29B**

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Dallas-Fort Worth Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	7	5.5	1.4	713	2.6	0.7	5.4
Moderate	16	12.6	7.6	1,908	6.8	4.5	19.4
Middle	32	25.2	19.2	4,454	16.0	12.6	29.7
Upper	72	56.7	71.7	20,825	74.6	82.2	45.4
Unknown	0	0.0	0.1	0	0.0	0.0	0.1
Total	127	100.0	100.0	27,900	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	3.0	0	0.0	1.4	5.4
Moderate	1	14.3	13.0	120	5.4	7.3	19.4
Middle	2	28.6	26.7	209	9.3	15.7	29.7
Upper	4	57.1	57.1	1,910	85.3	72.4	45.4
Unknown	0	0.0	0.2	0	0.0	3.2	0.1
Total	7	100.0	100.0	2,239	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	3.7	0	0.0	2.0	5.4
Moderate	0	0.0	23.7	0	0.0	14.5	19.4
Middle	0	0.0	38.9	0	0.0	33.0	29.7
Upper	0	0.0	33.6	0	0.0	50.5	45.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table C30**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Dallas-Fort Worth Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	268	14.1	4.4	55,046	16.2	4.8	7.6
Moderate	491	25.8	18.1	97,953	28.9	18.8	19.3
Middle	431	22.6	28.9	74,049	21.8	28.0	26.7
Upper	678	35.6	47.4	99,982	29.5	47.3	45.8
Unknown	37	1.9	0.9	12,436	3.7	1.0	0.6
Total	1,905	100.0	100.0	339,466	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table C31A

Distribution of 2020 Home Mortgage Lending By Borrower Income Level Assessment Area: Dallas-Fort Worth Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	1	1.9	3.9	78	0.4	2.0	23.4
Moderate	9	16.7	18.0	1,865	8.6	12.3	16.3
Middle	8	14.8	24.0	1,918	8.8	20.8	18.0
Upper	26	48.1	44.3	13,893	64.0	54.8	42.3
Unknown	10	18.5	9.8	3,955	18.2	10.1	0.0
Total	54	100.0	100.0	21,709	100.0	100.0	100.0
Refinance Loans							
Low	42	12.0	2.6	4,078	4.5	1.2	23.4
Moderate	53	15.1	9.0	7,133	7.9	5.5	16.3
Middle	75	21.4	17.1	12,524	13.9	13.3	18.0
Upper	144	41.1	52.1	53,939	60.0	61.0	42.3
Unknown	36	10.3	19.1	12,211	13.6	19.1	0.0
Total	350	100.0	100.0	89,885	100.0	100.0	100.0
Home Improvement Loans							
Low	20	16.3	3.4	1,225	6.9	1.9	23.4
Moderate	16	13.0	10.2	1,734	9.7	7.5	16.3
Middle	22	17.9	15.7	2,426	13.6	12.1	18.0
Upper	61	49.6	66.8	12,132	68.1	73.4	42.3
Unknown	4	3.3	4.0	287	1.6	5.1	0.0
Total	123	100.0	100.0	17,804	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	74	11.2	3.1	6,257	3.9	1.5	23.4
Moderate	102	15.4	12.6	13,256	8.3	8.4	16.3
Middle	125	18.9	19.4	19,629	12.3	16.4	18.0
Upper	306	46.3	47.4	102,640	64.3	57.4	42.3
Unknown	54	8.2	17.5	17,755	11.1	16.3	0.0
Total	661	100.0	100.0	159,537	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Table C31B

Distribution of 2020 Home Mortgage Lending By Borrower Income Level Assessment Area: Dallas-Fort Worth Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit							
Low	10	7.9	5.8	782	2.8	3.1	23.4
Moderate	21	16.5	10.5	2,056	7.4	5.6	16.3
Middle	20	15.7	14.6	2,761	9.9	10.2	18.0
Upper	73	57.5	66.8	21,217	76.0	77.6	42.3
Unknown	3	2.4	2.3	1,084	3.9	3.5	0.0
Total	127	100.0	100.0	27,900	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	14.3	5.4	94	4.2	2.1	23.4
Moderate	3	42.9	10.4	468	20.9	5.3	16.3
Middle	0	0.0	16.3	0	0.0	9.8	18.0
Upper	2	28.6	57.8	1,459	65.2	69.4	42.3
Unknown	1	14.3	10.1	218	9.7	13.4	0.0
Total	7	100.0	100.0	2,239	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.4	0	0.0	0.3	23.4
Moderate	0	0.0	0.5	0	0.0	0.5	16.3
Middle	0	0.0	0.4	0	0.0	0.5	18.0
Upper	0	0.0	0.6	0	0.0	1.5	42.3
Unknown	0	0.0	98.1	0	0.0	97.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table C32**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Dallas-Fort Worth Metropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	963	50.6	49.3	96,363	28.4	33.2	92.3
Over \$1 Million	628	33.0		205,242	60.5		6.6
Revenue Unknown	314	16.5		37,861	11.2		1.1
Total	1,905	100.0		339,466	100.0		100.0
By Loan Size							
\$100,000 or Less	1,118	58.7	94.4	41,145	12.1	41.1	
\$100,001 - \$250,000	362	19.0	2.9	65,181	19.2	14.9	
\$250,001 - \$1 Million	425	22.3	2.6	233,140	68.7	44.0	
Total	1,905	100.0	100.0	339,466	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	729	75.7		24,373	25.3		
\$100,001 - \$250,000	138	14.3		23,606	24.5		
\$250,001 - \$1 Million	96	10.0		48,384	50.2		
Total	963	100.0		96,363	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table C33A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: San Antonio Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	1.7	0	0.0	1.1	5.1
Moderate	0	0.0	14.3	0	0.0	9.7	27.1
Middle	1	50.0	33.1	182	69.5	27.3	27.4
Upper	1	50.0	50.9	80	30.5	61.8	40.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	262	100.0	100.0	100.0
Refinance Loans							
Low	2	15.4	0.9	150	7.8	0.7	5.1
Moderate	2	15.4	9.8	232	12.0	6.3	27.1
Middle	2	15.4	26.2	135	7.0	20.5	27.4
Upper	7	53.8	63.0	1,411	73.2	72.6	40.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	13	100.0	100.0	1,928	100.0	100.0	100.0
Home Improvement Loans							
Low	1	50.0	2.3	15	23.1	1.6	5.1
Moderate	0	0.0	15.7	0	0.0	11.8	27.1
Middle	0	0.0	23.2	0	0.0	18.4	27.4
Upper	1	50.0	58.9	50	76.9	68.1	40.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	65	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	7.6	0	0.0	4.4	7.0
Moderate	0	0.0	52.2	0	0.0	44.7	38.4
Middle	0	0.0	21.7	0	0.0	27.1	30.5
Upper	0	0.0	18.5	0	0.0	23.8	24.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	3	10.0	1.4	165	3.7	1.1	5.1
Moderate	7	23.3	12.9	466	10.6	10.1	27.1
Middle	4	13.3	30.2	362	8.2	24.5	27.4
Upper	16	53.3	55.5	3,422	77.5	64.2	40.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	30	100.0	100.0	4,415	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table C33B**

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: San Antonio Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	1.7	0	0.0	0.7	5.1
Moderate	5	38.5	11.3	234	10.8	7.4	27.1
Middle	1	7.7	20.7	45	2.1	12.9	27.4
Upper	7	53.8	66.3	1,881	87.1	79.0	40.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	2,160	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	3.4	0	0.0	2.4	5.1
Moderate	0	0.0	22.9	0	0.0	15.4	27.1
Middle	0	0.0	24.5	0	0.0	19.2	27.4
Upper	0	0.0	49.2	0	0.0	62.9	40.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	2.2	0	0.0	1.1	5.1
Moderate	0	0.0	23.2	0	0.0	14.9	27.1
Middle	0	0.0	40.1	0	0.0	36.5	27.4
Upper	0	0.0	34.5	0	0.0	47.5	40.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table C34**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: San Antonio Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	15	9.3	4.7	2,909	9.8	6.0	5.0
Moderate	43	26.5	22.0	7,058	23.8	21.9	22.8
Middle	39	24.1	27.0	7,397	24.9	28.7	28.4
Upper	64	39.5	45.7	12,132	40.9	42.8	43.6
Unknown	1	0.6	0.3	160	0.5	0.3	0.2
Total	162	100.0	100.0	29,656	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.



Table C35A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: San Antonio Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	1	50.0	3.4	182	69.5	1.8	23.8
Moderate	0	0.0	17.6	0	0.0	12.4	17.6
Middle	0	0.0	25.3	0	0.0	22.1	19.1
Upper	1	50.0	39.8	80	30.5	49.4	39.4
Unknown	0	0.0	13.8	0	0.0	14.3	0.0
Total	2	100.0	100.0	262	100.0	100.0	100.0
Refinance Loans							
Low	1	7.7	1.9	20	1.0	0.8	23.8
Moderate	0	0.0	6.3	0	0.0	3.6	17.6
Middle	4	30.8	12.7	407	21.1	9.1	19.1
Upper	8	61.5	37.0	1,501	77.9	41.7	39.4
Unknown	0	0.0	42.0	0	0.0	44.9	0.0
Total	13	100.0	100.0	1,928	100.0	100.0	100.0
Home Improvement Loans							
Low	1	50.0	6.1	15	23.1	3.6	23.8
Moderate	0	0.0	13.2	0	0.0	9.6	17.6
Middle	0	0.0	18.9	0	0.0	14.9	19.1
Upper	1	50.0	59.2	50	76.9	69.5	39.4
Unknown	0	0.0	2.7	0	0.0	2.4	0.0
Total	2	100.0	100.0	65	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	5	16.7	2.7	317	7.2	1.3	23.8
Moderate	2	6.7	11.7	60	1.4	8.1	17.6
Middle	7	23.3	18.4	703	15.9	15.7	19.1
Upper	15	50.0	37.0	3,316	75.1	44.8	39.4
Unknown	1	3.3	30.2	19	0.4	30.1	0.0
Total	30	100.0	100.0	4,415	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table C35B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: San Antonio Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	2	15.4	4.3	100	4.6	4.1	23.8
Moderate	2	15.4	12.3	60	2.8	7.9	17.6
Middle	3	23.1	25.0	296	13.7	16.8	19.1
Upper	5	38.5	54.3	1,685	78.0	69.2	39.4
Unknown	1	7.7	4.0	19	0.9	2.0	0.0
Total	13	100.0	100.0	2,160	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	8.4	0	0.0	4.2	23.8
Moderate	0	0.0	13.2	0	0.0	8.0	17.6
Middle	0	0.0	19.0	0	0.0	12.8	19.1
Upper	0	0.0	48.5	0	0.0	58.9	39.4
Unknown	0	0.0	10.9	0	0.0	16.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.4	0	0.0	0.2	23.8
Moderate	0	0.0	0.3	0	0.0	0.2	17.6
Middle	0	0.0	0.4	0	0.0	0.5	19.1
Upper	0	0.0	0.2	0	0.0	0.3	39.4
Unknown	0	0.0	98.7	0	0.0	98.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table C36**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses Assessment Area: San Antonio Metropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	81	50.0	35.7	9,017	30.4	23.2	92.8
Over \$1 Million	53	32.7		16,130	54.4		6.3
Revenue Unknown	28	17.3		4,509	15.2		0.9
Total	162	100.0		29,656	100.0		100.0
By Loan Size							
\$100,000 or Less	90	55.6	86.8	3,219	10.9	31.1	
\$100,001 - \$250,000	35	21.6	7.6	5,735	19.3	20.6	
\$250,001 - \$1 Million	37	22.8	5.6	20,702	69.8	48.3	
Total	162	100.0	100.0	29,656	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	60	74.1		1,973	21.9		
\$100,001 - \$250,000	13	16.0		2,159	23.9		
\$250,001 - \$1 Million	8	9.9		4,885	54.2		
Total	81	100.0		9,017	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

APPENDIX D: METROPOLITAN LIMITED-SCOPE ASSESSMENT AREAS

Table D1

2022 Combined Demographics Assessment Area: Inland Empire MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	48	4.9	36,200	3.5	10,864	30.0	224,678	21.8
Moderate	282	28.7	266,208	25.9	45,478	17.1	180,300	17.5
Middle	362	36.8	386,945	37.6	36,382	9.4	198,334	19.3
Upper	279	28.4	334,365	32.5	14,766	4.4	425,997	41.4
Unknown	13	1.3	5,591	0.5	754	13.5	0	0.0
<b>Total AA</b>	<b>984</b>	<b>100.0</b>	<b>1,029,309</b>	<b>100.0</b>	<b>108,244</b>	<b>10.5</b>	<b>1,029,309</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	65,594	19,792	2.2	30.2	36,968	56.4	8,834	13.5
Moderate	428,240	189,178	21.4	44.2	183,228	42.8	55,834	13.0
Middle	592,595	338,093	38.3	57.1	183,422	31.0	71,080	12.0
Upper	468,619	330,059	37.4	70.4	87,479	18.7	51,081	10.9
Unknown	11,394	4,911	0.6	43.1	3,373	29.6	3,110	27.3
<b>Total AA</b>	<b>1,566,442</b>	<b>882,033</b>	<b>100.0</b>	<b>56.3</b>	<b>494,470</b>	<b>31.6</b>	<b>189,939</b>	<b>12.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,845	2.9	4,517	2.9	303	2.9	25	2.7
Moderate	40,751	24.2	37,489	23.9	3,016	28.8	246	26.7
Middle	63,503	37.8	58,987	37.6	4,208	40.2	308	33.4
Upper	57,881	34.4	54,730	34.9	2,816	26.9	335	36.3
Unknown	1,160	0.7	1,035	0.7	116	1.1	9	1.0
<b>Total AA</b>	<b>168,140</b>	<b>100.0</b>	<b>156,758</b>	<b>100.0</b>	<b>10,459</b>	<b>100.0</b>	<b>923</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.2</b>		<b>6.2</b>		<b>0.5</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	52	3.5	42	3.0	9	10.6	1	33.3
Moderate	242	16.4	226	16.3	16	18.8	0	0.0
Middle	524	35.5	489	35.2	34	40.0	1	33.3
Upper	644	43.6	622	44.7	21	24.7	1	33.3
Unknown	16	1.1	11	0.8	5	5.9	0	0.0
<b>Total AA</b>	<b>1,478</b>	<b>100.0</b>	<b>1,390</b>	<b>100.0</b>	<b>85</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>94.0</b>		<b>5.8</b>		<b>0.2</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D2

2021 Combined Demographics Assessment Area: Inland Empire MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	43	5.2	47,381	4.8	19,296	40.7	225,448	23.0
Moderate	246	29.9	255,969	26.1	61,231	23.9	164,661	16.8
Middle	301	36.6	348,264	35.6	42,631	12.2	184,676	18.9
Upper	226	27.5	327,191	33.4	17,033	5.2	404,404	41.3
Unknown	6	0.7	384	0.0	40	10.4	0	0.0
Total AA	822	100.0	979,189	100.0	140,231	14.3	979,189	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	75,328	21,114	2.6	28.0	44,948	59.7	9,266	12.3
Moderate	416,192	172,176	21.0	41.4	186,837	44.9	57,179	13.7
Middle	555,369	305,288	37.2	55.0	167,036	30.1	83,045	15.0
Upper	472,583	320,458	39.1	67.8	94,922	20.1	57,203	12.1
Unknown	1,812	617	0.1	34.1	161	8.9	1,034	57.1
Total AA	1,521,284	819,653	100.0	53.9	493,904	32.5	207,727	13.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	7,164	4.3	6,513	4.2	602	5.8	49	6.0
Moderate	42,717	25.8	39,104	25.4	3,383	32.4	230	28.1
Middle	58,091	35.1	54,043	35.1	3,793	36.4	255	31.2
Upper	57,149	34.6	54,246	35.2	2,621	25.1	282	34.5
Unknown	156	0.1	126	0.1	28	0.3	2	0.2
Total AA	165,277	100.0	154,032	100.0	10,427	100.0	818	100.0
Percentage of Total Businesses:			93.2		6.3		0.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	75	5.1	62	4.5	12	13.2	1	50.0
Moderate	292	19.7	265	19.1	27	29.7	0	0.0
Middle	537	36.2	507	36.5	30	33.0	0	0.0
Upper	575	38.8	552	39.7	22	24.2	1	50.0
Unknown	3	0.2	3	0.2	0	0.0	0	0.0
Total AA	1,482	100.0	1,389	100.0	91	100.0	2	100.0
Percentage of Total Farms:			93.7		6.1		0.1	
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D3**

2020 Combined Demographics Assessment Area: Inland Empire MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	43	5.2	47,381	4.8	19,296	40.7	225,448	23.0
Moderate	246	29.9	255,969	26.1	61,231	23.9	164,661	16.8
Middle	301	36.6	348,264	35.6	42,631	12.2	184,676	18.9
Upper	226	27.5	327,191	33.4	17,033	5.2	404,404	41.3
Unknown	6	0.7	384	0.0	40	10.4	0	0.0
Total AA	822	100.0	979,189	100.0	140,231	14.3	979,189	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	75,328	21,114	2.6	28.0	44,948	59.7	9,266	12.3
Moderate	416,192	172,176	21.0	41.4	186,837	44.9	57,179	13.7
Middle	555,369	305,288	37.2	55.0	167,036	30.1	83,045	15.0
Upper	472,583	320,458	39.1	67.8	94,922	20.1	57,203	12.1
Unknown	1,812	617	0.1	34.1	161	8.9	1,034	57.1
Total AA	1,521,284	819,653	100.0	53.9	493,904	32.5	207,727	13.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	7,224	4.4	6,584	4.3	599	5.7	41	5.3
Moderate	42,601	25.9	38,960	25.5	3,422	32.3	219	28.3
Middle	57,711	35.1	53,577	35.0	3,890	36.7	244	31.6
Upper	56,656	34.5	53,737	35.1	2,652	25.0	267	34.5
Unknown	160	0.1	132	0.1	26	0.2	2	0.3
Total AA	164,352	100.0	152,990	100.0	10,589	100.0	773	100.0
Percentage of Total Businesses:			93.1		6.4		0.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	75	5.1	61	4.4	13	14.1	1	50.0
Moderate	293	19.7	264	19.0	29	31.5	0	0.0
Middle	525	35.4	497	35.8	28	30.4	0	0.0
Upper	589	39.7	566	40.7	22	23.9	1	50.0
Unknown	2	0.1	2	0.1	0	0.0	0	0.0
Total AA	1,484	100.0	1,390	100.0	92	100.0	2	100.0
Percentage of Total Farms:			93.7		6.2		0.1	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D4A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Inland Empire MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans													
Low	0	0.0	2.6	0	0.0	1.8	0	0.0	2.5	0	0.0	1.7	2.2
Moderate	0	0.0	20.3	0	0.0	16.6	0	0.0	21.5	0	0.0	17.0	21.4
Middle	2	66.7	37.5	2,490	92.4	34.9	0	0.0	39.2	0	0.0	37.1	38.3
Upper	1	33.3	39.5	206	7.6	46.6	5	100.0	36.1	3,665	100.0	43.4	37.4
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.8	0	0.0	0.8	0.6
Total	3	100.0	100.0	2,696	100.0	100.0	5	100.0	100.0	3,665	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.6	0	0.0	1.1	0	0.0	2.0	0	0.0	1.5	2.2
Moderate	1	7.7	16.1	134	2.1	12.7	4	21.1	20.4	874	15.5	16.0	21.4
Middle	2	15.4	36.0	650	10.0	32.4	4	21.1	39.1	931	16.6	36.2	38.3
Upper	10	76.9	46.3	5,726	88.0	53.8	11	57.9	37.8	3,819	67.9	45.5	37.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.7	0	0.0	0.8	0.6
Total	13	100.0	100.0	6,510	100.0	100.0	19	100.0	100.0	5,624	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.6	0	0.0	0.4	0	0.0	1.1	0	0.0	1.0	2.2
Moderate	4	6.3	12.8	382	4.1	11.8	9	9.5	11.7	1,125	8.8	10.1	21.4
Middle	18	28.1	32.1	2,730	29.4	30.1	20	21.1	33.1	2,143	16.8	29.6	38.3
Upper	42	65.6	54.5	6,186	66.5	57.6	65	68.4	53.6	9,183	72.1	58.6	37.4
Unknown	0	0.0	0.1	0	0.0	0.1	1	1.1	0.6	290	2.3	0.8	0.6
Total	64	100.0	100.0	9,298	100.0	100.0	95	100.0	100.0	12,741	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	13.0	0	0.0	7.9	0	0.0	13.0	0	0.0	6.4	7.9
Moderate	0	0.0	49.6	0	0.0	35.6	0	0.0	46.1	0	0.0	23.8	37.2
Middle	0	0.0	29.6	0	0.0	39.4	1	100.0	31.9	2,250	100.0	39.4	38.7
Upper	0	0.0	7.8	0	0.0	17.2	0	0.0	8.4	0	0.0	28.9	15.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.6	0	0.0	1.6	1.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	2,250	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	1.9	0	0.0	1.5	0	0.0	2.2	0	0.0	1.8	2.2
Moderate	12	9.9	17.4	1,900	7.5	14.6	15	8.5	20.2	2,180	6.5	16.7	21.4
Middle	28	23.1	36.3	6,710	26.6	33.4	45	25.6	38.4	8,639	25.8	36.5	38.3
Upper	81	66.9	44.3	16,658	65.9	50.4	114	64.8	38.5	22,310	66.6	44.0	37.4
Unknown	0	0.0	0.0	0	0.0	0.0	2	1.1	0.8	348	1.0	0.9	0.6
Total	121	100.0	100.0	25,268	100.0	100.0	176	100.0	100.0	33,477	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table D4B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Inland Empire MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	0.4	0	0.0	0.3	0	0.0	0.7	0	0.0	0.5	2.2
Moderate	6	15.0	9.6	1,033	16.1	9.1	2	3.6	11.5	181	2.0	8.2	21.4
Middle	6	15.0	30.9	840	13.1	26.0	20	35.7	32.4	3,315	36.0	27.8	38.3
Upper	28	70.0	59.1	4,540	70.8	64.6	33	58.9	54.6	5,643	61.4	62.3	37.4
Unknown	0	0.0	0.0	0	0.0	0.0	1	1.8	0.8	58	0.6	1.2	0.6
Total	40	100.0	100.0	6,413	100.0	100.0	56	100.0	100.0	9,197	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.3	0	0.0	0.6	0	0.0	1.6	0	0.0	1.7	2.2
Moderate	1	100.0	16.5	351	100.0	11.3	0	0.0	15.7	0	0.0	10.9	21.4
Middle	0	0.0	33.3	0	0.0	28.8	0	0.0	33.2	0	0.0	24.5	38.3
Upper	0	0.0	48.8	0	0.0	59.3	0	0.0	48.4	0	0.0	59.2	37.4
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	1.2	0	0.0	3.7	0.6
Total	1	100.0	100.0	351	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.4	0	0.0	2.7	0	0.0	3.1	0	0.0	2.4	2.2
Moderate	0	0.0	26.1	0	0.0	21.7	0	0.0	29.7	0	0.0	24.4	21.4
Middle	0	0.0	42.8	0	0.0	40.6	0	0.0	41.7	0	0.0	41.0	38.3
Upper	0	0.0	27.6	0	0.0	34.8	0	0.0	24.8	0	0.0	31.0	37.4
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.7	0	0.0	1.0	0.6
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													



Table D5A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Inland Empire MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	2.3	0	0.0	1.5	2.6
Moderate	0	0.0	19.4	0	0.0	15.2	21.0
Middle	2	40.0	37.5	1,360	53.8	34.3	37.2
Upper	3	60.0	40.8	1,167	46.2	48.9	39.1
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Total	5	100.0	100.0	2,527	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	1.2	0	0.0	0.8	2.6
Moderate	1	5.9	13.6	48	1.3	10.7	21.0
Middle	6	35.3	34.0	888	24.9	30.6	37.2
Upper	10	58.8	51.2	2,630	73.8	57.9	39.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	17	100.0	100.0	3,566	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.0	0	0.0	0.8	2.6
Moderate	2	6.5	12.7	125	2.8	9.8	21.0
Middle	5	16.1	30.8	394	8.8	28.1	37.2
Upper	24	77.4	55.5	3,940	88.4	61.3	39.1
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Total	31	100.0	100.0	4,459	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	18.2	0	0.0	12.3	10.5
Moderate	0	0.0	48.7	0	0.0	32.7	41.0
Middle	0	0.0	24.5	0	0.0	24.7	31.2
Upper	0	0.0	8.5	0	0.0	30.2	17.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	1.5	0	0.0	1.3	2.6
Moderate	7	8.4	15.4	711	4.4	12.7	21.0
Middle	20	24.1	35.1	3,777	23.4	31.6	37.2
Upper	56	67.5	48.0	11,664	72.2	54.4	39.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	83	100.0	100.0	16,152	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table D5B**

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Inland Empire MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	0.7	0	0.0	0.4	2.6
Moderate	4	14.3	11.7	538	11.6	8.3	21.0
Middle	6	21.4	28.1	785	16.9	23.7	37.2
Upper	18	64.3	59.3	3,327	71.5	67.4	39.1
Unknown	0	0.0	0.2	0	0.0	0.2	0.1
Total	28	100.0	100.0	4,650	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.0	0	0.0	1.1	2.6
Moderate	0	0.0	15.5	0	0.0	9.8	21.0
Middle	1	50.0	36.7	350	36.8	32.0	37.2
Upper	1	50.0	45.9	600	63.2	57.1	39.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	2	100.0	100.0	950	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	3.0	0	0.0	2.0	2.6
Moderate	0	0.0	23.7	0	0.0	18.1	21.0
Middle	0	0.0	42.3	0	0.0	39.6	37.2
Upper	0	0.0	30.9	0	0.0	40.2	39.1
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table D6**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Inland Empire MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	6	7.0	3.5	501	2.4	4.3	9	5.5	2.1	1,146	5.2	2.1	2.9
Moderate	22	25.6	23.6	6,412	31.0	28.7	40	24.2	21.3	4,820	21.8	24.5	24.2
Middle	28	32.6	34.2	5,183	25.0	35.1	73	44.2	37.7	8,288	37.4	39.3	37.8
Upper	30	34.9	38.0	8,612	41.6	31.4	40	24.2	37.8	7,666	34.6	33.0	34.4
Unknown	0	0.0	0.1	0	0.0	0.1	3	1.8	0.6	235	1.1	0.9	0.7
Total	86	100.0	100.0	20,708	100.0	100.0	165	100.0	100.0	22,155	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table D7

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Inland Empire MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	6	5.6	3.7	817	2.7	4.5	4.4
Moderate	22	20.6	25.0	6,903	22.7	29.8	25.9
Middle	35	32.7	34.1	8,399	27.6	34.8	35.1
Upper	44	41.1	36.5	14,317	47.0	30.2	34.5
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Total	107	100.0	100.0	30,436	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D8A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Inland Empire MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	1.7	0	0.0	1.1	0	0.0	1.8	0	0.0	1.2	21.8
Moderate	0	0.0	7.4	0	0.0	4.6	0	0.0	6.4	0	0.0	3.6	17.5
Middle	0	0.0	21.3	0	0.0	18.3	1	20.0	18.9	66	1.8	15.6	19.3
Upper	3	100.0	48.6	2,696	100.0	55.2	4	80.0	49.9	3,599	98.2	56.2	41.4
Unknown	0	0.0	20.9	0	0.0	20.7	0	0.0	23.1	0	0.0	23.5	0.0
Total	3	100.0	100.0	2,696	100.0	100.0	5	100.0	100.0	3,665	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.6	0	0.0	2.2	0	0.0	7.9	0	0.0	5.1	21.8
Moderate	0	0.0	10.7	0	0.0	7.5	2	10.5	15.2	430	7.6	11.1	17.5
Middle	1	7.7	19.8	158	2.4	17.6	5	26.3	22.9	1,003	17.8	21.3	19.3
Upper	11	84.6	42.7	4,532	69.6	48.6	12	63.2	37.2	4,191	74.5	44.4	41.4
Unknown	1	7.7	23.1	1,820	28.0	24.1	0	0.0	16.7	0	0.0	18.1	0.0
Total	13	100.0	100.0	6,510	100.0	100.0	19	100.0	100.0	5,624	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.9	0	0.0	2.8	1	1.1	2.6	60	0.5	2.4	21.8
Moderate	1	1.6	8.5	51	0.5	6.8	4	4.2	8.2	329	2.6	5.8	17.5
Middle	8	12.5	16.3	1,000	10.8	14.7	13	13.7	20.7	1,139	8.9	15.7	19.3
Upper	55	85.9	65.1	8,247	88.7	66.6	77	81.1	62.1	11,213	88.0	68.9	41.4
Unknown	0	0.0	6.1	0	0.0	9.1	0	0.0	6.5	0	0.0	7.3	0.0
Total	64	100.0	100.0	9,298	100.0	100.0	95	100.0	100.0	12,741	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	3.0	0	0.0	1.8	2	1.1	4.2	80	0.3	2.6	21.8
Moderate	2	1.7	9.6	143	0.6	6.4	11	6.3	9.8	1,314	4.2	6.2	17.5
Middle	14	11.6	20.1	1,647	6.5	17.7	26	14.9	20.4	2,774	8.9	17.3	19.3
Upper	104	86.0	44.9	21,658	85.7	51.1	135	77.1	46.0	26,129	83.7	52.4	41.4
Unknown	1	0.8	22.4	1,820	7.2	23.0	1	0.6	19.6	930	3.0	21.4	0.0
Total	121	100.0	100.0	25,268	100.0	100.0	175	100.0	100.0	31,227	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

**Table D8B**

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Inland Empire MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	0	0.0	4.3	0	0.0	5.0	1	1.8	2.8	20	0.2	3.0	21.8
Moderate	1	2.5	6.0	92	1.4	3.7	5	8.9	5.7	555	6.0	3.4	17.5
Middle	5	12.5	13.2	489	7.6	8.7	7	12.5	18.1	566	6.2	12.0	19.3
Upper	34	85.0	68.4	5,832	90.9	72.1	42	75.0	60.0	7,126	77.5	67.9	41.4
Unknown	0	0.0	8.2	0	0.0	10.6	1	1.8	13.5	930	10.1	13.7	0.0
Total	40	100.0	100.0	6,413	100.0	100.0	56	100.0	100.0	9,197	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	6.8	0	0.0	4.4	0	0.0	6.2	0	0.0	4.5	21.8
Moderate	0	0.0	9.3	0	0.0	4.7	0	0.0	10.1	0	0.0	5.2	17.5
Middle	0	0.0	15.1	0	0.0	8.4	0	0.0	17.4	0	0.0	8.3	19.3
Upper	1	100.0	56.0	351	100.0	64.1	0	0.0	55.4	0	0.0	66.3	41.4
Unknown	0	0.0	12.9	0	0.0	18.5	0	0.0	10.9	0	0.0	15.6	0.0
Total	1	100.0	100.0	351	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	21.8
Moderate	0	0.0	0.3	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	17.5
Middle	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	19.3
Upper	0	0.0	0.2	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	41.4
Unknown	0	0.0	99.3	0	0.0	99.6	0	0.0	99.4	0	0.0	99.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D9A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Inland Empire MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	2.0	0	0.0	1.1	23.0
Moderate	0	0.0	10.3	0	0.0	6.7	16.8
Middle	0	0.0	24.1	0	0.0	21.0	18.9
Upper	4	80.0	48.9	1,594	63.1	56.2	41.3
Unknown	1	20.0	14.6	933	36.9	15.0	0.0
Total	5	100.0	100.0	2,527	100.0	100.0	100.0
Refinance Loans							
Low	2	11.8	2.8	163	4.6	1.7	23.0
Moderate	2	11.8	9.3	157	4.4	6.5	16.8
Middle	1	5.9	17.8	241	6.8	15.6	18.9
Upper	11	64.7	43.9	2,635	73.9	48.0	41.3
Unknown	1	5.9	26.2	370	10.4	28.2	0.0
Total	17	100.0	100.0	3,566	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.6	0	0.0	2.3	23.0
Moderate	2	6.5	10.0	130	2.9	7.9	16.8
Middle	4	12.9	18.4	170	3.8	17.4	18.9
Upper	25	80.6	61.2	4,159	93.3	62.2	41.3
Unknown	0	0.0	6.7	0	0.0	10.2	0.0
Total	31	100.0	100.0	4,459	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	4	4.8	2.6	345	2.1	1.5	23.0
Moderate	6	7.2	9.5	607	3.8	6.5	16.8
Middle	7	8.4	19.3	593	3.7	17.1	18.9
Upper	64	77.1	45.1	13,304	82.4	50.3	41.3
Unknown	2	2.4	23.6	1,303	8.1	24.6	0.0
Total	83	100.0	100.0	16,152	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D9B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Inland Empire MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	2	7.1	6.2	182	3.9	5.0	23.0
Moderate	2	7.1	9.3	320	6.9	6.0	16.8
Middle	2	7.1	16.0	182	3.9	11.1	18.9
Upper	22	78.6	64.6	3,966	85.3	72.7	41.3
Unknown	0	0.0	3.9	0	0.0	5.3	0.0
Total	28	100.0	100.0	4,650	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	6.3	0	0.0	2.8	23.0
Moderate	0	0.0	10.2	0	0.0	6.4	16.8
Middle	0	0.0	18.7	0	0.0	9.6	18.9
Upper	2	100.0	53.1	950	100.0	65.1	41.3
Unknown	0	0.0	11.6	0	0.0	16.1	0.0
Total	2	100.0	100.0	950	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.1	0	0.0	0.0	23.0
Moderate	0	0.0	0.4	0	0.0	0.3	16.8
Middle	0	0.0	0.5	0	0.0	0.5	18.9
Upper	0	0.0	0.7	0	0.0	1.1	41.3
Unknown	0	0.0	98.4	0	0.0	97.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table D10**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Inland Empire MSA													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	30	34.9	46.3	3,687	17.8	23.9	114	69.1	53.1	8,025	36.2	32.0	93.2
Over \$1 Million	33	38.4		11,327	54.7		37	22.4		12,600	56.9		6.2
Revenue Unknown	23	26.7		5,694	27.5		14	8.5		1,530	6.9		0.5
Total	86	100.0		20,708	100.0		165	100.0		22,155	100.0		100.0
By Loan Size													
\$100,000 or Less	44	51.2	94.4	1,930	9.3	42.6	123	74.5	96.4	6,543	29.5	52.2	
\$100,001 - \$250,000	14	16.3	3.3	2,493	12.0	17.1	19	11.5	2.2	3,009	13.6	14.7	
\$250,001 - \$1 Million	28	32.6	2.3	16,285	78.6	40.4	23	13.9	1.4	12,603	56.9	33.1	
Total	86	100.0	100.0	20,708	100.0	100.0	165	100.0	100.0	22,155	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	22	73.3		925	25.1		104	91.2		5,404	67.3		
\$100,001 - \$250,000	4	13.3		679	18.4		8	7.0		1,229	15.3		
\$250,001 - \$1 Million	4	13.3		2,083	56.5		2	1.8		1,392	17.3		
Total	30	100.0		3,687	100.0		114	100.0		8,025	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table D11**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Inland Empire MSA							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	#%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	42	39.3	39.4	5,266	17.3	22.4	93.1
Over \$1 Million	53	49.5		22,041	72.4		6.4
Revenue Unknown	12	11.2		3,129	10.3		0.5
Total	107	100.0		30,436	100.0		100.0
By Loan Size							
\$100,000 or Less	39	36.4	90.4	1,638	5.4	38.2	
\$100,001 - \$250,000	27	25.2	5.9	4,738	15.6	20.3	
\$250,001 - \$1 Million	41	38.3	3.7	24,060	79.1	41.5	
Total	107	100.0	100.0	30,436	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	27	64.3		1,142	21.7		
\$100,001 - \$250,000	10	23.8		1,553	29.5		
\$250,001 - \$1 Million	5	11.9		2,571	48.8		
Total	42	100.0		5,266	100.0		
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



Table D12

2022 Combined Demographics Assessment Area: San Diego MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	46	6.2	43,837	5.8	10,530	24.0	172,988	22.8
Moderate	167	22.7	173,346	22.8	20,063	11.6	131,098	17.3
Middle	262	35.5	260,157	34.3	15,032	5.8	142,293	18.7
Upper	248	33.6	279,925	36.9	9,275	3.3	313,039	41.2
Unknown	14	1.9	2,153	0.3	144	6.7	0	0.0
Total AA	737	100.0	759,418	100.0	55,044	7.2	759,418	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied				Rental		Vacant
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	69,718	14,897	2.4	21.4	51,057	73.2	3,764	5.4
Moderate	279,122	96,116	15.8	34.4	164,465	58.9	18,541	6.6
Middle	437,896	226,716	37.2	51.8	180,673	41.3	30,507	7.0
Upper	423,636	270,251	44.4	63.8	121,644	28.7	31,741	7.5
Unknown	5,156	1,370	0.2	26.6	3,514	68.2	272	5.3
Total AA	1,215,528	609,350	100.0	50.1	521,353	42.9	84,825	7.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6,913	3.9	6,407	3.9	476	4.0	30	3.1
Moderate	30,660	17.3	28,623	17.4	1,919	16.3	118	12.1
Middle	61,356	34.6	57,025	34.7	4,014	34.0	317	32.4
Upper	76,901	43.4	71,154	43.3	5,246	44.5	501	51.3
Unknown	1,451	0.8	1,300	0.8	140	1.2	11	1.1
Total AA	177,281	100.0	164,509	100.0	11,795	100.0	977	100.0
Percentage of Total Businesses:				92.8		6.7		0.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	25	1.8	24	1.8	1	1.6	0	0.0
Moderate	142	10.0	137	10.1	5	8.2	0	0.0
Middle	605	42.6	584	43.0	20	32.8	1	100.0
Upper	646	45.5	611	45.0	35	57.4	0	0.0
Unknown	2	0.1	2	0.1	0	0.0	0	0.0
Total AA	1,420	100.0	1,358	100.0	61	100.0	1	100.0
Percentage of Total Farms:				95.6		4.3		0.1
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D13**

2021 Combined Demographics Assessment Area: San Diego MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	61	9.7	57,401	7.8	18,951	33.0	172,423	23.6
Moderate	142	22.6	158,623	21.7	25,027	15.8	123,833	16.9
Middle	204	32.5	236,551	32.3	20,679	8.7	130,363	17.8
Upper	214	34.1	278,708	38.1	13,088	4.7	304,709	41.7
Unknown	7	1.1	45	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>628</b>	<b>100.0</b>	<b>731,328</b>	<b>100.0</b>	<b>77,745</b>	<b>10.6</b>	<b>731,328</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	90,459	16,148	2.8	17.9	67,684	74.8	6,627	7.3
Moderate	255,834	87,646	15.1	34.3	148,426	58.0	19,762	7.7
Middle	403,508	205,291	35.5	50.9	168,950	41.9	29,267	7.3
Upper	430,949	269,968	46.6	62.6	129,999	30.2	30,982	7.2
Unknown	56	26	0.0	46.4	19	33.9	11	19.6
<b>Total AA</b>	<b>1,180,806</b>	<b>579,079</b>	<b>100.0</b>	<b>49.0</b>	<b>515,078</b>	<b>43.6</b>	<b>86,649</b>	<b>7.3</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	10,043	5.7	9,265	5.7	723	6.2	55	6.2
Moderate	27,626	15.7	25,765	15.8	1,735	14.8	126	14.1
Middle	61,926	35.2	57,295	35.0	4,405	37.6	226	25.3
Upper	76,429	43.4	71,096	43.5	4,850	41.3	483	54.1
Unknown	142	0.1	122	0.1	17	0.1	3	0.3
<b>Total AA</b>	<b>176,166</b>	<b>100.0</b>	<b>163,543</b>	<b>100.0</b>	<b>11,730</b>	<b>100.0</b>	<b>893</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.8</b>		<b>6.7</b>		<b>0.5</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	15	1.0	15	1.1	0	0.0	0	0.0
Moderate	190	13.3	185	13.5	5	8.1	0	0.0
Middle	514	35.9	493	36.0	21	33.9	0	0.0
Upper	712	49.8	676	49.4	36	58.1	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,431</b>	<b>100.0</b>	<b>1,369</b>	<b>100.0</b>	<b>62</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>95.7</b>		<b>4.3</b>		<b>0.0</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D14

2020 Combined Demographics Assessment Area: San Diego MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	61	9.7	57,401	7.8	18,951	33.0	172,423	23.6
Moderate	142	22.6	158,623	21.7	25,027	15.8	123,833	16.9
Middle	204	32.5	236,551	32.3	20,679	8.7	130,363	17.8
Upper	214	34.1	278,708	38.1	13,088	4.7	304,709	41.7
Unknown	7	1.1	45	0.0	0	0.0	0	0.0
Total AA	628	100.0	731,328	100.0	77,745	10.6	731,328	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	90,459	16,148	2.8	17.9	67,684	74.8	6,627	7.3
Moderate	255,834	87,646	15.1	34.3	148,426	58.0	19,762	7.7
Middle	403,508	205,291	35.5	50.9	168,950	41.9	29,267	7.3
Upper	430,949	269,968	46.6	62.6	129,999	30.2	30,982	7.2
Unknown	56	26	0.0	46.4	19	33.9	11	19.6
Total AA	1,180,806	579,079	100.0	49.0	515,078	43.6	86,649	7.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	10,142	5.7	9,361	5.7	730	6.1	51	5.9
Moderate	27,821	15.6	25,929	15.7	1,772	14.7	120	14.0
Middle	62,744	35.3	58,004	35.2	4,516	37.5	224	26.0
Upper	76,962	43.3	71,499	43.4	4,999	41.5	464	54.0
Unknown	145	0.1	128	0.1	16	0.1	1	0.1
Total AA	177,814	100.0	164,921	100.0	12,033	100.0	860	100.0
Percentage of Total Businesses:				92.7		6.8		0.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	18	1.2	18	1.3	0	0.0	0	0.0
Moderate	202	13.5	194	13.5	8	12.7	0	0.0
Middle	537	35.9	514	35.8	23	36.5	0	0.0
Upper	740	49.4	708	49.4	32	50.8	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,497	100.0	1,434	100.0	63	100.0	0	0.0
Percentage of Total Farms:				95.8		4.2		0.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D15A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: San Diego MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	3.4	0	0.0	2.5	0	0.0	2.6	0	0.0	1.7	2.4
Moderate	0	0.0	16.4	0	0.0	12.1	1	9.1	16.5	287	5.8	12.1	15.8
Middle	2	22.2	35.0	436	4.6	31.1	2	18.2	38.9	462	9.3	33.9	37.2
Upper	7	77.8	45.2	8,941	95.4	54.3	8	72.7	41.8	4,197	84.9	52.1	44.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	0.2	0.2
Total	9	100.0	100.0	9,377	100.0	100.0	11	100.0	100.0	4,946	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.6	0	0.0	2.0	0	0.0	2.5	0	0.0	1.7	2.4
Moderate	2	4.3	13.6	390	2.3	10.6	4	7.0	16.4	679	2.9	12.2	15.8
Middle	13	27.7	33.9	5,297	30.9	30.3	14	24.6	37.4	4,888	21.1	32.4	37.2
Upper	32	68.1	49.8	11,441	66.8	57.2	39	68.4	43.4	17,590	76.0	53.5	44.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	0.2	0.2
Total	47	100.0	100.0	17,128	100.0	100.0	57	100.0	100.0	23,157	100.0	100.0	100.0
Home Improvement Loans													
Low	1	0.5	1.8	136	0.3	1.6	1	0.4	1.3	118	0.2	0.8	2.4
Moderate	8	4.1	9.7	1,047	2.6	8.4	20	8.4	10.9	2,948	5.7	7.9	15.8
Middle	66	33.5	31.8	10,093	25.0	27.0	80	33.8	36.5	15,024	29.2	29.5	37.2
Upper	122	61.9	56.7	29,030	72.0	63.0	136	57.4	51.1	33,333	64.8	61.7	44.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	0.2	0.2
Total	197	100.0	100.0	40,306	100.0	100.0	237	100.0	100.0	51,423	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	23.1	0	0.0	12.2	0	0.0	13.5	0	0.0	8.2	10.1
Moderate	0	0.0	32.3	0	0.0	29.0	0	0.0	39.2	0	0.0	34.7	29.1
Middle	0	0.0	31.9	0	0.0	34.0	0	0.0	32.5	0	0.0	35.0	35.0
Upper	0	0.0	12.7	0	0.0	24.7	0	0.0	13.3	0	0.0	20.4	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.5	0	0.0	1.8	0.9
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	4	1.2	2.8	670	0.8	2.7	1	0.3	2.4	118	0.1	2.1	2.4
Moderate	12	3.5	14.2	1,906	2.1	11.9	32	8.7	15.7	4,488	4.8	13.4	15.8
Middle	104	30.7	34.0	19,613	22.1	30.5	115	31.3	37.6	23,253	25.0	32.8	37.2
Upper	219	64.6	49.0	66,748	75.1	54.9	219	59.7	44.1	65,276	70.1	51.3	44.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	0.3	0.2
Total	339	100.0	100.0	88,937	100.0	100.0	367	100.0	100.0	93,135	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D15B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: San Diego MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	3	3.6	1.0	534	2.9	0.5	0	0.0	1.1	0	0.0	0.5	2.4
Moderate	2	2.4	9.6	469	2.6	5.6	7	11.3	11.5	574	4.2	6.9	15.8
Middle	23	27.4	29.3	3,787	20.7	20.6	19	30.6	32.1	2,879	21.2	23.5	37.2
Upper	56	66.7	60.1	13,536	73.9	73.3	36	58.1	55.1	10,156	74.6	68.8	44.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	0.3	0.2
Total	84	100.0	100.0	18,326	100.0	100.0	62	100.0	100.0	13,609	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.1	0	0.0	0.9	0	0.0	1.4	0	0.0	0.4	2.4
Moderate	0	0.0	9.0	0	0.0	3.9	0	0.0	11.0	0	0.0	4.1	15.8
Middle	0	0.0	31.7	0	0.0	17.6	0	0.0	35.8	0	0.0	16.0	37.2
Upper	2	100.0	57.3	3,800	100.0	77.6	0	0.0	51.3	0	0.0	79.1	44.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.5	0	0.0	0.3	0.2
Total	2	100.0	100.0	3,800	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	4.2	0	0.0	3.3	0	0.0	2.8	0	0.0	2.4	2.4
Moderate	0	0.0	22.1	0	0.0	18.2	0	0.0	22.9	0	0.0	17.3	15.8
Middle	0	0.0	37.3	0	0.0	34.6	0	0.0	39.1	0	0.0	39.3	37.2
Upper	0	0.0	36.4	0	0.0	43.9	0	0.0	35.2	0	0.0	41.0	44.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D16A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: San Diego MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	1	10.0	3.3	150	2.3	2.4	2.8
Moderate	0	0.0	16.0	0	0.0	11.8	15.1
Middle	4	40.0	34.9	2,618	40.7	31.4	35.5
Upper	5	50.0	45.7	3,657	56.9	54.4	46.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	10	100.0	100.0	6,425	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.2	0	0.0	1.8	2.8
Moderate	2	3.5	12.5	491	1.6	10.1	15.1
Middle	8	14.0	34.0	2,445	7.8	31.1	35.5
Upper	47	82.5	51.3	28,386	90.6	57.1	46.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	57	100.0	100.0	31,322	100.0	100.0	100.0
Home Improvement Loans							
Low	3	2.3	2.0	427	1.8	1.8	2.8
Moderate	15	11.5	10.0	1,915	8.3	8.1	15.1
Middle	41	31.5	31.2	6,351	27.5	28.8	35.5
Upper	71	54.6	56.8	14,425	62.4	61.3	46.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	130	100.0	100.0	23,118	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	24.1	0	0.0	19.5	13.0
Moderate	1	50.0	35.2	150	12.0	32.4	26.4
Middle	0	0.0	28.3	0	0.0	31.0	34.3
Upper	1	50.0	12.3	1,100	88.0	17.1	26.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	1,250	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	6	2.4	2.5	861	1.2	2.6	2.8
Moderate	19	7.5	13.2	2,688	3.7	11.3	15.1
Middle	68	26.7	34.1	14,138	19.3	31.1	35.5
Upper	162	63.5	50.3	55,724	75.9	55.1	46.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	255	100.0	100.0	73,411	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D16B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: San Diego MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	2	3.6	1.4	284	2.6	1.0	2.8
Moderate	1	1.8	7.7	132	1.2	4.9	15.1
Middle	14	25.5	30.3	2,424	22.0	23.5	35.5
Upper	38	69.1	60.7	8,156	74.2	70.6	46.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	55	100.0	100.0	10,996	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.1	0	0.0	0.9	2.8
Moderate	0	0.0	10.1	0	0.0	3.6	15.1
Middle	1	100.0	32.8	300	100.0	20.7	35.5
Upper	0	0.0	55.0	0	0.0	74.8	46.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	300	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	4.7	0	0.0	3.0	2.8
Moderate	0	0.0	18.0	0	0.0	13.0	15.1
Middle	0	0.0	36.3	0	0.0	33.0	35.5
Upper	0	0.0	41.0	0	0.0	50.9	46.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D17

Table D.1

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: San Diego MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	21	8.8	5.2	2,104	4.5	5.2	3	2.3	3.4	641	2.2	3.9	3.9
Moderate	36	15.1	14.2	3,297	7.1	13.8	26	20.3	16.6	5,948	20.0	16.2	17.3
Middle	88	37.0	34.3	24,281	52.1	35.9	51	39.8	34.0	11,685	39.4	33.4	34.6
Upper	93	39.1	45.6	16,937	36.3	44.8	48	37.5	44.7	11,394	38.4	45.4	43.4
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.7	0	0.0	1.0	0.8
Total	238	100.0	100.0	46,619	100.0	100.0	128	100.0	100.0	29,668	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

**Table D18**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: San Diego MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
<b>Low</b>	39	10.7	5.1	3,894	7.3	5.2	5.7
<b>Moderate</b>	58	16.0	14.0	4,971	9.3	13.4	15.6
<b>Middle</b>	136	37.5	34.5	27,283	50.8	36.9	35.3
<b>Upper</b>	130	35.8	45.7	17,551	32.7	43.7	43.3
<b>Unknown</b>	0	0.0	0.1	0	0.0	0.2	0.1
<b>Total</b>	363	100.0	100.0	53,699	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							



Table 19A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: San Diego MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	1	11.1	1.1	186	2.0	0.5	0	0.0	0.9	0	0.0	0.4	22.8
Moderate	0	0.0	7.1	0	0.0	3.7	0	0.0	6.0	0	0.0	2.9	17.3
Middle	0	0.0	19.1	0	0.0	14.2	1	9.1	17.2	362	7.3	11.8	18.7
Upper	8	88.9	57.7	9,191	98.0	67.1	10	90.9	59.6	4,584	92.7	66.5	41.2
Unknown	0	0.0	14.9	0	0.0	14.4	0	0.0	16.3	0	0.0	18.4	0.0
Total	9	100.0	100.0	9,377	100.0	100.0	11	100.0	100.0	4,946	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.7	0	0.0	2.3	1	1.8	8.7	238	1.0	5.8	22.8
Moderate	3	6.4	10.3	585	3.4	6.5	3	5.3	12.8	671	2.9	8.0	17.3
Middle	8	17.0	18.5	2,672	15.6	15.0	5	8.8	20.1	910	3.9	15.8	18.7
Upper	34	72.3	46.7	12,459	72.7	54.4	47	82.5	43.8	18,158	78.4	54.3	41.2
Unknown	2	4.3	20.7	1,412	8.2	21.8	1	1.8	14.6	3,180	13.7	16.0	0.0
Total	47	100.0	100.0	17,128	100.0	100.0	57	100.0	100.0	23,157	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.1	0	0.0	2.6	2	0.8	2.9	238	0.5	2.7	22.8
Moderate	4	2.0	6.8	470	1.2	4.6	14	5.9	7.9	1,422	2.8	4.7	17.3
Middle	26	13.2	15.9	2,802	7.0	12.0	28	11.8	21.0	4,521	8.8	14.0	18.7
Upper	163	82.7	70.1	36,001	89.3	74.3	190	80.2	63.7	44,720	87.0	73.1	41.2
Unknown	4	2.0	4.2	1,033	2.6	6.4	3	1.3	4.6	522	1.0	5.6	0.0
Total	197	100.0	100.0	40,306	100.0	100.0	237	100.0	100.0	51,423	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	0.9	3.1	481	0.5	1.8	3	0.8	4.4	476	0.5	2.6	22.8
Moderate	13	3.8	9.4	1,720	1.9	5.6	23	6.3	8.9	2,298	2.5	4.8	17.3
Middle	44	13.0	18.5	7,014	7.9	14.6	40	10.9	18.7	6,254	6.7	13.1	18.7
Upper	271	79.9	50.1	75,102	84.4	58.6	297	80.9	54.0	80,405	86.3	62.5	41.2
Unknown	8	2.4	18.8	4,620	5.2	19.4	4	1.1	14.0	3,702	4.0	17.0	0.0
Total	339	100.0	100.0	88,937	100.0	100.0	367	100.0	100.0	93,135	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table D19B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: San Diego MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	2	2.4	2.5	295	1.6	3.4	0	0.0	2.7	0	0.0	2.7	22.8
Moderate	6	7.1	7.0	665	3.6	3.7	6	9.7	6.5	205	1.5	2.9	17.3
Middle	10	11.9	15.7	1,540	8.4	8.8	6	9.7	16.1	461	3.4	8.9	18.7
Upper	65	77.4	70.5	15,451	84.3	79.3	50	80.6	63.7	12,943	95.1	76.1	41.2
Unknown	1	1.2	4.3	375	2.0	4.7	0	0.0	11.1	0	0.0	9.4	0.0
Total	84	100.0	100.0	18,326	100.0	100.0	62	100.0	100.0	13,609	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	5.0	0	0.0	2.6	0	0.0	5.9	0	0.0	3.8	22.8
Moderate	0	0.0	8.6	0	0.0	3.8	0	0.0	9.7	0	0.0	3.3	17.3
Middle	0	0.0	13.4	0	0.0	6.2	0	0.0	17.1	0	0.0	5.4	18.7
Upper	1	50.0	63.7	2,000	52.6	67.8	0	0.0	58.2	0	0.0	68.7	41.2
Unknown	1	50.0	9.3	1,800	47.4	19.5	0	0.0	9.0	0	0.0	18.7	0.0
Total	2	100.0	100.0	3,800	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.2	0	0.0	0.0	0	0.0	1.1	0	0.0	0.3	22.8
Moderate	0	0.0	1.2	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	17.3
Middle	0	0.0	1.0	0	0.0	0.7	0	0.0	1.7	0	0.0	0.9	18.7
Upper	0	0.0	1.5	0	0.0	2.1	0	0.0	0.0	0	0.0	0.0	41.2
Unknown	0	0.0	96.1	0	0.0	96.6	0	0.0	97.2	0	0.0	98.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D20A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: San Diego MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	1.3	0	0.0	0.6	23.6
Moderate	1	10.0	8.8	150	2.3	5.0	16.9
Middle	0	0.0	23.2	0	0.0	18.1	17.8
Upper	9	90.0	56.7	6,275	97.7	66.4	41.7
Unknown	0	0.0	10.0	0	0.0	9.8	0.0
Total	10	100.0	100.0	6,425	100.0	100.0	100.0
Refinance Loans							
Low	1	1.8	2.5	156	0.5	1.5	23.6
Moderate	2	3.5	8.7	566	1.8	5.7	16.9
Middle	5	8.8	18.5	1,273	4.1	15.3	17.8
Upper	45	78.9	47.7	23,806	76.0	53.4	41.7
Unknown	4	7.0	22.5	5,521	17.6	24.1	0.0
Total	57	100.0	100.0	31,322	100.0	100.0	100.0
Home Improvement Loans							
Low	1	0.8	2.9	120	0.5	1.9	23.6
Moderate	1	0.8	8.3	265	1.1	6.2	16.9
Middle	18	13.8	18.9	2,782	12.0	17.5	17.8
Upper	108	83.1	64.5	19,810	85.7	64.5	41.7
Unknown	2	1.5	5.3	141	0.6	9.8	0.0
Total	130	100.0	100.0	23,118	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	3	1.2	2.3	332	0.5	1.3	23.6
Moderate	5	2.0	8.7	1,081	1.5	5.5	16.9
Middle	31	12.3	19.3	5,159	7.1	15.8	17.8
Upper	208	82.2	49.8	59,927	83.0	56.4	41.7
Unknown	6	2.4	20.0	5,662	7.8	20.9	0.0
Total	253	100.0	100.0	72,161	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Table D20B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: San Diego MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	1	1.8	3.7	56	0.5	3.8	23.6
Moderate	1	1.8	7.2	100	0.9	4.4	16.9
Middle	8	14.5	17.2	1,104	10.0	11.8	17.8
Upper	45	81.8	69.6	9,736	88.5	76.7	41.7
Unknown	0	0.0	2.3	0	0.0	3.3	0.0
Total	55	100.0	100.0	10,996	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	4.9	0	0.0	2.4	23.6
Moderate	0	0.0	9.6	0	0.0	3.6	16.9
Middle	0	0.0	19.9	0	0.0	8.1	17.8
Upper	1	100.0	58.5	300	100.0	69.5	41.7
Unknown	0	0.0	7.1	0	0.0	16.3	0.0
Total	1	100.0	100.0	300	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.1	0	0.0	0.1	23.6
Moderate	0	0.0	0.5	0	0.0	0.3	16.9
Middle	0	0.0	0.6	0	0.0	0.5	17.8
Upper	0	0.0	0.8	0	0.0	1.5	41.7
Unknown	0	0.0	97.9	0	0.0	97.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table D21**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: San Diego MSA													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	106	44.5	46.5	12,201	26.2	25.1	50	39.1	52.3	5,574	18.8	31.4	92.8
Over \$1 Million	84	35.3		30,719	65.9		67	52.3		22,707	76.5		6.7
Revenue Unknown	48	20.2		3,699	7.9		11	8.6		1,387	4.7		0.6
Total	238	100.0		46,619	100.0		128	100.0		29,668	100.0		100.0
By Loan Size													
\$100,000 or Less	134	56.3	93.4	5,236	11.2	40.1	64	50.0	96.0	3,329	11.2	50.0	
\$100,001 - \$250,000	48	20.2	3.8	8,326	17.9	17.9	30	23.4	2.4	5,958	20.1	15.2	
\$250,001 - \$1 Million	56	23.5	2.8	33,057	70.9	42.0	34	26.6	1.7	20,381	68.7	34.8	
Total	238	100.0	100.0	46,619	100.0	100.0	128	100.0	100.0	29,668	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	72	67.9		2,718	22.3		37	74.0		1,735	31.1		
\$100,001 - \$250,000	23	21.7		3,940	32.3		11	22.0		2,263	40.6		
\$250,001 - \$1 Million	11	10.4		5,543	45.4		2	4.0		1,576	28.3		
Total	106	100.0		12,201	100.0		50	100.0		5,574	100.0		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table D22**

Table 2.11

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: San Diego MSA							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	200	55.1	41.1	15,772	29.4	24.7	92.7
Over \$1 Million	95	26.2		32,447	60.4		6.8
Revenue Unknown	68	18.7		5,480	10.2		0.5
Total	363	100.0		53,699	100.0		100.0
By Loan Size							
\$100,000 or Less	233	64.2	89.7	7,466	13.9	37.9	
\$100,001 - \$250,000	69	19.0	6.3	12,544	23.4	20.7	
\$250,001 - \$1 Million	61	16.8	4.0	33,689	62.7	41.5	
Total	363	100.0	100.0	53,699	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	153	76.5		4,372	27.7		
\$100,001 - \$250,000	36	18.0		6,302	40.0		
\$250,001 - \$1 Million	11	5.5		5,098	32.3		
Total	200	100.0		15,772	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D23

2022 Combined Demographics								
Assessment Area: San Francisco Bay Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	91	8.8	72,932	7.1	13,583	18.6	240,172	23.5
Moderate	240	23.1	229,789	22.5	17,895	7.8	167,475	16.4
Middle	330	31.8	344,121	33.7	13,218	3.8	191,394	18.7
Upper	337	32.4	362,427	35.5	8,660	2.4	423,164	41.4
Unknown	41	3.9	12,936	1.3	1,582	12.2	0	0.0
Total AA	1,039	100.0	1,022,205	100.0	54,938	5.4	1,022,205	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by	% by unit	#	% by unit	#	% by unit
Low	132,500	30,475	3.5	23.0	92,364	69.7	9,661	7.3
Moderate	380,058	167,123	19.2	44.0	192,481	50.6	20,454	5.4
Middle	557,444	306,586	35.3	55.0	221,156	39.7	29,702	5.3
Upper	587,052	356,898	41.1	60.8	192,755	32.8	37,399	6.4
Unknown	41,149	7,819	0.9	19.0	29,308	71.2	4,022	9.8
Total AA	1,698,203	868,901	100.0	51.2	728,064	42.9	101,238	6.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	14,161	6.2	12,766	6.1	1,310	7.2	85	6.6
Moderate	41,273	18.0	38,171	18.2	2,914	16.0	188	14.6
Middle	68,371	29.8	63,034	30.0	4,965	27.3	372	28.9
Upper	93,111	40.6	85,392	40.7	7,170	39.4	549	42.7
Unknown	12,385	5.4	10,458	5.0	1,836	10.1	91	7.1
Total AA	229,301	100.0	209,821	100.0	18,195	100.0	1,285	100.0
Percentage of Total Businesses:				91.5		7.9		0.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	52	4.5	49	4.4	3	6.8	0	0.0
Moderate	196	16.8	189	16.9	7	15.9	0	0.0
Middle	285	24.5	271	24.2	14	31.8	0	0.0
Upper	604	51.8	584	52.2	19	43.2	1	50.0
Unknown	28	2.4	26	2.3	1	2.3	1	50.0
Total AA	1,165	100.0	1,119	100.0	44	100.0	2	100.0
Percentage of Total Farms:				96.1		3.8		0.2
Source: 2022 FFIEC Census Data								
2022 Dun & Bradstreet Data								
2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D24

2021 Combined Demographics								
Assessment Area: San Francisco Bay Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	113	12.2	99,051	10.1	24,321	24.6	240,734	24.5
Moderate	198	21.4	201,834	20.5	22,893	11.3	156,646	15.9
Middle	276	29.9	317,676	32.3	17,358	5.5	177,159	18.0
Upper	322	34.8	361,447	36.8	9,081	2.5	407,773	41.5
Unknown	15	1.6	2,304	0.2	283	12.3	0	0.0
Total AA	924	100.0	982,312	100.0	73,936	7.5	982,312	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by	% by unit	#	% by unit	#	% by unit
Low	191,251	39,757	4.8	20.8	135,027	70.6	16,467	8.6
Moderate	346,462	141,407	17.1	40.8	184,685	53.3	20,370	5.9
Middle	521,675	276,060	33.4	52.9	218,082	41.8	27,533	5.3
Upper	581,474	366,890	44.4	63.1	185,326	31.9	29,258	5.0
Unknown	10,511	1,318	0.2	12.5	7,999	76.1	1,194	11.4
Total AA	1,651,373	825,432	100.0	50.0	731,119	44.3	94,822	5.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	26,929	11.8	23,754	11.4	3,031	16.6	144	12.2
Moderate	39,481	17.3	36,368	17.4	2,930	16.0	183	15.5
Middle	65,298	28.6	60,294	28.9	4,693	25.7	311	26.3
Upper	94,659	41.5	86,702	41.5	7,434	40.7	523	44.2
Unknown	1,861	0.8	1,649	0.8	191	1.0	21	1.8
Total AA	228,228	100.0	208,767	100.0	18,279	100.0	1,182	100.0
Percentage of Total Businesses:				91.5		8.0		0.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	84	7.1	79	6.9	4	9.5	1	25.0
Moderate	144	12.1	140	12.2	3	7.1	1	25.0
Middle	375	31.5	354	31.0	20	47.6	1	25.0
Upper	582	48.9	566	49.5	15	35.7	1	25.0
Unknown	4	0.3	4	0.3	0	0.0	0	0.0
Total AA	1,189	100.0	1,143	100.0	42	100.0	4	100.0
Percentage of Total Farms:				96.1		3.5		0.3
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D25

2020 Combined Demographics								
Assessment Area: San Francisco Bay Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	113	12.2	99,051	10.1	24,321	24.6	240,734	24.5
Moderate	198	21.4	201,834	20.5	22,893	11.3	156,646	15.9
Middle	276	29.9	317,676	32.3	17,358	5.5	177,159	18.0
Upper	322	34.8	361,447	36.8	9,081	2.5	407,773	41.5
Unknown	15	1.6	2,304	0.2	283	12.3	0	0.0
Total AA	924	100.0	982,312	100.0	73,936	7.5	982,312	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by	% by unit	#	% by unit	#	% by unit
Low	191,251	39,757	4.8	20.8	135,027	70.6	16,467	8.6
Moderate	346,462	141,407	17.1	40.8	184,685	53.3	20,370	5.9
Middle	521,675	276,060	33.4	52.9	218,082	41.8	27,533	5.3
Upper	581,474	366,890	44.4	63.1	185,326	31.9	29,258	5.0
Unknown	10,511	1,318	0.2	12.5	7,999	76.1	1,194	11.4
Total AA	1,651,373	825,432	100.0	50.0	731,119	44.3	94,822	5.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	27,119	11.8	23,790	11.3	3,188	16.9	141	12.9
Moderate	39,804	17.3	36,626	17.4	3,015	16.0	163	14.9
Middle	65,942	28.6	60,853	28.9	4,807	25.6	282	25.7
Upper	95,469	41.5	87,376	41.5	7,603	40.4	490	44.7
Unknown	1,882	0.8	1,662	0.8	200	1.1	20	1.8
Total AA	230,216	100.0	210,307	100.0	18,813	100.0	1,096	100.0
Percentage of Total Businesses:				91.4		8.2		0.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	82	6.8	75	6.4	6	13.0	1	25.0
Moderate	148	12.2	143	12.3	4	8.7	1	25.0
Middle	376	31.0	356	30.6	19	41.3	1	25.0
Upper	604	49.8	586	50.3	17	37.0	1	25.0
Unknown	4	0.3	4	0.3	0	0.0	0	0.0
Total AA	1,214	100.0	1,164	100.0	46	100.0	4	100.0
Percentage of Total Farms:				95.9		3.8		0.3
Source: 2020 FFIEC Census Data								
2020 Dun & Bradstreet Data								
2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								



Table D26A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: San Francisco Bay Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	5.9	0	0.0	3.8	2	8.7	4.4	282	3.4	2.5	3.5
Moderate	1	6.7	18.4	1,520	20.9	13.1	5	21.7	21.2	720	8.8	14.8	19.2
Middle	5	33.3	32.6	1,602	22.1	28.4	6	26.1	37.4	2,493	30.3	33.1	35.3
Upper	9	60.0	42.5	4,138	57.0	54.3	10	43.5	36.1	4,724	57.5	48.6	41.1
Unknown	0	0.0	0.5	0	0.0	0.4	0	0.0	1.0	0	0.0	1.0	0.9
Total	15	100.0	100.0	7,260	100.0	100.0	23	100.0	100.0	8,219	100.0	100.0	100.0
Refinance Loans													
Low	2	2.2	4.4	372	0.6	3.2	2	2.1	4.1	1,190	2.7	2.5	3.5
Moderate	8	8.8	15.9	2,619	4.5	12.1	8	8.5	19.8	2,279	5.2	13.7	19.2
Middle	27	29.7	33.2	10,084	17.4	29.1	31	33.0	33.9	11,086	25.2	28.0	35.3
Upper	54	59.3	46.3	44,867	77.4	55.5	53	56.4	41.2	29,457	66.9	54.8	41.1
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	1.0	0	0.0	1.0	0.9
Total	91	100.0	100.0	57,942	100.0	100.0	94	100.0	100.0	44,012	100.0	100.0	100.0
Home Improvement Loans													
Low	9	3.0	3.0	1,515	1.9	2.4	2	0.8	2.0	160	0.3	1.3	3.5
Moderate	42	13.9	11.3	8,308	10.4	9.1	40	16.4	14.2	6,011	9.7	10.3	19.2
Middle	93	30.7	32.6	21,857	27.4	28.2	97	39.8	34.6	22,048	35.5	28.5	35.3
Upper	159	52.5	53.0	48,037	60.3	60.3	105	43.0	48.6	33,889	54.6	59.2	41.1
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.6	0	0.0	0.7	0.9
Total	303	100.0	100.0	79,717	100.0	100.0	244	100.0	100.0	62,108	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	17.8	0	0.0	13.7	0	0.0	11.4	0	0.0	10.6	12.8
Moderate	1	100.0	27.0	892	100.0	30.5	1	25.0	27.5	100,000	76.6	24.1	22.9
Middle	0	0.0	28.1	0	0.0	26.1	1	25.0	26.2	29,000	22.2	33.0	28.4
Upper	0	0.0	25.9	0	0.0	28.8	0	0.0	30.8	0	0.0	28.6	29.9
Unknown	0	0.0	1.2	0	0.0	0.9	2	50.0	4.1	1,517	1.2	3.8	6.1
Total	1	100.0	100.0	892	100.0	100.0	4	100.0	100.0	130,517	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	14	2.4	4.7	2,331	1.1	3.6	8	1.7	4.0	1,822	0.6	2.9	3.5
Moderate	79	13.5	16.3	20,084	9.9	12.6	70	14.7	19.5	112,346	39.6	14.5	19.2
Middle	187	31.9	32.9	50,443	24.8	28.6	178	37.3	35.4	79,138	27.9	30.6	35.3
Upper	306	52.2	45.8	130,468	64.2	54.9	219	45.9	40.2	88,660	31.3	50.7	41.1
Unknown	0	0.0	0.3	0	0.0	0.3	2	0.4	0.9	1,517	0.5	1.1	0.9
Total	586	100.0	100.0	203,326	100.0	100.0	477	100.0	100.0	283,483	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D26B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: San Francisco Bay Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Other Purpose Lines of Credit													
Low	3	1.7	2.3	444	0.8	1.5	2	1.8	2.0	190	0.6	1.0	3.5
Moderate	27	15.4	11.4	6,745	12.2	8.1	16	14.5	13.2	3,336	10.5	8.5	19.2
Middle	62	35.4	30.8	16,900	30.5	25.7	42	38.2	34.1	10,711	33.6	26.7	35.3
Upper	83	47.4	55.5	31,251	56.5	64.6	50	45.5	50.2	17,665	55.4	63.3	41.1
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.5	0	0.0	0.5	0.9
Total	175	100.0	100.0	55,340	100.0	100.0	110	100.0	100.0	31,902	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.3	0	0.0	1.7	0	0.0	2.7	0	0.0	0.9	3.5
Moderate	0	0.0	13.8	0	0.0	6.4	0	0.0	16.4	0	0.0	5.7	19.2
Middle	0	0.0	28.8	0	0.0	16.9	1	50.0	33.0	3,800	56.5	15.8	35.3
Upper	1	100.0	52.8	2,175	100.0	74.9	1	50.0	47.4	2,925	43.5	76.5	41.1
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.6	0	0.0	1.1	0.9
Total	1	100.0	100.0	2,175	100.0	100.0	2	100.0	100.0	6,725	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	8.4	0	0.0	6.4	0	0.0	5.0	0	0.0	3.2	3.5
Moderate	0	0.0	22.2	0	0.0	18.6	0	0.0	25.4	0	0.0	15.9	19.2
Middle	0	0.0	37.8	0	0.0	34.7	0	0.0	40.9	0	0.0	40.7	35.3
Upper	0	0.0	31.6	0	0.0	40.3	0	0.0	27.1	0	0.0	39.6	41.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.7	0	0.0	0.6	0.9
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D27A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: San Francisco Bay Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	1	14.3	5.8	95	4.4	3.8	4.8
Moderate	0	0.0	17.9	0	0.0	12.7	17.1
Middle	1	14.3	32.6	273	12.7	28.6	33.4
Upper	5	71.4	43.2	1,790	82.9	54.6	44.4
Unknown	0	0.0	0.4	0	0.0	0.4	0.2
Total	7	100.0	100.0	2,158	100.0	100.0	100.0
Refinance Loans							
Low	6	5.1	3.7	2,042	3.0	2.8	4.8
Moderate	11	9.4	15.3	5,588	8.3	12.2	17.1
Middle	22	18.8	34.9	10,103	15.1	31.5	33.4
Upper	78	66.7	45.9	49,356	73.6	53.3	44.4
Unknown	0	0.0	0.2	0	0.0	0.2	0.2
Total	117	100.0	100.0	67,089	100.0	100.0	100.0
Home Improvement Loans							
Low	14	7.8	3.1	2,459	5.3	2.6	4.8
Moderate	12	6.7	13.3	2,357	5.1	11.2	17.1
Middle	55	30.6	31.8	11,209	24.3	28.3	33.4
Upper	98	54.4	51.7	30,007	65.0	57.6	44.4
Unknown	1	0.6	0.1	105	0.2	0.2	0.2
Total	180	100.0	100.0	46,137	100.0	100.0	100.0
Multifamily Loans							Multi- family Units %
Low	0	0.0	18.0	0	0.0	15.7	
Moderate	0	0.0	27.2	0	0.0	21.6	24.1
Middle	2	100.0	28.7	1,485	100.0	27.1	26.8
Upper	0	0.0	25.0	0	0.0	34.6	27.5
Unknown	0	0.0	1.1	0	0.0	1.0	1.8
Total	2	100.0	100.0	1,485	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	29	7.7	4.1	5,510	3.8	3.5	
Moderate	30	7.9	15.7	9,298	6.3	12.5	17.1
Middle	102	27.0	34.3	28,037	19.1	30.5	33.4
Upper	216	57.1	45.7	103,876	70.7	53.3	44.4
Unknown	1	0.3	0.2	105	0.1	0.2	0.2
Total	378	100.0	100.0	146,826	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D27B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: San Francisco Bay Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	8	11.4	2.8	914	3.8	1.9	4.8
Moderate	7	10.0	11.8	1,353	5.7	8.5	17.1
Middle	21	30.0	29.2	4,817	20.3	22.8	33.4
Upper	34	48.6	56.0	16,673	70.2	66.7	44.4
Unknown	0	0.0	0.2	0	0.0	0.1	0.2
Total	70	100.0	100.0	23,757	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	4.9	0	0.0	2.1	4.8
Moderate	0	0.0	14.5	0	0.0	6.9	17.1
Middle	1	50.0	30.6	150	2.4	19.9	33.4
Upper	1	50.0	49.8	6,050	97.6	70.9	44.4
Unknown	0	0.0	0.2	0	0.0	0.1	0.2
Total	2	100.0	100.0	6,200	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	8.2	0	0.0	5.3	4.8
Moderate	0	0.0	20.2	0	0.0	12.7	17.1
Middle	0	0.0	30.7	0	0.0	26.6	33.4
Upper	0	0.0	40.4	0	0.0	54.9	44.4
Unknown	0	0.0	0.6	0	0.0	0.5	0.2
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D28

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: San Francisco Bay Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Low	54	14.2	10.8	12,196	14.6	12.6	16	6.1	5.9	4,179	6.3	5.9	6.2
Moderate	63	16.6	18.0	14,120	16.9	16.7	59	22.5	19.1	12,103	18.2	16.8	18.0
Middle	97	25.5	29.9	18,414	22.0	27.6	86	32.8	31.5	21,451	32.3	29.8	29.8
Upper	166	43.7	40.1	38,860	46.5	42.2	78	29.8	39.1	21,524	32.4	41.2	40.6
Unknown	0	0.0	0.6	0	0.0	0.8	23	8.8	3.9	7,225	10.9	6.1	5.4
Total	380	100.0	100.0	83,590	100.0	100.0	262	100.0	100.0	66,482	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table D29A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: San Francisco Bay Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	1	6.7	1.8	132	1.8	0.8	0	0.0	2.1	0	0.0	0.9	23.5
Moderate	1	6.7	9.2	264	3.6	4.5	2	8.7	9.4	891	10.8	4.3	16.4
Middle	4	26.7	17.8	1,402	19.3	12.2	9	39.1	17.5	1,827	22.2	11.8	18.7
Upper	9	60.0	60.4	5,462	75.2	72.3	11	47.8	58.3	4,626	56.3	71.3	41.4
Unknown	0	0.0	10.8	0	0.0	10.3	1	4.3	12.7	875	10.6	11.8	0.0
Total	15	100.0	100.0	7,260	100.0	100.0	23	100.0	100.0	8,219	100.0	100.0	100.0
Refinance Loans													
Low	6	6.6	6.0	1,252	2.2	3.3	1	1.1	11.5	120	0.3	6.8	23.5
Moderate	9	9.9	14.4	2,963	5.1	9.1	14	14.9	16.0	3,497	7.9	9.6	16.4
Middle	14	15.4	20.1	4,808	8.3	16.1	14	14.9	17.9	4,714	10.7	13.9	18.7
Upper	58	63.7	48.3	43,251	74.6	59.9	61	64.9	40.7	29,376	66.7	54.6	41.4
Unknown	4	4.4	11.2	5,668	9.8	11.5	4	4.3	13.9	6,305	14.3	15.2	0.0
Total	91	100.0	100.0	57,942	100.0	100.0	94	100.0	100.0	44,012	100.0	100.0	100.0
Home Improvement Loans													
Low	5	1.7	4.2	617	0.8	3.3	6	2.5	4.2	721	1.2	2.7	23.5
Moderate	19	6.3	9.9	2,187	2.7	7.0	17	7.0	11.6	2,746	4.4	6.9	16.4
Middle	59	19.5	19.5	10,729	13.5	15.3	56	23.0	20.8	9,383	15.1	14.7	18.7
Upper	215	71.0	62.5	64,834	81.3	67.8	160	65.6	58.9	47,857	77.1	69.9	41.4
Unknown	5	1.7	3.9	1,350	1.7	6.6	5	2.0	4.4	1,401	2.3	5.8	0.0
Total	303	100.0	100.0	79,717	100.0	100.0	244	100.0	100.0	62,108	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	15	2.6	5.1	2,471	1.2	2.6	11	2.3	6.1	1,330	0.9	3.2	23.5
Moderate	41	7.0	13.0	7,273	3.6	7.6	50	10.6	12.1	10,418	6.8	6.2	16.4
Middle	109	18.6	19.5	24,025	11.9	14.8	97	20.5	18.1	19,517	12.8	12.4	18.7
Upper	404	69.1	51.6	157,747	77.9	63.9	304	64.3	51.6	112,620	73.6	65.2	41.4
Unknown	16	2.7	10.9	10,918	5.4	11.2	11	2.3	12.1	9,081	5.9	13.0	0.0
Total	585	100.0	100.0	202,434	100.0	100.0	473	100.0	100.0	152,966	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.													

Table D29B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: San Francisco Bay Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	3	1.7	4.3	470	0.8	4.8	4	3.6	3.8	489	1.5	3.4	23.5
Moderate	12	6.9	8.3	1,859	3.4	4.4	17	15.5	9.3	3,284	10.3	4.6	16.4
Middle	32	18.3	17.9	7,086	12.8	11.1	18	16.4	20.2	3,593	11.3	12.5	18.7
Upper	121	69.1	63.6	42,025	75.9	70.7	70	63.6	58.4	24,036	75.3	68.8	41.4
Unknown	7	4.0	6.0	3,900	7.0	9.0	1	0.9	8.2	500	1.6	10.6	0.0
Total	175	100.0	100.0	55,340	100.0	100.0	110	100.0	100.0	31,902	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	6.6	0	0.0	2.8	0	0.0	8.1	0	0.0	4.4	23.5
Moderate	0	0.0	11.4	0	0.0	4.2	0	0.0	12.3	0	0.0	3.7	16.4
Middle	0	0.0	16.9	0	0.0	7.2	0	0.0	17.6	0	0.0	5.7	18.7
Upper	1	100.0	58.8	2,175	100.0	71.5	2	100.0	52.0	6,725	100.0	68.5	41.4
Unknown	0	0.0	6.2	0	0.0	14.2	0	0.0	10.0	0	0.0	17.7	0.0
Total	1	100.0	100.0	2,175	100.0	100.0	2	100.0	100.0	6,725	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.5	0	0.0	0.2	0	0.0	1.1	0	0.0	0.4	23.5
Moderate	0	0.0	0.2	0	0.0	0.2	0	0.0	0.6	0	0.0	0.6	16.4
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.7
Upper	0	0.0	0.4	0	0.0	0.3	0	0.0	1.1	0	0.0	0.1	41.4
Unknown	0	0.0	97.8	0	0.0	99.3	0	0.0	97.2	0	0.0	98.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D30A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: San Francisco Bay Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	2.0	0	0.0	0.9	24.5
Moderate	0	0.0	9.7	0	0.0	4.9	15.9
Middle	3	42.9	18.8	485	22.5	13.1	18.0
Upper	4	57.1	61.7	1,673	77.5	73.6	41.5
Unknown	0	0.0	7.7	0	0.0	7.5	0.0
Total	7	100.0	100.0	2,158	100.0	100.0	100.0
Refinance Loans							
Low	1	0.9	4.3	264	0.4	2.4	24.5
Moderate	13	11.1	13.2	3,352	5.0	8.8	15.9
Middle	17	14.5	22.0	4,878	7.3	18.3	18.0
Upper	75	64.1	51.0	48,172	71.8	60.7	41.5
Unknown	11	9.4	9.5	10,423	15.5	9.7	0.0
Total	117	100.0	100.0	67,089	100.0	100.0	100.0
Home Improvement Loans							
Low	3	1.7	4.1	295	0.6	2.7	24.5
Moderate	17	9.4	11.2	2,537	5.5	9.4	15.9
Middle	36	20.0	19.5	6,912	15.0	16.6	18.0
Upper	122	67.8	60.8	36,193	78.4	65.5	41.5
Unknown	2	1.1	4.4	200	0.4	5.8	0.0
Total	180	100.0	100.0	46,137	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	7	1.9	3.9	797	0.5	2.1	24.5
Moderate	35	9.3	12.5	6,421	4.4	7.8	15.9
Middle	64	17.0	21.2	13,984	9.6	16.8	18.0
Upper	254	67.6	53.0	107,416	73.9	63.6	41.5
Unknown	16	4.3	9.5	16,723	11.5	9.7	0.0
Total	376	100.0	100.0	145,341	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D30B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: San Francisco Bay Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	2	2.9	4.5	88	0.4	3.9	24.5
Moderate	5	7.1	8.7	532	2.2	5.0	15.9
Middle	8	11.4	17.9	1,709	7.2	12.1	18.0
Upper	52	74.3	64.1	15,328	64.5	71.8	41.5
Unknown	3	4.3	4.7	6,100	25.7	7.2	0.0
Total	70	100.0	100.0	23,757	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	50.0	6.0	150	2.4	2.2	24.5
Moderate	0	0.0	11.2	0	0.0	4.1	15.9
Middle	0	0.0	17.9	0	0.0	8.6	18.0
Upper	1	50.0	58.6	6,050	97.6	70.2	41.5
Unknown	0	0.0	6.3	0	0.0	14.9	0.0
Total	2	100.0	100.0	6,200	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.2	0	0.0	0.1	24.5
Moderate	0	0.0	1.2	0	0.0	0.6	15.9
Middle	0	0.0	1.7	0	0.0	1.1	18.0
Upper	0	0.0	1.8	0	0.0	2.5	41.5
Unknown	0	0.0	95.1	0	0.0	95.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							



**Table D31**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: San Francisco Bay Metropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	128	33.7	47.8	20,548	24.6	23.4	87	33.2	55.2	10,306	15.5	31.9	91.5
Over \$1 Million	154	40.5		51,572	61.7		148	56.5		49,050	73.8		7.9
Revenue Unknown	98	25.8		11,470	13.7		27	10.3		7,126	10.7		0.6
Total	380	100.0		83,590	100.0		262	100.0		66,482	100.0		100.0
By Loan Size													
\$100,000 or Less	185	48.7	92.7	8,721	10.4	37.8	127	48.5	96.0	7,233	10.9	48.0	
\$100,001 - \$250,000	80	21.1	4.1	14,560	17.4	17.9	52	19.8	2.1	9,678	14.6	13.0	
\$250,001 - \$1 Million	115	30.3	3.1	60,309	72.1	44.3	83	31.7	1.9	49,571	74.6	38.9	
Total	380	100.0	100.0	83,590	100.0	100.0	262	100.0	100.0	66,482	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	76	59.4		3,273	15.9		67	77.0		3,351	32.5		
\$100,001 - \$250,000	28	21.9		4,923	24.0		12	13.8		2,200	21.3		
\$250,001 - \$1 Million	24	18.8		12,352	60.1		8	9.2		4,755	46.1		
Total	128	100.0	20,548	100.0	87	100.0	10,306	100.0					
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table D32**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: San Francisco Bay Metropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	239	42.9	43.0	27,302	24.5	24.6	91.4
Over \$1 Million	230	41.3		73,366	65.8		8.2
Revenue Unknown	88	15.8		10,911	9.8		0.5
Total	557	100.0		111,579	100.0		100.0
By Loan Size							
\$100,000 or Less	303	54.4	88.5	13,059	11.7	35.2	
\$100,001 - \$250,000	108	19.4	6.7	19,274	17.3	19.8	
\$250,001 - \$1 Million	146	26.2	4.8	79,246	71.0	45.0	
Total	557	100.0	100.0	111,579	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	168	70.3		6,746	24.7		
\$100,001 - \$250,000	43	18.0		7,437	27.2		
\$250,001 - \$1 Million	28	11.7		13,119	48.1		
Total	239	100.0		27,302	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table D33**

2022 Combined Demographics Assessment Area: Santa Cruz MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	7.1	3,139	5.2	850	27.1	13,427	22.1
Moderate	12	17.1	8,937	14.7	1,070	12.0	10,155	16.7
Middle	29	41.4	24,718	40.6	1,446	5.8	11,749	19.3
Upper	23	32.9	24,076	39.6	640	2.7	25,539	42.0
Unknown	1	1.4	0	0.0	0	0.0	0	0.0
Total AA	70	100.0	60,870	100.0	4,006	6.6	60,870	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,049	1,326	2.3	21.9	4,325	71.5	398	6.6
Moderate	14,524	5,641	9.7	38.8	8,021	55.2	862	5.9
Middle	43,612	24,362	41.9	55.9	15,197	34.8	4,053	9.3
Upper	41,634	26,765	46.1	64.3	10,638	25.6	4,231	10.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	105,819	58,094	100.0	54.9	38,181	36.1	9,544	9.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	785	5.5	673	5.0	107	12.4	5	7.4
Moderate	1,633	11.4	1,530	11.4	94	10.9	9	13.2
Middle	6,627	46.2	6,189	46.1	403	46.8	35	51.5
Upper	5,301	37.0	5,025	37.5	257	29.8	19	27.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	14,346	100.0	13,417	100.0	861	100.0	68	100.0
Percentage of Total Businesses:				93.5		6.0		0.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	30	8.3	23	6.9	7	22.6	0	0.0
Moderate	37	10.2	33	9.9	4	12.9	0	0.0
Middle	134	36.9	122	36.7	12	38.7	0	0.0
Upper	162	44.6	154	46.4	8	25.8	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	363	100.0	332	100.0	31	100.0	0	0.0
Percentage of Total Farms:				91.5		8.5		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D34**

2021 Combined Demographics Assessment Area: Santa Cruz MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	3.8	2,495	4.2	640	25.7	13,798	23.1
Moderate	11	20.8	14,713	24.7	2,199	14.9	10,138	17.0
Middle	22	41.5	23,214	38.9	1,700	7.3	10,715	18.0
Upper	17	32.1	19,253	32.3	610	3.2	25,024	41.9
Unknown	1	1.9	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>53</b>	<b>100.0</b>	<b>59,675</b>	<b>100.0</b>	<b>5,149</b>	<b>8.6</b>	<b>59,675</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,113	1,393	2.5	22.8	4,288	70.1	432	7.1
Moderate	21,021	9,412	17.2	44.8	10,467	49.8	1,142	5.4
Middle	45,656	22,479	41.1	49.2	17,275	37.8	5,902	12.9
Upper	32,244	21,344	39.1	66.2	8,144	25.3	2,756	8.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>105,034</b>	<b>54,628</b>	<b>100.0</b>	<b>52.0</b>	<b>40,174</b>	<b>38.2</b>	<b>10,232</b>	<b>9.7</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	580	4.1	527	4.0	51	5.9	2	3.0
Moderate	2,224	15.6	2,032	15.2	184	21.2	8	12.1
Middle	6,857	48.1	6,438	48.3	390	44.9	29	43.9
Upper	4,604	32.3	4,333	32.5	244	28.1	27	40.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>14,265</b>	<b>100.0</b>	<b>13,330</b>	<b>100.0</b>	<b>869</b>	<b>100.0</b>	<b>66</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.4</b>		<b>6.1</b>		<b>0.5</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	11	3.0	9	2.7	2	5.9	0	0.0
Moderate	83	22.8	69	20.9	14	41.2	0	0.0
Middle	177	48.6	163	49.4	14	41.2	0	0.0
Upper	93	25.5	89	27.0	4	11.8	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>364</b>	<b>100.0</b>	<b>330</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>90.7</b>		<b>9.3</b>		<b>0.0</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table D35**

2020 Combined Demographics Assessment Area: Santa Cruz MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	3.8	2,495	4.2	640	25.7	13,798	23.1
Moderate	11	20.8	14,713	24.7	2,199	14.9	10,138	17.0
Middle	22	41.5	23,214	38.9	1,700	7.3	10,715	18.0
Upper	17	32.1	19,253	32.3	610	3.2	25,024	41.9
Unknown	1	1.9	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>53</b>	<b>100.0</b>	<b>59,675</b>	<b>100.0</b>	<b>5,149</b>	<b>8.6</b>	<b>59,675</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,113	1,393	2.5	22.8	4,288	70.1	432	7.1
Moderate	21,021	9,412	17.2	44.8	10,467	49.8	1,142	5.4
Middle	45,656	22,479	41.1	49.2	17,275	37.8	5,902	12.9
Upper	32,244	21,344	39.1	66.2	8,144	25.3	2,756	8.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>105,034</b>	<b>54,628</b>	<b>100.0</b>	<b>52.0</b>	<b>40,174</b>	<b>38.2</b>	<b>10,232</b>	<b>9.7</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	592	4.0	531	3.9	59	6.4	2	3.3
Moderate	2,263	15.5	2,067	15.1	190	20.7	6	9.8
Middle	7,079	48.4	6,638	48.6	412	45.0	29	47.5
Upper	4,694	32.1	4,415	32.3	255	27.8	24	39.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>14,628</b>	<b>100.0</b>	<b>13,651</b>	<b>100.0</b>	<b>916</b>	<b>100.0</b>	<b>61</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.3</b>		<b>6.3</b>		<b>0.4</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	11	2.9	9	2.7	2	5.1	0	0.0
Moderate	82	21.8	68	20.1	14	35.9	0	0.0
Middle	182	48.3	164	48.5	18	46.2	0	0.0
Upper	102	27.1	97	28.7	5	12.8	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>377</b>	<b>100.0</b>	<b>338</b>	<b>100.0</b>	<b>39</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>89.7</b>		<b>10.3</b>		<b>0.0</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D36A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Santa Cruz MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	2.9	0	0.0	2.2	0	0.0	2.5	0	0.0	2.0	2.3
Moderate	0	0.0	12.4	0	0.0	9.6	1	33.3	9.5	128	15.8	7.0	9.7
Middle	0	0.0	41.4	0	0.0	41.0	0	0.0	41.5	0	0.0	37.2	41.9
Upper	0	0.0	43.3	0	0.0	47.2	2	66.7	46.5	680	84.2	53.7	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	808	100.0	100.0	100.0
Refinance Loans													
Low	1	4.5	2.6	162	2.6	2.1	2	10.5	2.0	416	6.8	1.6	2.3
Moderate	8	36.4	15.9	2,055	33.6	12.9	2	10.5	8.9	278	4.5	7.0	9.7
Middle	6	27.3	41.8	1,758	28.7	41.5	8	42.1	44.6	2,196	35.7	40.4	41.9
Upper	7	31.8	39.8	2,149	35.1	43.6	7	36.8	44.6	3,253	53.0	50.9	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	22	100.0	100.0	6,124	100.0	100.0	19	100.0	100.0	6,143	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.1	0	0.0	1.1	0	0.0	1.1	0	0.0	0.6	2.3
Moderate	3	6.1	9.7	372	3.8	9.4	7	10.0	5.2	1,198	9.2	5.0	9.7
Middle	25	51.0	43.2	4,415	44.8	46.3	30	42.9	39.7	5,670	43.4	38.3	41.9
Upper	21	42.9	45.0	5,062	51.4	43.1	33	47.1	53.9	6,185	47.4	56.1	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	49	100.0	100.0	9,849	100.0	100.0	70	100.0	100.0	13,053	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	24.3	0	0.0	8.1	0	0.0	11.1	0	0.0	5.4	
Moderate	0	0.0	8.1	0	0.0	5.0	0	0.0	29.6	0	0.0	17.9	24.4
Middle	0	0.0	62.2	0	0.0	83.4	0	0.0	37.0	0	0.0	10.9	36.5
Upper	0	0.0	5.4	0	0.0	3.5	0	0.0	22.2	0	0.0	65.8	22.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	1.0	2.7	162	0.7	2.2	2	1.6	2.1	416	1.5	1.9	
Moderate	14	13.3	14.9	2,919	12.2	11.8	13	10.4	8.6	2,223	7.8	7.3	9.7
Middle	50	47.6	41.8	11,460	47.8	42.3	54	43.2	42.3	12,110	42.4	37.9	41.9
Upper	40	38.1	40.7	9,453	39.4	43.7	56	44.8	47.0	13,818	48.4	53.0	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	105	100.0	100.0	23,994	100.0	100.0	125	100.0	100.0	28,567	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D36B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Santa Cruz MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	#	\$(000)	%	\$%	#	%	#	\$(000)	%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	1.4	0	0.0	1.5	0	0.0	0.5	0	0.0	0.0	2.3
Moderate	3	8.8	8.5	492	6.1	6.3	3	9.1	5.9	619	7.2	4.1	9.7
Middle	19	55.9	42.7	5,287	65.9	43.9	16	48.5	37.3	4,244	49.6	36.7	41.9
Upper	12	35.3	47.4	2,242	28.0	48.3	14	42.4	56.4	3,700	43.2	59.2	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	34	100.0	100.0	8,021	100.0	100.0	33	100.0	100.0	8,563	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.1	0	0.0	0.4	0	0.0	2.8	0	0.0	0.8	2.3
Moderate	0	0.0	13.2	0	0.0	13.1	0	0.0	6.3	0	0.0	5.9	9.7
Middle	0	0.0	42.6	0	0.0	44.1	0	0.0	39.4	0	0.0	49.3	41.9
Upper	0	0.0	43.2	0	0.0	42.4	0	0.0	51.4	0	0.0	43.9	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	6.1	0	0.0	8.7	0	0.0	0.0	0	0.0	0.0	2.3
Moderate	0	0.0	33.3	0	0.0	38.4	0	0.0	37.5	0	0.0	25.9	9.7
Middle	0	0.0	39.4	0	0.0	39.4	0	0.0	50.0	0	0.0	63.4	41.9
Upper	0	0.0	21.2	0	0.0	13.6	0	0.0	12.5	0	0.0	10.6	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D37A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Santa Cruz MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	2.7	0	0.0	1.9	2.5
Moderate	1	33.3	11.5	223	25.5	9.1	17.2
Middle	2	66.7	43.6	653	74.5	43.2	41.1
Upper	0	0.0	42.1	0	0.0	45.8	39.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	876	100.0	100.0	100.0
Refinance Loans							
Low	2	6.1	2.3	699	6.3	1.9	2.5
Moderate	10	30.3	15.1	2,831	25.4	12.5	17.2
Middle	7	21.2	42.2	1,826	16.4	42.0	41.1
Upper	14	42.4	40.5	5,808	52.0	43.5	39.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	33	100.0	100.0	11,164	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.9	0	0.0	2.1	2.5
Moderate	2	7.4	9.2	386	6.9	10.1	17.2
Middle	12	44.4	44.4	2,052	36.5	45.0	41.1
Upper	13	48.1	44.6	3,177	56.6	42.9	39.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	27	100.0	100.0	5,615	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	14.3	0	0.0	47.3	17.8
Moderate	0	0.0	26.2	0	0.0	16.3	23.0
Middle	0	0.0	54.8	0	0.0	35.9	47.8
Upper	0	0.0	4.8	0	0.0	0.4	11.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	2	2.2	2.3	699	2.8	3.9	2.5
Moderate	14	15.4	14.4	3,540	14.2	12.0	17.2
Middle	36	39.6	42.5	7,611	30.5	42.0	41.1
Upper	39	42.9	40.8	13,101	52.5	42.2	39.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	91	100.0	100.0	24,951	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							



Table D37B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Santa Cruz MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Other Purpose Lines of Credit							
Low	0	0.0	0.5	0	0.0	0.2	2.5
Moderate	1	3.6	8.6	100	1.4	7.1	17.2
Middle	15	53.6	40.7	3,080	42.2	36.9	41.1
Upper	12	42.9	50.2	4,116	56.4	55.8	39.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	28	100.0	100.0	7,296	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.4	0	0.0	1.3	2.5
Moderate	0	0.0	18.3	0	0.0	11.6	17.2
Middle	0	0.0	42.3	0	0.0	45.9	41.1
Upper	0	0.0	38.0	0	0.0	41.1	39.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	2.5	0	0.0	2.7	2.5
Moderate	0	0.0	27.2	0	0.0	20.0	17.2
Middle	0	0.0	34.6	0	0.0	33.4	41.1
Upper	0	0.0	35.8	0	0.0	43.8	39.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D38

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Santa Cruz MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	11	8.0	3.8	1,484	7.4	4.1	8	13.6	5.9	875	6.7	10.9	5.5
Moderate	33	23.9	17.4	5,303	26.5	17.9	8	13.6	9.4	2,325	17.9	9.0	11.4
Middle	57	41.3	44.6	7,041	35.2	42.5	25	42.4	44.6	5,062	39.0	41.8	46.2
Upper	37	26.8	32.0	6,195	30.9	34.9	18	30.5	38.7	4,703	36.3	38.0	37.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	138	100.0	100.0	20,023	100.0	100.0	59	100.0	100.0	12,965	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

**Table D39**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Santa Cruz MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
<b>Low</b>	16	6.7	3.9	1,864	6.1	4.3	4.0
<b>Moderate</b>	49	20.6	16.4	6,396	20.8	19.5	15.5
<b>Middle</b>	103	43.3	46.1	13,186	43.0	42.8	48.4
<b>Upper</b>	70	29.4	32.0	9,231	30.1	31.5	32.1
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	238	100.0	100.0	30,677	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D40A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Santa Cruz MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans													
Low	0	0.0	0.8	0	0.0	0.3	0	0.0	0.8	0	0.0	0.2	22.1
Moderate	0	0.0	5.4	0	0.0	2.6	0	0.0	6.4	0	0.0	2.5	16.7
Middle	0	0.0	16.7	0	0.0	12.2	0	0.0	12.8	0	0.0	8.3	19.3
Upper	0	0.0	66.7	0	0.0	73.9	3	100.0	66.1	808	100.0	75.2	42.0
Unknown	0	0.0	10.4	0	0.0	11.0	0	0.0	13.9	0	0.0	13.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	808	100.0	100.0	100.0
Refinance Loans													
Low	3	13.6	5.0	635	10.4	3.3	3	15.8	9.8	491	8.0	7.4	22.1
Moderate	5	22.7	13.0	731	11.9	8.5	4	21.1	13.4	750	12.2	8.6	16.7
Middle	5	22.7	21.8	1,400	22.9	18.7	3	15.8	18.4	900	14.7	14.5	19.3
Upper	8	36.4	48.2	3,053	49.9	56.9	9	47.4	45.9	4,002	65.1	55.6	42.0
Unknown	1	4.5	11.9	305	5.0	12.6	0	0.0	12.5	0	0.0	13.9	0.0
Total	22	100.0	100.0	6,124	100.0	100.0	19	100.0	100.0	6,143	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.0	0	0.0	2.7	2	2.9	4.0	75	0.6	2.6	22.1
Moderate	4	8.2	11.0	382	3.9	9.6	12	17.1	8.3	1,490	11.4	6.5	16.7
Middle	10	20.4	19.8	1,602	16.3	18.3	15	21.4	21.8	2,167	16.6	16.4	19.3
Upper	35	71.4	62.5	7,865	79.9	66.2	41	58.6	63.3	9,321	71.4	70.6	42.0
Unknown	0	0.0	2.7	0	0.0	3.2	0	0.0	2.6	0	0.0	3.9	0.0
Total	49	100.0	100.0	9,849	100.0	100.0	70	100.0	100.0	13,053	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	3.8	4.2	857	3.6	2.5	6	4.8	5.4	613	2.1	3.5	22.1
Moderate	12	11.4	11.4	1,469	6.1	6.8	18	14.4	9.5	2,338	8.2	5.0	16.7
Middle	20	19.0	20.4	3,730	15.5	16.6	23	18.4	16.7	4,349	15.2	11.2	19.3
Upper	68	64.8	52.7	17,633	73.5	62.0	77	61.6	56.9	21,217	74.3	66.8	42.0
Unknown	1	1.0	11.3	305	1.3	12.1	1	0.8	11.5	50	0.2	13.5	0.0
Total	105	100.0	100.0	23,994	100.0	100.0	125	100.0	100.0	28,567	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table D40B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Santa Cruz MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	1	2.9	3.3	222	2.8	5.6	1	3.0	5.5	47	0.5	9.2	22.1
Moderate	3	8.8	12.3	356	4.4	6.6	2	6.1	6.4	98	1.1	2.7	16.7
Middle	5	14.7	9.0	728	9.1	5.7	5	15.2	19.5	1,282	15.0	11.7	19.3
Upper	25	73.5	72.0	6,715	83.7	78.0	24	72.7	60.5	7,086	82.8	67.9	42.0
Unknown	0	0.0	3.3	0	0.0	4.1	1	3.0	8.2	50	0.6	8.5	0.0
Total	34	100.0	100.0	8,021	100.0	100.0	33	100.0	100.0	8,563	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	7.4	0	0.0	4.6	0	0.0	8.5	0	0.0	3.7	22.1
Moderate	0	0.0	5.8	0	0.0	2.4	0	0.0	2.8	0	0.0	0.7	16.7
Middle	0	0.0	16.3	0	0.0	8.2	0	0.0	16.2	0	0.0	8.9	19.3
Upper	0	0.0	63.2	0	0.0	75.9	0	0.0	65.5	0	0.0	68.4	42.0
Unknown	0	0.0	7.4	0	0.0	8.9	0	0.0	7.0	0	0.0	18.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.1
Moderate	0	0.0	3.0	0	0.0	2.8	0	0.0	0.0	0	0.0	0.0	16.7
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	12.5	0	0.0	25.7	42.0
Unknown	0	0.0	97.0	0	0.0	97.2	0	0.0	87.5	0	0.0	74.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D41A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Santa Cruz MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans							
Low	0	0.0	1.4	0	0.0	0.4	23.1
Moderate	0	0.0	6.8	0	0.0	3.6	17.0
Middle	1	33.3	18.1	223	25.5	13.8	18.0
Upper	2	66.7	67.6	653	74.5	76.0	41.9
Unknown	0	0.0	6.1	0	0.0	6.1	0.0
Total	3	100.0	100.0	876	100.0	100.0	100.0
Refinance Loans							
Low	3	9.1	3.6	573	5.1	2.1	23.1
Moderate	3	9.1	12.6	512	4.6	8.8	17.0
Middle	7	21.2	23.4	2,670	23.9	20.8	18.0
Upper	16	48.5	51.8	6,372	57.1	58.8	41.9
Unknown	4	12.1	8.7	1,037	9.3	9.6	0.0
Total	33	100.0	100.0	11,164	100.0	100.0	100.0
Home Improvement Loans							
Low	1	3.7	3.3	100	1.8	2.5	23.1
Moderate	2	7.4	9.2	292	5.2	9.1	17.0
Middle	6	22.2	23.7	1,158	20.6	22.0	18.0
Upper	18	66.7	60.3	4,065	72.4	59.5	41.9
Unknown	0	0.0	3.5	0	0.0	6.9	0.0
Total	27	100.0	100.0	5,615	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	4	4.4	3.3	673	2.7	1.8	23.1
Moderate	7	7.7	11.3	994	4.0	7.6	17.0
Middle	17	18.7	22.3	4,309	17.3	19.1	18.0
Upper	59	64.8	54.6	17,938	71.9	62.5	41.9
Unknown	4	4.4	8.5	1,037	4.2	9.1	0.0
Total	91	100.0	100.0	24,951	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D41B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level							
Assessment Area: Santa Cruz MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	8.1	0	0.0	11.1	23.1
Moderate	2	7.1	7.7	190	2.6	4.9	17.0
Middle	3	10.7	19.6	258	3.5	14.4	18.0
Upper	23	82.1	60.8	6,848	93.9	64.7	41.9
Unknown	0	0.0	3.8	0	0.0	4.9	0.0
Total	28	100.0	100.0	7,296	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.1	0	0.0	1.4	23.1
Moderate	0	0.0	8.5	0	0.0	3.8	17.0
Middle	0	0.0	22.5	0	0.0	13.4	18.0
Upper	0	0.0	64.8	0	0.0	79.4	41.9
Unknown	0	0.0	2.1	0	0.0	2.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	23.1
Moderate	0	0.0	1.2	0	0.0	1.2	17.0
Middle	0	0.0	0.0	0	0.0	0.0	18.0
Upper	0	0.0	1.2	0	0.0	1.5	41.9
Unknown	0	0.0	97.5	0	0.0	97.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table D42**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses												
Assessment Area: Santa Cruz MSA												
	Bank and Aggregate Loans by Year											
	2021						2022					
	Bank			Agg			Bank			Agg		
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%
By Revenue												
\$1 Million or Less	72	52.2	51.3	8,057	40.2	29.9	21	35.6	53.3	3,638	28.1	32.8
Over \$1 Million	39	28.3		9,367	46.8		32	54.2		6,795	52.4	
Revenue Unknown	27	19.6		2,599	13.0		6	10.2		2,532	19.5	
Total	138	100.0		20,023	100.0		59	100.0		12,965	100.0	
By Loan Size												
\$100,000 or Less	81	58.7	96.0	3,888	19.4	51.1	25	42.4	95.4	1,876	14.5	42.3
\$100,001 - \$250,000	39	28.3	2.5	6,917	34.5	16.5	20	33.9	2.3	3,952	30.5	13.4
\$250,001 - \$1 Million	18	13.0	1.5	9,218	46.0	32.4	14	23.7	2.3	7,137	55.0	44.2
Total	138	100.0	100.0	20,023	100.0	100.0	59	100.0	100.0	12,965	100.0	100.0
By Loan Size and Revenues \$1 Million or Less												
\$100,000 or Less	50	69.4		2,197	27.3		10	47.6		696	19.1	
\$100,001 - \$250,000	15	20.8		2,794	34.7		9	42.9		1,677	46.1	
\$250,001 - \$1 Million	7	9.7		3,066	38.1		2	9.5		1,265	34.8	
Total	72	100.0		8,057	100.0		21	100.0		3,638	100.0	

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table D43**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses						
Assessment Area: Santa Cruz MSA						
	Bank and Aggregate Loans					
	Bank		Agg	Bank		Agg
	#	#%	#%	\$(000)	%	%
By Revenue						
\$1 Million or Less	133	55.9	44.3	11,679	38.1	31.5
Over \$1 Million	59	24.8		14,880	48.5	
Revenue Unknown	46	19.3		4,118	13.4	
Total	238	100.0		30,677	100.0	
By Loan Size						
\$100,000 or Less	163	68.5	93.1	6,930	22.6	50.2
\$100,001 - \$250,000	45	18.9	4.6	7,305	23.8	18.9
\$250,001 - \$1 Million	30	12.6	2.3	16,442	53.6	30.8
Total	238	100.0	100.0	30,677	100.0	100.0
By Loan Size and Revenues \$1 Million or Less						
\$100,000 or Less	105	78.9		4,240	36.3	
\$100,001 - \$250,000	21	15.8		3,512	30.1	
\$250,001 - \$1 Million	7	5.3		3,927	33.6	
Total	133	100.0		11,679	100.0	

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table D44**

2022 Combined Demographics								
Assessment Area: Ventura County MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	4.7	7,584	3.9	1,635	21.6	43,215	22.0
Moderate	46	24.2	42,875	21.8	4,249	9.9	32,443	16.5
Middle	77	40.5	81,858	41.7	4,365	5.3	40,828	20.8
Upper	55	28.9	63,333	32.3	1,635	2.6	79,826	40.7
Unknown	3	1.6	662	0.3	34	5.1	0	0.0
Total AA	190	100.0	196,312	100.0	11,918	6.1	196,312	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,697	3,038	1.8	31.3	5,976	61.6	683	7.0
Moderate	62,889	28,501	16.6	45.3	29,971	47.7	4,417	7.0
Middle	127,663	74,681	43.4	58.5	46,066	36.1	6,916	5.4
Upper	87,640	65,459	38.0	74.7	16,982	19.4	5,199	5.9
Unknown	1,536	358	0.2	23.3	607	39.5	571	37.2
Total AA	289,425	172,037	100.0	59.4	99,602	34.4	17,786	6.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,335	3.2	1,154	3.0	173	5.9	8	4.1
Moderate	7,166	17.0	6,581	16.9	554	18.9	31	15.7
Middle	18,954	45.1	17,445	44.8	1,434	48.9	75	38.1
Upper	14,483	34.4	13,634	35.0	766	26.1	83	42.1
Unknown	119	0.3	116	0.3	3	0.1	0	0.0
Total AA	42,057	100.0	38,930	100.0	2,930	100.0	197	100.0
Percentage of Total Businesses:				92.6		7.0		0.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	21	3.2	15	2.6	6	7.7	0	0.0
Moderate	166	25.6	133	23.3	33	42.3	0	0.0
Middle	253	39.0	228	39.9	25	32.1	0	0.0
Upper	208	32.0	194	34.0	14	17.9	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	649	100.0	571	100.0	78	100.0	0	0.0
Percentage of Total Farms:				88.0		12.0		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



Table D45

2021 Combined Demographics								
Assessment Area: Ventura County MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	5.2	6,791	3.4	1,924	28.3	43,971	22.2
Moderate	50	28.7	51,183	25.8	7,590	14.8	33,839	17.1
Middle	61	35.1	75,440	38.1	4,413	5.8	39,513	20.0
Upper	51	29.3	64,314	32.5	1,673	2.6	80,724	40.8
Unknown	3	1.7	319	0.2	43	13.5	0	0.0
Total AA	174	100.0	198,047	100.0	15,643	7.9	198,047	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,601	2,371	1.4	24.7	6,717	70.0	513	5.3
Moderate	73,564	33,096	19.2	45.0	35,742	48.6	4,726	6.4
Middle	113,231	70,117	40.6	61.9	36,765	32.5	6,349	5.6
Upper	86,356	66,786	38.7	77.3	16,421	19.0	3,149	3.6
Unknown	1,147	239	0.1	20.8	715	62.3	193	16.8
Total AA	283,899	172,609	100.0	60.8	96,360	33.9	14,930	5.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,179	5.2	1,811	4.7	362	12.3	6	3.6
Moderate	8,185	19.5	7,666	19.7	486	16.5	33	19.8
Middle	17,028	40.5	15,661	40.2	1,305	44.3	62	37.1
Upper	14,433	34.3	13,585	34.9	784	26.6	64	38.3
Unknown	221	0.5	210	0.5	9	0.3	2	1.2
Total AA	42,046	100.0	38,933	100.0	2,946	100.0	167	100.0
Percentage of Total Businesses:				92.6		7.0		0.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	42	6.4	31	5.4	11	14.5	0	0.0
Moderate	163	24.9	132	22.8	30	39.5	1	100.0
Middle	282	43.1	257	44.5	25	32.9	0	0.0
Upper	165	25.2	155	26.8	10	13.2	0	0.0
Unknown	3	0.5	3	0.5	0	0.0	0	0.0
Total AA	655	100.0	578	100.0	76	100.0	1	100.0
Percentage of Total Farms:				88.2		11.6		0.2
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D46**

2020 Combined Demographics Assessment Area: Ventura County MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	5.2	6,791	3.4	1,924	28.3	43,971	22.2
Moderate	50	28.7	51,183	25.8	7,590	14.8	33,839	17.1
Middle	61	35.1	75,440	38.1	4,413	5.8	39,513	20.0
Upper	51	29.3	64,314	32.5	1,673	2.6	80,724	40.8
Unknown	3	1.7	319	0.2	43	13.5	0	0.0
Total AA	174	100.0	198,047	100.0	15,643	7.9	198,047	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,601	2,371	1.4	24.7	6,717	70.0	513	5.3
Moderate	73,564	33,096	19.2	45.0	35,742	48.6	4,726	6.4
Middle	113,231	70,117	40.6	61.9	36,765	32.5	6,349	5.6
Upper	86,356	66,786	38.7	77.3	16,421	19.0	3,149	3.6
Unknown	1,147	239	0.1	20.8	715	62.3	193	16.8
Total AA	283,899	172,609	100.0	60.8	96,360	33.9	14,930	5.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,243	5.3	1,873	4.8	364	11.9	6	3.6
Moderate	8,313	19.5	7,774	19.7	503	16.5	36	21.7
Middle	17,221	40.4	15,800	40.1	1,361	44.7	60	36.1
Upper	14,625	34.3	13,754	34.9	809	26.6	62	37.3
Unknown	229	0.5	217	0.6	10	0.3	2	1.2
Total AA	42,631	100.0	39,418	100.0	3,047	100.0	166	100.0
Percentage of Total Businesses:				92.5		7.1		0.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	40	6.0	28	4.8	12	15.0	0	0.0
Moderate	170	25.5	138	23.6	31	38.8	1	100.0
Middle	286	42.9	260	44.4	26	32.5	0	0.0
Upper	168	25.2	157	26.8	11	13.8	0	0.0
Unknown	2	0.3	2	0.3	0	0.0	0	0.0
Total AA	666	100.0	585	100.0	80	100.0	1	100.0
Percentage of Total Farms:				87.8		12.0		0.2
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D47A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Ventura County MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	1.4	0	0.0	1.1	0	0.0	1.6	0	0.0	1.1	1.8
Moderate	2	100.0	22.0	915	100.0	17.1	1	50.0	20.1	449	10.1	14.7	16.6
Middle	0	0.0	39.2	0	0.0	36.7	0	0.0	43.8	0	0.0	43.4	43.4
Upper	0	0.0	37.2	0	0.0	44.9	1	50.0	34.2	4,000	89.9	40.3	38.0
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.3	0	0.0	0.5	0.2
Total	2	100.0	100.0	915	100.0	100.0	2	100.0	100.0	4,449	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.1	0	0.0	0.8	0	0.0	1.5	0	0.0	1.1	1.8
Moderate	2	33.3	17.4	778	36.9	14.0	2	25.0	16.5	718	18.8	13.2	16.6
Middle	0	0.0	40.9	0	0.0	37.7	2	25.0	42.5	348	9.1	38.1	43.4
Upper	4	66.7	40.3	1,332	63.1	47.3	4	50.0	39.2	2,752	72.1	47.0	38.0
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0	0.0	0.5	0.2
Total	6	100.0	100.0	2,110	100.0	100.0	8	100.0	100.0	3,818	100.0	100.0	100.0
Home Improvement Loans													
Low	1	3.3	1.1	100	1.9	0.8	0	0.0	0.9	0	0.0	0.8	1.8
Moderate	1	3.3	12.4	100	1.9	11.1	3	5.9	11.5	387	4.2	9.5	16.6
Middle	11	36.7	35.5	1,388	26.4	33.5	18	35.3	40.9	2,830	30.9	37.2	43.4
Upper	17	56.7	50.7	3,664	69.8	54.3	30	58.8	46.3	5,942	64.9	51.9	38.0
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.4	0	0.0	0.6	0.2
Total	30	100.0	100.0	5,252	100.0	100.0	51	100.0	100.0	9,159	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	14.8	0	0.0	3.1	0	0.0	9.2	0	0.0	7.9	4.7
Moderate	0	0.0	51.9	0	0.0	36.2	0	0.0	44.7	0	0.0	42.5	32.6
Middle	0	0.0	22.2	0	0.0	30.6	0	0.0	38.2	0	0.0	36.0	49.2
Upper	0	0.0	9.3	0	0.0	28.2	0	0.0	7.9	0	0.0	13.7	13.5
Unknown	0	0.0	1.9	0	0.0	1.8	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	1.9	1.2	100	0.9	0.9	0	0.0	1.5	0	0.0	1.5	1.8
Moderate	5	9.6	18.3	1,793	15.9	15.4	7	9.6	17.5	1,646	8.3	15.3	16.6
Middle	15	28.8	40.3	2,162	19.1	37.1	23	31.5	42.9	3,606	18.3	40.9	43.4
Upper	31	59.6	40.1	7,238	64.1	46.4	43	58.9	37.7	14,502	73.4	41.9	38.0
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.4	0	0.0	0.5	0.2
Total	52	100.0	100.0	11,293	100.0	100.0	73	100.0	100.0	19,754	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D47B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Ventura County MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	0.4	0	0.0	0.2	0	0.0	0.6	0	0.0	0.6	1.8
Moderate	0	0.0	8.2	0	0.0	6.2	1	8.3	12.1	92	4.0	8.0	16.6
Middle	4	28.6	38.0	774	25.7	30.2	3	25.0	42.1	428	18.4	36.6	43.4
Upper	10	71.4	53.3	2,242	74.3	63.2	8	66.7	44.7	1,808	77.7	54.4	38.0
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.4	0	0.0	0.5	0.2
Total	14	100.0	100.0	3,016	100.0	100.0	12	100.0	100.0	2,328	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.6	0	0.0	0.2	0	0.0	1.8	0	0.0	0.9	1.8
Moderate	0	0.0	11.9	0	0.0	7.3	0	0.0	16.1	0	0.0	7.1	16.6
Middle	0	0.0	38.4	0	0.0	28.3	0	0.0	43.5	0	0.0	37.8	43.4
Upper	0	0.0	49.1	0	0.0	64.2	0	0.0	37.8	0	0.0	52.8	38.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.8	0	0.0	1.5	0.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.6	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	1.8
Moderate	0	0.0	33.0	0	0.0	22.1	0	0.0	25.4	0	0.0	23.7	16.6
Middle	0	0.0	38.3	0	0.0	40.6	0	0.0	45.8	0	0.0	42.1	43.4
Upper	0	0.0	25.2	0	0.0	35.7	0	0.0	27.1	0	0.0	34.2	38.0
Unknown	0	0.0	0.9	0	0.0	1.1	0	0.0	1.7	0	0.0	0.0	0.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D48A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Ventura County MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	1.5	0	0.0	1.1	1.4
Moderate	2	40.0	21.2	535	34.1	16.4	19.2
Middle	1	20.0	39.2	400	25.5	36.8	40.6
Upper	2	40.0	38.0	632	40.3	45.5	38.7
Unknown	0	0.0	0.1	0	0.0	0.2	0.1
Total	5	100.0	100.0	1,567	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.7	0	0.0	0.5	1.4
Moderate	3	21.4	16.3	780	4.7	13.3	19.2
Middle	2	14.3	41.1	637	3.8	38.5	40.6
Upper	9	64.3	41.8	15,247	91.5	47.5	38.7
Unknown	0	0.0	0.1	0	0.0	0.2	0.1
Total	14	100.0	100.0	16,664	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.4	0	0.0	0.4	1.4
Moderate	1	5.9	11.3	77	2.4	9.6	19.2
Middle	5	29.4	37.7	713	22.3	36.3	40.6
Upper	11	64.7	50.1	2,403	75.3	53.1	38.7
Unknown	0	0.0	0.5	0	0.0	0.6	0.1
Total	17	100.0	100.0	3,193	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	12.0	0	0.0	4.1	
Moderate	0	0.0	39.0	0	0.0	29.0	42.3
Middle	0	0.0	41.0	0	0.0	54.0	34.6
Upper	0	0.0	5.0	0	0.0	11.9	14.2
Unknown	0	0.0	3.0	0	0.0	1.0	1.1
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	1	2.1	0.8	216	0.8	0.8	
Moderate	6	12.8	17.0	1,392	5.4	14.3	19.2
Middle	10	21.3	40.7	2,341	9.1	38.5	40.6
Upper	30	63.8	41.3	21,822	84.7	46.2	38.7
Unknown	0	0.0	0.2	0	0.0	0.2	0.1
Total	47	100.0	100.0	25,771	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D48B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Ventura County MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	1	9.1	0.6	216	5.0	0.5	1.4
Moderate	0	0.0	7.4	0	0.0	4.8	19.2
Middle	2	18.2	38.7	591	13.6	33.2	40.6
Upper	8	72.7	53.3	3,540	81.4	61.6	38.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	11	100.0	100.0	4,347	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.5	0	0.0	1.2	1.4
Moderate	0	0.0	9.4	0	0.0	5.8	19.2
Middle	0	0.0	45.1	0	0.0	35.7	40.6
Upper	0	0.0	44.0	0	0.0	57.3	38.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	3.0	0	0.0	1.9	1.4
Moderate	0	0.0	34.3	0	0.0	25.3	19.2
Middle	0	0.0	38.2	0	0.0	37.2	40.6
Upper	0	0.0	24.4	0	0.0	35.5	38.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D49

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Ventura County MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	1	5.3	4.8	400	7.9	10.1	0	0.0	3.1	0	0.0	5.3	3.2
Moderate	1	5.3	18.9	100	2.0	17.4	6	26.1	15.8	772	17.3	16.7	17.0
Middle	10	52.6	39.7	3,255	64.3	42.2	10	43.5	44.6	1,973	44.2	46.3	45.1
Upper	7	36.8	35.5	1,307	25.8	29.8	7	30.4	35.8	1,715	38.5	31.4	34.4
Unknown	0	0.0	0.4	0	0.0	0.4	0	0.0	0.3	0	0.0	0.1	0.3
Total	19	100.0	100.0	5,062	100.0	100.0	23	100.0	100.0	4,460	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

**Table D50**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Ventura County MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
<b>Low</b>	1	3.1	5.3	400	5.3	10.3	5.3
<b>Moderate</b>	4	12.5	18.6	156	2.1	16.7	19.5
<b>Middle</b>	16	50.0	40.4	5,812	77.3	42.7	40.4
<b>Upper</b>	11	34.4	34.8	1,148	15.3	29.1	34.3
<b>Unknown</b>	0	0.0	0.5	0	0.0	0.6	0.5
<b>Total</b>	32	100.0	100.0	7,516	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D51A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Ventura County MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	1.0	0	0.0	0.5	0	0.0	1.3	0	0.0	0.5	22.0
Moderate	1	50.0	7.4	434	47.4	4.2	0	0.0	7.6	0	0.0	3.7	16.5
Middle	1	50.0	20.7	481	52.6	16.7	1	50.0	21.0	449	10.1	15.5	20.8
Upper	0	0.0	53.7	0	0.0	61.6	1	50.0	52.5	4,000	89.9	57.8	40.7
Unknown	0	0.0	17.2	0	0.0	16.9	0	0.0	17.6	0	0.0	22.5	0.0
Total	2	100.0	100.0	915	100.0	100.0	2	100.0	100.0	4,449	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.9	0	0.0	2.2	1	12.5	9.4	118	3.1	6.6	22.0
Moderate	1	16.7	12.1	416	19.7	8.3	0	0.0	16.1	0	0.0	11.3	16.5
Middle	1	16.7	21.3	362	17.2	18.4	1	12.5	21.7	100	2.6	18.4	20.8
Upper	4	66.7	44.9	1,332	63.1	52.4	6	75.0	39.4	3,600	94.3	48.3	40.7
Unknown	0	0.0	17.7	0	0.0	18.6	0	0.0	13.3	0	0.0	15.3	0.0
Total	6	100.0	100.0	2,110	100.0	100.0	8	100.0	100.0	3,818	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.4	0	0.0	3.0	0	0.0	4.0	0	0.0	3.8	22.0
Moderate	1	3.3	9.5	200	3.8	7.7	3	5.9	10.0	477	5.2	6.5	16.5
Middle	5	16.7	18.4	477	9.1	16.3	15	29.4	22.5	2,322	25.4	17.8	20.8
Upper	24	80.0	63.4	4,575	87.1	67.9	33	64.7	57.1	6,360	69.4	65.1	40.7
Unknown	0	0.0	4.3	0	0.0	5.0	0	0.0	6.3	0	0.0	6.9	0.0
Total	30	100.0	100.0	5,252	100.0	100.0	51	100.0	100.0	9,159	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	3.3	0	0.0	1.8	1	1.4	5.0	118	0.6	2.9	22.0
Moderate	3	5.8	10.9	1,050	9.3	7.1	5	6.8	11.4	743	3.8	6.5	16.5
Middle	8	15.4	21.0	1,363	12.1	17.8	18	24.7	21.4	3,072	15.6	16.4	20.8
Upper	41	78.8	47.6	8,880	78.6	55.3	49	67.1	47.6	15,821	80.1	55.0	40.7
Unknown	0	0.0	17.2	0	0.0	18.0	0	0.0	14.5	0	0.0	19.3	0.0
Total	52	100.0	100.0	11,293	100.0	100.0	73	100.0	100.0	19,754	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													



Table D51B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Ventura County MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	5.5	0	0.0	6.5	0	0.0	4.0	0	0.0	5.2	22.0
Moderate	0	0.0	7.0	0	0.0	3.8	2	16.7	10.5	266	11.4	5.7	16.5
Middle	1	7.1	17.6	43	1.4	13.2	1	8.3	23.7	201	8.6	16.2	20.8
Upper	13	92.9	66.3	2,973	98.6	68.7	9	75.0	53.8	1,861	79.9	65.8	40.7
Unknown	0	0.0	3.5	0	0.0	7.8	0	0.0	8.1	0	0.0	7.0	0.0
Total	14	100.0	100.0	3,016	100.0	100.0	12	100.0	100.0	2,328	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.2	0	0.0	2.5	0	0.0	6.1	0	0.0	3.5	22.0
Moderate	0	0.0	10.5	0	0.0	5.2	0	0.0	11.4	0	0.0	4.9	16.5
Middle	0	0.0	17.3	0	0.0	10.0	0	0.0	17.5	0	0.0	7.9	20.8
Upper	0	0.0	60.4	0	0.0	71.3	0	0.0	52.2	0	0.0	67.4	40.7
Unknown	0	0.0	8.7	0	0.0	11.0	0	0.0	12.8	0	0.0	16.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.0
Moderate	0	0.0	1.7	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	16.5
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	40.7
Unknown	0	0.0	98.3	0	0.0	99.5	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D52A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Ventura County MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	1.6	0	0.0	1.0	22.2
Moderate	1	20.0	9.2	252	16.1	5.4	17.1
Middle	1	20.0	24.5	132	8.4	20.2	20.0
Upper	3	60.0	54.0	1,183	75.5	62.7	40.8
Unknown	0	0.0	10.7	0	0.0	10.7	0.0
Total	5	100.0	100.0	1,567	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.8	0	0.0	1.7	22.2
Moderate	3	21.4	11.1	821	4.9	7.8	17.1
Middle	0	0.0	22.5	0	0.0	19.9	20.0
Upper	10	71.4	46.0	15,053	90.3	51.8	40.8
Unknown	1	7.1	17.6	790	4.7	18.8	0.0
Total	14	100.0	100.0	16,664	100.0	100.0	100.0
Home Improvement Loans							
Low	1	5.9	4.0	150	4.7	2.8	22.2
Moderate	1	5.9	10.5	50	1.6	9.0	17.1
Middle	3	17.6	21.8	360	11.3	21.2	20.0
Upper	12	70.6	58.8	2,633	82.5	61.1	40.8
Unknown	0	0.0	4.8	0	0.0	5.8	0.0
Total	17	100.0	100.0	3,193	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	2.1	2.7	150	0.6	1.6	22.2
Moderate	5	10.6	10.7	1,123	4.4	7.3	17.1
Middle	5	10.6	22.6	553	2.1	19.8	20.0
Upper	35	74.5	47.7	23,155	89.8	54.2	40.8
Unknown	1	2.1	16.3	790	3.1	17.2	0.0
Total	47	100.0	100.0	25,771	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D52B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Ventura County MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	5.3	0	0.0	4.5	22.2
Moderate	0	0.0	9.3	0	0.0	7.5	17.1
Middle	1	9.1	19.4	61	1.4	15.7	20.0
Upper	10	90.9	64.8	4,286	98.6	70.2	40.8
Unknown	0	0.0	1.2	0	0.0	2.0	0.0
Total	11	100.0	100.0	4,347	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	4.8	0	0.0	2.7	22.2
Moderate	0	0.0	10.9	0	0.0	6.5	17.1
Middle	0	0.0	20.6	0	0.0	15.9	20.0
Upper	0	0.0	58.9	0	0.0	71.7	40.8
Unknown	0	0.0	4.8	0	0.0	3.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	22.2
Moderate	0	0.0	0.3	0	0.0	0.3	17.1
Middle	0	0.0	0.3	0	0.0	0.3	20.0
Upper	0	0.0	1.1	0	0.0	2.3	40.8
Unknown	0	0.0	98.3	0	0.0	97.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table D53**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Ventura County MSA													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	#	%	%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	10	52.6	45.1	2,473	48.9	23.5	6	26.1	51.6	336	7.5	30.9	92.6
Over \$1 Million	7	36.8		2,532	50.0		14	60.9		3,905	87.6		7.0
Revenue Unknown	2	10.5		57	1.1		3	13.0		219	4.9		0.5
Total	19	100.0		5,062	100.0		23	100.0		4,460	100.0		100.0
By Loan Size													
\$100,000 or Less	9	47.4	93.4	390	7.7	41.2	13	56.5	95.9	785	17.6	49.6	
\$100,001 - \$250,000	4	21.1	3.9	683	13.5	18.6	5	21.7	2.4	975	21.9	15.2	
\$250,001 - \$1 Million	6	31.6	2.7	3,989	78.8	40.2	5	21.7	1.6	2,700	60.5	35.2	
Total	19	100.0	100.0	5,062	100.0	100.0	23	100.0	100.0	4,460	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	6	60.0		233	9.4		6	100.0		336	100.0		
\$100,001 - \$250,000	2	20.0		283	11.4		0	0.0		0	0.0		
\$250,001 - \$1 Million	2	20.0		1,957	79.1		0	0.0		0	0.0		
Total	10	100.0		2,473	100.0		6	100.0		336	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table D54**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Ventura County MSA							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	#%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	15	46.9	37.2	2,046	27.2	24.1	92.5
Over \$1 Million	12	37.5		5,239	69.7		7.1
Revenue Unknown	5	15.6		231	3.1		0.4
Total	32	100.0		7,516	100.0		100.0
By Loan Size							
\$100,000 or Less	17	53.1	89.5	786	10.5	38.4	
\$100,001 - \$250,000	6	18.8	6.4	1,231	16.4	20.3	
\$250,001 - \$1 Million	9	28.1	4.1	5,499	73.2	41.3	
Total	32	100.0	100.0	7,516	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	11	73.3		455	22.2		
\$100,001 - \$250,000	2	13.3		369	18.0		
\$250,001 - \$1 Million	2	13.3		1,222	59.7		
Total	15	100.0		2,046	100.0		
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table D55**

2022 Combined Demographics Assessment Area: Naples MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	8	7.3	5,236	5.3	1,381	26.4	21,523	21.9
Moderate	21	19.3	20,029	20.4	2,325	11.6	17,688	18.0
Middle	44	40.4	39,169	39.9	2,069	5.3	19,185	19.6
Upper	33	30.3	32,351	33.0	975	3.0	39,725	40.5
Unknown	3	2.8	1,336	1.4	179	13.4	0	0.0
<b>Total AA</b>	<b>109</b>	<b>100.0</b>	<b>98,121</b>	<b>100.0</b>	<b>6,929</b>	<b>7.1</b>	<b>98,121</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	8,244	2,479	2.3	30.1	4,636	56.2	1,129	13.7
Moderate	35,637	19,187	17.4	53.8	9,046	25.4	7,404	20.8
Middle	90,531	44,798	40.7	49.5	15,939	17.6	29,794	32.9
Upper	81,352	42,257	38.4	51.9	7,977	9.8	31,118	38.3
Unknown	2,584	1,362	1.2	52.7	296	11.5	926	35.8
<b>Total AA</b>	<b>218,348</b>	<b>110,083</b>	<b>100.0</b>	<b>50.4</b>	<b>37,894</b>	<b>17.4</b>	<b>70,371</b>	<b>32.2</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	891	2.6	834	2.6	50	3.3	7	1.7
Moderate	5,257	15.5	5,095	15.9	125	8.2	37	8.8
Middle	14,827	43.6	13,948	43.5	700	46.0	179	42.5
Upper	12,644	37.2	11,808	36.9	643	42.2	193	45.8
Unknown	368	1.1	358	1.1	5	0.3	5	1.2
<b>Total AA</b>	<b>33,987</b>	<b>100.0</b>	<b>32,043</b>	<b>100.0</b>	<b>1,523</b>	<b>100.0</b>	<b>421</b>	<b>100.0</b>
Percentage of Total Businesses:				<b>94.3</b>		<b>4.5</b>		<b>1.2</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	43	17.5	33	14.3	10	62.5	0	0.0
Moderate	43	17.5	42	18.3	1	6.3	0	0.0
Middle	107	43.5	104	45.2	3	18.8	0	0.0
Upper	52	21.1	50	21.7	2	12.5	0	0.0
Unknown	1	0.4	1	0.4	0	0.0	0	0.0
<b>Total AA</b>	<b>246</b>	<b>100.0</b>	<b>230</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				<b>93.5</b>		<b>6.5</b>		<b>0.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D56**

2021 Combined Demographics Assessment Area: Naples MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	6	8.1	4,106	4.7	1,627	39.6	18,278	20.8
Moderate	15	20.3	17,381	19.8	3,098	17.8	15,489	17.7
Middle	26	35.1	35,130	40.1	2,147	6.1	16,908	19.3
Upper	26	35.1	31,048	35.4	1,147	3.7	36,990	42.2
Unknown	1	1.4	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>74</b>	<b>100.0</b>	<b>87,665</b>	<b>100.0</b>	<b>8,019</b>	<b>9.1</b>	<b>87,665</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	7,284	2,124	2.3	29.2	3,424	47.0	1,736	23.8
Moderate	36,919	15,285	16.3	41.4	10,215	27.7	11,419	30.9
Middle	76,674	38,746	41.3	50.5	13,667	17.8	24,261	31.6
Upper	80,705	37,578	40.1	46.6	8,849	11.0	34,278	42.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>201,582</b>	<b>93,733</b>	<b>100.0</b>	<b>46.5</b>	<b>36,155</b>	<b>17.9</b>	<b>71,694</b>	<b>35.6</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,008	3.0	954	3.0	46	3.0	8	2.2
Moderate	4,678	13.8	4,540	14.1	106	6.9	32	8.9
Middle	13,520	39.7	12,827	39.9	557	36.4	136	37.7
Upper	14,808	43.5	13,803	43.0	820	53.6	185	51.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>34,014</b>	<b>100.0</b>	<b>32,124</b>	<b>100.0</b>	<b>1,529</b>	<b>100.0</b>	<b>361</b>	<b>100.0</b>
Percentage of Total Businesses:				<b>94.4</b>		<b>4.5</b>		<b>1.1</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	29	11.2	26	10.6	3	21.4	0	0.0
Moderate	44	17.0	37	15.1	7	50.0	0	0.0
Middle	103	39.8	100	40.8	3	21.4	0	0.0
Upper	83	32.0	82	33.5	1	7.1	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>259</b>	<b>100.0</b>	<b>245</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				<b>94.6</b>		<b>5.4</b>		<b>0.0</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D57

2020 Combined Demographics Assessment Area: Naples MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	6	8.1	4,106	4.7	1,627	39.6	18,278	20.8
Moderate	15	20.3	17,381	19.8	3,098	17.8	15,489	17.7
Middle	26	35.1	35,130	40.1	2,147	6.1	16,908	19.3
Upper	26	35.1	31,048	35.4	1,147	3.7	36,990	42.2
Unknown	1	1.4	0	0.0	0	0.0	0	0.0
Total AA	74	100.0	87,665	100.0	8,019	9.1	87,665	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	7,284	2,124	2.3	29.2	3,424	47.0	1,736	23.8
Moderate	36,919	15,285	16.3	41.4	10,215	27.7	11,419	30.9
Middle	76,674	38,746	41.3	50.5	13,667	17.8	24,261	31.6
Upper	80,705	37,578	40.1	46.6	8,849	11.0	34,278	42.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	201,582	93,733	100.0	46.5	36,155	17.9	71,694	35.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	983	2.9	926	2.9	50	3.2	7	2.1
Moderate	4,603	13.7	4,470	14.1	106	6.8	27	8.0
Middle	13,427	39.9	12,741	40.1	565	36.1	121	35.7
Upper	14,666	43.5	13,640	42.9	842	53.9	184	54.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	33,679	100.0	31,777	100.0	1,563	100.0	339	100.0
Percentage of Total Businesses:				94.4		4.6		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	26	10.1	23	9.5	3	20.0	0	0.0
Moderate	42	16.3	35	14.5	7	46.7	0	0.0
Middle	99	38.5	95	39.4	3	20.0	1	100.0
Upper	90	35.0	88	36.5	2	13.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	257	100.0	241	100.0	15	100.0	1	100.0
Percentage of Total Farms:				93.8		5.8		0.4
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D58A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Naples MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	1.6	0	0.0	1.6	0	0.0	1.3	0	0.0	1.2	2.3
Moderate	4	57.1	15.1	1,311	17.7	10.7	0	0.0	19.9	0	0.0	13.4	17.4
Middle	0	0.0	41.7	0	0.0	34.6	2	40.0	46.0	2,947	41.8	39.2	40.7
Upper	3	42.9	41.5	6,080	82.3	53.1	3	60.0	31.7	4,100	58.2	45.0	38.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.0	0	0.0	1.2	1.2
Total	7	100.0	100.0	7,391	100.0	100.0	5	100.0	100.0	7,047	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.8	0	0.0	0.6	0	0.0	1.0	0	0.0	0.7	2.3
Moderate	2	28.6	13.8	252	7.2	9.6	0	0.0	19.1	0	0.0	11.1	17.4
Middle	4	57.1	43.6	1,458	41.5	37.6	2	50.0	43.0	1,203	13.7	34.7	40.7
Upper	1	14.3	41.8	1,800	51.3	52.2	2	50.0	35.7	7,602	86.3	52.4	38.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.2	0	0.0	1.1	1.2
Total	7	100.0	100.0	3,510	100.0	100.0	4	100.0	100.0	8,805	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.6	0	0.0	0.5	0	0.0	0.3	0	0.0	0.1	2.3
Moderate	1	50.0	10.5	200	87.0	7.7	2	66.7	15.1	556	85.9	8.9	17.4
Middle	0	0.0	45.4	0	0.0	34.5	0	0.0	44.7	0	0.0	39.9	40.7
Upper	1	50.0	43.5	30	13.0	57.3	1	33.3	38.0	91	14.1	49.8	38.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.8	0	0.0	1.3	1.2
Total	2	100.0	100.0	230	100.0	100.0	3	100.0	100.0	647	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	16.7	0	0.0	5.8	0	0.0	0.0	0	0.0	0.0	3.2
Moderate	0	0.0	50.0	0	0.0	28.5	0	0.0	27.3	0	0.0	21.7	10.6
Middle	0	0.0	5.6	0	0.0	17.0	0	0.0	54.5	0	0.0	68.4	42.3
Upper	0	0.0	27.8	0	0.0	48.6	0	0.0	18.2	0	0.0	9.9	43.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.7
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	1.2	0	0.0	1.2	0	0.0	1.1	0	0.0	1.0	2.3
Moderate	8	38.1	14.3	1,956	15.5	10.3	2	11.8	18.5	556	3.0	12.0	17.4
Middle	5	23.8	42.4	1,535	12.1	34.6	5	29.4	44.8	4,280	23.1	37.2	40.7
Upper	8	38.1	42.1	9,150	72.4	53.9	10	58.8	34.5	13,692	73.9	48.6	38.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.2	0	0.0	1.2	1.2
Total	21	100.0	100.0	12,641	100.0	100.0	17	100.0	100.0	18,528	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													



Table D58B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Naples MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	0.6	0	0.0	0.8	0	0.0	0.6	0	0.0	0.4	2.3
Moderate	1	25.0	10.4	193	25.1	9.5	0	0.0	11.5	0	0.0	5.8	17.4
Middle	1	25.0	44.0	77	10.0	35.1	1	25.0	46.0	130	10.2	35.3	40.7
Upper	2	50.0	45.0	500	64.9	54.7	3	75.0	39.9	1,149	89.8	57.0	38.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.0	0	0.0	1.4	1.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	770	100.0	100.0	4	100.0	100.0	1,279	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.4	0	0.0	0.3	0	0.0	0.7	0	0.0	0.7	2.3
Moderate	0	0.0	8.4	0	0.0	3.2	0	0.0	7.5	0	0.0	2.4	17.4
Middle	0	0.0	29.8	0	0.0	14.8	0	0.0	35.3	0	0.0	17.7	40.7
Upper	1	100.0	61.4	740	100.0	81.7	1	100.0	55.3	750	100.0	78.1	38.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.2	0	0.0	1.1	1.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	740	100.0	100.0	1	100.0	100.0	750	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.5	0	0.0	1.4	0	0.0	4.3	0	0.0	2.0	2.3
Moderate	0	0.0	22.2	0	0.0	17.6	0	0.0	34.0	0	0.0	22.4	17.4
Middle	0	0.0	37.0	0	0.0	31.2	0	0.0	42.6	0	0.0	41.7	40.7
Upper	0	0.0	38.3	0	0.0	49.9	0	0.0	14.9	0	0.0	30.6	38.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	4.3	0	0.0	3.3	1.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D59A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Naples MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	1.2	0	0.0	1.2	2.3
Moderate	3	30.0	15.2	674	13.6	10.9	16.3
Middle	6	60.0	41.4	3,962	79.9	34.3	41.3
Upper	1	10.0	42.2	323	6.5	53.5	40.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	10	100.0	100.0	4,959	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.7	0	0.0	0.5	2.3
Moderate	4	66.7	12.1	1,052	55.2	8.7	16.3
Middle	0	0.0	44.4	0	0.0	37.9	41.3
Upper	2	33.3	42.8	855	44.8	52.9	40.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	6	100.0	100.0	1,907	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.5	0	0.0	0.2	2.3
Moderate	0	0.0	12.0	0	0.0	10.8	16.3
Middle	0	0.0	49.0	0	0.0	40.0	41.3
Upper	2	100.0	38.5	600	100.0	49.1	40.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	600	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	40.0	0	0.0	24.8	16.3
Middle	0	0.0	50.0	0	0.0	75.1	33.6
Upper	1	100.0	10.0	14,000	100.0	0.0	48.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	14,000	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	1.0	0	0.0	0.9	
Moderate	8	30.8	13.8	2,036	6.5	10.2	16.3
Middle	7	26.9	42.6	4,062	12.9	35.8	41.3
Upper	11	42.3	42.6	25,292	80.6	53.1	40.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	26	100.0	100.0	31,390	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D59B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Naples MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit							
Low	0	0.0	0.2	0	0.0	0.0	2.3
Moderate	0	0.0	11.9	0	0.0	8.6	16.3
Middle	1	25.0	36.6	100	7.7	23.2	41.3
Upper	3	75.0	51.4	1,194	92.3	68.2	40.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	1,294	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.6	0	0.0	1.7	2.3
Moderate	1	33.3	11.3	310	3.6	5.4	16.3
Middle	0	0.0	31.9	0	0.0	13.0	41.3
Upper	2	66.7	55.3	8,320	96.4	79.9	40.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	8,630	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.7	0	0.0	0.8	2.3
Moderate	0	0.0	27.6	0	0.0	21.7	16.3
Middle	0	0.0	36.2	0	0.0	28.8	41.3
Upper	0	0.0	34.5	0	0.0	48.7	40.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table D60**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Naples MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	1	10.0	3.0	29	1.4	3.5	0	0.0	2.2	0	0.0	2.8	2.6
Moderate	1	10.0	12.7	10	0.5	7.8	1	20.0	15.7	10	1.2	11.9	15.5
Middle	4	40.0	39.7	728	34.1	35.3	3	60.0	45.9	397	49.2	43.8	43.6
Upper	4	40.0	44.3	1,370	64.1	53.2	1	20.0	35.1	400	49.6	40.7	37.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.9	0	0.0	0.7	1.1
Total	10	100.0	100.0	2,137	100.0	100.0	5	100.0	100.0	807	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

**Table D61**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Naples MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	1	10.0	2.8	34	3.2	3.6	2.9
Moderate	0	0.0	11.0	0	0.0	6.5	13.7
Middle	5	50.0	40.1	381	36.3	36.9	39.9
Upper	4	40.0	45.8	634	60.4	52.7	43.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	10	100.0	100.0	1,049	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Table D62A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Naples MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	2.2	0	0.0	1.2	0	0.0	2.2	0	0.0	1.1	21.9
Moderate	1	14.3	11.0	192	2.6	6.0	0	0.0	9.1	0	0.0	4.5	18.0
Middle	0	0.0	16.4	0	0.0	10.7	1	20.0	17.8	80	1.1	11.2	19.6
Upper	5	71.4	58.2	1,999	27.0	68.8	4	80.0	56.2	6,967	98.9	67.7	40.5
Unknown	1	14.3	12.1	5,200	70.4	13.1	0	0.0	14.7	0	0.0	15.6	0.0
Total	7	100.0	100.0	7,391	100.0	100.0	5	100.0	100.0	7,047	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.0	0	0.0	2.1	1	25.0	8.2	200	2.3	4.4	21.9
Moderate	1	14.3	14.3	139	4.0	8.4	0	0.0	17.1	0	0.0	9.1	18.0
Middle	2	28.6	19.5	414	11.8	14.0	0	0.0	21.1	0	0.0	14.1	19.6
Upper	4	57.1	47.0	2,957	84.2	60.1	2	50.0	40.8	1,203	13.7	56.2	40.5
Unknown	0	0.0	15.3	0	0.0	15.4	1	25.0	12.8	7,402	84.1	16.2	0.0
Total	7	100.0	100.0	3,510	100.0	100.0	4	100.0	100.0	8,805	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.0	0	0.0	2.4	0	0.0	3.9	0	0.0	2.0	21.9
Moderate	0	0.0	13.3	0	0.0	7.1	0	0.0	15.6	0	0.0	7.6	18.0
Middle	1	50.0	18.6	30	13.0	12.8	0	0.0	17.6	0	0.0	9.5	19.6
Upper	1	50.0	60.2	200	87.0	73.7	3	100.0	59.4	647	100.0	77.8	40.5
Unknown	0	0.0	2.9	0	0.0	3.9	0	0.0	3.5	0	0.0	3.1	0.0
Total	2	100.0	100.0	230	100.0	100.0	3	100.0	100.0	647	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	3.1	0	0.0	1.6	1	5.9	4.2	200	1.1	2.0	21.9
Moderate	2	9.5	12.4	331	2.6	6.7	0	0.0	12.0	0	0.0	5.6	18.0
Middle	3	14.3	17.6	444	3.5	11.6	1	5.9	18.6	80	0.4	11.3	19.6
Upper	15	71.4	53.6	6,666	52.7	66.2	14	82.4	52.4	10,846	58.5	65.6	40.5
Unknown	1	4.8	13.2	5,200	41.1	13.9	1	5.9	12.9	7,402	40.0	15.5	0.0
Total	21	100.0	100.0	12,641	100.0	100.0	17	100.0	100.0	18,528	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table D62B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Naples MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	0	0.0	4.0	0	0.0	1.7	0	0.0	6.3	0	0.0	3.8	21.9
Moderate	0	0.0	15.0	0	0.0	6.5	0	0.0	13.7	0	0.0	6.4	18.0
Middle	0	0.0	18.5	0	0.0	12.3	0	0.0	20.5	0	0.0	10.7	19.6
Upper	4	100.0	59.2	770	100.0	75.9	4	100.0	54.2	1,279	100.0	74.5	40.5
Unknown	0	0.0	3.3	0	0.0	3.6	0	0.0	5.3	0	0.0	4.5	0.0
Total	4	100.0	100.0	770	100.0	100.0	4	100.0	100.0	1,279	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.7	0	0.0	1.3	0	0.0	4.4	0	0.0	1.1	21.9
Moderate	0	0.0	7.5	0	0.0	1.5	0	0.0	11.2	0	0.0	2.5	18.0
Middle	0	0.0	7.7	0	0.0	2.0	0	0.0	12.9	0	0.0	3.5	19.6
Upper	1	100.0	72.0	740	100.0	83.0	1	100.0	61.4	750	100.0	72.4	40.5
Unknown	0	0.0	8.1	0	0.0	12.3	0	0.0	10.1	0	0.0	20.5	0.0
Total	1	100.0	100.0	740	100.0	100.0	1	100.0	100.0	750	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.7	0	0.0	1.1	0	0.0	8.5	0	0.0	4.5	21.9
Moderate	0	0.0	1.2	0	0.0	1.4	0	0.0	0.0	0	0.0	0.0	18.0
Middle	0	0.0	2.5	0	0.0	3.6	0	0.0	0.0	0	0.0	0.0	19.6
Upper	0	0.0	1.2	0	0.0	1.6	0	0.0	0.0	0	0.0	0.0	40.5
Unknown	0	0.0	91.4	0	0.0	92.4	0	0.0	91.5	0	0.0	95.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D63A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Naples MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	##	##	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	2.8	0	0.0	1.3	20.8
Moderate	6	60.0	15.7	1,435	28.9	9.4	17.7
Middle	1	10.0	18.0	289	5.8	12.5	19.3
Upper	3	30.0	55.7	3,235	65.2	68.3	42.2
Unknown	0	0.0	7.7	0	0.0	8.4	0.0
Total	10	100.0	100.0	4,959	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.3	0	0.0	1.5	20.8
Moderate	0	0.0	11.4	0	0.0	6.7	17.7
Middle	2	33.3	17.7	600	31.5	12.6	19.3
Upper	3	50.0	50.6	1,125	59.0	62.5	42.2
Unknown	1	16.7	16.9	182	9.5	16.8	0.0
Total	6	100.0	100.0	1,907	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.8	0	0.0	3.2	20.8
Moderate	0	0.0	13.0	0	0.0	6.9	17.7
Middle	0	0.0	21.2	0	0.0	14.3	19.3
Upper	2	100.0	56.1	600	100.0	72.2	42.2
Unknown	0	0.0	3.0	0	0.0	3.4	0.0
Total	2	100.0	100.0	600	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	4.0	3.2	100	0.6	1.5	20.8
Moderate	6	24.0	13.5	1,435	8.3	8.0	17.7
Middle	3	12.0	17.6	889	5.1	12.2	19.3
Upper	13	52.0	52.8	9,344	53.7	65.5	42.2
Unknown	2	8.0	12.9	5,622	32.3	12.8	0.0
Total	25	100.0	100.0	17,390	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D63B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level							
Assessment Area: Naples MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	1	25.0	5.6	100	7.7	4.4	20.8
Moderate	0	0.0	13.3	0	0.0	6.6	17.7
Middle	0	0.0	18.3	0	0.0	8.9	19.3
Upper	3	75.0	60.9	1,194	92.3	78.5	42.2
Unknown	0	0.0	1.9	0	0.0	1.5	0.0
Total	4	100.0	100.0	1,294	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	5.0	0	0.0	1.6	20.8
Moderate	0	0.0	10.9	0	0.0	3.0	17.7
Middle	0	0.0	12.8	0	0.0	4.5	19.3
Upper	2	66.7	62.5	3,190	37.0	74.7	42.2
Unknown	1	33.3	8.8	5,440	63.0	16.2	0.0
Total	3	100.0	100.0	8,630	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	3.0	0	0.0	1.7	20.8
Moderate	0	0.0	3.3	0	0.0	2.9	17.7
Middle	0	0.0	0.0	0	0.0	0.0	19.3
Upper	0	0.0	0.6	0	0.0	0.7	42.2
Unknown	0	0.0	93.1	0	0.0	94.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



**Table D64**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses												
Assessment Area: Naples MSA												
	Bank and Aggregate Loans by Year											
	2021						2022					
	Bank			Agg			Bank			Agg		
	#	##%	##%	\$(000)	\$%	\$%	#	##%	##%	\$(000)	\$%	\$%
By Revenue												
\$1 Million or Less	4	40.0	46.9	67	3.1	30.3	2	40.0	51.1	57	7.1	35.6
Over \$1 Million	0	0.0		0	0.0		2	40.0		350	43.4	
Revenue Unknown	6	60.0		2,070	96.9		1	20.0		400	49.6	
Total	10	100.0		2,137	100.0		5	100.0		807	100.0	
By Loan Size												
\$100,000 or Less	6	60.0	93.8	166	7.8	41.5	3	60.0	95.7	157	19.5	51.8
\$100,001 - \$250,000	0	0.0	3.6	0	0.0	17.1	1	20.0	2.6	250	31.0	15.1
\$250,001 - \$1 Million	4	40.0	2.7	1,971	92.2	41.4	1	20.0	1.8	400	49.6	33.1
Total	10	100.0	100.0	2,137	100.0	100.0	5	100.0	100.0	807	100.0	100.0
By Loan Size and Revenues \$1 Million or Less												
\$100,000 or Less	4	100.0		67	100.0		2	100.0		57	100.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0	
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0	
Total	4	100.0		67	100.0		2	100.0		57	100.0	

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table D65**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Naples MSA							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	6	60.0	39.8	296	28.2	28.6	94.4
Over \$1 Million	2	20.0		319	30.4		4.6
Revenue Unknown	2	20.0		434	41.4		1.0
Total	10	100.0		1,049	100.0		100.0
By Loan Size							
\$100,000 or Less	7	70.0	90.1	283	27.0	37.8	
\$100,001 - \$250,000	2	20.0	5.8	366	34.9	19.8	
\$250,001 - \$1 Million	1	10.0	4.1	400	38.1	42.4	
Total	10	100.0	100.0	1,049	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	5	83.3		180	60.8		
\$100,001 - \$250,000	1	16.7		116	39.2		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	6	100.0		296	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table D66**

2022 Combined Demographics Assessment Area: Battle Creek MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	7.5	1,757	5.3	727	41.4	7,285	21.9
Moderate	13	32.5	8,250	24.8	1,711	20.7	5,731	17.2
Middle	15	37.5	13,123	39.4	983	7.5	6,582	19.8
Upper	9	22.5	10,184	30.6	470	4.6	13,716	41.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>40</b>	<b>100.0</b>	<b>33,314</b>	<b>100.0</b>	<b>3,891</b>	<b>11.7</b>	<b>33,314</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,580	1,462	3.9	40.8	1,525	42.6	593	16.6
Moderate	18,404	8,093	21.5	44.0	7,658	41.6	2,653	14.4
Middle	23,662	15,678	41.7	66.3	5,526	23.4	2,458	10.4
Upper	15,243	12,403	33.0	81.4	1,779	11.7	1,061	7.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>60,889</b>	<b>37,636</b>	<b>100.0</b>	<b>61.8</b>	<b>16,488</b>	<b>27.1</b>	<b>6,765</b>	<b>11.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	243	5.6	214	5.6	27	6.7	2	3.9
Moderate	1,320	30.7	1,135	29.5	174	42.9	11	21.6
Middle	1,662	38.6	1,498	38.9	138	34.0	26	51.0
Upper	1,081	25.1	1,002	26.0	67	16.5	12	23.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>4,306</b>	<b>100.0</b>	<b>3,849</b>	<b>100.0</b>	<b>406</b>	<b>100.0</b>	<b>51</b>	<b>100.0</b>
Percentage of Total Businesses:				89.4		9.4		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.2	2	1.3	0	0.0	0	0.0
Moderate	22	13.5	22	14.1	0	0.0	0	0.0
Middle	86	52.8	83	53.2	3	50.0	0	0.0
Upper	53	32.5	49	31.4	3	50.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>163</b>	<b>100.0</b>	<b>156</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
Percentage of Total Farms:				95.7		3.7		0.6
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table D67**

2021 Combined Demographics Assessment Area: Battle Creek MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	10.3	2,135	6.3	908	42.5	7,285	21.7
Moderate	12	30.8	7,832	23.3	1,835	23.4	5,985	17.8
Middle	15	38.5	13,788	41.0	1,243	9.0	6,591	19.6
Upper	8	20.5	9,870	29.4	518	5.2	13,764	40.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>39</b>	<b>100.0</b>	<b>33,625</b>	<b>100.0</b>	<b>4,504</b>	<b>13.4</b>	<b>33,625</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	4,608	1,907	5.2	41.4	1,689	36.7	1,012	22.0
Moderate	16,795	7,716	21.1	45.9	6,041	36.0	3,038	18.1
Middle	23,487	15,641	42.7	66.6	5,338	22.7	2,508	10.7
Upper	15,826	11,376	31.0	71.9	3,142	19.9	1,308	8.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>60,716</b>	<b>36,640</b>	<b>100.0</b>	<b>60.3</b>	<b>16,210</b>	<b>26.7</b>	<b>7,866</b>	<b>13.0</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	361	8.3	314	8.1	44	10.5	3	6.5
Moderate	1,184	27.1	1,009	25.9	166	39.4	9	19.6
Middle	1,485	34.0	1,351	34.6	110	26.1	24	52.2
Upper	1,337	30.6	1,226	31.4	101	24.0	10	21.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>4,367</b>	<b>100.0</b>	<b>3,900</b>	<b>100.0</b>	<b>421</b>	<b>100.0</b>	<b>46</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.3</b>		<b>9.6</b>		<b>1.1</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.2	2	1.3	0	0.0	0	0.0
Moderate	5	3.0	5	3.2	0	0.0	0	0.0
Middle	127	77.0	121	76.6	5	83.3	1	100.0
Upper	31	18.8	30	19.0	1	16.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>165</b>	<b>100.0</b>	<b>158</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>95.8</b>		<b>3.6</b>		<b>0.6</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D68**

2020 Combined Demographics Assessment Area: Battle Creek MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	10.3	2,135	6.3	908	42.5	7,285	21.7
Moderate	12	30.8	7,832	23.3	1,835	23.4	5,985	17.8
Middle	15	38.5	13,788	41.0	1,243	9.0	6,591	19.6
Upper	8	20.5	9,870	29.4	518	5.2	13,764	40.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>39</b>	<b>100.0</b>	<b>33,625</b>	<b>100.0</b>	<b>4,504</b>	<b>13.4</b>	<b>33,625</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied				Rental		Vacant
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	4,608	1,907	5.2	41.4	1,689	36.7	1,012	22.0
Moderate	16,795	7,716	21.1	45.9	6,041	36.0	3,038	18.1
Middle	23,487	15,641	42.7	66.6	5,338	22.7	2,508	10.7
Upper	15,826	11,376	31.0	71.9	3,142	19.9	1,308	8.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>60,716</b>	<b>36,640</b>	<b>100.0</b>	<b>60.3</b>	<b>16,210</b>	<b>26.7</b>	<b>7,866</b>	<b>13.0</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	369	8.3	317	8.0	49	11.2	3	6.8
Moderate	1,167	26.2	995	25.0	163	37.4	9	20.5
Middle	1,544	34.6	1,409	35.4	113	25.9	22	50.0
Upper	1,378	30.9	1,257	31.6	111	25.5	10	22.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>4,458</b>	<b>100.0</b>	<b>3,978</b>	<b>100.0</b>	<b>436</b>	<b>100.0</b>	<b>44</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.2</b>		<b>9.8</b>		<b>1.0</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.2	2	1.2	0	0.0	0	0.0
Moderate	6	3.6	6	3.7	0	0.0	0	0.0
Middle	128	75.7	121	75.2	6	85.7	1	100.0
Upper	33	19.5	32	19.9	1	14.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>169</b>	<b>100.0</b>	<b>161</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>95.3</b>		<b>4.1</b>		<b>0.6</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D69A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Battle Creek MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans													
Low	0	0.0	3.6	0	0.0	1.8	0	0.0	5.9	0	0.0	3.8	3.9
Moderate	2	33.3	25.0	313	38.4	16.1	1	100.0	24.5	47	100.0	17.1	21.5
Middle	3	50.0	39.6	338	41.4	42.3	0	0.0	40.5	0	0.0	43.2	41.7
Upper	1	16.7	31.7	165	20.2	39.9	0	0.0	29.1	0	0.0	35.9	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	6	100.0	100.0	816	100.0	100.0	1	100.0	100.0	47	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.7	0	0.0	0.7	1	4.3	2.2	48	1.5	1.7	3.9
Moderate	3	16.7	14.0	206	8.3	8.8	4	17.4	18.4	225	6.8	12.6	21.5
Middle	5	27.8	44.3	454	18.3	44.0	10	43.5	44.0	1,099	33.4	43.1	41.7
Upper	10	55.6	40.0	1,815	73.3	46.6	8	34.8	35.3	1,915	58.3	42.6	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	18	100.0	100.0	2,475	100.0	100.0	23	100.0	100.0	3,287	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.0	0	0.0	1.1	0	0.0	2.4	0	0.0	2.3	3.9
Moderate	3	33.3	15.7	150	17.5	11.3	3	33.3	24.8	104	18.8	18.0	21.5
Middle	2	22.2	44.2	250	29.1	42.3	3	33.3	40.1	199	36.0	41.3	41.7
Upper	4	44.4	38.2	458	53.4	45.3	3	33.3	32.7	250	45.2	38.4	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	9	100.0	100.0	858	100.0	100.0	9	100.0	100.0	553	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	100.0	0.0	143	100.0	0.0	0	0.0	0.0	0	0.0	0.0	9.0
Moderate	0	0.0	55.6	0	0.0	28.1	0	0.0	36.8	0	0.0	24.3	49.4
Middle	0	0.0	22.2	0	0.0	30.4	1	100.0	42.1	2,000	100.0	43.6	35.1
Upper	0	0.0	22.2	0	0.0	41.5	0	0.0	21.1	0	0.0	32.2	6.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	143	100.0	100.0	1	100.0	100.0	2,000	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	2	4.7	2.5	153	3.1	1.1	1	2.4	4.2	48	0.7	2.7	3.9
Moderate	12	27.9	19.1	852	17.2	13.6	9	21.4	22.3	418	6.5	16.3	21.5
Middle	12	27.9	42.1	1,401	28.2	42.1	17	40.5	41.6	3,458	53.9	43.1	41.7
Upper	17	39.5	36.3	2,560	51.6	43.2	15	35.7	31.9	2,487	38.8	37.8	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	43	100.0	100.0	4,966	100.0	100.0	42	100.0	100.0	6,411	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D69B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Battle Creek MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	1	12.5	0.0	10	1.6	0.0	0	0.0	1.9	0	0.0	1.0	3.9
Moderate	3	37.5	17.6	120	19.6	14.4	1	14.3	16.2	42	9.1	9.8	21.5
Middle	2	25.0	47.1	359	58.8	38.6	2	28.6	42.9	100	21.6	40.5	41.7
Upper	2	25.0	35.3	122	20.0	47.0	4	57.1	39.0	322	69.4	48.6	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	611	100.0	100.0	7	100.0	100.0	464	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.9	0	0.0	1.0	0	0.0	2.4	0	0.0	1.1	3.9
Moderate	1	100.0	23.2	63	100.0	15.0	0	0.0	16.7	0	0.0	8.9	21.5
Middle	0	0.0	39.1	0	0.0	45.3	1	100.0	39.3	60	100.0	48.2	41.7
Upper	0	0.0	34.8	0	0.0	38.7	0	0.0	41.7	0	0.0	41.8	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	63	100.0	100.0	1	100.0	100.0	60	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.5	0	0.0	2.5	0	0.0	6.5	0	0.0	4.0	3.9
Moderate	0	0.0	35.0	0	0.0	24.9	0	0.0	38.7	0	0.0	25.8	21.5
Middle	0	0.0	27.5	0	0.0	26.1	0	0.0	32.3	0	0.0	30.9	41.7
Upper	0	0.0	35.0	0	0.0	46.5	0	0.0	22.6	0	0.0	39.3	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D70A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Battle Creek MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	1.8	0	0.0	1.0	5.2
Moderate	1	50.0	21.0	59	47.6	12.8	21.1
Middle	1	50.0	38.6	65	52.4	39.3	42.7
Upper	0	0.0	38.6	0	0.0	46.9	31.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	124	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	1.2	0	0.0	0.5	5.2
Moderate	4	21.1	11.3	278	15.5	6.7	21.1
Middle	3	15.8	43.0	180	10.0	41.7	42.7
Upper	12	63.2	44.5	1,336	74.5	51.1	31.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	19	100.0	100.0	1,794	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.3	0	0.0	0.7	5.2
Moderate	2	33.3	16.4	99	24.9	11.8	21.1
Middle	3	50.0	40.9	198	49.9	41.7	42.7
Upper	1	16.7	41.3	100	25.2	45.8	31.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	6	100.0	100.0	397	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	16.7	0	0.0	7.7	10.2
Moderate	0	0.0	50.0	0	0.0	67.3	36.5
Middle	0	0.0	25.0	0	0.0	3.0	29.5
Upper	0	0.0	8.3	0	0.0	22.0	23.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	1.5	0	0.0	1.0	5.2
Moderate	7	21.9	15.6	436	16.0	11.4	21.1
Middle	8	25.0	40.9	464	17.0	39.3	42.7
Upper	17	53.1	41.9	1,827	67.0	48.3	31.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	32	100.0	100.0	2,727	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D70B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Battle Creek MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	4.3	0	0.0	3.4	5.2
Moderate	0	0.0	10.1	0	0.0	7.6	21.1
Middle	1	20.0	46.4	21	5.1	49.0	42.7
Upper	4	80.0	39.1	391	94.9	40.0	31.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	412	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.7	0	0.0	1.0	5.2
Moderate	0	0.0	9.5	0	0.0	4.7	21.1
Middle	0	0.0	39.2	0	0.0	41.1	42.7
Upper	0	0.0	48.6	0	0.0	53.2	31.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	3.0	0	0.0	1.6	5.2
Moderate	0	0.0	26.9	0	0.0	19.5	21.1
Middle	0	0.0	29.9	0	0.0	31.9	42.7
Upper	0	0.0	40.3	0	0.0	47.1	31.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D71

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Battle Creek MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	10	13.0	8.8	2,304	14.7	8.6	4	7.4	4.5	555	3.6	2.6	5.6
Moderate	44	57.1	24.2	8,585	54.8	32.6	24	44.4	25.3	7,486	48.4	33.9	30.7
Middle	10	13.0	33.9	2,880	18.4	32.8	19	35.2	36.8	6,478	41.9	35.3	38.6
Upper	13	16.9	32.6	1,885	12.0	25.4	7	13.0	32.8	958	6.2	27.9	25.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	77	100.0	100.0	15,654	100.0	100.0	54	100.0	100.0	15,477	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													



**Table D72**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Battle Creek MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	15	9.9	7.7	2,990	9.3	7.4	8.3
Moderate	72	47.7	25.2	16,716	52.2	33.8	26.2
Middle	21	13.9	33.8	5,273	16.5	29.4	34.6
Upper	43	28.5	33.0	7,037	22.0	29.2	30.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	151	100.0	100.0	32,016	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D73A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Battle Creek MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	1	16.7	7.2	62	7.6	3.8	0	0.0	8.9	0	0.0	5.3	21.9
Moderate	1	16.7	26.4	165	20.2	19.0	1	100.0	28.5	47	100.0	21.9	17.2
Middle	3	50.0	23.1	421	51.6	21.3	0	0.0	24.3	0	0.0	23.9	19.8
Upper	1	16.7	33.1	168	20.6	45.9	0	0.0	23.7	0	0.0	34.1	41.2
Unknown	0	0.0	10.2	0	0.0	10.0	0	0.0	14.8	0	0.0	14.9	0.0
Total	6	100.0	100.0	816	100.0	100.0	1	100.0	100.0	47	100.0	100.0	100.0
Refinance Loans													
Low	4	22.2	5.7	375	15.2	3.0	6	26.1	12.0	554	16.9	7.0	21.9
Moderate	5	27.8	16.5	420	17.0	11.3	7	30.4	26.4	687	20.9	20.9	17.2
Middle	4	22.2	25.0	370	14.9	21.2	4	17.4	26.1	522	15.9	26.1	19.8
Upper	5	27.8	38.8	1,310	52.9	48.0	5	21.7	28.1	1,424	43.3	37.6	41.2
Unknown	0	0.0	13.9	0	0.0	16.6	1	4.3	7.4	100	3.0	8.4	0.0
Total	18	100.0	100.0	2,475	100.0	100.0	23	100.0	100.0	3,287	100.0	100.0	100.0
Home Improvement Loans													
Low	1	11.1	8.4	92	10.7	5.1	2	22.2	10.1	51	9.2	8.2	21.9
Moderate	1	11.1	21.3	51	5.9	16.0	1	11.1	22.6	61	11.0	19.4	17.2
Middle	2	22.2	23.3	107	12.5	20.7	1	11.1	27.5	17	3.1	26.5	19.8
Upper	5	55.6	45.4	608	70.9	57.2	4	44.4	37.0	350	63.3	43.7	41.2
Unknown	0	0.0	1.6	0	0.0	1.0	1	11.1	2.8	74	13.4	2.3	0.0
Total	9	100.0	100.0	858	100.0	100.0	9	100.0	100.0	553	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	8	19.0	6.5	599	12.4	3.4	10	24.4	10.0	680	15.4	6.0	21.9
Moderate	9	21.4	20.8	736	15.3	15.0	11	26.8	26.8	1,013	23.0	21.3	17.2
Middle	10	23.8	23.8	908	18.8	21.0	5	12.2	25.2	539	12.2	24.6	19.8
Upper	15	35.7	36.7	2,580	53.5	47.1	11	26.8	26.8	1,895	43.0	35.6	41.2
Unknown	0	0.0	12.2	0	0.0	13.4	4	9.8	11.3	284	6.4	12.5	0.0
Total	42	100.0	100.0	4,823	100.0	100.0	41	100.0	100.0	4,411	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table D73B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Battle Creek MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	2	25.0	7.4	70	11.5	4.6	2	28.6	8.6	75	16.2	7.9	21.9
Moderate	2	25.0	26.5	100	16.4	21.7	2	28.6	30.5	218	47.0	24.4	17.2
Middle	1	12.5	19.1	10	1.6	13.8	0	0.0	24.8	0	0.0	21.7	19.8
Upper	3	37.5	44.1	431	70.5	57.1	2	28.6	35.2	121	26.1	45.3	41.2
Unknown	0	0.0	2.9	0	0.0	2.7	1	14.3	1.0	50	10.8	0.6	0.0
Total	8	100.0	100.0	611	100.0	100.0	7	100.0	100.0	464	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	10.1	0	0.0	6.6	0	0.0	9.5	0	0.0	6.5	21.9
Moderate	0	0.0	14.5	0	0.0	9.5	0	0.0	15.5	0	0.0	12.8	17.2
Middle	0	0.0	20.3	0	0.0	14.1	0	0.0	32.1	0	0.0	32.9	19.8
Upper	1	100.0	50.7	63	100.0	61.0	0	0.0	41.7	0	0.0	46.9	41.2
Unknown	0	0.0	4.3	0	0.0	8.7	1	100.0	1.2	60	100.0	0.9	0.0
Total	1	100.0	100.0	63	100.0	100.0	1	100.0	100.0	60	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.9
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.2
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	41.2
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table D74A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Battle Creek MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	1	50.0	9.1	65	52.4	5.1	21.7
Moderate	1	50.0	24.2	59	47.6	18.0	17.8
Middle	0	0.0	25.1	0	0.0	24.1	19.6
Upper	0	0.0	31.8	0	0.0	43.2	40.9
Unknown	0	0.0	9.8	0	0.0	9.6	0.0
Total	2	100.0	100.0	124	100.0	100.0	100.0
Refinance Loans							
Low	3	15.8	5.7	192	10.7	2.7	21.7
Moderate	4	21.1	14.5	244	13.6	9.4	17.8
Middle	7	36.8	21.4	637	35.5	17.9	19.6
Upper	5	26.3	42.3	721	40.2	52.0	40.9
Unknown	0	0.0	16.2	0	0.0	18.0	0.0
Total	19	100.0	100.0	1,794	100.0	100.0	100.0
Home Improvement Loans							
Low	1	16.7	8.0	60	15.1	6.3	21.7
Moderate	1	16.7	16.4	50	12.6	14.2	17.8
Middle	2	33.3	25.8	109	27.5	23.4	19.6
Upper	2	33.3	48.9	178	44.8	55.4	40.9
Unknown	0	0.0	0.9	0	0.0	0.7	0.0
Total	6	100.0	100.0	397	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	5	15.6	7.0	317	11.6	3.7	21.7
Moderate	6	18.8	18.0	353	12.9	12.8	17.8
Middle	12	37.5	22.4	1,023	37.5	20.1	19.6
Upper	9	28.1	37.6	1,034	37.9	47.8	40.9
Unknown	0	0.0	15.0	0	0.0	15.6	0.0
Total	32	100.0	100.0	2,727	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D74B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Battle Creek MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	10.1	0	0.0	11.1	21.7
Moderate	0	0.0	20.3	0	0.0	15.8	17.8
Middle	3	60.0	31.9	277	67.2	23.5	19.6
Upper	2	40.0	36.2	135	32.8	49.0	40.9
Unknown	0	0.0	1.4	0	0.0	0.5	0.0
Total	5	100.0	100.0	412	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	6.8	0	0.0	3.8	21.7
Moderate	0	0.0	21.6	0	0.0	13.2	17.8
Middle	0	0.0	16.2	0	0.0	11.6	19.6
Upper	0	0.0	50.0	0	0.0	67.5	40.9
Unknown	0	0.0	5.4	0	0.0	3.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	21.7
Moderate	0	0.0	0.0	0	0.0	0.0	17.8
Middle	0	0.0	0.0	0	0.0	0.0	19.6
Upper	0	0.0	0.0	0	0.0	0.0	40.9
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D75

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Battle Creek MSA													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	25	32.5	46.8	3,145	20.1	33.9	19	35.2	49.4	2,483	16.0	34.1	89.4
Over \$1 Million	39	50.6		11,709	74.8		31	57.4		12,674	81.9		9.4
Revenue Unknown	13	16.9		800	5.1		4	7.4		320	2.1		1.2
Total	77	100.0		15,654	100.0		54	100.0		15,477	100.0		100.0
By Loan Size													
\$100,000 or Less	41	53.2	91.9	2,110	13.5	40.2	20	37.0	94.3	1,039	6.7	40.3	
\$100,001 - \$250,000	17	22.1	5.2	2,693	17.2	24.1	12	22.2	3.1	2,122	13.7	17.8	
\$250,001 - \$1 Million	19	24.7	2.8	10,851	69.3	35.7	22	40.7	2.7	12,316	79.6	41.9	
Total	77	100.0	100.0	15,654	100.0	100.0	54	100.0	100.0	15,477	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	17	68.0		806	25.6		12	63.2		609	24.5		
\$100,001 - \$250,000	5	20.0		883	28.1		6	31.6		1,097	44.2		
\$250,001 - \$1 Million	3	12.0		1,456	46.3		1	5.3		777	31.3		
Total	25	100.0		3,145	100.0		19	100.0		2,483	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D76

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Battle Creek MSA							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	61	40.4	28.9	7,577	23.7	18.6	89.2
Over \$1 Million	66	43.7		20,562	64.2		9.8
Revenue Unknown	24	15.9		3,877	12.1		1.0
Total	151	100.0		32,016	100.0		100.0
By Loan Size							
\$100,000 or Less	74	49.0	86.9	3,502	10.9	31.1	
\$100,001 - \$250,000	32	21.2	7.8	5,114	16.0	21.9	
\$250,001 - \$1 Million	45	29.8	5.3	23,400	73.1	47.0	
Total	151	100.0	100.0	32,016	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	44	72.1		1,872	24.7		
\$100,001 - \$250,000	9	14.8		1,304	17.2		
\$250,001 - \$1 Million	8	13.1		4,401	58.1		
Total	61	100.0		7,577	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D77

2022 Combined Demographics Assessment Area: Fenton MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	16	11.9	9,012	8.3	3,511	39.0	23,052	21.3
Moderate	33	24.6	21,362	19.7	5,018	23.5	18,958	17.5
Middle	41	30.6	34,988	32.3	3,341	9.5	22,509	20.8
Upper	39	29.1	40,177	37.1	1,776	4.4	43,911	40.5
Unknown	5	3.7	2,891	2.7	393	13.6	0	0.0
Total AA	134	100.0	108,430	100.0	14,039	12.9	108,430	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	20,522	8,014	6.7	39.1	7,401	36.1	5,107	24.9
Moderate	47,988	20,839	17.5	43.4	18,764	39.1	8,385	17.5
Middle	58,678	39,973	33.5	68.1	14,016	23.9	4,689	8.0
Upper	60,706	47,609	39.9	78.4	9,692	16.0	3,405	5.6
Unknown	4,689	2,949	2.5	62.9	1,324	28.2	416	8.9
Total AA	192,583	119,384	100.0	62.0	51,197	26.6	22,002	11.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	842	5.8	783	5.8	55	5.3	4	3.4
Moderate	2,805	19.3	2,577	19.2	210	20.2	18	15.1
Middle	5,059	34.7	4,580	34.2	433	41.6	46	38.7
Upper	5,148	35.3	4,840	36.1	266	25.5	42	35.3
Unknown	712	4.9	625	4.7	78	7.5	9	7.6
Total AA	14,566	100.0	13,405	100.0	1,042	100.0	119	100.0
Percentage of Total Businesses:				92.0		7.2		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	2	1.0	2	1.0	0	0.0	0	0.0
Moderate	9	4.6	9	4.7	0	0.0	0	0.0
Middle	90	46.2	87	45.5	3	75.0	0	0.0
Upper	92	47.2	91	47.6	1	25.0	0	0.0
Unknown	2	1.0	2	1.0	0	0.0	0	0.0
Total AA	195	100.0	191	100.0	4	100.0	0	0.0
Percentage of Total Farms:				97.9		2.1		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D78

2021 Combined Demographics Assessment Area: Fenton MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	20	15.3	10,926	10.2	5,076	46.5	25,191	23.6
Moderate	28	21.4	17,635	16.5	5,354	30.4	16,425	15.4
Middle	47	35.9	39,617	37.1	5,147	13.0	21,298	20.0
Upper	34	26.0	38,469	36.1	1,978	5.1	43,733	41.0
Unknown	2	1.5	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>131</b>	<b>100.0</b>	<b>106,647</b>	<b>100.0</b>	<b>17,555</b>	<b>16.5</b>	<b>106,647</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	25,965	9,778	8.5	37.7	9,208	35.5	6,979	26.9
Moderate	40,574	17,059	14.9	42.0	14,236	35.1	9,279	22.9
Middle	67,526	44,230	38.5	65.5	16,987	25.2	6,309	9.3
Upper	57,113	43,756	38.1	76.6	10,014	17.5	3,343	5.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>191,178</b>	<b>114,823</b>	<b>100.0</b>	<b>60.1</b>	<b>50,445</b>	<b>26.4</b>	<b>25,910</b>	<b>13.6</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,492	10.4	1,343	10.2	138	12.9	11	10.0
Moderate	1,933	13.4	1,780	13.5	141	13.2	12	10.9
Middle	6,177	43.0	5,600	42.4	530	49.4	47	42.7
Upper	4,739	33.0	4,453	33.7	247	23.0	39	35.5
Unknown	39	0.3	22	0.2	16	1.5	1	0.9
<b>Total AA</b>	<b>14,380</b>	<b>100.0</b>	<b>13,198</b>	<b>100.0</b>	<b>1,072</b>	<b>100.0</b>	<b>110</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.8</b>		<b>7.5</b>		<b>0.8</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	6	3.0	6	3.0	0	0.0	0	0.0
Moderate	5	2.5	5	2.5	0	0.0	0	0.0
Middle	82	40.6	81	40.9	1	25.0	0	0.0
Upper	109	54.0	106	53.5	3	75.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>202</b>	<b>100.0</b>	<b>198</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.0</b>		<b>2.0</b>		<b>0.0</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



Table D79

2020 Combined Demographics Assessment Area: Fenton MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	20	15.3	10,926	10.2	5,076	46.5	25,191	23.6
Moderate	28	21.4	17,635	16.5	5,354	30.4	16,425	15.4
Middle	47	35.9	39,617	37.1	5,147	13.0	21,298	20.0
Upper	34	26.0	38,469	36.1	1,978	5.1	43,733	41.0
Unknown	2	1.5	0	0.0	0	0.0	0	0.0
Total AA	131	100.0	106,647	100.0	17,555	16.5	106,647	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	25,965	9,778	8.5	37.7	9,208	35.5	6,979	26.9
Moderate	40,574	17,059	14.9	42.0	14,236	35.1	9,279	22.9
Middle	67,526	44,230	38.5	65.5	16,987	25.2	6,309	9.3
Upper	57,113	43,756	38.1	76.6	10,014	17.5	3,343	5.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	191,178	114,823	100.0	60.1	50,445	26.4	25,910	13.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,419	9.9	1,269	9.6	140	12.8	10	9.6
Moderate	1,863	13.0	1,704	12.9	147	13.5	12	11.5
Middle	6,179	43.0	5,602	42.6	532	48.8	45	43.3
Upper	4,853	33.8	4,563	34.7	254	23.3	36	34.6
Unknown	40	0.3	22	0.2	17	1.6	1	1.0
Total AA	14,354	100.0	13,160	100.0	1,090	100.0	104	100.0
Percentage of Total Businesses:				91.7		7.6		0.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	8	3.8	8	3.9	0	0.0	0	0.0
Moderate	6	2.9	6	2.9	0	0.0	0	0.0
Middle	85	40.5	85	41.1	0	0.0	0	0.0
Upper	111	52.9	108	52.2	3	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	210	100.0	207	100.0	3	100.0	0	0.0
Percentage of Total Farms:				98.6		1.4		0.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D80A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Fenton MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	2.5	0	0.0	1.0	0	0.0	2.6	0	0.0	1.3	6.7
Moderate	1	33.3	7.4	165	36.3	4.2	1	20.0	13.1	180	18.5	7.9	17.5
Middle	1	33.3	43.6	190	41.8	35.4	2	40.0	36.2	185	19.0	30.5	33.5
Upper	1	33.3	46.5	100	22.0	59.3	2	40.0	46.0	608	62.5	57.2	39.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.1	0	0.0	3.1	2.5
Total	3	100.0	100.0	455	100.0	100.0	5	100.0	100.0	973	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.8	0	0.0	0.3	0	0.0	1.7	0	0.0	1.0	6.7
Moderate	0	0.0	3.5	0	0.0	2.2	2	40.0	8.7	223	50.3	5.0	17.5
Middle	2	25.0	36.0	284	26.3	27.9	2	40.0	34.6	170	38.4	28.6	33.5
Upper	6	75.0	59.6	795	73.7	69.6	1	20.0	52.3	50	11.3	62.0	39.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.6	0	0.0	3.4	2.5
Total	8	100.0	100.0	1,079	100.0	100.0	5	100.0	100.0	443	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.6	0	0.0	0.7	0	0.0	2.7	0	0.0	1.5	6.7
Moderate	0	0.0	6.2	0	0.0	3.3	0	0.0	8.6	0	0.0	5.2	17.5
Middle	0	0.0	33.8	0	0.0	29.2	1	16.7	28.3	50	12.4	23.9	33.5
Upper	5	100.0	58.3	273	100.0	66.9	5	83.3	58.3	353	87.6	66.6	39.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.2	0	0.0	2.7	2.5
Total	5	100.0	100.0	273	100.0	100.0	6	100.0	100.0	403	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	18.2	0	0.0	2.8	0	0.0	0.0	0	0.0	0.0	8.9
Moderate	0	0.0	13.6	0	0.0	16.4	0	0.0	40.0	0	0.0	45.6	36.1
Middle	0	0.0	36.4	0	0.0	57.1	0	0.0	23.3	0	0.0	39.0	23.6
Upper	0	0.0	31.8	0	0.0	23.8	0	0.0	30.0	0	0.0	12.9	26.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	6.7	0	0.0	2.5	4.5
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	1.5	0	0.0	0.7	0	0.0	2.3	0	0.0	1.2	6.7
Moderate	1	5.9	5.3	165	8.0	3.4	4	19.0	11.3	464	22.6	9.6	17.5
Middle	3	17.6	38.9	474	23.0	31.7	6	28.6	34.7	455	22.1	30.2	33.5
Upper	13	76.5	54.2	1,418	68.9	64.2	11	52.4	49.4	1,136	55.3	55.8	39.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.3	0	0.0	3.2	2.5
Total	17	100.0	100.0	2,057	100.0	100.0	21	100.0	100.0	2,055	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D80B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Fenton MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	2.0	0	0.0	1.0	0	0.0	1.1	0	0.0	0.4	6.7
Moderate	0	0.0	8.4	0	0.0	5.0	0	0.0	6.9	0	0.0	4.6	17.5
Middle	0	0.0	30.4	0	0.0	25.0	1	25.0	29.4	50	28.6	23.1	33.5
Upper	1	100.0	59.2	250	100.0	69.0	3	75.0	60.8	125	71.4	67.2	39.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.8	0	0.0	4.7	2.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	250	100.0	100.0	4	100.0	100.0	175	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.4	0	0.0	0.9	0	0.0	3.1	0	0.0	2.3	6.7
Moderate	0	0.0	10.4	0	0.0	7.3	1	100.0	12.1	61	100.0	8.5	17.5
Middle	0	0.0	38.0	0	0.0	32.2	0	0.0	33.9	0	0.0	28.1	33.5
Upper	0	0.0	50.1	0	0.0	59.6	0	0.0	48.2	0	0.0	57.1	39.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.7	0	0.0	4.0	2.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	61	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.9	0	0.0	1.5	0	0.0	5.0	0	0.0	2.3	6.7
Moderate	0	0.0	10.8	0	0.0	6.1	0	0.0	17.5	0	0.0	10.8	17.5
Middle	0	0.0	44.6	0	0.0	36.5	0	0.0	38.8	0	0.0	32.0	33.5
Upper	0	0.0	41.7	0	0.0	55.8	0	0.0	36.3	0	0.0	52.4	39.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.5	0	0.0	2.5	2.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table D81A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Fenton MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	1.9	0	0.0	0.8	8.5
Moderate	0	0.0	6.2	0	0.0	3.4	14.9
Middle	0	0.0	42.1	0	0.0	33.2	38.5
Upper	2	100.0	49.8	513	100.0	62.6	38.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	513	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.3	0	0.0	0.1	8.5
Moderate	0	0.0	2.5	0	0.0	1.6	14.9
Middle	2	28.6	32.2	236	19.7	24.4	38.5
Upper	5	71.4	64.9	963	80.3	73.9	38.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	1,199	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.5	0	0.0	0.4	8.5
Moderate	0	0.0	3.0	0	0.0	1.7	14.9
Middle	2	50.0	39.3	211	67.8	30.9	38.5
Upper	2	50.0	56.3	100	32.2	67.0	38.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	311	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	17.4	0	0.0	3.6	
Moderate	0	0.0	21.7	0	0.0	33.9	24.3
Middle	0	0.0	26.1	0	0.0	39.5	35.7
Upper	0	0.0	34.8	0	0.0	23.0	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	1.1	0	0.0	0.5	
Moderate	0	0.0	4.3	0	0.0	3.2	14.9
Middle	4	28.6	36.7	447	21.6	28.4	38.5
Upper	10	71.4	57.9	1,626	78.4	67.9	38.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	14	100.0	100.0	2,073	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D81B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Fenton MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit							
Low	0	0.0	0.0	0	0.0	0.0	8.5
Moderate	0	0.0	10.5	0	0.0	6.5	14.9
Middle	0	0.0	33.1	0	0.0	26.5	38.5
Upper	1	100.0	56.4	50	100.0	66.9	38.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	50	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.5	0	0.0	1.3	8.5
Moderate	0	0.0	7.2	0	0.0	3.5	14.9
Middle	0	0.0	44.4	0	0.0	36.3	38.5
Upper	0	0.0	45.9	0	0.0	58.8	38.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	3.7	0	0.0	1.8	8.5
Moderate	0	0.0	13.3	0	0.0	6.0	14.9
Middle	0	0.0	46.7	0	0.0	41.5	38.5
Upper	0	0.0	36.3	0	0.0	50.7	38.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table D82**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Fenton MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	2	5.4	8.8	678	6.1	8.3	1	3.8	3.5	85	1.1	5.7	5.8
Moderate	1	2.7	12.8	85	0.8	12.1	2	7.7	17.3	295	4.0	23.3	19.3
Middle	23	62.2	40.4	7,839	70.9	48.2	14	53.8	30.8	4,532	61.3	34.3	34.7
Upper	11	29.7	37.3	2,447	22.1	31.1	9	34.6	41.8	2,485	33.6	31.9	35.3
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	6.0	0	0.0	4.5	4.9
Total	37	100.0	100.0	11,049	100.0	100.0	26	100.0	100.0	7,397	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

**Table D83**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Fenton MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	3	5.3	9.0	978	8.7	9.3	9.9
Moderate	3	5.3	10.9	308	2.8	10.9	13.0
Middle	32	56.1	42.6	6,351	56.7	49.1	43.0
Upper	18	31.6	36.9	3,093	27.6	29.9	33.8
Unknown	1	1.8	0.2	466	4.2	0.5	0.3
Total	57	100.0	100.0	11,196	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Table D84A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Fenton MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	7.9	0	0.0	3.7	0	0.0	8.1	0	0.0	3.6	21.3
Moderate	2	66.7	23.4	290	63.7	16.8	3	60.0	22.1	365	37.5	15.7	17.5
Middle	0	0.0	23.0	0	0.0	22.8	0	0.0	22.0	0	0.0	21.0	20.8
Upper	1	33.3	27.6	165	36.3	38.4	1	20.0	27.6	340	34.9	40.0	40.5
Unknown	0	0.0	18.0	0	0.0	18.2	1	20.0	20.2	268	27.5	19.7	0.0
Total	3	100.0	100.0	455	100.0	100.0	5	100.0	100.0	973	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.8	0	0.0	2.6	0	0.0	9.3	0	0.0	5.3	21.3
Moderate	3	37.5	17.8	322	29.8	12.5	0	0.0	23.7	0	0.0	17.7	17.5
Middle	1	12.5	24.2	150	13.9	21.2	3	60.0	26.0	293	66.1	24.9	20.8
Upper	2	25.0	36.9	193	17.9	46.2	1	20.0	31.1	50	11.3	41.4	40.5
Unknown	2	25.0	16.2	414	38.4	17.5	1	20.0	9.9	100	22.6	10.6	0.0
Total	8	100.0	100.0	1,079	100.0	100.0	5	100.0	100.0	443	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.7	0	0.0	3.7	0	0.0	6.5	0	0.0	4.0	21.3
Moderate	1	20.0	18.6	28	10.3	16.0	0	0.0	19.7	0	0.0	16.2	17.5
Middle	0	0.0	25.7	0	0.0	22.7	2	33.3	22.3	123	30.5	18.9	20.8
Upper	4	80.0	46.6	245	89.7	53.6	2	33.3	49.9	224	55.6	59.5	40.5
Unknown	0	0.0	2.5	0	0.0	4.0	2	33.3	1.5	56	13.9	1.3	0.0
Total	5	100.0	100.0	273	100.0	100.0	6	100.0	100.0	403	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	6.1	0	0.0	3.1	0	0.0	8.4	0	0.0	4.2	21.3
Moderate	6	35.3	19.9	640	31.1	14.4	4	19.0	22.0	415	20.2	16.1	17.5
Middle	1	5.9	23.5	150	7.3	21.8	6	28.6	23.3	477	23.2	21.9	20.8
Upper	8	47.1	33.8	853	41.5	43.1	7	33.3	31.6	739	36.0	41.6	40.5
Unknown	2	11.8	16.7	414	20.1	17.7	4	19.0	14.8	424	20.6	16.2	0.0
Total	17	100.0	100.0	2,057	100.0	100.0	21	100.0	100.0	2,055	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table D84B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Fenton MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	8.4	0	0.0	6.7	0	0.0	6.9	0	0.0	5.0	21.3
Moderate	0	0.0	18.4	0	0.0	15.7	1	25.0	17.0	50	28.6	11.5	17.5
Middle	0	0.0	15.6	0	0.0	14.8	0	0.0	22.1	0	0.0	17.1	20.8
Upper	1	100.0	54.4	250	100.0	58.8	3	75.0	49.8	125	71.4	63.4	40.5
Unknown	0	0.0	3.2	0	0.0	4.0	0	0.0	4.2	0	0.0	3.0	0.0
Total	1	100.0	100.0	250	100.0	100.0	4	100.0	100.0	175	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	6.7	0	0.0	3.6	0	0.0	11.7	0	0.0	8.7	21.3
Moderate	0	0.0	22.9	0	0.0	14.4	0	0.0	21.5	0	0.0	15.3	17.5
Middle	0	0.0	19.7	0	0.0	16.8	1	100.0	28.0	61	100.0	25.6	20.8
Upper	0	0.0	47.8	0	0.0	62.4	0	0.0	37.0	0	0.0	48.3	40.5
Unknown	0	0.0	2.9	0	0.0	2.9	0	0.0	1.8	0	0.0	2.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	61	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.3
Moderate	0	0.0	0.7	0	0.0	0.6	0	0.0	0.0	0	0.0	0.0	17.5
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	2.5	0	0.0	2.1	20.8
Upper	0	0.0	0.7	0	0.0	1.0	0	0.0	0.0	0	0.0	0.0	40.5
Unknown	0	0.0	98.6	0	0.0	98.4	0	0.0	97.5	0	0.0	97.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													



Table D85A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Fenton MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	7.4	0	0.0	3.6	23.6
Moderate	1	50.0	22.0	160	31.2	16.3	15.4
Middle	0	0.0	26.7	0	0.0	25.7	20.0
Upper	1	50.0	29.7	353	68.8	40.6	41.0
Unknown	0	0.0	14.2	0	0.0	13.8	0.0
Total	2	100.0	100.0	513	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.2	0	0.0	1.6	23.6
Moderate	0	0.0	11.6	0	0.0	7.6	15.4
Middle	2	28.6	22.4	346	28.9	17.9	20.0
Upper	2	28.6	45.9	343	28.6	54.9	41.0
Unknown	3	42.9	16.9	510	42.5	18.0	0.0
Total	7	100.0	100.0	1,199	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	5.6	0	0.0	2.5	23.6
Moderate	0	0.0	16.8	0	0.0	12.2	15.4
Middle	3	75.0	24.3	271	87.1	19.8	20.0
Upper	1	25.0	47.5	40	12.9	57.6	41.0
Unknown	0	0.0	5.8	0	0.0	7.9	0.0
Total	4	100.0	100.0	311	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	4.9	0	0.0	2.4	23.6
Moderate	1	7.1	15.6	160	7.7	10.9	15.4
Middle	5	35.7	23.5	617	29.8	20.7	20.0
Upper	5	35.7	38.9	786	37.9	48.8	41.0
Unknown	3	21.4	17.1	510	24.6	17.1	0.0
Total	14	100.0	100.0	2,073	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D85B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level							
Assessment Area: Fenton MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit							
Low	0	0.0	8.7	0	0.0	6.0	23.6
Moderate	0	0.0	17.4	0	0.0	11.4	15.4
Middle	0	0.0	18.6	0	0.0	11.8	20.0
Upper	1	100.0	53.5	50	100.0	69.5	41.0
Unknown	0	0.0	1.7	0	0.0	1.2	0.0
Total	1	100.0	100.0	50	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	9.3	0	0.0	5.5	23.6
Moderate	0	0.0	20.1	0	0.0	14.7	15.4
Middle	0	0.0	22.6	0	0.0	24.1	20.0
Upper	0	0.0	45.9	0	0.0	52.5	41.0
Unknown	0	0.0	2.2	0	0.0	3.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.2	0	0.0	0.2	23.6
Moderate	0	0.0	0.2	0	0.0	0.3	15.4
Middle	0	0.0	0.0	0	0.0	0.0	20.0
Upper	0	0.0	0.5	0	0.0	0.5	41.0
Unknown	0	0.0	99.0	0	0.0	99.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table D86**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses															
Assessment Area: Fenton MSA															
	Bank and Aggregate Loans by Year												Total Businesses %		
	2021						2022								
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg			
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%			
By Revenue															
\$1 Million or Less	8	21.6	41.8	922	8.3	24.0	3	11.5	48.4	437	5.9	26.9	92.0		
Over \$1 Million	23	62.2		9,770	88.4		22	84.6		6,935	93.8		7.2		
Revenue Unknown	6	16.2			357		3.2	1		3.8			25	0.3	0.8
Total	37	100.0			11,049		100.0	26		100.0			7,397	100.0	
By Loan Size															
\$100,000 or Less	15	40.5	90.5	911	8.2	33.8	10	38.5	94.8	670	9.1	40.5			
\$100,001 - \$250,000	9	24.3	5.8	1,687	15.3	21.5	8	30.8	2.8	1,725	23.3	14.3			
\$250,001 - \$1 Million	13	35.1	3.7	8,451	76.5	44.7	8	30.8	2.4	5,002	67.6	45.2			
Total	37	100.0	100.0	11,049	100.0	100.0	26	100.0	100.0	7,397	100.0	100.0			
By Loan Size and Revenues \$1 Million or Less															
\$100,000 or Less	6	75.0		389	42.2		2	66.7		185	42.3				
\$100,001 - \$250,000	1	12.5			105		11.4	0		0.0				0	0.0
\$250,001 - \$1 Million	1	12.5			428		46.4	1		33.3				252	57.7
Total	8	100.0			922		100.0	3		100.0				437	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.															

**Table D87**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Fenton MSA							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	23	40.4	43.1	3,199	28.6	26.8	91.7
Over \$1 Million	28	49.1		7,572	67.6		7.6
Revenue Unknown	6	10.5		425	3.8		0.7
Total	57	100.0		11,196	100.0		100.0
By Loan Size							
\$100,000 or Less	28	49.1	86.4	1,313	11.7	31.1	
\$100,001 - \$250,000	13	22.8	8.1	2,294	20.5	21.8	
\$250,001 - \$1 Million	16	28.1	5.5	7,589	67.8	47.1	
Total	57	100.0	100.0	11,196	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	15	65.2		569	17.8		
\$100,001 - \$250,000	3	13.0		359	11.2		
\$250,001 - \$1 Million	5	21.7		2,271	71.0		
Total	23	100.0		3,199	100.0		
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table D88**

2022 Combined Demographics								
Assessment Area: Grand Rapids-Kentwood Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	5.2	7,745	3.3	1,899	24.5	42,756	18.0
Moderate	38	18.1	35,778	15.0	4,831	13.5	42,648	17.9
Middle	104	49.5	114,401	48.1	6,320	5.5	55,302	23.2
Upper	53	25.2	76,884	32.3	1,435	1.9	97,259	40.9
Unknown	4	1.9	3,157	1.3	320	10.1	0	0.0
<b>Total AA</b>	<b>210</b>	<b>100.0</b>	<b>237,965</b>	<b>100.0</b>	<b>14,805</b>	<b>6.2</b>	<b>237,965</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	14,123	4,702	1.8	33.3	8,410	59.5	1,011	7.2
Moderate	63,324	33,249	13.1	52.5	25,855	40.8	4,220	6.7
Middle	182,519	125,886	49.5	69.0	48,033	26.3	8,600	4.7
Upper	102,929	87,435	34.4	84.9	11,436	11.1	4,058	3.9
Unknown	4,768	2,919	1.1	61.2	1,456	30.5	393	8.2
<b>Total AA</b>	<b>367,663</b>	<b>254,191</b>	<b>100.0</b>	<b>69.1</b>	<b>95,190</b>	<b>25.9</b>	<b>18,282</b>	<b>5.0</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	923	2.4	827	2.4	94	2.3	2	0.6
Moderate	6,754	17.5	5,707	16.7	1,002	24.6	45	13.8
Middle	17,934	46.4	15,950	46.6	1,833	45.0	151	46.5
Upper	12,693	32.9	11,450	33.4	1,120	27.5	123	37.8
Unknown	324	0.8	298	0.9	22	0.5	4	1.2
<b>Total AA</b>	<b>38,628</b>	<b>100.0</b>	<b>34,232</b>	<b>100.0</b>	<b>4,071</b>	<b>100.0</b>	<b>325</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.6</b>		<b>10.5</b>		<b>0.8</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5	0.7	5	0.7	0	0.0	0	0.0
Moderate	50	6.6	45	6.4	5	9.3	0	0.0
Middle	414	54.5	383	54.3	31	57.4	0	0.0
Upper	285	37.5	267	37.9	18	33.3	0	0.0
Unknown	5	0.7	5	0.7	0	0.0	0	0.0
<b>Total AA</b>	<b>759</b>	<b>100.0</b>	<b>705</b>	<b>100.0</b>	<b>54</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>92.9</b>		<b>7.1</b>		<b>0.0</b>
Source: 2022 FFIEC Census Data								
2022 Dun & Bradstreet Data								
2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table D89**

2021 Combined Demographics								
Assessment Area: Grand Rapids-Kentwood Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	12	6.6	7,778	3.5	3,245	41.7	42,098	18.7
Moderate	33	18.1	33,662	14.9	6,327	18.8	39,134	17.4
Middle	90	49.5	115,651	51.3	8,403	7.3	49,913	22.1
Upper	46	25.3	68,308	30.3	2,379	3.5	94,254	41.8
Unknown	1	0.5	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>182</b>	<b>100.0</b>	<b>225,399</b>	<b>100.0</b>	<b>20,354</b>	<b>9.0</b>	<b>225,399</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	15,395	4,718	2.0	30.6	8,400	54.6	2,277	14.8
Moderate	62,933	28,754	12.3	45.7	29,441	46.8	4,738	7.5
Middle	181,174	125,000	53.4	69.0	45,196	24.9	10,978	6.1
Upper	92,569	75,801	32.4	81.9	11,934	12.9	4,834	5.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>352,071</b>	<b>234,273</b>	<b>100.0</b>	<b>66.5</b>	<b>94,971</b>	<b>27.0</b>	<b>22,827</b>	<b>6.5</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,362	3.5	1,098	3.2	258	6.3	6	2.0
Moderate	5,625	14.5	4,919	14.3	683	16.6	23	7.8
Middle	18,961	49.0	16,776	48.9	2,037	49.4	148	50.0
Upper	12,749	32.9	11,488	33.5	1,142	27.7	119	40.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>38,697</b>	<b>100.0</b>	<b>34,281</b>	<b>100.0</b>	<b>4,120</b>	<b>100.0</b>	<b>296</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.6</b>		<b>10.6</b>		<b>0.8</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	4	0.5	4	0.6	0	0.0	0	0.0
Moderate	23	3.0	16	2.2	7	12.3	0	0.0
Middle	467	60.4	428	59.8	39	68.4	0	0.0
Upper	279	36.1	268	37.4	11	19.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>773</b>	<b>100.0</b>	<b>716</b>	<b>100.0</b>	<b>57</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>92.6</b>		<b>7.4</b>		<b>0.0</b>
Source: 2021 FFIEC Census Data								
2021 Dun & Bradstreet Data								
2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table D90**

2020 Combined Demographics								
Assessment Area: Grand Rapids-Kentwood Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	12	6.6	7,778	3.5	3,245	41.7	42,098	18.7
Moderate	33	18.1	33,662	14.9	6,327	18.8	39,134	17.4
Middle	90	49.5	115,651	51.3	8,403	7.3	49,913	22.1
Upper	46	25.3	68,308	30.3	2,379	3.5	94,254	41.8
Unknown	1	0.5	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>182</b>	<b>100.0</b>	<b>225,399</b>	<b>100.0</b>	<b>20,354</b>	<b>9.0</b>	<b>225,399</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	15,395	4,718	2.0	30.6	8,400	54.6	2,277	14.8
Moderate	62,933	28,754	12.3	45.7	29,441	46.8	4,738	7.5
Middle	181,174	125,000	53.4	69.0	45,196	24.9	10,978	6.1
Upper	92,569	75,801	32.4	81.9	11,934	12.9	4,834	5.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>352,071</b>	<b>234,273</b>	<b>100.0</b>	<b>66.5</b>	<b>94,971</b>	<b>27.0</b>	<b>22,827</b>	<b>6.5</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,324	3.4	1,065	3.1	254	6.1	5	1.8
Moderate	5,541	14.2	4,834	14.0	686	16.4	21	7.4
Middle	19,177	49.2	16,965	49.1	2,073	49.5	139	48.9
Upper	12,954	33.2	11,658	33.8	1,177	28.1	119	41.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>38,996</b>	<b>100.0</b>	<b>34,522</b>	<b>100.0</b>	<b>4,190</b>	<b>100.0</b>	<b>284</b>	<b>100.0</b>
Percentage of Total Businesses:				88.5		10.7		0.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	3	0.4	3	0.4	0	0.0	0	0.0
Moderate	22	2.8	16	2.2	6	10.0	0	0.0
Middle	480	60.8	439	60.1	41	68.3	0	0.0
Upper	285	36.1	272	37.3	13	21.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>790</b>	<b>100.0</b>	<b>730</b>	<b>100.0</b>	<b>60</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				92.4		7.6		0.0
Source: 2020 FFIEC Census Data								
2020 Dun & Bradstreet Data								
2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D91A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Grand Rapids-Kentwood Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	3.3	0	0.0	2.0	2	15.4	3.2	344	12.7	1.8	1.8
Moderate	8	44.4	15.7	1,606	36.3	11.2	6	46.2	15.8	1,561	57.5	11.3	13.1
Middle	9	50.0	52.1	2,571	58.1	49.1	4	30.8	49.1	744	27.4	45.7	49.5
Upper	1	5.6	28.8	248	5.6	37.6	1	7.7	31.0	65	2.4	40.4	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.8	0	0.0	0.9	1.1
Total	18	100.0	100.0	4,425	100.0	100.0	13	100.0	100.0	2,714	100.0	100.0	100.0
Refinance Loans													
Low	3	4.8	1.4	285	2.6	0.9	0	0.0	1.6	0	0.0	1.1	1.8
Moderate	8	12.7	11.4	1,260	11.5	7.8	3	6.5	14.5	374	4.8	11.0	13.1
Middle	29	46.0	50.9	3,473	31.6	46.4	24	52.2	48.6	2,674	34.7	44.6	49.5
Upper	23	36.5	36.3	5,968	54.3	44.9	19	41.3	34.2	4,666	60.5	42.4	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.0	0	0.0	0.9	1.1
Total	63	100.0	100.0	10,986	100.0	100.0	46	100.0	100.0	7,714	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.5	0	0.0	1.0	0	0.0	1.1	0	0.0	0.7	1.8
Moderate	3	13.0	9.5	227	10.3	7.7	1	3.7	10.1	9	0.3	7.4	13.1
Middle	15	65.2	50.4	1,251	56.8	45.5	17	63.0	48.7	1,546	53.9	44.2	49.5
Upper	5	21.7	38.6	724	32.9	45.7	9	33.3	39.4	1,314	45.8	47.0	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.6	0	0.0	0.7	1.1
Total	23	100.0	100.0	2,202	100.0	100.0	27	100.0	100.0	2,869	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	7.4	0	0.0	11.7	0	0.0	3.6	0	0.0	3.7	5.7
Moderate	0	0.0	27.8	0	0.0	23.0	0	0.0	19.1	0	0.0	30.9	24.1
Middle	0	0.0	47.2	0	0.0	37.0	0	0.0	67.3	0	0.0	53.5	53.6
Upper	0	0.0	17.6	0	0.0	28.3	0	0.0	10.0	0	0.0	11.9	14.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	2.3
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	3	2.3	2.1	285	1.3	1.8	2	1.8	2.4	344	2.1	1.8	1.8
Moderate	20	15.5	12.8	3,165	15.0	9.8	11	9.8	14.2	2,072	12.4	13.1	13.1
Middle	68	52.7	51.2	8,916	42.1	47.0	62	55.4	48.8	7,213	43.0	46.0	49.5
Upper	38	29.5	33.9	8,801	41.6	41.4	37	33.0	33.6	7,139	42.6	38.4	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.9	0	0.0	0.8	1.1
Total	129	100.0	100.0	21,167	100.0	100.0	112	100.0	100.0	16,768	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D91B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Grand Rapids-Kentwood Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	0	0.0	0.8	0	0.0	0.4	0	0.0	0.8	0	0.0	0.3	1.8
Moderate	1	4.2	8.5	72	2.1	5.0	0	0.0	8.7	0	0.0	5.1	13.1
Middle	14	58.3	51.7	1,486	43.5	47.4	15	68.2	45.9	2,084	67.7	39.2	49.5
Upper	9	37.5	39.1	1,861	54.4	47.2	7	31.8	43.6	994	32.3	54.6	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.0	0	0.0	0.8	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	3,419	100.0	100.0	22	100.0	100.0	3,078	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.8	0	0.0	2.4	0	0.0	1.8	0	0.0	1.4	1.8
Moderate	0	0.0	14.7	0	0.0	9.5	1	25.0	14.3	128	32.6	10.6	13.1
Middle	1	100.0	46.5	135	100.0	37.1	2	50.0	47.9	165	42.0	42.5	49.5
Upper	0	0.0	34.9	0	0.0	51.0	1	25.0	35.0	100	25.4	44.9	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.0	0	0.0	0.6	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	135	100.0	100.0	4	100.0	100.0	393	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.7	0	0.0	2.8	0	0.0	18.6	0	0.0	8.7	1.8
Moderate	0	0.0	39.3	0	0.0	20.0	0	0.0	12.8	0	0.0	14.3	13.1
Middle	0	0.0	43.7	0	0.0	55.1	0	0.0	58.9	0	0.0	57.8	49.5
Upper	0	0.0	13.3	0	0.0	22.1	0	0.0	8.9	0	0.0	17.8	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.8	0	0.0	1.4	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													



Table D92A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Grand Rapids-Kentwood Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	1	6.7	2.9	238	6.5	1.8	2.0
Moderate	4	26.7	14.7	588	16.0	10.5	12.3
Middle	6	40.0	52.7	1,151	31.4	49.4	53.4
Upper	4	26.7	29.6	1,688	46.1	38.3	32.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	15	100.0	100.0	3,665	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	1.0	0	0.0	0.6	2.0
Moderate	11	15.5	8.5	1,414	9.8	5.6	12.3
Middle	31	43.7	50.4	6,447	44.6	45.8	53.4
Upper	29	40.8	40.2	6,602	45.6	48.0	32.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	71	100.0	100.0	14,463	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.3	0	0.0	1.1	2.0
Moderate	2	8.3	7.7	79	3.5	5.6	12.3
Middle	8	33.3	51.0	650	29.0	46.1	53.4
Upper	14	58.3	40.0	1,512	67.5	47.3	32.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	24	100.0	100.0	2,241	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	4.5	0	0.0	2.1	
Moderate	0	0.0	29.2	0	0.0	49.6	31.3
Middle	0	0.0	52.8	0	0.0	39.8	49.9
Upper	0	0.0	13.5	0	0.0	8.4	14.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	1	0.8	1.6	238	1.0	1.1	
Moderate	18	14.0	10.6	2,131	9.0	9.6	12.3
Middle	53	41.1	51.1	9,336	39.4	46.6	53.4
Upper	57	44.2	36.6	12,018	50.7	42.7	32.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	129	100.0	100.0	23,723	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D92B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Grand Rapids-Kentwood Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit							
Low	0	0.0	0.8	0	0.0	0.4	2.0
Moderate	1	5.6	7.6	50	1.7	4.2	12.3
Middle	8	44.4	49.4	1,088	36.8	45.3	53.4
Upper	9	50.0	42.3	1,816	61.5	50.1	32.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	18	100.0	100.0	2,954	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.9	0	0.0	3.8	2.0
Moderate	0	0.0	11.5	0	0.0	9.9	12.3
Middle	0	0.0	51.7	0	0.0	38.8	53.4
Upper	1	100.0	33.9	400	100.0	47.5	32.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	400	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	3.9	0	0.0	2.0	2.0
Moderate	0	0.0	22.8	0	0.0	15.1	12.3
Middle	0	0.0	52.2	0	0.0	42.9	53.4
Upper	0	0.0	21.1	0	0.0	39.9	32.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table D93**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Grand Rapids-Kentwood Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Low	9	4.1	3.5	2,367	4.0	4.9	6	3.4	2.1	1,589	2.9	2.4	2.4
Moderate	36	16.5	13.4	10,830	18.5	15.6	58	33.3	16.2	17,734	32.6	20.7	17.5
Middle	101	46.3	48.2	30,266	51.7	47.3	63	36.2	44.5	22,079	40.6	42.9	46.4
Upper	72	33.0	34.5	15,114	25.8	32.2	45	25.9	35.9	12,812	23.6	33.0	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	2	1.1	0.7	160	0.3	0.9	0.8
Total	218	100.0	100.0	58,577	100.0	100.0	174	100.0	100.0	54,374	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

**Table D94**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Grand Rapids-Kentwood Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	14	4.4	3.6	3,275	4.6	5.0	3.4
Moderate	68	21.6	14.1	21,577	30.1	16.2	14.2
Middle	130	41.3	48.1	29,262	40.8	46.8	49.2
Upper	103	32.7	34.0	17,641	24.6	31.9	33.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	315	100.0	100.0	71,755	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D95A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Grand Rapids-Kentwood Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	2	11.1	7.9	217	4.9	4.5	3	23.1	8.0	275	10.1	4.1	18.0
Moderate	4	22.2	22.3	639	14.4	16.4	1	7.7	23.3	344	12.7	16.9	17.9
Middle	3	16.7	22.5	739	16.7	20.4	3	23.1	22.3	642	23.7	20.4	23.2
Upper	8	44.4	34.0	2,720	61.5	46.1	6	46.2	32.9	1,453	53.5	46.1	40.9
Unknown	1	5.6	13.2	110	2.5	12.7	0	0.0	13.5	0	0.0	12.5	0.0
Total	18	100.0	100.0	4,425	100.0	100.0	13	100.0	100.0	2,714	100.0	100.0	100.0
Refinance Loans													
Low	7	11.1	8.7	639	5.8	4.9	11	23.9	15.4	947	12.3	9.3	18.0
Moderate	12	19.0	21.4	1,379	12.6	15.7	11	23.9	25.9	1,293	16.8	20.7	17.9
Middle	15	23.8	23.9	1,827	16.6	21.3	9	19.6	22.4	1,752	22.7	21.2	23.2
Upper	25	39.7	34.9	6,663	60.6	46.2	12	26.1	28.1	3,071	39.8	39.3	40.9
Unknown	4	6.3	11.1	478	4.4	11.8	3	6.5	8.0	651	8.4	9.5	0.0
Total	63	100.0	100.0	10,986	100.0	100.0	46	100.0	100.0	7,714	100.0	100.0	100.0
Home Improvement Loans													
Low	3	13.0	6.2	168	7.6	4.2	6	22.2	7.8	254	8.9	4.4	18.0
Moderate	6	26.1	19.4	398	18.1	14.9	8	29.6	21.3	566	19.7	15.9	17.9
Middle	2	8.7	25.6	187	8.5	22.1	3	11.1	27.3	395	13.8	23.3	23.2
Upper	12	52.2	46.4	1,449	65.8	56.1	10	37.0	41.3	1,654	57.7	54.1	40.9
Unknown	0	0.0	2.5	0	0.0	2.7	0	0.0	2.3	0	0.0	2.3	0.0
Total	23	100.0	100.0	2,202	100.0	100.0	27	100.0	100.0	2,869	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	15	11.6	8.2	1,278	6.0	4.7	27	24.1	10.4	2,077	12.4	5.6	18.0
Moderate	24	18.6	21.4	2,588	12.2	15.9	25	22.3	23.5	2,606	15.5	17.7	17.9
Middle	28	21.7	23.4	3,757	17.7	20.8	18	16.1	23.1	3,021	18.0	20.7	23.2
Upper	56	43.4	35.5	12,906	61.0	46.6	37	33.0	32.9	7,999	47.7	45.0	40.9
Unknown	6	4.7	11.5	638	3.0	12.0	5	4.5	10.2	1,065	6.4	11.0	0.0
Total	129	100.0	100.0	21,167	100.0	100.0	112	100.0	100.0	16,768	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table D95B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Grand Rapids-Kentwood Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	3	12.5	6.8	254	7.4	3.1	5	22.7	8.6	461	15.0	4.7	18.0
Moderate	2	8.3	16.6	172	5.0	11.7	3	13.6	19.2	150	4.9	12.7	17.9
Middle	7	29.2	24.7	869	25.4	19.5	3	13.6	25.2	232	7.5	19.4	23.2
Upper	11	45.8	49.6	2,074	60.7	64.1	9	40.9	43.4	1,821	59.2	59.7	40.9
Unknown	1	4.2	2.3	50	1.5	1.6	2	9.1	3.6	414	13.5	3.4	0.0
Total	24	100.0	100.0	3,419	100.0	100.0	22	100.0	100.0	3,078	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.4	0	0.0	4.5	2	50.0	12.4	140	35.6	7.2	18.0
Moderate	0	0.0	21.2	0	0.0	13.4	2	50.0	23.8	253	64.4	17.1	17.9
Middle	1	100.0	21.4	135	100.0	15.5	0	0.0	26.7	0	0.0	19.6	23.2
Upper	0	0.0	45.2	0	0.0	60.9	0	0.0	33.9	0	0.0	53.0	40.9
Unknown	0	0.0	3.8	0	0.0	5.8	0	0.0	3.2	0	0.0	3.1	0.0
Total	1	100.0	100.0	135	100.0	100.0	4	100.0	100.0	393	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.4	0	0.0	0.5	18.0
Moderate	0	0.0	0.4	0	0.0	0.5	0	0.0	0.8	0	0.0	1.6	17.9
Middle	0	0.0	0.4	0	0.0	0.6	0	0.0	0.0	0	0.0	0.0	23.2
Upper	0	0.0	0.4	0	0.0	1.1	0	0.0	0.4	0	0.0	0.3	40.9
Unknown	0	0.0	98.9	0	0.0	97.7	0	0.0	98.4	0	0.0	97.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table D96A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Grand Rapids-Kentwood Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	1	6.7	8.3	400	10.9	4.8	18.7
Moderate	4	26.7	27.0	741	20.2	20.5	17.4
Middle	7	46.7	23.7	1,297	35.4	21.9	22.1
Upper	3	20.0	33.5	1,227	33.5	45.7	41.8
Unknown	0	0.0	7.5	0	0.0	7.1	0.0
Total	15	100.0	100.0	3,665	100.0	100.0	100.0
Refinance Loans							
Low	6	8.5	5.4	613	4.2	2.8	18.7
Moderate	17	23.9	18.4	2,261	15.6	12.8	17.4
Middle	16	22.5	24.4	2,936	20.3	20.8	22.1
Upper	24	33.8	42.1	7,194	49.7	53.4	41.8
Unknown	8	11.3	9.7	1,459	10.1	10.1	0.0
Total	71	100.0	100.0	14,463	100.0	100.0	100.0
Home Improvement Loans							
Low	2	8.3	6.2	80	3.6	3.7	18.7
Moderate	4	16.7	15.6	260	11.6	11.9	17.4
Middle	9	37.5	26.2	817	36.5	22.9	22.1
Upper	8	33.3	50.2	1,024	45.7	59.2	41.8
Unknown	1	4.2	1.8	60	2.7	2.2	0.0
Total	24	100.0	100.0	2,241	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	9	7.0	6.3	1,093	4.6	3.6	18.7
Moderate	28	21.7	20.7	3,431	14.5	15.4	17.4
Middle	37	28.7	24.0	5,729	24.1	21.0	22.1
Upper	44	34.1	39.5	11,347	47.8	50.6	41.8
Unknown	11	8.5	9.4	2,123	8.9	9.5	0.0
Total	129	100.0	100.0	23,723	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D96B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Grand Rapids-Kentwood Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Other Purpose Lines of Credit							
Low	0	0.0	6.7	0	0.0	3.5	18.7
Moderate	3	16.7	17.1	169	5.7	11.7	17.4
Middle	5	27.8	23.4	679	23.0	18.1	22.1
Upper	8	44.4	49.7	1,502	50.8	63.8	41.8
Unknown	2	11.1	3.1	604	20.4	2.9	0.0
Total	18	100.0	100.0	2,954	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	8.5	0	0.0	5.5	18.7
Moderate	0	0.0	19.7	0	0.0	13.0	17.4
Middle	0	0.0	25.9	0	0.0	18.7	22.1
Upper	1	100.0	42.0	400	100.0	60.5	41.8
Unknown	0	0.0	3.8	0	0.0	2.3	0.0
Total	1	100.0	100.0	400	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.8	0	0.0	0.7	18.7
Moderate	0	0.0	1.3	0	0.0	1.1	17.4
Middle	0	0.0	0.7	0	0.0	0.7	22.1
Upper	0	0.0	0.0	0	0.0	0.0	41.8
Unknown	0	0.0	97.2	0	0.0	97.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D97

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Grand Rapids-Kentwood Metropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	69	31.7	44.3	8,037	13.7	23.9	39	22.4	48.1	7,422	13.6	24.4	88.6
Over \$1 Million	117	53.7		46,755	79.8		128	73.6		45,227	83.2		10.5
Revenue Unknown	32	14.7		3,785	6.5		7	4.0		1,725	3.2		0.8
Total	218	100.0		58,577	100.0		174	100.0		54,374	100.0		100.0
By Loan Size													
\$100,000 or Less	109	50.0	84.4	5,467	9.3	21.7	77	44.3	88.3	4,392	8.1	23.4	
\$100,001 - \$250,000	28	12.8	7.7	5,078	8.7	18.1	28	16.1	5.4	5,169	9.5	16.0	
\$250,001 - \$1 Million	81	37.2	7.9	48,032	82.0	60.2	69	39.7	6.4	44,813	82.4	60.7	
Total	218	100.0	100.0	58,577	100.0	100.0	174	100.0	100.0	54,374	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	53	76.8		2,429	30.2		28	71.8		1,568	21.1		
\$100,001 - \$250,000	6	8.7		993	12.4		4	10.3		721	9.7		
\$250,001 - \$1 Million	10	14.5		4,615	57.4		7	17.9		5,133	69.2		
Total	69	100.0		8,037	100.0		39	100.0		7,422	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D98

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Grand Rapids-Kentwood Metropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	#%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	129	41.0	35.8	9,250	12.9	19.5	88.5
Over \$1 Million	146	46.3		57,119	79.6		10.7
Revenue Unknown	40	12.7		5,386	7.5		0.7
Total	315	100.0		71,755	100.0		100.0
By Loan Size							
\$100,000 or Less	176	55.9	77.4	7,551	10.5	19.9	
\$100,001 - \$250,000	49	15.6	11.8	8,533	11.9	20.4	
\$250,001 - \$1 Million	90	28.6	10.8	55,671	77.6	59.7	
Total	315	100.0	100.0	71,755	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	109	84.5		4,193	45.3		
\$100,001 - \$250,000	15	11.6		2,394	25.9		
\$250,001 - \$1 Million	5	3.9		2,663	28.8		
Total	129	100.0		9,250	100.0		
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



Table D99

2022 Combined Demographics Assessment Area: Jackson MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	6.5	1,363	3.4	588	43.1	7,477	18.7
Moderate	14	30.4	10,314	25.8	1,558	15.1	7,599	19.0
Middle	15	32.6	16,650	41.7	898	5.4	8,365	21.0
Upper	12	26.1	11,451	28.7	343	3.0	16,467	41.3
Unknown	2	4.3	130	0.3	41	31.5	0	0.0
<b>Total AA</b>	<b>46</b>	<b>100.0</b>	<b>39,908</b>	<b>100.0</b>	<b>3,428</b>	<b>8.6</b>	<b>39,908</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,196	814	1.8	25.5	1,810	56.6	572	17.9
Moderate	20,487	10,871	23.5	53.1	7,666	37.4	1,950	9.5
Middle	26,856	19,868	43.0	74.0	4,636	17.3	2,352	8.8
Upper	18,320	14,638	31.7	79.9	1,325	7.2	2,357	12.9
Unknown	860	40	0.1	4.7	548	63.7	272	31.6
<b>Total AA</b>	<b>69,719</b>	<b>46,231</b>	<b>100.0</b>	<b>66.3</b>	<b>15,985</b>	<b>22.9</b>	<b>7,503</b>	<b>10.8</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	172	3.2	144	3.0	27	5.0	1	1.8
Moderate	1,666	30.8	1,424	29.5	236	44.1	6	10.7
Middle	2,038	37.6	1,855	38.5	155	29.0	28	50.0
Upper	1,226	22.6	1,138	23.6	71	13.3	17	30.4
Unknown	313	5.8	263	5.5	46	8.6	4	7.1
<b>Total AA</b>	<b>5,415</b>	<b>100.0</b>	<b>4,824</b>	<b>100.0</b>	<b>535</b>	<b>100.0</b>	<b>56</b>	<b>100.0</b>
Percentage of Total Businesses:				89.1		9.9		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.5	1	0.5	0	0.0	0	0.0
Moderate	7	3.6	7	3.6	0	0.0	0	0.0
Middle	118	60.2	116	60.1	2	66.7	0	0.0
Upper	69	35.2	68	35.2	1	33.3	0	0.0
Unknown	1	0.5	1	0.5	0	0.0	0	0.0
<b>Total AA</b>	<b>196</b>	<b>100.0</b>	<b>193</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				98.5		1.5		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D100

2021 Combined Demographics Assessment Area: Jackson MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	6	15.8	3,504	8.8	1,654	47.2	8,910	22.3
Moderate	9	23.7	7,028	17.6	1,361	19.4	6,996	17.5
Middle	14	36.8	20,124	50.4	1,772	8.8	8,057	20.2
Upper	8	21.1	9,274	23.2	371	4.0	15,967	40.0
Unknown	1	2.6	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>38</b>	<b>100.0</b>	<b>39,930</b>	<b>100.0</b>	<b>5,158</b>	<b>12.9</b>	<b>39,930</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,780	2,485	5.7	36.7	3,214	47.4	1,081	15.9
Moderate	14,319	6,790	15.6	47.4	5,487	38.3	2,042	14.3
Middle	32,454	23,375	53.7	72.0	5,948	18.3	3,131	9.6
Upper	15,568	10,905	25.0	70.0	2,387	15.3	2,276	14.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>69,121</b>	<b>43,555</b>	<b>100.0</b>	<b>63.0</b>	<b>17,036</b>	<b>24.6</b>	<b>8,530</b>	<b>12.3</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	535	9.9	430	8.9	99	18.4	6	10.5
Moderate	1,543	28.4	1,330	27.5	204	38.0	9	15.8
Middle	2,224	41.0	2,035	42.1	159	29.6	30	52.6
Upper	1,119	20.6	1,032	21.4	75	14.0	12	21.1
Unknown	4	0.1	4	0.1	0	0.0	0	0.0
<b>Total AA</b>	<b>5,425</b>	<b>100.0</b>	<b>4,831</b>	<b>100.0</b>	<b>537</b>	<b>100.0</b>	<b>57</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.1</b>		<b>9.9</b>		<b>1.1</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.0	2	1.0	0	0.0	0	0.0
Moderate	7	3.4	7	3.5	0	0.0	0	0.0
Middle	139	67.5	136	67.3	3	75.0	0	0.0
Upper	58	28.2	57	28.2	1	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>206</b>	<b>100.0</b>	<b>202</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.1</b>		<b>1.9</b>		<b>0.0</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D101

2020 Combined Demographics Assessment Area: Jackson MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	6	15.8	3,504	8.8	1,654	47.2	8,910	22.3
Moderate	9	23.7	7,028	17.6	1,361	19.4	6,996	17.5
Middle	14	36.8	20,124	50.4	1,772	8.8	8,057	20.2
Upper	8	21.1	9,274	23.2	371	4.0	15,967	40.0
Unknown	1	2.6	0	0.0	0	0.0	0	0.0
Total AA	38	100.0	39,930	100.0	5,158	12.9	39,930	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,780	2,485	5.7	36.7	3,214	47.4	1,081	15.9
Moderate	14,319	6,790	15.6	47.4	5,487	38.3	2,042	14.3
Middle	32,454	23,375	53.7	72.0	5,948	18.3	3,131	9.6
Upper	15,568	10,905	25.0	70.0	2,387	15.3	2,276	14.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	69,121	43,555	100.0	63.0	17,036	24.6	8,530	12.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	548	9.9	442	8.9	102	18.6	4	7.5
Moderate	1,561	28.2	1,339	27.1	213	38.9	9	17.0
Middle	2,270	41.0	2,083	42.1	158	28.9	29	54.7
Upper	1,160	20.9	1,075	21.7	74	13.5	11	20.8
Unknown	4	0.1	4	0.1	0	0.0	0	0.0
Total AA	5,543	100.0	4,943	100.0	547	100.0	53	100.0
Percentage of Total Businesses:				89.2		9.9		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.0	2	1.0	0	0.0	0	0.0
Moderate	7	3.4	7	3.4	0	0.0	0	0.0
Middle	143	68.8	140	68.6	3	75.0	0	0.0
Upper	56	26.9	55	27.0	1	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	208	100.0	204	100.0	4	100.0	0	0.0
Percentage of Total Farms:				98.1		1.9		0.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D102A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Jackson MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	3	23.1	5.3	218	14.2	2.5	0	0.0	2.0	0	0.0	1.0	1.8
Moderate	2	15.4	18.8	134	8.7	13.1	6	42.9	29.7	700	30.6	20.6	23.5
Middle	4	30.8	51.5	357	23.2	53.2	6	42.9	41.8	1,121	49.0	43.4	43.0
Upper	4	30.8	24.4	830	53.9	31.2	1	7.1	26.2	113	4.9	34.8	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	1	7.1	0.3	352	15.4	0.2	0.1
Total	13	100.0	100.0	1,539	100.0	100.0	14	100.0	100.0	2,286	100.0	100.0	100.0
Refinance Loans													
Low	3	5.8	1.7	171	2.6	0.8	0	0.0	0.9	0	0.0	0.4	1.8
Moderate	5	9.6	12.4	543	8.3	8.7	6	24.0	19.5	492	14.5	13.6	23.5
Middle	26	50.0	54.5	3,365	51.6	54.6	10	40.0	44.2	1,018	30.0	44.3	43.0
Upper	18	34.6	31.4	2,447	37.5	35.9	9	36.0	35.2	1,887	55.5	41.5	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	0.1	0.1
Total	52	100.0	100.0	6,526	100.0	100.0	25	100.0	100.0	3,397	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.4	0	0.0	2.1	0	0.0	0.6	0	0.0	0.7	1.8
Moderate	4	10.8	12.7	250	10.3	6.6	7	26.9	17.5	223	10.7	12.6	23.5
Middle	19	51.4	52.2	1,444	59.4	48.9	12	46.2	48.4	1,413	67.6	48.3	43.0
Upper	14	37.8	32.7	736	30.3	42.4	7	26.9	33.4	453	21.7	38.4	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Total	37	100.0	100.0	2,430	100.0	100.0	26	100.0	100.0	2,089	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	26.7	0	0.0	33.2	0	0.0	20.0	0	0.0	57.2	8.3
Moderate	0	0.0	33.3	0	0.0	19.9	0	0.0	50.0	0	0.0	40.6	60.9
Middle	1	100.0	26.7	141	100.0	33.6	0	0.0	20.0	0	0.0	1.2	22.3
Upper	0	0.0	13.3	0	0.0	13.3	0	0.0	0.0	0	0.0	0.0	1.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	10.0	0	0.0	1.0	6.9
Total	1	100.0	100.0	141	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	7	5.7	3.2	427	3.5	2.5	0	0.0	1.5	0	0.0	3.2	1.8
Moderate	14	11.4	15.0	1,220	10.0	10.9	21	26.6	24.7	1,533	17.0	18.9	23.5
Middle	61	49.6	53.2	6,037	49.3	53.3	35	44.3	43.4	4,360	48.3	42.0	43.0
Upper	41	33.3	28.6	4,558	37.2	33.2	22	27.8	30.1	2,776	30.8	35.7	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	1	1.3	0.3	352	3.9	0.2	0.1
Total	123	100.0	100.0	12,242	100.0	100.0	79	100.0	100.0	9,021	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D102B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Jackson MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	1	5.0	1.1	38	2.4	0.4	0	0.0	0.0	0	0.0	0.0	1.8
Moderate	3	15.0	11.6	293	18.2	10.6	2	14.3	17.6	118	9.4	14.6	23.5
Middle	11	55.0	54.7	730	45.5	52.8	7	50.0	44.4	808	64.7	38.1	43.0
Upper	5	25.0	32.6	545	33.9	36.1	5	35.7	37.9	323	25.9	47.2	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	1,606	100.0	100.0	14	100.0	100.0	1,249	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.9	0	0.0	0.5	0	0.0	0.7	0	0.0	0.2	1.8
Moderate	0	0.0	15.9	0	0.0	11.4	0	0.0	15.3	0	0.0	9.8	23.5
Middle	0	0.0	53.3	0	0.0	57.6	0	0.0	53.5	0	0.0	47.6	43.0
Upper	0	0.0	29.9	0	0.0	30.5	0	0.0	29.9	0	0.0	41.8	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.7	0	0.0	0.6	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	10.6	0	0.0	6.1	0	0.0	3.2	0	0.0	1.3	1.8
Moderate	0	0.0	12.8	0	0.0	8.0	0	0.0	25.8	0	0.0	26.4	23.5
Middle	0	0.0	57.4	0	0.0	59.7	0	0.0	35.5	0	0.0	39.0	43.0
Upper	0	0.0	19.1	0	0.0	26.2	0	0.0	35.5	0	0.0	33.3	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table D103A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Jackson MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	4.7	0	0.0	2.3	5.7
Moderate	0	0.0	18.2	0	0.0	12.4	15.6
Middle	5	62.5	51.4	659	59.5	53.4	53.7
Upper	3	37.5	25.6	448	40.5	31.9	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	8	100.0	100.0	1,107	100.0	100.0	100.0
Refinance Loans							
Low	1	2.4	1.2	52	0.8	0.5	5.7
Moderate	9	21.4	9.6	1,727	27.7	6.9	15.6
Middle	21	50.0	54.0	3,110	49.8	52.7	53.7
Upper	11	26.2	35.2	1,352	21.7	39.8	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	42	100.0	100.0	6,241	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.2	0	0.0	1.8	5.7
Moderate	4	18.2	12.2	202	12.1	8.2	15.6
Middle	12	54.5	59.5	818	49.0	62.8	53.7
Upper	6	27.3	25.2	649	38.9	27.2	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	22	100.0	100.0	1,669	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	40.0	0	0.0	43.6	11.2
Moderate	0	0.0	20.0	0	0.0	31.5	43.9
Middle	0	0.0	20.0	0	0.0	1.2	29.0
Upper	0	0.0	20.0	0	0.0	23.7	15.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	1	1.1	2.7	52	0.5	1.7	5.7
Moderate	15	16.5	13.4	1,999	19.3	9.5	15.6
Middle	50	54.9	53.2	5,443	52.6	52.4	53.7
Upper	25	27.5	30.8	2,854	27.6	36.4	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	91	100.0	100.0	10,348	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D103B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Jackson MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	0.9	0	0.0	0.1	5.7
Moderate	2	10.5	13.5	70	5.3	8.6	15.6
Middle	12	63.2	53.2	856	64.3	47.6	53.7
Upper	5	26.3	32.4	405	30.4	43.7	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	1,331	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	5.7
Moderate	0	0.0	22.1	0	0.0	16.5	15.6
Middle	0	0.0	58.9	0	0.0	58.1	53.7
Upper	0	0.0	18.9	0	0.0	25.4	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	4.6	0	0.0	2.7	5.7
Moderate	0	0.0	23.8	0	0.0	17.3	15.6
Middle	0	0.0	51.7	0	0.0	51.0	53.7
Upper	0	0.0	19.9	0	0.0	29.0	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table D104**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Jackson MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	29	15.8	8.9	6,696	17.1	8.7	5	4.0	2.6	1,510	4.2	2.5	3.2
Moderate	64	34.8	26.7	13,667	35.0	38.6	63	50.4	28.5	18,217	50.3	36.7	30.8
Middle	51	27.7	41.7	11,896	30.4	35.6	32	25.6	39.3	9,537	26.3	32.9	37.6
Upper	40	21.7	22.3	6,833	17.5	17.0	17	13.6	24.9	5,062	14.0	19.3	22.6
Unknown	0	0.0	0.0	0	0.0	0.0	8	6.4	4.0	1,875	5.2	8.3	5.8
Total	184	100.0	100.0	39,092	100.0	100.0	125	100.0	100.0	36,201	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

**Table D105**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Jackson MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	39	15.0	9.3	8,301	17.5	12.8	9.9
Moderate	100	38.5	26.9	18,004	37.8	35.3	28.2
Middle	70	26.9	40.6	14,201	29.9	32.3	41.0
Upper	51	19.6	22.9	7,063	14.8	19.4	20.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	260	100.0	100.0	47,569	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.



Table D106A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Jackson MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	2	15.4	8.0	141	9.2	4.4	1	7.1	17.1	85	3.7	9.4	18.7
Moderate	1	7.7	23.6	128	8.3	16.3	1	7.1	26.5	113	4.9	20.4	19.0
Middle	5	38.5	24.9	475	30.9	23.8	6	42.9	21.7	826	36.1	22.7	21.0
Upper	4	30.8	29.6	487	31.6	41.8	3	21.4	20.6	690	30.2	33.0	41.3
Unknown	1	7.7	13.9	308	20.0	13.8	3	21.4	14.1	572	25.0	14.5	0.0
Total	13	100.0	100.0	1,539	100.0	100.0	14	100.0	100.0	2,286	100.0	100.0	100.0
Refinance Loans													
Low	6	11.5	5.6	313	4.8	3.1	4	16.0	17.2	420	12.4	10.6	18.7
Moderate	8	15.4	16.5	735	11.3	11.8	13	52.0	29.3	1,249	36.8	25.5	19.0
Middle	14	26.9	22.3	1,530	23.4	20.1	3	12.0	23.5	621	18.3	23.8	21.0
Upper	19	36.5	39.5	3,424	52.5	48.0	3	12.0	23.5	872	25.7	32.5	41.3
Unknown	5	9.6	16.0	524	8.0	17.0	2	8.0	6.6	235	6.9	7.6	0.0
Total	52	100.0	100.0	6,526	100.0	100.0	25	100.0	100.0	3,397	100.0	100.0	100.0
Home Improvement Loans													
Low	1	2.7	7.2	50	2.1	4.4	4	15.4	15.0	338	16.2	11.2	18.7
Moderate	6	16.2	19.1	261	10.7	16.3	6	23.1	22.9	409	19.6	20.5	19.0
Middle	12	32.4	26.7	791	32.6	22.1	6	23.1	28.0	320	15.3	24.1	21.0
Upper	14	37.8	45.4	1,137	46.8	56.1	7	26.9	32.2	924	44.2	43.3	41.3
Unknown	4	10.8	1.6	191	7.9	1.1	3	11.5	1.9	98	4.7	1.0	0.0
Total	37	100.0	100.0	2,430	100.0	100.0	26	100.0	100.0	2,089	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	9	7.4	6.6	504	4.2	3.7	12	15.2	16.6	1,077	11.9	9.7	18.7
Moderate	18	14.8	19.3	1,179	9.7	13.8	22	27.8	26.6	1,921	21.3	21.8	19.0
Middle	36	29.5	23.3	3,094	25.6	21.7	20	25.3	22.8	2,259	25.0	22.9	21.0
Upper	48	39.3	35.8	6,248	51.6	45.3	17	21.5	23.4	2,859	31.7	33.6	41.3
Unknown	11	9.0	14.9	1,076	8.9	15.5	8	10.1	10.7	905	10.0	12.0	0.0
Total	122	100.0	100.0	12,101	100.0	100.0	79	100.0	100.0	9,021	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table D106B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Jackson MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	10.5	0	0.0	6.9	3	21.4	10.5	234	18.7	5.8	18.7
Moderate	3	15.0	16.8	55	3.4	12.5	2	14.3	15.0	150	12.0	12.7	19.0
Middle	5	25.0	18.9	298	18.6	21.4	5	35.7	23.5	492	39.4	20.1	21.0
Upper	11	55.0	50.5	1,200	74.7	56.3	4	28.6	48.4	373	29.9	59.5	41.3
Unknown	1	5.0	3.2	53	3.3	2.8	0	0.0	2.6	0	0.0	2.0	0.0
Total	20	100.0	100.0	1,606	100.0	100.0	14	100.0	100.0	1,249	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	6.5	0	0.0	4.8	0	0.0	15.3	0	0.0	10.2	18.7
Moderate	0	0.0	17.8	0	0.0	11.4	0	0.0	26.4	0	0.0	21.0	19.0
Middle	0	0.0	26.2	0	0.0	21.9	0	0.0	26.4	0	0.0	19.0	21.0
Upper	0	0.0	46.7	0	0.0	57.9	0	0.0	27.8	0	0.0	40.6	41.3
Unknown	0	0.0	2.8	0	0.0	4.0	0	0.0	4.2	0	0.0	9.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.7
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	41.3
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D107A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Jackson MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	11.3	0	0.0	6.1	22.3
Moderate	1	12.5	26.4	175	15.8	20.3	17.5
Middle	3	37.5	23.0	359	32.4	22.3	20.2
Upper	4	50.0	29.6	573	51.8	41.8	40.0
Unknown	0	0.0	9.7	0	0.0	9.5	0.0
Total	8	100.0	100.0	1,107	100.0	100.0	100.0
Refinance Loans							
Low	9	21.4	4.2	554	8.9	2.1	22.3
Moderate	3	7.1	14.3	212	3.4	10.0	17.5
Middle	9	21.4	22.5	1,109	17.8	19.5	20.2
Upper	19	45.2	42.1	4,044	64.8	50.3	40.0
Unknown	2	4.8	16.9	322	5.2	18.1	0.0
Total	42	100.0	100.0	6,241	100.0	100.0	100.0
Home Improvement Loans							
Low	5	22.7	7.7	280	16.8	4.9	22.3
Moderate	3	13.6	17.6	274	16.4	14.8	17.5
Middle	4	18.2	25.2	222	13.3	26.2	20.2
Upper	10	45.5	48.6	893	53.5	52.9	40.0
Unknown	0	0.0	0.9	0	0.0	1.2	0.0
Total	22	100.0	100.0	1,669	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	16	17.6	6.9	889	8.6	3.6	22.3
Moderate	10	11.0	18.8	871	8.4	13.9	17.5
Middle	21	23.1	22.3	2,010	19.4	20.4	20.2
Upper	40	44.0	37.0	6,178	59.7	46.6	40.0
Unknown	4	4.4	15.1	400	3.9	15.5	0.0
Total	91	100.0	100.0	10,348	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D107B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Jackson MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	2	10.5	5.4	55	4.1	4.0	22.3
Moderate	3	15.8	26.1	210	15.8	19.2	17.5
Middle	5	26.3	20.7	320	24.0	21.9	20.2
Upper	7	36.8	47.7	668	50.2	54.9	40.0
Unknown	2	10.5	0.0	78	5.9	0.0	0.0
Total	19	100.0	100.0	1,331	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	7.4	0	0.0	4.3	22.3
Moderate	0	0.0	18.9	0	0.0	11.7	17.5
Middle	0	0.0	23.2	0	0.0	23.1	20.2
Upper	0	0.0	46.3	0	0.0	54.2	40.0
Unknown	0	0.0	4.2	0	0.0	6.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	22.3
Moderate	0	0.0	0.0	0	0.0	0.0	17.5
Middle	0	0.0	0.0	0	0.0	0.0	20.2
Upper	0	0.0	0.0	0	0.0	0.0	40.0
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table D108**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Jackson MSA													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	66	35.9	45.6	9,771	25.0	27.5	46	36.8	49.7	11,285	31.2	28.7	89.1
Over \$1 Million	81	44.0		24,649	63.1		61	48.8		20,544	56.7		9.9
Revenue Unknown	37	20.1		4,672	12.0		18	14.4		4,372	12.1		1.0
Total	184	100.0		39,092	100.0		125	100.0		36,201	100.0		100.0
By Loan Size													
\$100,000 or Less	77	41.8	92.7	4,556	11.7	34.4	40	32.0	96.1	2,954	8.2	48.1	
\$100,001 -	56	30.4	4.1	9,610	24.6	17.8	31	24.8	1.8	6,057	16.7	11.3	
\$250,001 - \$1	51	27.7	3.2	24,926	63.8	47.9	54	43.2	2.1	27,190	75.1	40.7	
Total	184	100.0	100.0	39,092	100.0	100.0	125	100.0	100.0	36,201	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	39	59.1		2,317	23.7		17	37.0		1,133	10.0		
\$100,001 -	17	25.8		2,789	28.5		13	28.3		2,467	21.9		
\$250,001 - \$1	10	15.2		4,665	47.7		16	34.8		7,685	68.1		
Total	66	100.0		9,771	100.0		46	100.0		11,285	100.0		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table D109**

Table 2-100

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Jackson MSA							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	116	44.6	42.1	11,718	24.6	24.6	89.2
Over \$1 Million	110	42.3		31,692	66.6		9.9
Revenue Unknown	34	13.1		4,159	8.7		1.0
Total	260	100.0		47,569	100.0		100.0
By Loan Size							
\$100,000 or Less	139	53.5	88.3	6,498	13.7	29.8	
\$100,001 - \$250,000	64	24.6	6.4	11,257	23.7	19.9	
\$250,001 - \$1 Million	57	21.9	5.3	29,814	62.7	50.3	
Total	260	100.0	100.0	47,569	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	85	73.3		3,524	30.1		
\$100,001 - \$250,000	21	18.1		3,346	28.6		
\$250,001 - \$1 Million	10	8.6		4,848	41.4		
Total	116	100.0		11,718	100.0		

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Table D110

2022 Combined Demographics Assessment Area: Kalamazoo-Portage MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	6	8.8	3,425	5.5	927	27.1	13,444	21.5
Moderate	17	25.0	13,119	20.9	1,918	14.6	11,488	18.3
Middle	23	33.8	24,426	39.0	1,307	5.4	12,327	19.7
Upper	21	30.9	21,569	34.4	986	4.6	25,405	40.5
Unknown	1	1.5	125	0.2	79	63.2	0	0.0
<b>Total AA</b>	<b>68</b>	<b>100.0</b>	<b>62,664</b>	<b>100.0</b>	<b>5,217</b>	<b>8.3</b>	<b>62,664</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	7,630	1,880	2.8	24.6	4,427	58.0	1,323	17.3
Moderate	26,160	12,400	18.4	47.4	11,618	44.4	2,142	8.2
Middle	44,697	28,681	42.6	64.2	13,362	29.9	2,654	5.9
Upper	32,329	24,212	36.0	74.9	6,246	19.3	1,871	5.8
Unknown	1,769	82	0.1	4.6	1,370	77.4	317	17.9
<b>Total AA</b>	<b>112,585</b>	<b>67,255</b>	<b>100.0</b>	<b>59.7</b>	<b>37,023</b>	<b>32.9</b>	<b>8,307</b>	<b>7.4</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	624	6.4	532	6.1	90	9.7	2	2.6
Moderate	1,816	18.7	1,635	18.8	167	18.0	14	18.4
Middle	4,013	41.3	3,599	41.3	384	41.4	30	39.5
Upper	3,216	33.1	2,900	33.3	286	30.8	30	39.5
Unknown	39	0.4	38	0.4	1	0.1	0	0.0
<b>Total AA</b>	<b>9,708</b>	<b>100.0</b>	<b>8,704</b>	<b>100.0</b>	<b>928</b>	<b>100.0</b>	<b>76</b>	<b>100.0</b>
Percentage of Total Businesses:				89.7		9.6		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	0.9	2	1.0	0	0.0	0	0.0
Moderate	30	14.1	24	12.4	6	30.0	0	0.0
Middle	103	48.4	96	49.7	7	35.0	0	0.0
Upper	78	36.6	71	36.8	7	35.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>213</b>	<b>100.0</b>	<b>193</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				90.6		9.4		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D111

2021 Combined Demographics								
Assessment Area: Kalamazoo-Portage MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	12.3	4,549	7.5	1,812	39.8	13,136	21.7
Moderate	11	19.3	7,582	12.5	1,342	17.7	10,337	17.1
Middle	24	42.1	29,446	48.7	2,718	9.2	12,245	20.3
Upper	14	24.6	18,759	31.0	823	4.4	24,720	40.9
Unknown	1	1.8	102	0.2	51	50.0	0	0.0
Total AA	57	100.0	60,438	100.0	6,746	11.2	60,438	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	12,207	3,153	4.9	25.8	6,969	57.1	2,085	17.1
Moderate	17,169	7,111	11.1	41.4	8,159	47.5	1,899	11.1
Middle	52,290	32,604	50.7	62.4	15,645	29.9	4,041	7.7
Upper	28,119	21,384	33.3	76.0	4,973	17.7	1,762	6.3
Unknown	411	50	0.1	12.2	293	71.3	68	16.5
Total AA	110,196	64,302	100.0	58.4	36,039	32.7	9,855	8.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	795	8.2	688	7.9	106	11.2	1	1.4
Moderate	1,989	20.5	1,688	19.4	285	30.2	16	21.6
Middle	4,460	45.9	4,034	46.4	394	41.7	32	43.2
Upper	2,418	24.9	2,238	25.8	155	16.4	25	33.8
Unknown	46	0.5	41	0.5	5	0.5	0	0.0
Total AA	9,708	100.0	8,689	100.0	945	100.0	74	100.0
Percentage of Total Businesses:				89.5		9.7		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.5	1	0.5	0	0.0	0	0.0
Moderate	26	12.1	19	9.8	7	35.0	0	0.0
Middle	126	58.9	115	59.6	10	50.0	1	100.0
Upper	61	28.5	58	30.1	3	15.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	214	100.0	193	100.0	20	100.0	1	100.0
Percentage of Total Farms:				90.2		9.3		0.5
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D112

2020 Combined Demographics Assessment Area: Kalamazoo-Portage MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	12.3	4,549	7.5	1,812	39.8	13,136	21.7
Moderate	11	19.3	7,582	12.5	1,342	17.7	10,337	17.1
Middle	24	42.1	29,446	48.7	2,718	9.2	12,245	20.3
Upper	14	24.6	18,759	31.0	823	4.4	24,720	40.9
Unknown	1	1.8	102	0.2	51	50.0	0	0.0
<b>Total AA</b>	<b>57</b>	<b>100.0</b>	<b>60,438</b>	<b>100.0</b>	<b>6,746</b>	<b>11.2</b>	<b>60,438</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	12,207	3,153	4.9	25.8	6,969	57.1	2,085	17.1
Moderate	17,169	7,111	11.1	41.4	8,159	47.5	1,899	11.1
Middle	52,290	32,604	50.7	62.4	15,645	29.9	4,041	7.7
Upper	28,119	21,384	33.3	76.0	4,973	17.7	1,762	6.3
Unknown	411	50	0.1	12.2	293	71.3	68	16.5
<b>Total AA</b>	<b>110,196</b>	<b>64,302</b>	<b>100.0</b>	<b>58.4</b>	<b>36,039</b>	<b>32.7</b>	<b>9,855</b>	<b>8.9</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	793	8.0	681	7.7	111	11.5	1	1.4
Moderate	2,014	20.3	1,717	19.3	281	29.0	16	22.2
Middle	4,572	46.1	4,122	46.4	421	43.4	29	40.3
Upper	2,496	25.2	2,318	26.1	152	15.7	26	36.1
Unknown	42	0.4	38	0.4	4	0.4	0	0.0
<b>Total AA</b>	<b>9,917</b>	<b>100.0</b>	<b>8,876</b>	<b>100.0</b>	<b>969</b>	<b>100.0</b>	<b>72</b>	<b>100.0</b>
Percentage of Total Businesses:				<b>89.5</b>		<b>9.8</b>		<b>0.7</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.5	1	0.5	0	0.0	0	0.0
Moderate	26	11.8	17	8.7	9	37.5	0	0.0
Middle	128	58.2	115	59.0	12	50.0	1	100.0
Upper	65	29.5	62	31.8	3	12.5	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>220</b>	<b>100.0</b>	<b>195</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
Percentage of Total Farms:				<b>88.6</b>		<b>10.9</b>		<b>0.5</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



Table D 113A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Kalamazoo-Portage MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	5.2	0	0.0	2.6	0	0.0	5.6	0	0.0	2.2	2.8
Moderate	2	20.0	15.0	587	27.6	9.8	2	50.0	25.0	233	38.4	16.0	18.4
Middle	5	50.0	47.7	845	39.8	42.6	1	25.0	36.7	174	28.7	36.2	42.6
Upper	3	30.0	32.0	691	32.5	44.9	1	25.0	32.5	200	32.9	45.3	36.0
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	0.1
Total	10	100.0	100.0	2,123	100.0	100.0	4	100.0	100.0	607	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.8	0	0.0	1.0	2	7.7	1.9	184	4.8	1.1	2.8
Moderate	2	5.0	8.8	150	2.6	5.7	4	15.4	17.7	282	7.4	12.2	18.4
Middle	20	50.0	49.5	2,453	43.1	42.6	11	42.3	41.8	1,774	46.5	38.1	42.6
Upper	18	45.0	39.8	3,088	54.3	50.7	9	34.6	38.7	1,579	41.3	48.6	36.0
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1
Total	40	100.0	100.0	5,691	100.0	100.0	26	100.0	100.0	3,819	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.0	0	0.0	2.2	0	0.0	2.1	0	0.0	2.1	2.8
Moderate	3	21.4	9.7	142	15.1	6.7	3	21.4	15.0	286	19.1	11.0	18.4
Middle	7	50.0	46.9	473	50.2	43.1	4	28.6	38.3	386	25.8	36.5	42.6
Upper	4	28.6	40.4	327	34.7	47.9	7	50.0	44.7	825	55.1	50.4	36.0
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	0.1
Total	14	100.0	100.0	942	100.0	100.0	14	100.0	100.0	1,497	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	10.8	0	0.0	5.7	0	0.0	14.0	0	0.0	11.7	12.4
Moderate	0	0.0	32.4	0	0.0	36.9	0	0.0	23.3	0	0.0	10.6	26.0
Middle	0	0.0	35.1	0	0.0	32.7	0	0.0	39.5	0	0.0	62.7	40.0
Upper	0	0.0	21.6	0	0.0	24.7	0	0.0	14.0	0	0.0	9.7	16.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	9.3	0	0.0	5.2	4.8
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	1.3	3.1	100	1.0	1.9	3	5.4	3.7	284	3.4	2.9	2.8
Moderate	7	9.2	11.1	879	8.8	9.3	11	19.6	20.7	836	10.0	14.1	18.4
Middle	40	52.6	48.5	4,358	43.5	41.9	22	39.3	38.8	3,818	45.9	39.7	42.6
Upper	28	36.8	37.1	4,688	46.8	46.7	20	35.7	36.5	3,389	40.7	42.7	36.0
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.7	0.1
Total	76	100.0	100.0	10,025	100.0	100.0	56	100.0	100.0	8,327	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D 113B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Kalamazoo-Portage MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	1	8.3	2.5	100	7.9	2.1	1	8.3	2.1	100	4.2	0.7	2.8
Moderate	0	0.0	9.6	0	0.0	6.7	2	16.7	10.2	35	1.5	5.2	18.4
Middle	8	66.7	48.2	587	46.3	44.9	6	50.0	42.6	1,484	61.7	41.9	42.6
Upper	3	25.0	39.6	582	45.9	46.3	3	25.0	45.1	785	32.7	52.2	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	1,269	100.0	100.0	12	100.0	100.0	2,404	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.8	0	0.0	1.2	0	0.0	0.8	0	0.0	0.4	2.8
Moderate	0	0.0	11.3	0	0.0	7.3	0	0.0	17.1	0	0.0	15.0	18.4
Middle	0	0.0	38.3	0	0.0	30.0	0	0.0	43.0	0	0.0	43.9	42.6
Upper	0	0.0	47.5	0	0.0	61.4	0	0.0	39.1	0	0.0	40.6	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	4.2	0	0.0	2.9	0	0.0	0.0	0	0.0	0.0	2.8
Moderate	0	0.0	13.9	0	0.0	8.6	0	0.0	39.0	0	0.0	26.3	18.4
Middle	0	0.0	59.7	0	0.0	54.0	0	0.0	28.8	0	0.0	29.0	42.6
Upper	0	0.0	22.2	0	0.0	34.4	0	0.0	32.2	0	0.0	44.7	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D114A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Kalamazoo-Portage MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	0	0.0	4.5	0	0.0	2.4	4.9
Moderate	0	0.0	13.0	0	0.0	8.5	11.1
Middle	5	62.5	49.1	807	56.3	44.4	50.7
Upper	3	37.5	33.3	627	43.7	44.7	33.3
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Total	8	100.0	100.0	1,434	100.0	100.0	100.0
Refinance Loans							
Low	1	5.3	1.4	89	3.0	0.8	4.9
Moderate	3	15.8	7.0	373	12.5	4.4	11.1
Middle	10	52.6	46.9	1,622	54.4	39.8	50.7
Upper	5	26.3	44.6	897	30.1	54.8	33.3
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Total	19	100.0	100.0	2,981	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.5	0	0.0	1.2	4.9
Moderate	0	0.0	7.3	0	0.0	5.2	11.1
Middle	1	50.0	45.9	50	25.0	38.2	50.7
Upper	1	50.0	44.1	150	75.0	55.4	33.3
Unknown	0	0.0	0.1	0	0.0	0.0	0.1
Total	2	100.0	100.0	200	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	6.9	0	0.0	3.7	20.2
Moderate	0	0.0	17.2	0	0.0	4.0	19.0
Middle	0	0.0	48.3	0	0.0	57.9	47.3
Upper	0	0.0	27.6	0	0.0	34.5	12.3
Unknown	0	0.0	0.0	0	0.0	0.0	1.3
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	1	2.8	2.6	89	1.6	1.6	4.9
Moderate	3	8.3	9.2	373	6.6	5.9	11.1
Middle	19	52.8	48.0	2,837	49.9	42.8	50.7
Upper	13	36.1	40.1	2,388	42.0	49.6	33.3
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Total	36	100.0	100.0	5,687	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D114B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Kalamazoo-Portage MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	2.2	0	0.0	1.8	4.9
Moderate	0	0.0	7.8	0	0.0	5.4	11.1
Middle	3	42.9	48.7	358	33.4	47.8	50.7
Upper	4	57.1	41.2	714	66.6	45.0	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	1,072	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.7	0	0.0	0.2	4.9
Moderate	0	0.0	7.4	0	0.0	4.5	11.1
Middle	0	0.0	57.0	0	0.0	46.2	50.7
Upper	0	0.0	34.8	0	0.0	49.0	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	4.5	0	0.0	2.1	4.9
Moderate	0	0.0	13.8	0	0.0	10.2	11.1
Middle	0	0.0	61.6	0	0.0	55.2	50.7
Upper	0	0.0	20.1	0	0.0	32.6	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table D115**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Kalamazoo-Portage MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	3	3.8	8.1	535	3.4	9.4	3	5.9	7.7	323	2.4	9.3	6.4
Moderate	31	38.8	17.5	8,334	53.6	20.1	9	17.6	16.8	3,244	23.7	13.9	18.7
Middle	28	35.0	45.8	3,741	24.1	48.3	22	43.1	38.6	5,941	43.5	43.8	41.3
Upper	18	22.5	28.0	2,941	18.9	22.1	17	33.3	36.1	4,151	30.4	32.1	33.1
Unknown	0	0.0	0.2	0	0.0	0.0	0	0.0	0.3	0	0.0	0.7	0.4
Total	80	100.0	100.0	15,551	100.0	100.0	51	100.0	100.0	13,659	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

**Table D 116**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Kalamazoo-Portage MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
	#	#%	#%	\$(000)	\$%	\$%	
Low	16	12.5	7.8	1,633	6.9	8.2	8.0
Moderate	43	33.6	20.2	10,617	44.7	21.3	20.3
Middle	48	37.5	44.2	7,809	32.9	45.5	46.1
Upper	21	16.4	27.4	3,679	15.5	24.9	25.2
Unknown	0	0.0	0.2	0	0.0	0.1	0.4
Total	128	100.0	100.0	23,738	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Table D117A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Kalamazoo-Portage MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	3	30.0	11.5	275	13.0	6.0	2	50.0	11.2	233	38.4	6.0	21.5
Moderate	3	30.0	23.6	786	37.0	17.3	0	0.0	21.4	0	0.0	16.0	18.3
Middle	1	10.0	23.8	261	12.3	22.2	1	25.0	20.9	174	28.7	20.4	19.7
Upper	2	20.0	30.1	587	27.6	43.6	0	0.0	28.7	0	0.0	44.0	40.5
Unknown	1	10.0	11.0	214	10.1	10.9	1	25.0	17.8	200	32.9	13.6	0.0
Total	10	100.0	100.0	2,123	100.0	100.0	4	100.0	100.0	607	100.0	100.0	100.0
Refinance Loans													
Low	6	15.0	9.0	544	9.6	4.8	5	19.2	14.7	250	6.5	8.5	21.5
Moderate	15	37.5	20.5	1,838	32.3	14.6	9	34.6	23.8	1,053	27.6	18.8	18.3
Middle	7	17.5	23.8	888	15.6	20.7	5	19.2	23.3	828	21.7	21.4	19.7
Upper	8	20.0	35.6	1,806	31.7	48.6	7	26.9	31.0	1,688	44.2	42.6	40.5
Unknown	4	10.0	11.1	615	10.8	11.3	0	0.0	7.3	0	0.0	8.6	0.0
Total	40	100.0	100.0	5,691	100.0	100.0	26	100.0	100.0	3,819	100.0	100.0	100.0
Home Improvement Loans													
Low	2	14.3	10.2	127	13.5	7.4	2	14.3	11.0	236	15.8	7.7	21.5
Moderate	6	42.9	19.9	448	47.6	15.2	2	14.3	21.9	300	20.0	16.9	18.3
Middle	2	14.3	22.4	40	4.2	21.5	7	50.0	24.1	611	40.8	21.3	19.7
Upper	4	28.6	45.1	327	34.7	53.2	3	21.4	39.8	350	23.4	50.8	40.5
Unknown	0	0.0	2.4	0	0.0	2.7	0	0.0	3.2	0	0.0	3.3	0.0
Total	14	100.0	100.0	942	100.0	100.0	14	100.0	100.0	1,497	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	14	18.4	10.0	1,191	11.9	5.4	10	17.9	12.1	745	8.9	6.8	21.5
Moderate	27	35.5	21.3	3,179	31.7	15.7	15	26.8	22.0	1,829	22.0	16.8	18.3
Middle	14	18.4	23.5	1,750	17.5	21.3	17	30.4	22.0	1,942	23.3	20.7	19.7
Upper	16	21.1	34.5	3,076	30.7	46.6	11	19.6	31.6	2,211	26.6	44.3	40.5
Unknown	5	6.6	10.7	829	8.3	11.1	3	5.4	12.3	1,600	19.2	11.5	0.0
Total	76	100.0	100.0	10,025	100.0	100.0	56	100.0	100.0	8,327	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table D117B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Kalamazoo-Portage MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	3	25.0	13.2	245	19.3	8.9	1	8.3	11.6	26	1.1	6.7	21.5
Moderate	3	25.0	19.3	107	8.4	12.9	4	33.3	21.3	476	19.8	15.4	18.3
Middle	4	33.3	19.6	561	44.2	17.5	4	33.3	22.7	329	13.7	19.5	19.7
Upper	2	16.7	43.9	356	28.1	55.7	1	8.3	41.4	173	7.2	56.3	40.5
Unknown	0	0.0	3.9	0	0.0	5.0	2	16.7	3.0	1,400	58.2	2.1	0.0
Total	12	100.0	100.0	1,269	100.0	100.0	12	100.0	100.0	2,404	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	10.6	0	0.0	6.4	0	0.0	10.5	0	0.0	6.4	21.5
Moderate	0	0.0	14.9	0	0.0	9.7	0	0.0	21.3	0	0.0	16.8	18.3
Middle	0	0.0	27.0	0	0.0	20.9	0	0.0	22.9	0	0.0	19.7	19.7
Upper	0	0.0	43.3	0	0.0	59.2	0	0.0	42.6	0	0.0	54.2	40.5
Unknown	0	0.0	4.3	0	0.0	3.7	0	0.0	2.7	0	0.0	2.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.5
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.3
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	40.5
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D118A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Kalamazoo-Portage MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	1	12.5	14.5	77	5.4	8.3	21.7
Moderate	1	12.5	25.6	135	9.4	19.8	17.1
Middle	3	37.5	21.9	472	32.9	21.9	20.3
Upper	2	25.0	27.0	544	37.9	39.2	40.9
Unknown	1	12.5	11.0	206	14.4	10.7	0.0
Total	8	100.0	100.0	1,434	100.0	100.0	100.0
Refinance Loans							
Low	3	15.8	7.5	265	8.9	3.8	21.7
Moderate	5	26.3	17.1	707	23.7	11.7	17.1
Middle	6	31.6	23.3	846	28.4	19.9	20.3
Upper	3	15.8	39.1	822	27.6	51.0	40.9
Unknown	2	10.5	13.0	341	11.4	13.6	0.0
Total	19	100.0	100.0	2,981	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	11.6	0	0.0	7.5	21.7
Moderate	1	50.0	18.6	150	75.0	14.4	17.1
Middle	0	0.0	22.7	0	0.0	19.3	20.3
Upper	0	0.0	43.9	0	0.0	55.7	40.9
Unknown	1	50.0	3.2	50	25.0	3.1	0.0
Total	2	100.0	100.0	200	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	4	11.1	10.2	342	6.0	5.6	21.7
Moderate	9	25.0	20.0	1,106	19.4	14.7	17.1
Middle	10	27.8	22.3	1,418	24.9	20.4	20.3
Upper	8	22.2	34.7	2,124	37.3	46.3	40.9
Unknown	5	13.9	12.8	697	12.3	13.0	0.0
Total	36	100.0	100.0	5,687	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							



Table D118B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Kalamazoo-Portage MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	14.5	0	0.0	11.6	21.7
Moderate	2	28.6	21.4	114	10.6	15.8	17.1
Middle	1	14.3	19.2	100	9.3	19.8	20.3
Upper	3	42.9	43.5	758	70.7	50.7	40.9
Unknown	1	14.3	1.4	100	9.3	2.0	0.0
Total	7	100.0	100.0	1,072	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	11.9	0	0.0	4.9	21.7
Moderate	0	0.0	20.0	0	0.0	12.2	17.1
Middle	0	0.0	25.2	0	0.0	18.3	20.3
Upper	0	0.0	37.8	0	0.0	59.7	40.9
Unknown	0	0.0	5.2	0	0.0	4.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.4	0	0.0	0.2	21.7
Moderate	0	0.0	0.0	0	0.0	0.0	17.1
Middle	0	0.0	0.0	0	0.0	0.0	20.3
Upper	0	0.0	0.4	0	0.0	0.8	40.9
Unknown	0	0.0	99.1	0	0.0	99.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D119

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Kalamazoo-Portage MSA													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	34	42.5	47.8	5,674	36.5	30.4	15	29.4	50.1	2,362	17.3	32.5	89.7
Over \$1 Million	33	41.3		7,150	46.0		32	62.7		10,475	76.7		9.6
Revenue Unknown	13	16.3		2,727	17.5		4	7.8		822	6.0		0.8
Total	80	100.0		15,551	100.0		51	100.0		13,659	100.0		100.0
By Loan Size													
\$100,000 or Less	41	51.3	86.9	2,151	13.8	26.0	18	35.3	91.9	1,097	8.0	30.7	
\$100,001 - \$250,000	21	26.3	7.1	3,842	24.7	19.5	17	33.3	3.8	3,404	24.9	14.7	
\$250,001 - \$1 Million	18	22.5	5.9	9,558	61.5	54.4	16	31.4	4.2	9,158	67.0	54.5	
Total	80	100.0	100.0	15,551	100.0	100.0	51	100.0	100.0	13,659	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	25	73.5		1,135	20.0		11	73.3		662	28.0		
\$100,001 - \$250,000	3	8.8		556	9.8		2	13.3		350	14.8		
\$250,001 - \$1 Million	6	17.6		3,983	70.2		2	13.3		1,350	57.2		
Total	34	100.0		5,674	100.0		15	100.0		2,362	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D120

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Kalamazoo-Portage MSA							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	62	48.4	36.9	8,526	35.9	26.5	89.5
Over \$1 Million	45	35.2		10,988	46.3		9.8
Revenue Unknown	21	16.4		4,224	17.8		0.7
Total	128	100.0		23,738	100.0		100.0
By Loan Size							
\$100,000 or Less	74	57.8	81.2	3,388	14.3	23.2	
\$100,001 - \$250,000	23	18.0	10.3	3,956	16.7	20.9	
\$250,001 - \$1 Million	31	24.2	8.5	16,394	69.1	55.8	
Total	128	100.0	100.0	23,738	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	46	74.2		1,933	22.7		
\$100,001 - \$250,000	7	11.3		1,186	13.9		
\$250,001 - \$1 Million	9	14.5		5,407	63.4		
Total	62	100.0		8,526	100.0		
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D121

2022 Combined Demographics								
Assessment Area: Lansing-East Lansing Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	5.1	3,827	3.4	1,317	34.4	22,238	20.0
Moderate	26	19.1	18,104	16.3	2,789	15.4	18,899	17.0
Middle	57	41.9	51,512	46.3	3,315	6.4	24,193	21.8
Upper	34	25.0	37,477	33.7	1,237	3.3	45,827	41.2
Unknown	12	8.8	237	0.2	73	30.8	0	0.0
Total AA	136	100.0	111,157	100.0	8,731	7.9	111,157	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,171	3,136	2.5	34.2	4,614	50.3	1,421	15.5
Moderate	39,788	17,590	14.1	44.2	17,917	45.0	4,281	10.8
Middle	92,813	59,391	47.8	64.0	27,450	29.6	5,972	6.4
Upper	57,931	44,046	35.4	76.0	11,565	20.0	2,320	4.0
Unknown	3,911	193	0.2	4.9	2,995	76.6	723	18.5
Total AA	203,614	124,356	100.0	61.1	64,541	31.7	14,717	7.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	972	5.4	855	5.2	113	7.8	4	2.0
Moderate	3,551	19.6	3,142	19.0	355	24.4	54	26.6
Middle	7,829	43.1	7,132	43.2	619	42.5	78	38.4
Upper	5,264	29.0	4,885	29.6	320	22.0	59	29.1
Unknown	547	3.0	490	3.0	49	3.4	8	3.9
Total AA	18,163	100.0	16,504	100.0	1,456	100.0	203	100.0
Percentage of Total Businesses:				90.9		8.0		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	3	0.5	3	0.5	0	0.0	0	0.0
Moderate	20	3.1	20	3.2	0	0.0	0	0.0
Middle	380	59.8	370	59.7	9	64.3	1	100.0
Upper	227	35.7	224	36.1	3	21.4	0	0.0
Unknown	5	0.8	3	0.5	2	14.3	0	0.0
Total AA	635	100.0	620	100.0	14	100.0	1	100.0
Percentage of Total Farms:				97.6		2.2		0.2
Source: 2022 FFIEC Census Data								
2022 Dun & Bradstreet Data								
2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D122

2021 Combined Demographics Assessment Area: Lansing-East Lansing Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	6.9	4,657	4.3	1,915	41.1	22,380	20.5
Moderate	27	20.6	20,408	18.7	4,562	22.4	18,724	17.1
Middle	52	39.7	47,500	43.4	3,542	7.5	22,161	20.3
Upper	34	26.0	36,654	33.5	1,799	4.9	46,107	42.2
Unknown	9	6.9	153	0.1	62	40.5	0	0.0
<b>Total AA</b>	<b>131</b>	<b>100.0</b>	<b>109,372</b>	<b>100.0</b>	<b>11,880</b>	<b>10.9</b>	<b>109,372</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	13,332	2,713	2.3	20.3	8,280	62.1	2,339	17.5
Moderate	42,742	19,909	16.9	46.6	17,972	42.0	4,861	11.4
Middle	81,195	53,434	45.3	65.8	21,535	26.5	6,226	7.7
Upper	60,959	41,804	35.4	68.6	15,927	26.1	3,228	5.3
Unknown	1,483	156	0.1	10.5	1,177	79.4	150	10.1
<b>Total AA</b>	<b>199,711</b>	<b>118,016</b>	<b>100.0</b>	<b>59.1</b>	<b>64,891</b>	<b>32.5</b>	<b>16,804</b>	<b>8.4</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,327	7.3	1,128	6.9	192	12.9	7	3.4
Moderate	3,551	19.6	3,154	19.2	345	23.1	52	25.2
Middle	6,602	36.4	6,077	37.0	443	29.7	82	39.8
Upper	6,265	34.5	5,731	34.9	477	31.9	57	27.7
Unknown	399	2.2	354	2.2	37	2.5	8	3.9
<b>Total AA</b>	<b>18,144</b>	<b>100.0</b>	<b>16,444</b>	<b>100.0</b>	<b>1,494</b>	<b>100.0</b>	<b>206</b>	<b>100.0</b>
Percentage of Total Businesses:				90.6		8.2		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4	0.6	4	0.6	0	0.0	0	0.0
Moderate	23	3.6	23	3.7	0	0.0	0	0.0
Middle	410	64.6	401	64.6	8	61.5	1	100.0
Upper	192	30.2	189	30.4	3	23.1	0	0.0
Unknown	6	0.9	4	0.6	2	15.4	0	0.0
<b>Total AA</b>	<b>635</b>	<b>100.0</b>	<b>621</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
Percentage of Total Farms:				97.8		2.0		0.2
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D123

2020 Combined Demographics								
Assessment Area: Lansing-East Lansing Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	6.9	4,657	4.3	1,915	41.1	22,380	20.5
Moderate	27	20.6	20,408	18.7	4,562	22.4	18,724	17.1
Middle	52	39.7	47,500	43.4	3,542	7.5	22,161	20.3
Upper	34	26.0	36,654	33.5	1,799	4.9	46,107	42.2
Unknown	9	6.9	153	0.1	62	40.5	0	0.0
Total AA	131	100.0	109,372	100.0	11,880	10.9	109,372	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	13,332	2,713	2.3	20.3	8,280	62.1	2,339	17.5
Moderate	42,742	19,909	16.9	46.6	17,972	42.0	4,861	11.4
Middle	81,195	53,434	45.3	65.8	21,535	26.5	6,226	7.7
Upper	60,959	41,804	35.4	68.6	15,927	26.1	3,228	5.3
Unknown	1,483	156	0.1	10.5	1,177	79.4	150	10.1
Total AA	199,711	118,016	100.0	59.1	64,891	32.5	16,804	8.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,314	7.2	1,115	6.7	193	12.4	6	3.0
Moderate	3,575	19.5	3,168	19.1	356	22.9	51	25.9
Middle	6,734	36.7	6,180	37.3	475	30.5	79	40.1
Upper	6,301	34.4	5,752	34.7	495	31.8	54	27.4
Unknown	405	2.2	360	2.2	38	2.4	7	3.6
Total AA	18,329	100.0	16,575	100.0	1,557	100.0	197	100.0
Percentage of Total Businesses:				90.4		8.5		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	5	0.7	5	0.8	0	0.0	0	0.0
Moderate	23	3.4	23	3.5	0	0.0	0	0.0
Middle	433	64.4	424	64.4	8	61.5	1	100.0
Upper	205	30.5	202	30.7	3	23.1	0	0.0
Unknown	6	0.9	4	0.6	2	15.4	0	0.0
Total AA	672	100.0	658	100.0	13	100.0	1	100.0
Percentage of Total Farms:				97.9		1.9		0.1
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D124A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Lansing-East Lansing Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%%	#	#%	#%	\$(000)	%	%%	
Home Purchase Loans													
Low	0	0.0	3.6	0	0.0	1.8	1	9.1	3.6	111	8.1	1.7	2.5
Moderate	7	53.8	20.7	1,256	53.0	12.9	5	45.5	19.2	574	42.1	12.4	14.1
Middle	4	30.8	42.2	585	24.7	40.5	4	36.4	47.0	471	34.6	44.1	47.8
Upper	2	15.4	33.3	529	22.3	44.5	1	9.1	29.9	206	15.1	41.5	35.4
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0.2
Total	13	100.0	100.0	2,370	100.0	100.0	11	100.0	100.0	1,362	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.1	0	0.0	0.6	0	0.0	2.2	0	0.0	1.1	2.5
Moderate	7	31.8	11.5	538	21.8	6.9	5	25.0	12.5	472	16.9	8.1	14.1
Middle	8	36.4	44.3	885	35.8	41.2	8	40.0	51.6	1,077	38.6	48.9	47.8
Upper	7	31.8	42.9	1,047	42.4	51.1	7	35.0	33.7	1,242	44.5	41.8	35.4
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0.2
Total	22	100.0	100.0	2,470	100.0	100.0	20	100.0	100.0	2,791	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.4	0	0.0	0.6	0	0.0	2.6	0	0.0	1.6	2.5
Moderate	1	9.1	15.4	20	2.0	9.6	1	7.1	11.2	16	1.6	7.9	14.1
Middle	5	45.5	44.6	415	41.7	43.6	4	28.6	49.4	240	24.2	45.9	47.8
Upper	5	45.5	38.6	561	56.3	46.2	9	64.3	36.6	735	74.2	43.7	35.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	0	0.0	0.9	0.2
Total	11	100.0	100.0	996	100.0	100.0	14	100.0	100.0	991	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	14.6	0	0.0	13.4	0	0.0	8.8	0	0.0	2.9	3.6
Moderate	0	0.0	33.7	0	0.0	17.7	0	0.0	25.0	0	0.0	23.3	24.0
Middle	1	100.0	27.0	11,593	100.0	34.8	0	0.0	45.6	0	0.0	28.6	44.7
Upper	0	0.0	23.6	0	0.0	33.9	1	100.0	10.3	7,750	100.0	16.3	20.2
Unknown	0	0.0	1.1	0	0.0	0.2	0	0.0	10.3	0	0.0	29.0	7.5
Total	1	100.0	100.0	11,593	100.0	100.0	1	100.0	100.0	7,750	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	2.2	0	0.0	2.6	1	1.8	2.9	111	0.8	1.7	2.5
Moderate	16	28.1	15.1	1,902	10.2	10.6	12	21.4	15.7	1,162	8.1	12.7	14.1
Middle	22	38.6	43.4	13,952	75.0	40.2	21	37.5	48.3	2,411	16.8	42.8	47.8
Upper	19	33.3	39.2	2,750	14.8	46.4	21	37.5	32.8	10,617	74.2	38.4	35.4
Unknown	0	0.0	0.2	0	0.0	0.2	1	1.8	0.2	11	0.1	4.5	0.2
Total	57	100.0	100.0	18,604	100.0	100.0	56	100.0	100.0	14,312	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D124B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Lansing-East Lansing Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	1.6	0	0.0	1.2	0	0.0	1.2	0	0.0	0.8	2.5
Moderate	1	10.0	10.5	88	7.5	6.5	1	10.0	9.0	100	7.1	5.8	14.1
Middle	4	40.0	40.4	474	40.3	37.9	5	50.0	45.0	623	43.9	40.2	47.8
Upper	5	50.0	47.3	613	52.2	54.2	3	30.0	44.7	684	48.2	53.1	35.4
Unknown	0	0.0	0.2	0	0.0	0.2	1	10.0	0.1	11	0.8	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	1,175	100.0	100.0	10	100.0	100.0	1,418	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.5	0	0.0	0.3	0	0.0	0.8	0	0.0	0.9	2.5
Moderate	0	0.0	13.1	0	0.0	6.3	0	0.0	9.2	0	0.0	6.9	14.1
Middle	0	0.0	51.6	0	0.0	44.1	0	0.0	56.2	0	0.0	50.5	47.8
Upper	0	0.0	34.7	0	0.0	49.2	0	0.0	33.7	0	0.0	41.8	35.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	7.5	0	0.0	3.0	0	0.0	8.8	0	0.0	3.2	2.5
Moderate	0	0.0	22.6	0	0.0	14.8	0	0.0	18.8	0	0.0	10.3	14.1
Middle	0	0.0	51.9	0	0.0	56.5	0	0.0	50.0	0	0.0	47.1	47.8
Upper	0	0.0	17.9	0	0.0	25.8	0	0.0	22.5	0	0.0	39.4	35.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D125A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Lansing-East Lansing Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	2.8	0	0.0	1.3	2.3
Moderate	2	33.3	18.9	141	16.3	11.7	16.9
Middle	2	33.3	44.0	334	38.6	41.8	45.3
Upper	2	33.3	34.1	390	45.1	44.8	35.4
Unknown	0	0.0	0.3	0	0.0	0.3	0.1
Total	6	100.0	100.0	865	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.8	0	0.0	0.4	2.3
Moderate	2	14.3	8.2	201	13.1	4.6	16.9
Middle	4	28.6	42.2	508	33.2	38.4	45.3
Upper	8	57.1	48.7	823	53.7	56.4	35.4
Unknown	0	0.0	0.2	0	0.0	0.2	0.1
Total	14	100.0	100.0	1,532	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.6	0	0.0	1.3	2.3
Moderate	1	14.3	12.3	88	21.3	8.1	16.9
Middle	3	42.9	41.8	184	44.6	36.5	45.3
Upper	3	42.9	44.1	141	34.1	53.8	35.4
Unknown	0	0.0	0.2	0	0.0	0.3	0.1
Total	7	100.0	100.0	413	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	14.1	0	0.0	12.8	
Moderate	0	0.0	25.4	0	0.0	10.4	21.7
Middle	0	0.0	43.7	0	0.0	49.5	33.2
Upper	0	0.0	16.9	0	0.0	27.3	28.2
Unknown	0	0.0	0.0	0	0.0	0.0	2.2
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	1.6	0	0.0	1.7	
Moderate	7	21.2	12.6	557	17.1	7.7	16.9
Middle	10	30.3	42.6	1,086	33.4	40.4	45.3
Upper	16	48.5	42.9	1,609	49.5	49.9	35.4
Unknown	0	0.0	0.2	0	0.0	0.2	0.1
Total	33	100.0	100.0	3,252	100.0	100.0	100.0

Source: 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.



Table D125B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Lansing-East Lansing Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Other Purpose Lines of Credit							
Low	0	0.0	0.9	0	0.0	0.5	2.3
Moderate	2	33.3	10.9	127	28.7	6.6	16.9
Middle	1	16.7	35.4	60	13.6	29.3	45.3
Upper	3	50.0	52.5	255	57.7	63.3	35.4
Unknown	0	0.0	0.3	0	0.0	0.3	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	442	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.3	0	0.0	1.4	2.3
Moderate	0	0.0	13.8	0	0.0	11.1	16.9
Middle	0	0.0	43.2	0	0.0	41.2	45.3
Upper	0	0.0	40.5	0	0.0	46.2	35.4
Unknown	0	0.0	0.3	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	4.3	0	0.0	2.7	2.3
Moderate	0	0.0	25.5	0	0.0	16.1	16.9
Middle	0	0.0	42.9	0	0.0	43.4	45.3
Upper	0	0.0	27.3	0	0.0	37.9	35.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D126

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Lansing-East Lansing Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	6	6.6	6.8	2,382	15.1	10.2	4	5.7	4.7	955	6.6	7.0	5.4
Moderate	26	28.6	18.2	4,108	26.1	17.4	19	27.1	15.6	3,845	26.7	15.9	19.6
Middle	31	34.1	34.2	4,959	31.5	30.1	28	40.0	41.4	5,232	36.3	42.2	43.1
Upper	24	26.4	39.0	4,142	26.3	40.0	19	27.1	36.0	4,379	30.4	32.9	29.0
Unknown	4	4.4	1.5	146	0.9	2.2	0	0.0	1.8	0	0.0	1.9	3.0
Total	91	100.0	100.0	15,737	100.0	100.0	70	100.0	100.0	14,411	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table D127

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Lansing-East Lansing Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	18	10.3	7.7	5,346	21.4	11.5	7.2
Moderate	66	37.7	17.9	7,967	31.9	20.0	19.5
Middle	43	24.6	33.5	5,510	22.1	30.2	36.7
Upper	47	26.9	39.3	6,140	24.6	36.9	34.4
Unknown	1	0.6	1.3	11	0.0	1.1	2.2
Total	175	100.0	100.0	24,974	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Table D128A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Lansing-East Lansing Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	13.0	0	0.0	6.9	5	45.5	13.1	591	43.4	6.9	20.0
Moderate	3	23.1	25.9	314	13.2	19.7	4	36.4	25.0	507	37.2	19.6	17.0
Middle	4	30.8	23.0	555	23.4	23.1	2	18.2	21.5	264	19.4	21.7	21.8
Upper	5	38.5	27.7	1,398	59.0	40.1	0	0.0	26.1	0	0.0	39.7	41.2
Unknown	1	7.7	10.4	103	4.3	10.3	0	0.0	14.3	0	0.0	12.1	0.0
Total	13	100.0	100.0	2,370	100.0	100.0	11	100.0	100.0	1,362	100.0	100.0	100.0
Refinance Loans													
Low	4	18.2	6.8	366	14.8	3.9	5	25.0	13.2	408	14.6	8.2	20.0
Moderate	3	13.6	20.6	308	12.5	15.1	5	25.0	28.7	688	24.7	24.3	17.0
Middle	5	22.7	25.2	377	15.3	23.1	3	15.0	25.3	330	11.8	25.5	21.8
Upper	7	31.8	34.7	1,192	48.3	44.3	6	30.0	25.0	1,226	43.9	33.7	41.2
Unknown	3	13.6	12.7	227	9.2	13.7	1	5.0	7.8	139	5.0	8.3	0.0
Total	22	100.0	100.0	2,470	100.0	100.0	20	100.0	100.0	2,791	100.0	100.0	100.0
Home Improvement Loans													
Low	2	18.2	9.7	135	13.6	7.8	3	21.4	12.2	255	25.7	8.4	20.0
Moderate	3	27.3	22.4	288	28.9	19.2	0	0.0	22.7	0	0.0	19.4	17.0
Middle	1	9.1	25.5	42	4.2	23.3	2	14.3	28.8	100	10.1	27.9	21.8
Upper	4	36.4	40.4	476	47.8	46.3	8	57.1	34.6	620	62.6	42.0	41.2
Unknown	1	9.1	2.0	55	5.5	3.5	1	7.1	1.7	16	1.6	2.3	0.0
Total	11	100.0	100.0	996	100.0	100.0	14	100.0	100.0	991	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	6	10.7	9.2	501	7.1	5.2	14	25.5	12.2	1,288	19.6	7.1	20.0
Moderate	12	21.4	22.4	1,165	16.6	17.1	12	21.8	25.1	1,453	22.1	20.4	17.0
Middle	12	21.4	24.2	1,019	14.5	23.0	10	18.2	23.6	1,010	15.4	22.8	21.8
Upper	21	37.5	33.0	3,941	56.2	42.7	16	29.1	28.4	2,506	38.2	39.1	41.2
Unknown	5	8.9	11.2	385	5.5	12.0	3	5.5	10.7	305	4.6	10.6	0.0
Total	56	100.0	100.0	7,011	100.0	100.0	55	100.0	100.0	6,562	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table D128B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Lansing-East Lansing Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	0	0.0	6.6	0	0.0	5.0	1	10.0	6.5	34	2.4	4.1	20.0
Moderate	3	30.0	17.1	255	21.7	13.4	3	30.0	19.6	258	18.2	13.9	17.0
Middle	2	20.0	24.1	45	3.8	21.6	3	30.0	27.8	316	22.3	24.1	21.8
Upper	5	50.0	51.8	875	74.5	59.6	2	20.0	45.5	660	46.5	57.6	41.2
Unknown	0	0.0	0.4	0	0.0	0.4	1	10.0	0.6	150	10.6	0.3	0.0
Total	10	100.0	100.0	1,175	100.0	100.0	10	100.0	100.0	1,418	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.0	0	0.0	4.2	0	0.0	10.4	0	0.0	6.7	20.0
Moderate	0	0.0	29.1	0	0.0	22.1	0	0.0	26.1	0	0.0	22.2	17.0
Middle	0	0.0	29.1	0	0.0	27.5	0	0.0	27.3	0	0.0	21.1	21.8
Upper	0	0.0	28.6	0	0.0	41.6	0	0.0	34.5	0	0.0	48.7	41.2
Unknown	0	0.0	5.2	0	0.0	4.6	0	0.0	1.6	0	0.0	1.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	41.2
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table D129A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Lansing-East Lansing Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	1	16.7	13.8	41	4.7	7.7	20.5
Moderate	3	50.0	28.3	410	47.4	22.6	17.1
Middle	2	33.3	22.9	414	47.9	23.2	20.3
Upper	0	0.0	26.9	0	0.0	38.8	42.2
Unknown	0	0.0	8.0	0	0.0	7.6	0.0
Total	6	100.0	100.0	865	100.0	100.0	100.0
Refinance Loans							
Low	4	28.6	5.7	329	21.5	3.0	20.5
Moderate	4	28.6	18.1	398	26.0	12.8	17.1
Middle	1	7.1	24.5	190	12.4	21.7	20.3
Upper	3	21.4	39.4	323	21.1	49.3	42.2
Unknown	2	14.3	12.2	292	19.1	13.2	0.0
Total	14	100.0	100.0	1,532	100.0	100.0	100.0
Home Improvement Loans							
Low	1	14.3	11.5	60	14.5	6.6	20.5
Moderate	1	14.3	20.7	66	16.0	18.7	17.1
Middle	2	28.6	21.8	75	18.2	20.7	20.3
Upper	3	42.9	43.8	212	51.3	51.0	42.2
Unknown	0	0.0	2.2	0	0.0	3.0	0.0
Total	7	100.0	100.0	413	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	8	24.2	8.8	485	14.9	4.8	20.5
Moderate	10	30.3	21.4	989	30.4	16.4	17.1
Middle	5	15.2	23.5	679	20.9	22.0	20.3
Upper	8	24.2	34.9	807	24.8	45.0	42.2
Unknown	2	6.1	11.4	292	9.0	11.7	0.0
Total	33	100.0	100.0	3,252	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D129B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Lansing-East Lansing Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Other Purpose Lines of Credit							
Low	2	33.3	7.0	55	12.4	5.1	20.5
Moderate	2	33.3	15.1	115	26.0	12.5	17.1
Middle	0	0.0	25.4	0	0.0	21.7	20.3
Upper	2	33.3	51.9	272	61.5	59.8	42.2
Unknown	0	0.0	0.6	0	0.0	0.9	0.0
Total	6	100.0	100.0	442	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	10.6	0	0.0	6.9	20.5
Moderate	0	0.0	22.1	0	0.0	16.1	17.1
Middle	0	0.0	25.1	0	0.0	21.1	20.3
Upper	0	0.0	39.7	0	0.0	52.8	42.2
Unknown	0	0.0	2.5	0	0.0	3.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	20.5
Moderate	0	0.0	0.3	0	0.0	0.1	17.1
Middle	0	0.0	0.3	0	0.0	0.0	20.3
Upper	0	0.0	0.0	0	0.0	0.0	42.2
Unknown	0	0.0	99.5	0	0.0	99.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D130

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Lansing-East Lansing Metropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	30	33.0	47.8	2,815	17.9	31.5	29	41.4	49.4	2,916	20.2	30.4	90.9
Over \$1 Million	39	42.9		9,714	61.7		36	51.4		9,800	68.0		8.0
Revenue Unknown	22	24.2		3,208	20.4		5	7.1		1,695	11.8		1.1
Total	91	100.0		15,737	100.0		70	100.0		14,411	100.0		100.0
By Loan Size													
\$100,000 or Less	56	61.5	88.2	2,868	18.2	26.5	37	52.9	92.4	2,154	14.9	33.9	
\$100,001 - \$250,000	18	19.8	6.6	3,212	20.4	20.9	19	27.1	4.2	3,545	24.6	19.2	
\$250,001 - \$1 Million	17	18.7	5.2	9,657	61.4	52.6	14	20.0	3.4	8,712	60.5	46.8	
Total	91	100.0	100.0	15,737	100.0	100.0	70	100.0	100.0	14,411	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	24	80.0		1,216	43.2		21	72.4		1,301	44.6		
\$100,001 - \$250,000	4	13.3		649	23.1		7	24.1		1,297	44.5		
\$250,001 - \$1 Million	2	6.7		950	33.7		1	3.4		318	10.9		
Total	30	100.0		2,815	100.0		29	100.0		2,916	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D131

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Lansing-East Lansing Metropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	88	50.3	41.5	7,248	29.0	26.3	90.4
Over \$1 Million	55	31.4		15,592	62.4		8.5
Revenue Unknown	32	18.3		2,134	8.5		1.1
Total	175	100.0		24,974	100.0		100.0
By Loan Size							
\$100,000 or Less	118	67.4	82.9	4,369	17.5	25.1	
\$100,001 - \$250,000	30	17.1	9.9	4,943	19.8	23.0	
\$250,001 - \$1 Million	27	15.4	7.2	15,662	62.7	52.0	
Total	175	100.0	100.0	24,974	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	72	81.8		2,719	37.5		
\$100,001 - \$250,000	10	11.4		1,489	20.5		
\$250,001 - \$1 Million	6	6.8		3,040	41.9		
Total	88	100.0		7,248	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D132

2022 Combined Demographics Assessment Area: Midland MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	4.8	491	2.1	101	20.6	4,561	19.8
Moderate	4	19.0	3,812	16.5	568	14.9	4,183	18.1
Middle	12	57.1	12,940	56.1	730	5.6	5,081	22.0
Upper	4	19.0	5,814	25.2	267	4.6	9,232	40.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	21	100.0	23,057	100.0	1,666	7.2	23,057	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,029	573	2.2	55.7	346	33.6	110	10.7
Moderate	7,637	4,362	16.5	57.1	2,403	31.5	872	11.4
Middle	19,870	15,590	58.9	78.5	2,829	14.2	1,451	7.3
Upper	8,529	5,941	22.4	69.7	2,209	25.9	379	4.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	37,065	26,466	100.0	71.4	7,787	21.0	2,812	7.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	184	5.8	131	4.6	52	19.7	1	2.9
Moderate	663	20.9	600	20.8	53	20.1	10	28.6
Middle	1,439	45.3	1,317	45.7	103	39.0	19	54.3
Upper	892	28.1	831	28.9	56	21.2	5	14.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,178	100.0	2,879	100.0	264	100.0	35	100.0
Percentage of Total Businesses:				90.6		8.3		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1	1.1	1	1.1	0	0.0	0	0.0
Moderate	17	18.7	17	19.1	0	0.0	0	0.0
Middle	59	64.8	57	64.0	2	100.0	0	0.0
Upper	14	15.4	14	15.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	91	100.0	89	100.0	2	100.0	0	0.0
Percentage of Total Farms:				97.8		2.2		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



Table D133

2021 Combined Demographics Assessment Area: Midland MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.3	599	2.6	182	30.4	4,635	20.1
Moderate	4	21.1	4,364	18.9	620	14.2	4,073	17.7
Middle	9	47.4	9,968	43.2	831	8.3	4,782	20.7
Upper	5	26.3	8,135	35.3	469	5.8	9,576	41.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>19</b>	<b>100.0</b>	<b>23,066</b>	<b>100.0</b>	<b>2,102</b>	<b>9.1</b>	<b>23,066</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,089	436	1.7	40.0	597	54.8	56	5.1
Moderate	7,588	4,423	17.5	58.3	2,571	33.9	594	7.8
Middle	15,259	11,325	44.7	74.2	2,607	17.1	1,327	8.7
Upper	12,259	9,153	36.1	74.7	2,505	20.4	601	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>36,195</b>	<b>25,337</b>	<b>100.0</b>	<b>70.0</b>	<b>8,280</b>	<b>22.9</b>	<b>2,578</b>	<b>7.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	185	5.7	132	4.5	51	19.5	2	5.1
Moderate	703	21.7	634	21.6	58	22.1	11	28.2
Middle	996	30.8	915	31.2	64	24.4	17	43.6
Upper	1,352	41.8	1,254	42.7	89	34.0	9	23.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,236</b>	<b>100.0</b>	<b>2,935</b>	<b>100.0</b>	<b>262</b>	<b>100.0</b>	<b>39</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.7</b>		<b>8.1</b>		<b>1.2</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	17	18.3	17	18.7	0	0.0	0	0.0
Middle	56	60.2	54	59.3	2	100.0	0	0.0
Upper	20	21.5	20	22.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>93</b>	<b>100.0</b>	<b>91</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.8</b>		<b>2.2</b>		<b>0.0</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D134

2020 Combined Demographics Assessment Area: Midland MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.3	599	2.6	182	30.4	4,635	20.1
Moderate	4	21.1	4,364	18.9	620	14.2	4,073	17.7
Middle	9	47.4	9,968	43.2	831	8.3	4,782	20.7
Upper	5	26.3	8,135	35.3	469	5.8	9,576	41.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>19</b>	<b>100.0</b>	<b>23,066</b>	<b>100.0</b>	<b>2,102</b>	<b>9.1</b>	<b>23,066</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,089	436	1.7	40.0	597	54.8	56	5.1
Moderate	7,588	4,423	17.5	58.3	2,571	33.9	594	7.8
Middle	15,259	11,325	44.7	74.2	2,607	17.1	1,327	8.7
Upper	12,259	9,153	36.1	74.7	2,505	20.4	601	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>36,195</b>	<b>25,337</b>	<b>100.0</b>	<b>70.0</b>	<b>8,280</b>	<b>22.9</b>	<b>2,578</b>	<b>7.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	189	5.6	137	4.5	50	18.7	2	4.8
Moderate	725	21.6	653	21.4	60	22.4	12	28.6
Middle	1,045	31.1	956	31.3	70	26.1	19	45.2
Upper	1,401	41.7	1,304	42.8	88	32.8	9	21.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,360</b>	<b>100.0</b>	<b>3,050</b>	<b>100.0</b>	<b>268</b>	<b>100.0</b>	<b>42</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.8</b>		<b>8.0</b>		<b>1.3</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	19	19.0	19	19.4	0	0.0	0	0.0
Middle	61	61.0	59	60.2	2	100.0	0	0.0
Upper	20	20.0	20	20.4	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>100</b>	<b>100.0</b>	<b>98</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.0</b>		<b>2.0</b>		<b>0.0</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D135A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Midland MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans													
Low	0	0.0	2.0	0	0.0	1.1	0	0.0	2.8	0	0.0	1.4	2.2
Moderate	0	0.0	17.0	0	0.0	11.2	1	100.0	19.0	150	100.0	12.9	16.5
Middle	1	100.0	40.5	67	100.0	38.9	0	0.0	53.2	0	0.0	52.6	58.9
Upper	0	0.0	40.5	0	0.0	48.8	0	0.0	25.0	0	0.0	33.1	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	67	100.0	100.0	1	100.0	100.0	150	100.0	100.0	100.0
Refinance Loans													
Low	1	20.0	1.3	100	20.4	0.7	0	0.0	1.7	0	0.0	1.1	2.2
Moderate	1	20.0	13.8	120	24.5	9.7	1	25.0	20.2	84	20.7	15.6	16.5
Middle	2	40.0	43.2	176	35.9	41.5	3	75.0	59.8	321	79.3	61.3	58.9
Upper	1	20.0	41.8	94	19.2	48.1	0	0.0	18.4	0	0.0	22.1	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	490	100.0	100.0	4	100.0	100.0	405	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	2.8	0	0.0	1.2	2.2
Moderate	1	33.3	19.2	50	37.6	12.3	0	0.0	10.7	0	0.0	9.0	16.5
Middle	1	33.3	35.6	33	24.8	39.1	2	50.0	57.6	145	50.2	57.1	58.9
Upper	1	33.3	45.2	50	37.6	48.6	2	50.0	28.8	144	49.8	32.8	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	133	100.0	100.0	4	100.0	100.0	289	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	18.2	0	0.0	5.0	0	0.0	0.0	0	0.0	0.0	3.5
Moderate	0	0.0	45.5	0	0.0	24.4	0	0.0	23.5	0	0.0	22.5	29.3
Middle	0	0.0	9.1	0	0.0	9.8	0	0.0	47.1	0	0.0	35.4	27.5
Upper	0	0.0	27.3	0	0.0	60.8	0	0.0	29.4	0	0.0	42.1	39.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	7.1	1.6	100	9.3	0.9	0	0.0	2.3	0	0.0	1.2	2.2
Moderate	4	28.6	15.3	270	25.1	10.7	2	18.2	18.6	234	19.7	13.7	16.5
Middle	4	28.6	41.9	276	25.7	39.9	6	54.5	55.7	566	47.7	54.2	58.9
Upper	5	35.7	41.2	428	39.9	48.6	3	27.3	23.4	386	32.5	30.8	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	14	100.0	100.0	1,074	100.0	100.0	11	100.0	100.0	1,186	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D135B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Midland MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	2.2
Moderate	2	40.0	0.0	100	26.0	0.0	0	0.0	8.7	0	0.0	3.1	16.5
Middle	0	0.0	33.3	0	0.0	42.2	1	50.0	52.2	100	29.2	54.4	58.9
Upper	3	60.0	66.7	284	74.0	57.8	1	50.0	39.1	242	70.8	42.5	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	384	100.0	100.0	2	100.0	100.0	342	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	2.5	0	0.0	1.8	2.2
Moderate	0	0.0	12.0	0	0.0	5.4	0	0.0	17.3	0	0.0	14.8	16.5
Middle	0	0.0	52.0	0	0.0	46.1	0	0.0	55.6	0	0.0	51.0	58.9
Upper	0	0.0	36.0	0	0.0	48.5	0	0.0	24.7	0	0.0	32.4	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	2.2
Moderate	0	0.0	19.2	0	0.0	14.2	0	0.0	18.8	0	0.0	14.3	16.5
Middle	0	0.0	50.0	0	0.0	53.0	0	0.0	75.0	0	0.0	79.1	58.9
Upper	0	0.0	30.8	0	0.0	32.8	0	0.0	6.3	0	0.0	6.6	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D136A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Midland MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	1.7	0	0.0	0.9	1.7
Moderate	0	0.0	16.3	0	0.0	10.7	17.5
Middle	1	50.0	40.4	77	30.7	38.0	44.7
Upper	1	50.0	41.6	174	69.3	50.4	36.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	251	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	1.0	0	0.0	0.6	1.7
Moderate	0	0.0	10.6	0	0.0	7.4	17.5
Middle	0	0.0	44.1	0	0.0	40.4	44.7
Upper	1	100.0	44.3	100	100.0	51.6	36.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	100	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.2	0	0.0	0.4	1.7
Moderate	0	0.0	10.5	0	0.0	10.2	17.5
Middle	2	66.7	48.8	250	69.4	42.5	44.7
Upper	1	33.3	39.5	110	30.6	46.8	36.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	360	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	33.3	0	0.0	18.0	31.1
Middle	0	0.0	40.0	0	0.0	34.3	25.5
Upper	0	0.0	26.7	0	0.0	47.7	40.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	1.3	0	0.0	0.7	
Moderate	0	0.0	13.1	0	0.0	9.0	17.5
Middle	4	57.1	42.9	383	49.9	39.4	44.7
Upper	3	42.9	42.7	384	50.1	50.8	36.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	767	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D136B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Midland MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit							
Low	0	0.0	0.0	0	0.0	0.0	1.7
Moderate	0	0.0	14.8	0	0.0	9.7	17.5
Middle	1	100.0	29.6	56	100.0	33.0	44.7
Upper	0	0.0	55.6	0	0.0	57.3	36.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	56	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	1.7
Moderate	0	0.0	11.1	0	0.0	3.8	17.5
Middle	0	0.0	48.1	0	0.0	37.5	44.7
Upper	0	0.0	40.7	0	0.0	58.7	36.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.5	0	0.0	1.2	1.7
Moderate	0	0.0	12.3	0	0.0	9.8	17.5
Middle	0	0.0	61.5	0	0.0	55.7	44.7
Upper	0	0.0	24.6	0	0.0	33.3	36.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table D137**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Midland MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	5	26.3	6.5	933	36.9	18.1	3	25.0	4.6	890	43.0	12.0	5.8
Moderate	2	10.5	22.4	235	9.3	21.0	1	8.3	18.7	75	3.6	16.8	20.9
Middle	6	31.6	31.9	1,017	40.3	25.8	7	58.3	49.0	959	46.3	35.2	45.3
Upper	6	31.6	38.8	341	13.5	35.1	1	8.3	27.6	147	7.1	36.0	28.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	19	100.0	100.0	2,526	100.0	100.0	12	100.0	100.0	2,071	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

**Table D138**

Distribution of 2020 Small Business Lending by Income Level of Geography							
Assessment Area: Midland MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	5	17.9	7.2	977	33.7	14.0	5.6
Moderate	1	3.6	22.7	75	2.6	24.1	21.6
Middle	9	32.1	28.6	695	24.0	18.8	31.1
Upper	13	46.4	41.3	1,153	39.8	43.1	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	28	100.0	100.0	2,900	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D139A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Midland MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	11.0	0	0.0	5.6	0	0.0	15.0	0	0.0	8.0	19.8
Moderate	0	0.0	19.2	0	0.0	13.6	0	0.0	24.8	0	0.0	18.4	18.1
Middle	1	100.0	23.0	67	100.0	20.6	1	100.0	20.9	150	100.0	21.3	22.0
Upper	0	0.0	35.0	0	0.0	49.6	0	0.0	24.6	0	0.0	39.3	40.0
Unknown	0	0.0	11.8	0	0.0	10.6	0	0.0	14.7	0	0.0	13.1	0.0
Total	1	100.0	100.0	67	100.0	100.0	1	100.0	100.0	150	100.0	100.0	100.0
Refinance Loans													
Low	1	20.0	7.8	100	20.4	4.2	2	50.0	18.8	159	39.3	11.7	19.8
Moderate	2	40.0	15.9	179	36.5	10.8	0	0.0	24.1	0	0.0	21.2	18.1
Middle	0	0.0	22.5	0	0.0	19.0	0	0.0	23.7	0	0.0	23.5	22.0
Upper	1	20.0	41.2	94	19.2	52.6	1	25.0	24.5	200	49.4	34.9	40.0
Unknown	1	20.0	12.6	117	23.9	13.4	1	25.0	9.0	46	11.4	8.7	0.0
Total	5	100.0	100.0	490	100.0	100.0	4	100.0	100.0	405	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.8	0	0.0	5.1	0	0.0	14.7	0	0.0	10.1	19.8
Moderate	1	33.3	16.4	50	37.6	12.5	1	25.0	17.5	45	15.6	14.8	18.1
Middle	1	33.3	24.7	33	24.8	23.7	2	50.0	20.3	200	69.2	18.7	22.0
Upper	1	33.3	52.1	50	37.6	58.7	1	25.0	45.8	44	15.2	55.7	40.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.7	0	0.0	0.7	0.0
Total	3	100.0	100.0	133	100.0	100.0	4	100.0	100.0	289	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	7.1	9.2	100	9.3	4.9	2	18.2	15.7	159	13.4	8.9	19.8
Moderate	5	35.7	17.2	379	35.3	12.1	1	9.1	23.8	45	3.8	18.9	18.1
Middle	4	28.6	22.6	284	26.4	19.7	4	36.4	22.0	450	37.9	21.8	22.0
Upper	3	21.4	38.6	194	18.1	51.1	3	27.3	26.6	486	41.0	38.9	40.0
Unknown	1	7.1	12.5	117	10.9	12.2	1	9.1	11.9	46	3.9	11.5	0.0
Total	14	100.0	100.0	1,074	100.0	100.0	11	100.0	100.0	1,186	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													



Table D139B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Midland MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	6.5	0	0.0	2.6	19.8
Moderate	2	40.0	0.0	150	39.1	0.0	0	0.0	13.0	0	0.0	9.8	18.1
Middle	2	40.0	26.7	184	47.9	35.3	1	50.0	28.3	100	29.2	21.3	22.0
Upper	1	20.0	73.3	50	13.0	64.7	1	50.0	52.2	242	70.8	66.3	40.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	384	100.0	100.0	2	100.0	100.0	342	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	24.0	0	0.0	13.0	0	0.0	8.6	0	0.0	5.5	19.8
Moderate	0	0.0	24.0	0	0.0	20.9	0	0.0	27.2	0	0.0	22.5	18.1
Middle	0	0.0	16.0	0	0.0	17.3	0	0.0	30.9	0	0.0	27.0	22.0
Upper	0	0.0	36.0	0	0.0	48.8	0	0.0	30.9	0	0.0	42.3	40.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.5	0	0.0	2.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.8
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.1
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	40.0
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D140A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Midland MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	16.9	0	0.0	9.3	20.1
Moderate	0	0.0	24.0	0	0.0	18.3	17.7
Middle	0	0.0	23.6	0	0.0	24.0	20.7
Upper	2	100.0	27.4	251	100.0	41.3	41.5
Unknown	0	0.0	8.1	0	0.0	7.1	0.0
Total	2	100.0	100.0	251	100.0	100.0	100.0
Refinance Loans							
Low	1	100.0	6.4	100	100.0	3.0	20.1
Moderate	0	0.0	16.6	0	0.0	11.4	17.7
Middle	0	0.0	21.3	0	0.0	18.2	20.7
Upper	0	0.0	41.0	0	0.0	52.1	41.5
Unknown	0	0.0	14.7	0	0.0	15.2	0.0
Total	1	100.0	100.0	100	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	9.3	0	0.0	5.5	20.1
Moderate	0	0.0	15.1	0	0.0	7.6	17.7
Middle	0	0.0	24.4	0	0.0	18.4	20.7
Upper	2	66.7	50.0	260	72.2	68.1	41.5
Unknown	1	33.3	1.2	100	27.8	0.4	0.0
Total	3	100.0	100.0	360	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	14.3	10.7	100	13.0	5.7	20.1
Moderate	0	0.0	19.3	0	0.0	14.2	17.7
Middle	1	14.3	21.9	56	7.3	20.5	20.7
Upper	4	57.1	35.1	511	66.6	47.3	41.5
Unknown	1	14.3	13.1	100	13.0	12.4	0.0
Total	7	100.0	100.0	767	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D140B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level							
Assessment Area: Midland MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit							
Low	0	0.0	7.4	0	0.0	6.8	20.1
Moderate	0	0.0	14.8	0	0.0	20.4	17.7
Middle	1	100.0	7.4	56	100.0	4.2	20.7
Upper	0	0.0	63.0	0	0.0	66.1	41.5
Unknown	0	0.0	7.4	0	0.0	2.4	0.0
Total	1	100.0	100.0	56	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	7.4	0	0.0	3.2	20.1
Moderate	0	0.0	18.5	0	0.0	10.6	17.7
Middle	0	0.0	29.6	0	0.0	23.4	20.7
Upper	0	0.0	40.7	0	0.0	59.4	41.5
Unknown	0	0.0	3.7	0	0.0	3.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	20.1
Moderate	0	0.0	0.0	0	0.0	0.0	17.7
Middle	0	0.0	0.0	0	0.0	0.0	20.7
Upper	0	0.0	0.0	0	0.0	0.0	41.5
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D141

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Midland MSA													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	7	36.8	57.1	949	37.6	45.1	7	58.3	57.1	491	23.7	37.2	90.6
Over \$1 Million	7	36.8		1,434	56.8		4	33.3		1,080	52.1		8.3
Revenue Unknown	5	26.3		143	5.7		1	8.3		500	24.1		1.1
Total	19	100.0		2,526	100.0		12	100.0		2,071	100.0		100.0
By Loan Size													
\$100,000 or Less	14	73.7	88.7	569	22.5	32.5	8	66.7	92.9	484	23.4	36.5	
\$100,001 - \$250,000	2	10.5	6.7	307	12.2	21.0	2	16.7	3.7	337	16.3	17.6	
\$250,001 - \$1 Million	3	15.8	4.7	1,650	65.3	46.4	2	16.7	3.4	1,250	60.4	45.9	
Total	19	100.0	100.0	2,526	100.0	100.0	12	100.0	100.0	2,071	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	4	57.1		142	15.0		6	85.7		344	70.1		
\$100,001 - \$250,000	2	28.6		307	32.3		1	14.3		147	29.9		
\$250,001 - \$1 Million	1	14.3		500	52.7		0	0.0		0	0.0		
Total	7	100.0		949	100.0		7	100.0		491	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D142

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Midland MSA							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	14	50.0	38.0	905	31.2	28.2	90.8
Over \$1 Million	10	35.7		1,883	64.9		8.0
Revenue Unknown	4	14.3		112	3.9		1.3
Total	28	100.0		2,900	100.0		100.0
By Loan Size							
\$100,000 or Less	23	82.1	82.5	1,015	35.0	27.8	
\$100,001 - \$250,000	1	3.6	10.4	147	5.1	23.2	
\$250,001 - \$1 Million	4	14.3	7.1	1,738	59.9	49.0	
Total	28	100.0	100.0	2,900	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	12	85.7		456	50.4		
\$100,001 - \$250,000	1	7.1		147	16.2		
\$250,001 - \$1 Million	1	7.1		302	33.4		
Total	14	100.0		905	100.0		
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D143

2022 Combined Demographics Assessment Area: Muskegon MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	10.9	3,618	8.2	1,197	33.1	9,041	20.4
Moderate	8	17.4	5,626	12.7	1,117	19.9	8,299	18.7
Middle	21	45.7	22,575	50.9	1,827	8.1	9,396	21.2
Upper	11	23.9	12,571	28.3	429	3.4	17,654	39.8
Unknown	1	2.2	0	0.0	0	0.0	0	0.0
Total AA	46	100.0	44,390	100.0	4,570	10.3	44,390	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	8,134	2,962	5.9	36.4	3,639	44.7	1,533	18.8
Moderate	9,909	5,299	10.5	53.5	3,388	34.2	1,222	12.3
Middle	37,465	26,613	52.8	71.0	7,319	19.5	3,533	9.4
Upper	18,827	15,488	30.8	82.3	1,356	7.2	1,983	10.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	74,335	50,362	100.0	67.8	15,702	21.1	8,271	11.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	732	12.2	650	12.1	77	14.0	5	9.8
Moderate	1,031	17.2	832	15.4	194	35.3	5	9.8
Middle	2,671	44.6	2,448	45.4	192	34.9	31	60.8
Upper	1,559	26.0	1,462	27.1	87	15.8	10	19.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,993	100.0	5,392	100.0	550	100.0	51	100.0
Percentage of Total Businesses:				90.0		9.2		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	5	3.9	5	4.1	0	0.0	0	0.0
Middle	99	76.7	95	77.2	4	66.7	0	0.0
Upper	25	19.4	23	18.7	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	129	100.0	123	100.0	6	100.0	0	0.0
Percentage of Total Farms:				95.3		4.7		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D144

2021 Combined Demographics Assessment Area: Muskegon MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	11.6	3,329	7.6	1,611	48.4	9,463	21.7
Moderate	11	25.6	9,228	21.1	2,102	22.8	7,404	17.0
Middle	14	32.6	17,533	40.1	1,992	11.4	9,013	20.6
Upper	12	27.9	13,586	31.1	630	4.6	17,796	40.7
Unknown	1	2.3	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>43</b>	<b>100.0</b>	<b>43,676</b>	<b>100.0</b>	<b>6,335</b>	<b>14.5</b>	<b>43,676</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,912	2,421	5.0	35.0	3,048	44.1	1,443	20.9
Moderate	17,758	9,070	18.8	51.1	6,583	37.1	2,105	11.9
Middle	26,965	20,263	41.9	75.1	3,873	14.4	2,829	10.5
Upper	21,719	16,567	34.3	76.3	2,665	12.3	2,487	11.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>73,354</b>	<b>48,321</b>	<b>100.0</b>	<b>65.9</b>	<b>16,169</b>	<b>22.0</b>	<b>8,864</b>	<b>12.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	527	8.8	446	8.3	81	14.6	0	0.0
Moderate	1,346	22.5	1,157	21.5	181	32.6	8	18.6
Middle	2,026	33.9	1,883	35.0	124	22.3	19	44.2
Upper	2,086	34.9	1,900	35.3	170	30.6	16	37.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>5,985</b>	<b>100.0</b>	<b>5,386</b>	<b>100.0</b>	<b>556</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>
Percentage of Total Businesses:				90.0		9.3		0.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	83	66.4	82	69.5	1	14.3	0	0.0
Upper	42	33.6	36	30.5	6	85.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>125</b>	<b>100.0</b>	<b>118</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				94.4		5.6		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D145

2020 Combined Demographics Assessment Area: Muskegon MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	11.6	3,329	7.6	1,611	48.4	9,463	21.7
Moderate	11	25.6	9,228	21.1	2,102	22.8	7,404	17.0
Middle	14	32.6	17,533	40.1	1,992	11.4	9,013	20.6
Upper	12	27.9	13,586	31.1	630	4.6	17,796	40.7
Unknown	1	2.3	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>43</b>	<b>100.0</b>	<b>43,676</b>	<b>100.0</b>	<b>6,335</b>	<b>14.5</b>	<b>43,676</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,912	2,421	5.0	35.0	3,048	44.1	1,443	20.9
Moderate	17,758	9,070	18.8	51.1	6,583	37.1	2,105	11.9
Middle	26,965	20,263	41.9	75.1	3,873	14.4	2,829	10.5
Upper	21,719	16,567	34.3	76.3	2,665	12.3	2,487	11.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>73,354</b>	<b>48,321</b>	<b>100.0</b>	<b>65.9</b>	<b>16,169</b>	<b>22.0</b>	<b>8,864</b>	<b>12.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	509	8.4	426	7.9	83	14.4	0	0.0
Moderate	1,317	21.8	1,124	20.8	186	32.2	7	16.3
Middle	2,094	34.7	1,947	36.0	128	22.2	19	44.2
Upper	2,114	35.0	1,917	35.4	180	31.2	17	39.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>6,034</b>	<b>100.0</b>	<b>5,414</b>	<b>100.0</b>	<b>577</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>
Percentage of Total Businesses:				89.7		9.6		0.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	84	66.7	83	69.7	1	14.3	0	0.0
Upper	42	33.3	36	30.3	6	85.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>126</b>	<b>100.0</b>	<b>119</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				94.4		5.6		0.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D146A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Muskegon MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	5.0	0	0.0	2.3	2	22.2	7.6	377	23.3	4.4	5.9
Moderate	3	42.9	23.6	290	27.7	16.5	1	11.1	15.1	30	1.9	9.6	10.5
Middle	1	14.3	40.3	92	8.8	42.5	5	55.6	50.7	773	47.9	52.4	52.8
Upper	3	42.9	31.0	666	63.5	38.7	1	11.1	26.6	435	26.9	33.6	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	1,048	100.0	100.0	9	100.0	100.0	1,615	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.2	0	0.0	0.5	1	4.0	3.2	70	2.5	2.5	5.9
Moderate	3	12.5	13.0	338	9.8	9.3	2	8.0	9.9	138	4.9	7.4	10.5
Middle	11	45.8	44.8	1,581	46.0	43.0	12	48.0	53.6	1,100	39.5	51.0	52.8
Upper	10	41.7	41.0	1,517	44.2	47.1	10	40.0	33.3	1,480	53.1	39.1	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	24	100.0	100.0	3,436	100.0	100.0	25	100.0	100.0	2,788	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.9	0	0.0	1.8	0	0.0	3.5	0	0.0	2.9	5.9
Moderate	2	15.4	13.6	99	8.8	10.5	2	14.3	8.0	79	7.5	5.9	10.5
Middle	8	61.5	42.5	732	65.1	43.5	7	50.0	48.5	393	37.5	45.2	52.8
Upper	3	23.1	41.0	294	26.1	44.2	5	35.7	39.9	577	55.0	46.0	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	13	100.0	100.0	1,125	100.0	100.0	14	100.0	100.0	1,049	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	11.8	0	0.0	0.6	0	0.0	26.3	0	0.0	20.1	20.0
Moderate	0	0.0	41.2	0	0.0	15.5	0	0.0	21.1	0	0.0	45.5	21.8
Middle	0	0.0	17.6	0	0.0	20.8	0	0.0	42.1	0	0.0	28.8	52.0
Upper	0	0.0	29.4	0	0.0	63.0	1	100.0	10.5	7,311	100.0	5.6	6.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	7,311	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	2	3.5	2.8	38	0.6	1.3	3	4.9	5.6	447	3.2	4.2	5.9
Moderate	11	19.3	17.1	1,011	14.9	12.6	6	9.8	12.9	286	2.1	9.8	10.5
Middle	26	45.6	42.9	3,047	44.9	41.7	28	45.9	51.3	2,626	18.9	50.8	52.8
Upper	18	31.6	37.3	2,695	39.7	44.3	24	39.3	30.2	10,567	75.9	35.1	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	57	100.0	100.0	6,791	100.0	100.0	61	100.0	100.0	13,926	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													



Table D146B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Muskegon MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	1	9.1	0.8	10	0.9	0.2	0	0.0	2.5	0	0.0	2.1	5.9
Moderate	2	18.2	14.0	224	20.5	13.6	1	8.3	3.0	39	3.4	0.9	10.5
Middle	6	54.5	36.4	642	58.7	24.3	4	33.3	54.5	360	31.0	52.8	52.8
Upper	2	18.2	48.8	218	19.9	62.0	7	58.3	39.9	764	65.7	44.1	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	1,094	100.0	100.0	12	100.0	100.0	1,163	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	50.0	4.2	28	31.8	3.0	0	0.0	4.2	0	0.0	2.6	5.9
Moderate	1	50.0	10.4	60	68.2	7.2	0	0.0	10.9	0	0.0	6.1	10.5
Middle	0	0.0	43.8	0	0.0	34.7	0	0.0	58.2	0	0.0	44.4	52.8
Upper	0	0.0	41.7	0	0.0	55.1	0	0.0	26.7	0	0.0	47.0	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	88	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.4	0	0.0	0.9	0	0.0	6.3	0	0.0	4.0	5.9
Moderate	0	0.0	21.9	0	0.0	14.7	0	0.0	45.0	0	0.0	21.9	10.5
Middle	0	0.0	43.8	0	0.0	48.2	0	0.0	28.8	0	0.0	44.6	52.8
Upper	0	0.0	32.9	0	0.0	36.2	0	0.0	19.8	0	0.0	29.6	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table D147A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Muskegon MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	3.3	0	0.0	1.4	5.0
Moderate	1	20.0	20.3	54	7.2	13.7	18.8
Middle	2	40.0	41.9	206	27.6	41.6	41.9
Upper	2	40.0	34.5	486	65.1	43.3	34.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	746	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.7	0	0.0	0.3	5.0
Moderate	1	4.2	9.7	31	0.9	6.7	18.8
Middle	12	50.0	45.2	1,942	56.1	43.7	41.9
Upper	11	45.8	44.4	1,486	43.0	49.3	34.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	24	100.0	100.0	3,459	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.6	0	0.0	1.3	5.0
Moderate	1	11.1	13.8	50	5.9	10.3	18.8
Middle	2	22.2	36.2	260	30.6	32.4	41.9
Upper	6	66.7	47.4	541	63.6	56.0	34.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	9	100.0	100.0	851	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	14.4
Moderate	0	0.0	28.6	0	0.0	11.0	44.0
Middle	0	0.0	50.0	0	0.0	40.5	16.2
Upper	0	0.0	21.4	0	0.0	48.5	25.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	1.9	0	0.0	0.8	5.0
Moderate	5	10.6	14.3	276	4.7	9.8	18.8
Middle	19	40.4	43.4	2,553	43.9	42.3	41.9
Upper	23	48.9	40.5	2,993	51.4	47.1	34.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	47	100.0	100.0	5,822	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D147B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Muskegon MSA							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	0.7	0	0.0	0.2	5.0
Moderate	2	22.2	11.5	141	18.4	3.4	18.8
Middle	3	33.3	29.5	145	18.9	16.3	41.9
Upper	4	44.4	58.3	480	62.7	80.0	34.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	766	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.9	0	0.0	0.9	5.0
Moderate	0	0.0	13.1	0	0.0	9.6	18.8
Middle	0	0.0	44.9	0	0.0	42.2	41.9
Upper	0	0.0	40.2	0	0.0	47.2	34.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	2.4	0	0.0	1.1	5.0
Moderate	0	0.0	18.4	0	0.0	13.8	18.8
Middle	0	0.0	48.5	0	0.0	50.8	41.9
Upper	0	0.0	30.6	0	0.0	34.3	34.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table D148**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Muskegon MSA													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Low	6	8.1	9.0	1,333	7.5	14.6	3	5.7	9.8	661	6.9	8.6	12.2
Moderate	30	40.5	23.2	7,569	42.8	27.2	26	49.1	19.4	5,032	52.6	31.1	17.2
Middle	7	9.5	34.4	1,012	5.7	26.1	16	30.2	45.1	2,281	23.8	37.5	44.6
Upper	31	41.9	33.3	7,755	43.9	32.1	8	15.1	25.3	1,590	16.6	22.7	26.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	74	100.0	100.0	17,669	100.0	100.0	53	100.0	100.0	9,564	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

**Table D149**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Muskegon MSA							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
	#	#%	#%	\$(000)	\$%	\$%	
<b>Low</b>	20	17.2	9.0	6,070	26.6	14.8	8.4
<b>Moderate</b>	43	37.1	23.5	6,615	29.0	25.1	21.8
<b>Middle</b>	12	10.3	32.6	1,159	5.1	27.9	34.7
<b>Upper</b>	41	35.3	34.8	8,977	39.3	32.1	35.0
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	116	100.0	100.0	22,821	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D150A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Muskegon MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	2	28.6	9.1	167	15.9	5.2	1	11.1	9.5	90	5.6	5.4	20.4
Moderate	4	57.1	28.0	545	52.0	21.8	2	22.2	24.2	228	14.1	18.9	18.7
Middle	0	0.0	22.6	0	0.0	21.7	4	44.4	21.8	613	38.0	21.6	21.2
Upper	1	14.3	27.5	336	32.1	38.7	2	22.2	26.4	684	42.4	37.8	39.8
Unknown	0	0.0	12.8	0	0.0	12.6	0	0.0	18.1	0	0.0	16.3	0.0
Total	7	100.0	100.0	1,048	100.0	100.0	9	100.0	100.0	1,615	100.0	100.0	100.0
Refinance Loans													
Low	2	8.3	7.2	107	3.1	4.0	7	28.0	13.2	371	13.3	7.8	20.4
Moderate	8	33.3	22.1	856	24.9	16.2	6	24.0	26.9	589	21.1	22.0	18.7
Middle	3	12.5	24.5	369	10.7	22.1	5	20.0	25.7	557	20.0	25.4	21.2
Upper	9	37.5	32.8	1,884	54.8	43.4	6	24.0	24.8	1,199	43.0	34.6	39.8
Unknown	2	8.3	13.4	220	6.4	14.3	1	4.0	9.4	72	2.6	10.3	0.0
Total	24	100.0	100.0	3,436	100.0	100.0	25	100.0	100.0	2,788	100.0	100.0	100.0
Home Improvement Loans													
Low	2	15.4	4.4	108	9.6	3.0	2	14.3	7.4	135	12.9	4.1	20.4
Moderate	1	7.7	19.8	22	2.0	15.5	4	28.6	18.6	199	19.0	13.2	18.7
Middle	4	30.8	26.5	245	21.8	22.6	3	21.4	25.4	136	13.0	21.7	21.2
Upper	5	38.5	46.6	600	53.3	56.0	4	28.6	46.2	519	49.5	58.2	39.8
Unknown	1	7.7	2.7	150	13.3	2.9	1	7.1	2.3	60	5.7	2.7	0.0
Total	13	100.0	100.0	1,125	100.0	100.0	14	100.0	100.0	1,049	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	12.3	7.8	410	6.0	4.5	11	18.3	10.3	658	9.9	6.0	20.4
Moderate	15	26.3	24.0	1,503	22.1	18.6	13	21.7	24.0	1,107	16.7	19.4	18.7
Middle	9	15.8	23.7	824	12.1	21.8	12	20.0	23.1	1,306	19.7	22.5	21.2
Upper	21	36.8	31.4	3,565	52.5	41.6	21	35.0	28.0	3,344	50.6	38.0	39.8
Unknown	5	8.8	13.2	489	7.2	13.6	3	5.0	14.7	200	3.0	14.2	0.0
Total	57	100.0	100.0	6,791	100.0	100.0	60	100.0	100.0	6,615	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table D150B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Muskegon MSA													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	9.1	0	0.0	4.7	1	8.3	8.6	62	5.3	4.9	20.4
Moderate	1	9.1	18.2	20	1.8	13.4	1	8.3	21.2	91	7.8	13.4	18.7
Middle	2	18.2	21.5	210	19.2	21.7	0	0.0	19.7	0	0.0	15.6	21.2
Upper	6	54.5	48.8	745	68.1	58.8	9	75.0	45.5	942	81.0	62.9	39.8
Unknown	2	18.2	2.5	119	10.9	1.4	1	8.3	5.1	68	5.8	3.2	0.0
Total	11	100.0	100.0	1,094	100.0	100.0	12	100.0	100.0	1,163	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	50.0	5.2	28	31.8	2.3	0	0.0	11.5	0	0.0	6.2	20.4
Moderate	1	50.0	24.0	60	68.2	16.6	0	0.0	24.8	0	0.0	20.6	18.7
Middle	0	0.0	28.1	0	0.0	18.9	0	0.0	29.1	0	0.0	22.4	21.2
Upper	0	0.0	40.6	0	0.0	61.7	0	0.0	31.5	0	0.0	48.7	39.8
Unknown	0	0.0	2.1	0	0.0	0.6	0	0.0	3.0	0	0.0	2.1	0.0
Total	2	100.0	100.0	88	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.4	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	20.4
Moderate	0	0.0	1.4	0	0.0	1.6	0	0.0	0.0	0	0.0	0.0	18.7
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	39.8
Unknown	0	0.0	97.3	0	0.0	98.2	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table D151A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level							
Assessment Area: Muskegon MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	10.1	0	0.0	6.0	21.7
Moderate	2	40.0	29.9	146	19.6	23.4	17.0
Middle	1	20.0	25.2	114	15.3	24.6	20.6
Upper	2	40.0	26.0	486	65.1	37.6	40.7
Unknown	0	0.0	8.8	0	0.0	8.5	0.0
Total	5	100.0	100.0	746	100.0	100.0	100.0
Refinance Loans							
Low	3	12.5	5.8	157	4.5	3.0	21.7
Moderate	7	29.2	19.2	737	21.3	13.0	17.0
Middle	1	4.2	23.4	114	3.3	20.3	20.6
Upper	11	45.8	38.1	2,185	63.2	49.3	40.7
Unknown	2	8.3	13.5	266	7.7	14.4	0.0
Total	24	100.0	100.0	3,459	100.0	100.0	100.0
Home Improvement Loans							
Low	3	33.3	7.7	219	25.7	5.9	21.7
Moderate	1	11.1	18.6	36	4.2	15.2	17.0
Middle	2	22.2	24.4	220	25.9	20.6	20.6
Upper	3	33.3	48.1	376	44.2	56.4	40.7
Unknown	0	0.0	1.3	0	0.0	1.9	0.0
Total	9	100.0	100.0	851	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	8	17.0	7.5	416	7.1	4.3	21.7
Moderate	12	25.5	22.6	1,010	17.3	17.1	17.0
Middle	6	12.8	23.5	676	11.6	21.7	20.6
Upper	18	38.3	33.1	3,204	55.0	44.0	40.7
Unknown	3	6.4	13.3	516	8.9	12.9	0.0
Total	47	100.0	100.0	5,822	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

**Table D151B**

Distribution of 2020 Home Mortgage Lending by Borrower Income Level							
Assessment Area: Muskegon MSA							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	2	22.2	7.9	40	5.2	7.2	21.7
Moderate	2	22.2	12.9	91	11.9	5.1	17.0
Middle	2	22.2	23.7	228	29.8	15.2	20.6
Upper	2	22.2	52.5	157	20.5	70.9	40.7
Unknown	1	11.1	2.9	250	32.6	1.5	0.0
Total	9	100.0	100.0	766	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	12.1	0	0.0	8.6	21.7
Moderate	0	0.0	17.8	0	0.0	9.3	17.0
Middle	0	0.0	23.4	0	0.0	21.5	20.6
Upper	0	0.0	38.3	0	0.0	51.7	40.7
Unknown	0	0.0	8.4	0	0.0	8.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	21.7
Moderate	0	0.0	0.0	0	0.0	0.0	17.0
Middle	0	0.0	0.0	0	0.0	0.0	20.6
Upper	0	0.0	0.0	0	0.0	0.0	40.7
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



**Table D152**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Muskegon MSA													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	17	23.0	48.4	1,363	7.7	28.4	15	28.3	51.0	1,373	14.4	28.9	90.0
Over \$1 Million	43	58.1		14,989	84.8		36	67.9		8,037	84.0		9.2
Revenue Unknown	14	18.9		1,317	7.5		2	3.8		154	1.6		0.9
Total	74	100.0		17,669	100.0		53	100.0		9,564	100.0		100.0
By Loan Size													
\$100,000 or Less	35	47.3	86.2	1,971	11.2	24.8	29	54.7	89.9	1,583	16.6	25.9	
\$100,001 - \$250,000	14	18.9	6.8	2,618	14.8	18.1	12	22.6	4.9	2,097	21.9	17.9	
\$250,001 - \$1 Million	25	33.8	7.0	13,080	74.0	57.1	12	22.6	5.1	5,884	61.5	56.2	
Total	74	100.0	100.0	17,669	100.0	100.0	53	100.0	100.0	9,564	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	13	76.5		724	53.1		12	80.0		645	47.0		
\$100,001 - \$250,000	4	23.5		639	46.9		2	13.3		345	25.1		
\$250,001 - \$1 Million	0	0.0		0	0.0		1	6.7		383	27.9		
Total	17	100.0		1,363	100.0		15	100.0		1,373	100.0		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table D153**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Muskegon MSA							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	52	44.8	41.1	4,024	17.6	27.0	89.7
Over \$1 Million	57	49.1		18,150	79.5		9.6
Revenue Unknown	7	6.0		647	2.8		0.7
Total	116	100.0		22,821	100.0		100.0
By Loan Size							
\$100,000 or Less	60	51.7	82.0	2,722	11.9	26.0	
\$100,001 - \$250,000	26	22.4	10.3	4,561	20.0	23.9	
\$250,001 - \$1 Million	30	25.9	7.8	15,538	68.1	50.2	
Total	116	100.0	100.0	22,821	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	40	76.9		1,501	37.3		
\$100,001 - \$250,000	11	21.2		1,823	45.3		
\$250,001 - \$1 Million	1	1.9		700	17.4		
Total	52	100.0		4,024	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D154

2022 Combined Demographics Assessment Area: Austin Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	27	6.4	21,562	5.2	5,043	23.4	84,820	20.4
Moderate	100	23.5	88,697	21.3	9,409	10.6	70,060	16.8
Middle	142	33.4	148,541	35.7	7,483	5.0	86,524	20.8
Upper	140	32.9	154,103	37.0	3,732	2.4	174,832	42.0
Unknown	16	3.8	3,333	0.8	868	26.0	0	0.0
<b>Total AA</b>	<b>425</b>	<b>100.0</b>	<b>416,236</b>	<b>100.0</b>	<b>26,535</b>	<b>6.4</b>	<b>416,236</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	46,024	9,969	2.6	21.7	31,665	68.8	4,390	9.5
Moderate	168,410	68,287	17.6	40.5	88,696	52.7	11,427	6.8
Middle	257,600	145,995	37.6	56.7	95,133	36.9	16,472	6.4
Upper	245,168	162,416	41.8	66.2	67,066	27.4	15,686	6.4
Unknown	11,984	2,028	0.5	16.9	8,389	70.0	1,567	13.1
<b>Total AA</b>	<b>729,186</b>	<b>388,695</b>	<b>100.0</b>	<b>53.3</b>	<b>290,949</b>	<b>39.9</b>	<b>49,542</b>	<b>6.8</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	4,296	3.8	3,899	3.7	349	5.3	48	2.8
Moderate	19,691	17.3	18,104	17.1	1,384	21.0	203	11.8
Middle	33,259	29.2	31,067	29.4	1,823	27.7	369	21.4
Upper	53,245	46.7	49,496	46.8	2,713	41.3	1,036	60.0
Unknown	3,601	3.2	3,223	3.0	307	4.7	71	4.1
<b>Total AA</b>	<b>114,092</b>	<b>100.0</b>	<b>105,789</b>	<b>100.0</b>	<b>6,576</b>	<b>100.0</b>	<b>1,727</b>	<b>100.0</b>
Percentage of Total Businesses:				92.7		5.8		1.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	31	2.7	29	2.5	2	20.0	0	0.0
Moderate	216	18.6	210	18.3	6	60.0	0	0.0
Middle	347	29.9	347	30.2	0	0.0	0	0.0
Upper	546	47.1	545	47.4	1	10.0	0	0.0
Unknown	20	1.7	19	1.7	1	10.0	0	0.0
<b>Total AA</b>	<b>1,160</b>	<b>100.0</b>	<b>1,150</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				99.1		0.9		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D155

2021 Combined Demographics Assessment Area: Austin Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	35	11.4	31,879	8.8	10,391	32.6	80,058	22.1
Moderate	61	19.9	61,300	16.9	10,378	16.9	58,783	16.2
Middle	109	35.5	133,878	37.0	8,757	6.5	70,901	19.6
Upper	96	31.3	133,405	36.9	3,529	2.6	152,076	42.0
Unknown	6	2.0	1,356	0.4	723	53.3	0	0.0
Total AA	307	100.0	361,818	100.0	33,778	9.3	361,818	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	70,447	14,466	4.4	20.5	49,572	70.4	6,409	9.1
Moderate	111,296	49,968	15.0	44.9	53,337	47.9	7,991	7.2
Middle	233,702	125,580	37.8	53.7	92,054	39.4	16,068	6.9
Upper	214,242	141,494	42.6	66.0	57,791	27.0	14,957	7.0
Unknown	6,623	712	0.2	10.8	5,039	76.1	872	13.2
Total AA	636,310	332,220	100.0	52.2	257,793	40.5	46,297	7.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	7,697	7.0	6,994	6.8	636	9.8	67	4.4
Moderate	13,935	12.6	12,907	12.6	898	13.8	130	8.5
Middle	35,340	32.1	32,871	32.2	2,070	31.9	399	26.0
Upper	51,874	47.1	48,239	47.2	2,765	42.6	870	56.6
Unknown	1,379	1.3	1,186	1.2	123	1.9	70	4.6
Total AA	110,225	100.0	102,197	100.0	6,492	100.0	1,536	100.0
Percentage of Total Businesses:				92.7		5.9		1.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	41	3.6	38	3.3	3	27.3	0	0.0
Moderate	151	13.1	146	12.8	5	45.5	0	0.0
Middle	403	34.9	403	35.3	0	0.0	0	0.0
Upper	554	48.0	552	48.3	2	18.2	0	0.0
Unknown	5	0.4	4	0.3	1	9.1	0	0.0
Total AA	1,154	100.0	1,143	100.0	11	100.0	0	0.0
Percentage of Total Farms:				99.0		1.0		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D156

2020 Combined Demographics Assessment Area: Austin Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	35	11.4	31,879	8.8	10,391	32.6	80,058	22.1
Moderate	61	19.9	61,300	16.9	10,378	16.9	58,783	16.2
Middle	109	35.5	133,878	37.0	8,757	6.5	70,901	19.6
Upper	96	31.3	133,405	36.9	3,529	2.6	152,076	42.0
Unknown	6	2.0	1,356	0.4	723	53.3	0	0.0
<b>Total AA</b>	<b>307</b>	<b>100.0</b>	<b>361,818</b>	<b>100.0</b>	<b>33,778</b>	<b>9.3</b>	<b>361,818</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	70,447	14,466	4.4	20.5	49,572	70.4	6,409	9.1
Moderate	111,296	49,968	15.0	44.9	53,337	47.9	7,991	7.2
Middle	233,702	125,580	37.8	53.7	92,054	39.4	16,068	6.9
Upper	214,242	141,494	42.6	66.0	57,791	27.0	14,957	7.0
Unknown	6,623	712	0.2	10.8	5,039	76.1	872	13.2
<b>Total AA</b>	<b>636,310</b>	<b>332,220</b>	<b>100.0</b>	<b>52.2</b>	<b>257,793</b>	<b>40.5</b>	<b>46,297</b>	<b>7.3</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	7,578	7.0	6,873	6.9	649	9.9	56	3.9
Moderate	13,700	12.7	12,671	12.7	906	13.9	123	8.5
Middle	34,523	32.0	32,089	32.1	2,053	31.4	381	26.4
Upper	50,639	47.0	47,016	47.1	2,806	42.9	817	56.7
Unknown	1,375	1.3	1,186	1.2	124	1.9	65	4.5
<b>Total AA</b>	<b>107,815</b>	<b>100.0</b>	<b>99,835</b>	<b>100.0</b>	<b>6,538</b>	<b>100.0</b>	<b>1,442</b>	<b>100.0</b>
Percentage of Total Businesses:				92.6		6.1		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	44	3.8	40	3.5	3	30.0	1	100.0
Moderate	146	12.6	141	12.3	5	50.0	0	0.0
Middle	405	34.9	405	35.3	0	0.0	0	0.0
Upper	559	48.2	558	48.6	1	10.0	0	0.0
Unknown	5	0.4	4	0.3	1	10.0	0	0.0
<b>Total AA</b>	<b>1,159</b>	<b>100.0</b>	<b>1,148</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
Percentage of Total Farms:				99.1		0.9		0.1
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D157A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Austin Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	4.6	0	0.0	4.1	0	0.0	1.8	0	0.0	1.6	2.6
Moderate	0	0.0	12.3	0	0.0	9.6	3	25.0	18.1	584	10.3	14.9	17.6
Middle	3	75.0	46.3	845	65.9	37.9	2	16.7	43.4	533	9.4	36.9	37.6
Upper	1	25.0	36.5	438	34.1	48.2	6	50.0	35.8	4,401	77.9	46.1	41.8
Unknown	0	0.0	0.3	0	0.0	0.2	1	8.3	0.8	129	2.3	0.6	0.5
Total	4	100.0	100.0	1,283	100.0	100.0	12	100.0	100.0	5,647	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.5	0	0.0	3.3	0	0.0	2.1	0	0.0	1.6	2.6
Moderate	3	6.7	10.7	382	2.7	8.4	4	9.3	16.6	1,349	7.7	12.5	17.6
Middle	14	31.1	38.7	3,255	22.9	32.3	8	18.6	39.7	2,715	15.5	30.6	37.6
Upper	28	62.2	46.9	10,549	74.4	55.9	30	69.8	41.1	13,389	76.4	54.9	41.8
Unknown	0	0.0	0.1	0	0.0	0.1	1	2.3	0.4	75	0.4	0.4	0.5
Total	45	100.0	100.0	14,186	100.0	100.0	43	100.0	100.0	17,528	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.2	0	0.0	2.9	0	0.0	1.3	0	0.0	1.0	2.6
Moderate	2	6.9	8.4	135	2.5	7.1	3	6.8	13.4	261	2.4	9.2	17.6
Middle	8	27.6	33.5	1,404	25.9	27.6	15	34.1	31.4	2,367	21.7	21.0	37.6
Upper	19	65.5	54.7	3,872	71.6	62.2	26	59.1	53.5	8,283	75.9	68.4	41.8
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.4	0	0.0	0.4	0.5
Total	29	100.0	100.0	5,411	100.0	100.0	44	100.0	100.0	10,911	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	20.7	0	0.0	11.3	0	0.0	13.1	0	0.0	11.7	12.0
Moderate	0	0.0	24.3	0	0.0	24.7	1	100.0	29.0	32,200	100.0	30.5	27.5
Middle	0	0.0	28.6	0	0.0	37.2	0	0.0	31.1	0	0.0	29.7	30.0
Upper	0	0.0	23.6	0	0.0	24.1	0	0.0	23.0	0	0.0	25.1	27.1
Unknown	0	0.0	2.9	0	0.0	2.7	0	0.0	3.8	0	0.0	2.9	3.4
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	32,200	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	2	1.8	4.0	67	0.2	4.0	0	0.0	1.9	0	0.0	2.6	2.6
Moderate	5	4.6	11.4	517	1.7	9.6	12	9.1	17.4	34,442	43.9	15.7	17.6
Middle	38	34.9	41.9	6,780	22.9	35.0	35	26.5	41.4	7,454	9.5	33.9	37.6
Upper	64	58.7	42.4	22,196	75.1	51.1	83	62.9	38.7	36,342	46.3	47.0	41.8
Unknown	0	0.0	0.2	0	0.0	0.3	2	1.5	0.7	204	0.3	0.8	0.5
Total	109	100.0	100.0	29,560	100.0	100.0	132	100.0	100.0	78,442	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D157B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Austin Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	2	6.7	2.6	67	1.4	1.6	0	0.0	1.4	0	0.0	0.6	2.6
Moderate	0	0.0	4.5	0	0.0	2.3	1	3.2	8.6	48	0.6	4.6	17.6
Middle	13	43.3	27.3	1,276	27.4	16.6	10	32.3	27.3	1,839	22.8	14.6	37.6
Upper	15	50.0	65.4	3,307	71.1	79.3	20	64.5	62.4	6,189	76.6	79.9	41.8
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0.5
Total	30	100.0	100.0	4,650	100.0	100.0	31	100.0	100.0	8,076	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.4	0	0.0	1.3	0	0.0	1.5	0	0.0	0.6	2.6
Moderate	0	0.0	8.8	0	0.0	3.6	0	0.0	13.2	0	0.0	6.1	17.6
Middle	0	0.0	33.1	0	0.0	16.0	0	0.0	31.3	0	0.0	13.3	37.6
Upper	1	100.0	55.5	4,030	100.0	79.0	1	100.0	53.3	4,080	100.0	79.2	41.8
Unknown	0	0.0	0.2	0	0.0	0.0	0	0.0	0.7	0	0.0	0.8	0.5
Total	1	100.0	100.0	4,030	100.0	100.0	1	100.0	100.0	4,080	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	5.3	0	0.0	8.8	0	0.0	4.9	0	0.0	5.5	2.6
Moderate	0	0.0	21.7	0	0.0	16.8	0	0.0	31.5	0	0.0	36.9	17.6
Middle	0	0.0	49.9	0	0.0	43.4	0	0.0	44.3	0	0.0	30.4	37.6
Upper	0	0.0	22.9	0	0.0	31.1	0	0.0	19.0	0	0.0	27.2	41.8
Unknown	0	0.0	0.2	0	0.0	0.0	0	0.0	0.3	0	0.0	0.0	0.5
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D158A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Austin Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	4.4	0	0.0	4.0	4.4
Moderate	0	0.0	12.5	0	0.0	10.0	15.0
Middle	4	66.7	45.4	2,060	74.6	38.8	37.8
Upper	2	33.3	37.5	700	25.4	47.1	42.6
Unknown	0	0.0	0.2	0	0.0	0.1	0.2
Total	6	100.0	100.0	2,760	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.3	0	0.0	3.0	4.4
Moderate	3	9.7	9.9	554	6.4	7.8	15.0
Middle	10	32.3	35.7	1,361	15.8	30.0	37.8
Upper	18	58.1	51.0	6,697	77.8	59.0	42.6
Unknown	0	0.0	0.1	0	0.0	0.1	0.2
Total	31	100.0	100.0	8,612	100.0	100.0	100.0
Home Improvement Loans							
Low	1	3.7	3.7	65	1.7	4.5	4.4
Moderate	6	22.2	8.1	762	19.6	6.4	15.0
Middle	6	22.2	31.4	742	19.1	25.5	37.8
Upper	14	51.9	56.6	2,322	59.7	63.5	42.6
Unknown	0	0.0	0.1	0	0.0	0.1	0.2
Total	27	100.0	100.0	3,891	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	17.0	0	0.0	17.0	
Moderate	0	0.0	24.1	0	0.0	18.1	15.8
Middle	0	0.0	39.0	0	0.0	39.2	34.4
Upper	0	0.0	18.4	0	0.0	25.5	24.8
Unknown	0	0.0	1.4	0	0.0	0.2	2.8
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	1	1.1	3.8	65	0.3	4.1	
Moderate	11	12.4	11.3	1,519	7.1	9.3	15.0
Middle	27	30.3	40.0	4,618	21.7	34.3	37.8
Upper	50	56.2	44.7	15,054	70.8	52.2	42.6
Unknown	0	0.0	0.2	0	0.0	0.2	0.2
Total	89	100.0	100.0	21,256	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D158B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Austin Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	2.1	0	0.0	1.4	4.4
Moderate	2	8.7	5.0	203	6.2	2.1	15.0
Middle	7	30.4	24.0	455	13.8	15.0	37.8
Upper	14	60.9	68.9	2,635	80.0	81.4	42.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Total	23	100.0	100.0	3,293	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	3.1	0	0.0	1.2	4.4
Moderate	0	0.0	10.6	0	0.0	4.2	15.0
Middle	0	0.0	34.3	0	0.0	14.8	37.8
Upper	2	100.0	51.5	2,700	100.0	77.5	42.6
Unknown	0	0.0	0.5	0	0.0	2.2	0.2
Total	2	100.0	100.0	2,700	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	4.0	0	0.0	3.1	4.4
Moderate	0	0.0	22.7	0	0.0	14.5	15.0
Middle	0	0.0	48.6	0	0.0	42.5	37.8
Upper	0	0.0	24.4	0	0.0	39.4	42.6
Unknown	0	0.0	0.3	0	0.0	0.4	0.2
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



Table D159

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography													
Assessment Area: Austin Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	22	13.0	7.1	4,875	18.1	8.3	8	4.3	3.5	1,163	3.0	3.6	3.8
Moderate	23	13.6	12.7	5,298	19.7	12.6	44	23.9	18.0	12,211	31.3	18.3	17.3
Middle	42	24.9	33.4	6,729	25.0	32.6	42	22.8	30.8	10,188	26.1	28.5	29.2
Upper	82	48.5	45.3	9,972	37.1	45.2	78	42.4	45.1	12,814	32.9	46.9	46.7
Unknown	0	0.0	0.9	0	0.0	1.2	12	6.5	2.1	2,626	6.7	2.5	3.2
Total	169	100.0	100.0	26,874	100.0	100.0	184	100.0	100.0	39,002	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D160

Distribution of 2020 Small Business Lending by Income Level of Geography							
Assessment Area: Austin Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	23	8.6	7.5	4,672	11.0	8.8	7.0
Moderate	32	12.0	12.5	5,607	13.1	12.6	12.7
Middle	82	30.7	32.4	14,497	34.0	30.9	32.0
Upper	125	46.8	46.1	16,752	39.3	46.0	47.0
Unknown	5	1.9	0.9	1,137	2.7	1.2	1.3
Total	267	100.0	100.0	42,665	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D161A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Austin Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	2.0	0	0.0	0.9	1	8.3	1.7	146	2.6	0.7	20.4
Moderate	1	25.0	11.4	217	16.9	7.2	2	16.7	9.9	267	4.7	6.1	16.8
Middle	1	25.0	17.5	513	40.0	14.1	2	16.7	19.2	393	7.0	15.6	20.8
Upper	2	50.0	48.5	553	43.1	58.7	7	58.3	49.3	4,841	85.7	58.2	42.0
Unknown	0	0.0	20.6	0	0.0	19.2	0	0.0	19.9	0	0.0	19.5	0.0
Total	4	100.0	100.0	1,283	100.0	100.0	12	100.0	100.0	5,647	100.0	100.0	100.0
Refinance Loans													
Low	3	6.7	3.4	412	2.9	1.9	3	7.0	7.6	240	1.4	4.0	20.4
Moderate	5	11.1	12.5	771	5.4	8.3	3	7.0	16.7	877	5.0	10.5	16.8
Middle	7	15.6	18.7	1,473	10.4	15.5	7	16.3	20.7	1,762	10.1	16.0	20.8
Upper	27	60.0	44.9	10,936	77.1	53.9	28	65.1	42.1	13,989	79.8	53.2	42.0
Unknown	3	6.7	20.4	594	4.2	20.4	2	4.7	13.0	660	3.8	16.2	0.0
Total	45	100.0	100.0	14,186	100.0	100.0	43	100.0	100.0	17,528	100.0	100.0	100.0
Home Improvement Loans													
Low	2	6.9	3.0	123	2.3	1.4	1	2.3	5.3	100	0.9	2.6	20.4
Moderate	0	0.0	10.0	0	0.0	6.6	0	0.0	10.8	0	0.0	5.6	16.8
Middle	6	20.7	17.6	630	11.6	13.2	11	25.0	19.2	1,267	11.6	12.1	20.8
Upper	21	72.4	65.9	4,658	86.1	72.5	31	70.5	63.3	9,444	86.6	76.9	42.0
Unknown	0	0.0	3.4	0	0.0	6.4	1	2.3	1.5	100	0.9	2.8	0.0
Total	29	100.0	100.0	5,411	100.0	100.0	44	100.0	100.0	10,911	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	6.4	2.8	665	2.2	1.3	5	3.8	3.6	486	1.1	1.6	20.4
Moderate	7	6.4	11.9	1,082	3.7	7.6	8	6.1	11.8	1,496	3.2	7.0	16.8
Middle	18	16.5	18.0	3,280	11.1	14.5	26	19.8	19.5	3,976	8.6	15.3	20.8
Upper	73	67.0	47.0	23,899	80.8	56.7	88	67.2	48.1	39,490	85.4	57.5	42.0
Unknown	4	3.7	20.4	634	2.1	19.8	4	3.1	17.1	794	1.7	18.6	0.0
Total	109	100.0	100.0	29,560	100.0	100.0	131	100.0	100.0	46,242	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table D161B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Austin Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	2	6.7	4.1	130	2.8	3.0	0	0.0	4.0	0	0.0	2.8	20.4
Moderate	1	3.3	7.1	94	2.0	3.4	3	9.7	8.1	352	4.4	3.2	16.8
Middle	4	13.3	12.0	664	14.3	5.7	6	19.4	17.0	554	6.9	8.0	20.8
Upper	22	73.3	72.9	3,722	80.0	83.2	21	67.7	66.0	7,136	88.4	76.2	42.0
Unknown	1	3.3	3.9	40	0.9	4.7	1	3.2	4.9	34	0.4	9.8	0.0
Total	30	100.0	100.0	4,650	100.0	100.0	31	100.0	100.0	8,076	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.4	0	0.0	1.7	0	0.0	6.0	0	0.0	2.6	20.4
Moderate	0	0.0	8.9	0	0.0	2.4	0	0.0	13.2	0	0.0	4.5	16.8
Middle	0	0.0	13.9	0	0.0	4.7	0	0.0	19.6	0	0.0	6.8	20.8
Upper	1	100.0	65.3	4,030	100.0	74.0	1	100.0	56.0	4,080	100.0	65.5	42.0
Unknown	0	0.0	7.5	0	0.0	17.2	0	0.0	5.3	0	0.0	20.6	0.0
Total	1	100.0	100.0	4,030	100.0	100.0	1	100.0	100.0	4,080	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.8	0	0.0	0.3	0	0.0	3.3	0	0.0	0.8	20.4
Moderate	0	0.0	1.4	0	0.0	0.8	0	0.0	0.3	0	0.0	0.1	16.8
Middle	0	0.0	0.5	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	20.8
Upper	0	0.0	0.3	0	0.0	0.8	0	0.0	0.5	0	0.0	1.0	42.0
Unknown	0	0.0	97.1	0	0.0	97.6	0	0.0	95.9	0	0.0	98.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D162A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level							
Assessment Area: Austin Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	3.9	0	0.0	2.0	22.1
Moderate	0	0.0	18.5	0	0.0	12.7	16.2
Middle	0	0.0	22.1	0	0.0	19.2	19.6
Upper	6	100.0	45.7	2,760	100.0	54.9	42.0
Unknown	0	0.0	9.8	0	0.0	11.2	0.0
Total	6	100.0	100.0	2,760	100.0	100.0	100.0
Refinance Loans							
Low	1	3.2	2.7	95	1.1	1.4	22.1
Moderate	8	25.8	11.2	1,277	14.8	7.5	16.2
Middle	3	9.7	19.3	855	9.9	16.2	19.6
Upper	16	51.6	49.2	5,962	69.2	57.1	42.0
Unknown	3	9.7	17.7	423	4.9	17.8	0.0
Total	31	100.0	100.0	8,612	100.0	100.0	100.0
Home Improvement Loans							
Low	1	3.7	3.7	133	3.4	2.3	22.1
Moderate	5	18.5	11.8	682	17.5	7.8	16.2
Middle	2	7.4	17.9	155	4.0	15.4	19.6
Upper	18	66.7	65.2	2,846	73.1	72.0	42.0
Unknown	1	3.7	1.4	75	1.9	2.5	0.0
Total	27	100.0	100.0	3,891	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	5	5.6	3.2	362	1.7	1.7	22.1
Moderate	15	16.9	14.2	2,162	10.2	9.8	16.2
Middle	5	5.6	20.0	1,010	4.8	17.3	19.6
Upper	60	67.4	47.1	17,224	81.0	55.8	42.0
Unknown	4	4.5	15.5	498	2.3	15.4	0.0
Total	89	100.0	100.0	21,256	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D162B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level							
Assessment Area: Austin Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	3	13.0	6.2	134	4.1	3.0	22.1
Moderate	2	8.7	10.9	203	6.2	6.4	16.2
Middle	0	0.0	12.6	0	0.0	6.4	19.6
Upper	18	78.3	68.9	2,956	89.8	83.4	42.0
Unknown	0	0.0	1.4	0	0.0	0.8	0.0
Total	23	100.0	100.0	3,293	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	5.3	0	0.0	1.8	22.1
Moderate	0	0.0	13.3	0	0.0	4.9	16.2
Middle	0	0.0	14.9	0	0.0	4.6	19.6
Upper	2	100.0	58.5	2,700	100.0	73.7	42.0
Unknown	0	0.0	7.9	0	0.0	14.9	0.0
Total	2	100.0	100.0	2,700	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.7	0	0.0	0.4	22.1
Moderate	0	0.0	1.2	0	0.0	1.0	16.2
Middle	0	0.0	0.3	0	0.0	0.5	19.6
Upper	0	0.0	0.6	0	0.0	1.3	42.0
Unknown	0	0.0	97.1	0	0.0	96.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table D163**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Austin Metropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	60	35.5	45.2	6,366	23.7	27.4	47	25.5	48.9	4,678	12.0	33.7	92.7
Over \$1 Million	60	35.5		15,740	58.6		90	48.9		27,697	71.0		5.8
Revenue Unknown	49	29.0		4,768	17.7		47	25.5		6,627	17.0		1.5
Total	169	100.0		26,874	100.0		184	100.0		39,002	100.0		100.0
By Loan Size													
\$100,000 or Less	106	62.7	92.6	4,724	17.6	37.2	101	54.9	94.8	5,272	13.5	43.8	
\$100,001 - \$250,000	29	17.2	4.1	5,309	19.8	17.3	34	18.5	2.8	6,621	17.0	14.9	
\$250,001 - \$1 Million	34	20.1	3.3	16,841	62.7	45.5	49	26.6	2.4	27,109	69.5	41.3	
Total	169	100.0	100.0	26,874	100.0	100.0	184	100.0	100.0	39,002	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	42	70.0		1,414	22.2		33	70.2		1,486	31.8		
\$100,001 - \$250,000	13	21.7		2,227	35.0		9	19.1		1,487	31.8		
\$250,001 - \$1 Million	5	8.3		2,725	42.8		5	10.6		1,705	36.4		
Total	60	100.0	6,366	100.0	47	100.0	4,678	100.0					
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

**Table D164**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Austin Metropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	142	53.2	39.3	12,486	29.3	25.0	92.6
Over \$1 Million	78	29.2		22,716	53.2		6.1
Revenue Unknown	47	17.6		7,463	17.5		1.3
Total	267	100.0		42,665	100.0		100.0
By Loan Size							
\$100,000 or Less	171	64.0	88.6	6,712	15.7	34.7	
\$100,001 - \$250,000	45	16.9	6.7	7,975	18.7	20.5	
\$250,001 - \$1 Million	51	19.1	4.7	27,978	65.6	44.8	
Total	267	100.0	100.0	42,665	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	110	77.5		3,823	30.6		
\$100,001 - \$250,000	20	14.1		3,576	28.6		
\$250,001 - \$1 Million	12	8.5		5,087	40.7		
Total	142	100.0		12,486	100.0		
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D165

2022 Combined Demographics Assessment Area: Houston Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	215	13.8	168,037	10.2	54,180	32.2	389,059	23.6
Moderate	385	24.6	377,238	22.9	60,353	16.0	273,834	16.6
Middle	408	26.1	472,141	28.6	36,171	7.7	294,579	17.8
Upper	505	32.3	614,325	37.2	20,536	3.3	693,387	42.0
Unknown	49	3.1	19,118	1.2	4,477	23.4	0	0.0
<b>Total AA</b>	<b>1,562</b>	<b>100.0</b>	<b>1,650,859</b>	<b>100.0</b>	<b>175,717</b>	<b>10.6</b>	<b>1,650,859</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied				Rental		Vacant
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	297,280	71,836	5.1	24.2	187,981	63.2	37,463	12.6
Moderate	604,210	274,443	19.4	45.4	273,153	45.2	56,614	9.4
Middle	714,369	428,552	30.3	60.0	224,956	31.5	60,861	8.5
Upper	903,672	625,964	44.3	69.3	211,220	23.4	66,488	7.4
Unknown	48,212	12,289	0.9	25.5	28,761	59.7	7,162	14.9
<b>Total AA</b>	<b>2,567,743</b>	<b>1,413,084</b>	<b>100.0</b>	<b>55.0</b>	<b>926,071</b>	<b>36.1</b>	<b>228,588</b>	<b>8.9</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or =		Over \$1 Million		Revenue Not	
	#	%	#	%	#	%	#	%
Low	32,585	8.9	29,507	8.7	2,842	11.7	236	5.3
Moderate	72,249	19.6	65,975	19.5	5,700	23.4	574	12.9
Middle	93,438	25.4	87,016	25.7	5,518	22.7	904	20.3
Upper	163,076	44.3	150,745	44.5	9,682	39.8	2,649	59.6
Unknown	6,387	1.7	5,734	1.7	569	2.3	84	1.9
<b>Total AA</b>	<b>367,735</b>	<b>100.0</b>	<b>338,977</b>	<b>100.0</b>	<b>24,311</b>	<b>100.0</b>	<b>4,447</b>	<b>100.0</b>
Percentage of Total Businesses:				92.2		6.6		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	87	3.5	84	3.5	3	7.3	0	0.0
Moderate	315	12.8	302	12.5	12	29.3	1	16.7
Middle	713	29.0	699	29.0	10	24.4	4	66.7
Upper	1,307	53.2	1,291	53.6	15	36.6	1	16.7
Unknown	34	1.4	33	1.4	1	2.4	0	0.0
<b>Total AA</b>	<b>2,456</b>	<b>100.0</b>	<b>2,409</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>
Percentage of Total Farms:				98.1		1.7		0.2
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D166

2021 Combined Demographics Assessment Area: Houston Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	158	15.2	159,612	10.8	57,230	35.9	362,116	24.4
Moderate	302	29.1	358,696	24.2	70,103	19.5	238,045	16.0
Middle	258	24.8	406,320	27.4	41,170	10.1	252,221	17.0
Upper	312	30.0	556,835	37.5	21,449	3.9	631,386	42.6
Unknown	9	0.9	2,305	0.2	999	43.3	0	0.0
Total AA	1,039	100.0	1,483,768	100.0	190,951	12.9	1,483,768	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	291,630	67,997	5.4	23.3	178,152	61.1	45,481	15.6
Moderate	584,643	265,840	21.0	45.5	253,118	43.3	65,685	11.2
Middle	616,393	363,015	28.6	58.9	202,026	32.8	51,352	8.3
Upper	831,143	569,614	44.9	68.5	200,009	24.1	61,520	7.4
Unknown	6,183	789	0.1	12.8	4,770	77.1	624	10.1
Total AA	2,329,992	1,267,255	100.0	54.4	838,075	36.0	224,662	9.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or =		Over \$1 Million		Revenue Not	
	#	%	#	%	#	%	#	%
Low	35,090	9.9	31,319	9.6	3,531	14.5	240	6.3
Moderate	66,930	18.9	61,066	18.8	5,403	22.2	461	12.1
Middle	83,628	23.6	77,723	23.9	5,213	21.4	692	18.2
Upper	167,432	47.3	154,856	47.6	10,172	41.8	2,404	63.2
Unknown	647	0.2	596	0.2	44	0.2	7	0.2
Total AA	353,727	100.0	325,560	100.0	24,363	100.0	3,804	100.0
Percentage of Total Businesses:				92.0		6.9		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	86	3.6	81	3.4	5	12.5	0	0.0
Moderate	274	11.4	263	11.1	9	22.5	2	28.6
Middle	734	30.4	719	30.4	11	27.5	4	57.1
Upper	1,315	54.5	1,299	54.9	15	37.5	1	14.3
Unknown	3	0.1	3	0.1	0	0.0	0	0.0
Total AA	2,412	100.0	2,365	100.0	40	100.0	7	100.0
Percentage of Total Farms:				98.1		1.7		0.3
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



Table D167

2020 Combined Demographics Assessment Area: Houston Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	158	15.2	159,612	10.8	57,230	35.9	362,116	24.4
Moderate	302	29.1	358,696	24.2	70,103	19.5	238,045	16.0
Middle	258	24.8	406,320	27.4	41,170	10.1	252,221	17.0
Upper	312	30.0	556,835	37.5	21,449	3.9	631,386	42.6
Unknown	9	0.9	2,305	0.2	999	43.3	0	0.0
<b>Total AA</b>	<b>1,039</b>	<b>100.0</b>	<b>1,483,768</b>	<b>100.0</b>	<b>190,951</b>	<b>12.9</b>	<b>1,483,768</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	291,630	67,997	5.4	23.3	178,152	61.1	45,481	15.6
Moderate	584,643	265,840	21.0	45.5	253,118	43.3	65,685	11.2
Middle	616,393	363,015	28.6	58.9	202,026	32.8	51,352	8.3
Upper	831,143	569,614	44.9	68.5	200,009	24.1	61,520	7.4
Unknown	6,183	789	0.1	12.8	4,770	77.1	624	10.1
<b>Total AA</b>	<b>2,329,992</b>	<b>1,267,255</b>	<b>100.0</b>	<b>54.4</b>	<b>838,075</b>	<b>36.0</b>	<b>224,662</b>	<b>9.6</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or =		Over \$1 Million		Revenue Not	
	#	%	#	%	#	%	#	%
Low	33,903	9.9	30,011	9.6	3,683	14.7	209	5.8
Moderate	64,848	19.0	58,841	18.8	5,571	22.3	436	12.1
Middle	80,016	23.4	74,026	23.6	5,320	21.3	670	18.5
Upper	162,543	47.5	149,870	47.8	10,378	41.5	2,295	63.5
Unknown	634	0.2	577	0.2	50	0.2	7	0.2
<b>Total AA</b>	<b>341,944</b>	<b>100.0</b>	<b>313,325</b>	<b>100.0</b>	<b>25,002</b>	<b>100.0</b>	<b>3,617</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.6</b>		<b>7.3</b>		<b>1.1</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	87	3.6	82	3.5	5	12.5	0	0.0
Moderate	264	10.9	253	10.7	9	22.5	2	25.0
Middle	738	30.5	722	30.5	11	27.5	5	62.5
Upper	1,324	54.8	1,308	55.2	15	37.5	1	12.5
Unknown	3	0.1	3	0.1	0	0.0	0	0.0
<b>Total AA</b>	<b>2,416</b>	<b>100.0</b>	<b>2,368</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.0</b>		<b>1.7</b>		<b>0.3</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D168A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Houston Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	2	8.3	3.0	251	4.1	2.2	1	5.9	3.7	170	2.6	2.5	5.1
Moderate	3	12.5	13.9	756	12.2	10.0	5	29.4	15.5	766	11.7	10.9	19.4
Middle	6	25.0	28.3	972	15.7	22.7	3	17.6	31.9	395	6.0	27.7	30.3
Upper	13	54.2	54.6	4,198	68.0	64.9	8	47.1	47.9	5,215	79.7	58.0	44.3
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	1.0	0	0.0	0.9	0.9
Total	24	100.0	100.0	6,177	100.0	100.0	17	100.0	100.0	6,546	100.0	100.0	100.0
Refinance Loans													
Low	9	4.3	2.1	1,273	2.5	1.5	9	4.6	3.1	1,094	2.7	2.0	5.1
Moderate	31	14.9	10.1	3,594	7.2	7.0	37	18.8	15.0	4,483	10.9	9.9	19.4
Middle	56	26.9	24.6	9,593	19.1	18.9	64	32.5	31.1	11,906	29.0	24.8	30.3
Upper	111	53.4	63.2	35,303	70.2	72.5	86	43.7	50.0	23,384	56.9	62.6	44.3
Unknown	1	0.5	0.0	500	1.0	0.0	1	0.5	0.9	194	0.5	0.8	0.9
Total	208	100.0	100.0	50,263	100.0	100.0	197	100.0	100.0	41,061	100.0	100.0	100.0
Home Improvement Loans													
Low	4	4.8	2.5	333	3.2	1.9	8	7.6	2.8	806	5.5	2.2	5.1
Moderate	19	22.9	11.7	1,714	16.5	8.9	17	16.2	10.8	1,286	8.8	7.9	19.4
Middle	16	19.3	19.1	1,790	17.2	14.6	22	21.0	23.6	2,913	19.8	19.2	30.3
Upper	44	53.0	66.7	6,579	63.2	74.6	57	54.3	62.0	9,587	65.3	70.1	44.3
Unknown	0	0.0	0.0	0	0.0	0.0	1	1.0	0.7	100	0.7	0.7	0.9
Total	83	100.0	100.0	10,416	100.0	100.0	105	100.0	100.0	14,692	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	2	100.0	22.7	1,400	100.0	16.5	0	0.0	19.5	0	0.0	12.7	22.9
Moderate	0	0.0	31.1	0	0.0	23.3	0	0.0	28.1	0	0.0	20.1	26.4
Middle	0	0.0	19.1	0	0.0	20.8	0	0.0	21.9	0	0.0	28.2	21.2
Upper	0	0.0	26.9	0	0.0	38.5	1	100.0	26.9	54,205	100.0	33.7	25.3
Unknown	0	0.0	0.2	0	0.0	0.8	0	0.0	3.5	0	0.0	5.3	4.2
Total	2	100.0	100.0	1,400	100.0	100.0	1	100.0	100.0	54,205	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	23	5.2	2.6	3,835	4.3	2.8	23	4.9	3.6	2,428	1.7	3.8	5.1
Moderate	79	17.8	12.3	9,147	10.2	9.6	80	17.2	15.3	8,892	6.2	11.9	19.4
Middle	103	23.2	26.6	14,767	16.5	21.0	139	29.8	31.4	22,888	16.0	27.1	30.3
Upper	238	53.6	58.4	61,318	68.5	66.4	218	46.8	48.8	107,620	75.1	55.8	44.3
Unknown	1	0.2	0.1	500	0.6	0.1	6	1.3	0.9	1,392	1.0	1.4	0.9
Total	444	100.0	100.0	89,567	100.0	100.0	466	100.0	100.0	143,220	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D168B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography													
Assessment Area: Houston Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit													
Low	6	4.9	1.7	578	3.2	1.1	5	3.5	1.8	358	1.5	1.5	5.1
Moderate	26	21.1	7.7	3,083	17.3	5.3	20	13.9	7.1	2,237	9.2	4.9	19.4
Middle	25	20.3	18.1	2,412	13.5	12.5	50	34.7	21.3	7,674	31.6	15.7	30.3
Upper	66	53.7	72.4	11,767	66.0	81.1	65	45.1	69.2	12,909	53.2	77.6	44.3
Unknown	0	0.0	0.0	0	0.0	0.0	4	2.8	0.6	1,098	4.5	0.3	0.9
Total	123	100.0	100.0	17,840	100.0	100.0	144	100.0	100.0	24,276	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.4	0	0.0	1.8	0	0.0	2.9	0	0.0	1.8	5.1
Moderate	0	0.0	13.8	0	0.0	6.1	1	50.0	14.6	120	4.9	8.1	19.4
Middle	0	0.0	25.9	0	0.0	14.1	0	0.0	29.2	0	0.0	18.7	30.3
Upper	4	100.0	56.9	3,471	100.0	78.0	1	50.0	52.7	2,320	95.1	70.4	44.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.6	0	0.0	1.0	0.9
Total	4	100.0	100.0	3,471	100.0	100.0	2	100.0	100.0	2,440	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.3	0	0.0	2.1	0	0.0	4.1	0	0.0	6.7	5.1
Moderate	0	0.0	20.5	0	0.0	14.6	0	0.0	25.8	0	0.0	18.7	19.4
Middle	0	0.0	40.5	0	0.0	38.9	0	0.0	39.9	0	0.0	35.7	30.3
Upper	0	0.0	35.7	0	0.0	44.4	0	0.0	29.3	0	0.0	38.1	44.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.9	0	0.0	0.8	0.9
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table D169A**

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Houston Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	1	3.2	2.8	96	1.5	2.2	5.4
Moderate	6	19.4	12.7	797	12.3	9.3	21.0
Middle	6	19.4	27.5	960	14.8	22.0	28.6
Upper	18	58.1	56.9	4,636	71.4	66.5	44.9
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Total	31	100.0	100.0	6,489	100.0	100.0	100.0
Refinance Loans							
Low	12	4.6	1.9	1,570	3.3	1.5	5.4
Moderate	42	16.2	8.8	5,381	11.2	6.2	21.0
Middle	66	25.5	22.0	10,163	21.1	17.1	28.6
Upper	139	53.7	67.2	31,076	64.5	75.0	44.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	259	100.0	100.0	48,190	100.0	100.0	100.0
Home Improvement Loans							
Low	4	4.5	2.1	272	2.3	1.5	5.4
Moderate	10	11.2	11.5	1,040	8.7	8.8	21.0
Middle	25	28.1	20.4	2,157	18.0	16.3	28.6
Upper	50	56.2	66.0	8,500	71.0	73.4	44.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	89	100.0	100.0	11,969	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	21.7	0	0.0	15.6	25.3
Moderate	0	0.0	30.5	0	0.0	21.0	27.6
Middle	0	0.0	21.1	0	0.0	22.5	21.2
Upper	0	0.0	26.8	0	0.0	41.0	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.7
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	20	4.1	2.4	2,157	2.5	2.4	5.4
Moderate	79	16.0	11.2	9,244	10.9	8.5	21.0
Middle	131	26.6	25.4	17,152	20.3	20.1	28.6
Upper	263	53.3	60.9	56,104	66.3	69.0	44.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	493	100.0	100.0	84,657	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table D169B**

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Houston Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	3	2.7	2.2	219	1.5	1.6	5.4
Moderate	21	19.1	9.3	2,026	13.4	4.9	21.0
Middle	32	29.1	18.4	3,535	23.4	11.6	28.6
Upper	54	49.1	70.0	9,297	61.7	81.8	44.9
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Total	110	100.0	100.0	15,077	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.8	0	0.0	1.4	5.4
Moderate	0	0.0	13.3	0	0.0	7.4	21.0
Middle	2	50.0	26.6	337	11.5	17.8	28.6
Upper	2	50.0	57.2	2,595	88.5	73.4	44.9
Unknown	0	0.0	0.1	0	0.0	0.0	0.1
Total	4	100.0	100.0	2,932	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	2.7	0	0.0	1.7	5.4
Moderate	0	0.0	19.7	0	0.0	14.2	21.0
Middle	0	0.0	40.0	0	0.0	34.3	28.6
Upper	0	0.0	37.6	0	0.0	49.8	44.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table D170**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography Assessment Area: Houston Metropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	177	16.9	9.5	35,093	17.7	11.7	87	12.9	8.0	20,443	13.6	9.3	8.9
Moderate	273	26.1	18.2	52,076	26.2	19.3	181	26.9	18.2	48,069	31.9	20.2	19.6
Middle	234	22.4	23.8	47,247	23.8	22.7	160	23.8	25.4	31,445	20.9	24.2	25.4
Upper	361	34.5	47.9	64,162	32.3	46.0	233	34.7	46.4	49,515	32.8	44.6	44.3
Unknown	1	0.1	0.1	84	0.0	0.1	11	1.6	1.5	1,323	0.9	1.5	1.7
Total	1,046	100.0	100.0	198,662	100.0	100.0	672	100.0	100.0	150,795	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

**Table D171**

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Houston Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	260	14.9	9.9	50,072	19.4	11.9	9.9
Moderate	446	25.6	17.8	65,845	25.5	18.5	19.0
Middle	417	23.9	23.0	58,159	22.5	22.5	23.4
Upper	617	35.4	48.8	82,900	32.1	46.6	47.5
Unknown	4	0.2	0.1	1,322	0.5	0.1	0.2
Total	1,744	100.0	100.0	258,298	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D172A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Houston Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	2	8.3	2.3	100	1.6	1.1	0	0.0	2.6	0	0.0	1.2	23.6
Moderate	2	8.3	14.2	299	4.8	9.5	3	17.6	13.9	420	6.4	9.1	16.6
Middle	5	20.8	20.5	1,000	16.2	17.0	4	23.5	20.3	752	11.5	16.8	17.8
Upper	15	62.5	40.6	4,778	77.4	52.8	8	47.1	40.6	4,825	73.7	52.2	42.0
Unknown	0	0.0	22.4	0	0.0	19.6	2	11.8	22.6	549	8.4	20.7	0.0
Total	24	100.0	100.0	6,177	100.0	100.0	17	100.0	100.0	6,546	100.0	100.0	100.0
Refinance Loans													
Low	17	8.2	2.5	1,298	2.6	1.2	27	13.7	6.9	2,736	6.7	3.5	23.6
Moderate	37	17.8	9.4	4,352	8.7	5.6	43	21.8	16.7	6,272	15.3	10.8	16.6
Middle	45	21.6	16.7	7,131	14.2	12.2	38	19.3	21.0	6,441	15.7	16.4	17.8
Upper	98	47.1	48.5	34,953	69.5	58.5	85	43.1	41.7	25,123	61.2	54.4	42.0
Unknown	11	5.3	23.1	2,529	5.0	22.5	4	2.0	13.8	489	1.2	14.9	0.0
Total	208	100.0	100.0	50,263	100.0	100.0	197	100.0	100.0	41,061	100.0	100.0	100.0
Home Improvement Loans													
Low	9	10.8	4.2	470	4.5	2.2	12	11.4	5.2	854	5.8	3.1	23.6
Moderate	11	13.3	8.6	814	7.8	6.0	22	21.0	10.9	2,693	18.3	7.6	16.6
Middle	16	19.3	15.6	1,778	17.1	11.8	22	21.0	16.6	2,577	17.5	12.3	17.8
Upper	47	56.6	69.0	7,354	70.6	76.1	48	45.7	65.2	8,532	58.1	74.5	42.0
Unknown	0	0.0	2.6	0	0.0	3.8	1	1.0	2.1	36	0.2	2.5	0.0
Total	83	100.0	100.0	10,416	100.0	100.0	105	100.0	100.0	14,692	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	47	10.6	2.4	3,265	3.7	1.1	63	13.5	3.7	5,678	6.4	1.7	23.6
Moderate	76	17.2	11.8	7,959	9.0	7.8	88	18.9	14.3	11,929	13.4	9.3	16.6
Middle	92	20.8	18.4	13,553	15.4	14.8	94	20.2	20.1	14,187	15.9	16.6	17.8
Upper	214	48.4	44.2	60,616	68.8	55.2	210	45.2	41.5	55,909	62.8	52.8	42.0
Unknown	13	2.9	23.1	2,774	3.1	21.1	10	2.2	20.5	1,312	1.5	19.6	0.0
Total	442	100.0	100.0	88,167	100.0	100.0	465	100.0	100.0	89,015	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table D172B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Houston Metropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	18	14.6	4.4	1,309	7.3	1.9	23	16.0	4.6	1,968	8.1	2.9	23.6
Moderate	26	21.1	8.5	2,494	14.0	5.0	20	13.9	10.5	2,544	10.5	5.9	16.6
Middle	26	21.1	13.8	3,644	20.4	8.7	30	20.8	14.6	4,417	18.2	9.9	17.8
Upper	51	41.5	70.6	10,148	56.9	81.7	68	47.2	65.6	15,109	62.2	77.0	42.0
Unknown	2	1.6	2.7	245	1.4	2.7	3	2.1	4.7	238	1.0	4.3	0.0
Total	123	100.0	100.0	17,840	100.0	100.0	144	100.0	100.0	24,276	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	25.0	5.6	88	2.5	2.8	1	50.0	7.8	120	4.9	4.5	23.6
Moderate	0	0.0	13.6	0	0.0	6.8	0	0.0	16.2	0	0.0	9.0	16.6
Middle	0	0.0	17.7	0	0.0	9.0	0	0.0	19.3	0	0.0	11.1	17.8
Upper	3	75.0	57.1	3,383	97.5	69.9	1	50.0	50.5	2,320	95.1	63.8	42.0
Unknown	0	0.0	6.1	0	0.0	11.4	0	0.0	6.2	0	0.0	11.7	0.0
Total	4	100.0	100.0	3,471	100.0	100.0	2	100.0	100.0	2,440	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.6	0	0.0	0.3	0	0.0	1.4	0	0.0	0.8	23.6
Moderate	0	0.0	0.9	0	0.0	0.7	0	0.0	1.3	0	0.0	1.1	16.6
Middle	0	0.0	0.3	0	0.0	0.3	0	0.0	0.4	0	0.0	0.4	17.8
Upper	0	0.0	0.4	0	0.0	0.5	0	0.0	0.2	0	0.0	0.3	42.0
Unknown	0	0.0	97.8	0	0.0	98.3	0	0.0	96.7	0	0.0	97.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													



Table D173A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Houston Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	2	6.5	3.1	224	3.5	1.5	24.4
Moderate	10	32.3	18.6	1,511	23.3	12.5	16.0
Middle	9	29.0	23.6	1,999	30.8	19.8	17.0
Upper	6	19.4	44.5	1,581	24.4	56.1	42.6
Unknown	4	12.9	10.2	1,174	18.1	10.1	0.0
Total	31	100.0	100.0	6,489	100.0	100.0	100.0
Refinance Loans							
Low	29	11.2	1.8	2,649	5.5	0.8	24.4
Moderate	47	18.1	7.7	5,382	11.2	4.5	16.0
Middle	51	19.7	15.0	7,759	16.1	11.0	17.0
Upper	118	45.6	54.1	29,466	61.1	63.1	42.6
Unknown	14	5.4	21.3	2,934	6.1	20.6	0.0
Total	259	100.0	100.0	48,190	100.0	100.0	100.0
Home Improvement Loans							
Low	11	12.4	3.7	787	6.6	1.9	24.4
Moderate	13	14.6	9.8	1,041	8.7	6.7	16.0
Middle	22	24.7	15.7	2,689	22.5	11.6	17.0
Upper	41	46.1	67.6	7,090	59.2	75.2	42.6
Unknown	2	2.2	3.2	362	3.0	4.6	0.0
Total	89	100.0	100.0	11,969	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	53	10.8	2.4	4,476	5.3	1.2	24.4
Moderate	94	19.1	12.7	10,578	12.5	8.4	16.0
Middle	101	20.5	18.5	14,680	17.3	15.1	17.0
Upper	222	45.0	47.4	50,319	59.4	58.3	42.6
Unknown	23	4.7	18.9	4,604	5.4	17.0	0.0
Total	493	100.0	100.0	84,657	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D173B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Houston Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	11	10.0	5.0	816	5.4	1.8	24.4
Moderate	23	20.9	10.4	2,544	16.9	5.2	16.0
Middle	19	17.3	15.5	2,233	14.8	9.1	17.0
Upper	54	49.1	65.1	9,350	62.0	81.2	42.6
Unknown	3	2.7	3.9	134	0.9	2.6	0.0
Total	110	100.0	100.0	15,077	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	5.4	0	0.0	2.3	24.4
Moderate	1	25.0	13.0	100	3.4	6.5	16.0
Middle	0	0.0	18.0	0	0.0	10.9	17.0
Upper	3	75.0	54.0	2,832	96.6	67.5	42.6
Unknown	0	0.0	9.6	0	0.0	12.7	0.0
Total	4	100.0	100.0	2,932	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.3	0	0.0	0.2	24.4
Moderate	0	0.0	0.6	0	0.0	0.5	16.0
Middle	0	0.0	0.6	0	0.0	0.7	17.0
Upper	0	0.0	0.4	0	0.0	0.6	42.6
Unknown	0	0.0	98.1	0	0.0	98.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D174

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Houston Metropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	416	39.8	42.3	56,704	28.5	27.1	265	39.4	50.2	38,635	25.6	34.9	92.2
Over \$1 Million	386	36.9		117,009	58.9		335	49.9		101,983	67.6		6.6
Revenue Unknown	244	23.3		24,949	12.6		72	10.7		10,177	6.7		1.2
Total	1,046	100.0		198,662	100.0		672	100.0		150,795	100.0		100.0
By Loan Size													
\$100,000 or Less	568	54.3	92.7	24,425	12.3	37.6	335	49.9	94.7	16,923	11.2	41.7	
\$100,001 - \$250,000	232	22.2	4.0	42,466	21.4	17.3	143	21.3	2.8	28,171	18.7	14.8	
\$250,001 - \$1 Million	246	23.5	3.3	131,771	66.3	45.2	194	28.9	2.5	105,701	70.1	43.5	
Total	1,046	100.0	100.0	198,662	100.0	100.0	672	100.0	100.0	150,795	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	277	66.6		11,527	20.3		173	65.3		7,725	20.0		
\$100,001 - \$250,000	79	19.0		13,574	23.9		49	18.5		8,973	23.2		
\$250,001 - \$1 Million	60	14.4		31,603	55.7		43	16.2		21,937	56.8		
Total	416	100.0		56,704	100.0		265	100.0		38,635	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table D175

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Houston Metropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	971	55.7	37.6	79,990	31.0	23.7	91.6
Over \$1 Million	515	29.5		147,449	57.1		7.3
Revenue Unknown	258	14.8		30,859	11.9		1.1
Total	1,744	100.0		258,298	100.0		100.0
By Loan Size							
\$100,000 or Less	1,119	64.2	88.8	40,037	15.5	33.4	
\$100,001 - \$250,000	312	17.9	6.4	55,858	21.6	19.5	
\$250,001 - \$1 Million	313	17.9	4.9	162,403	62.9	47.1	
Total	1,744	100.0	100.0	258,298	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	780	80.3		26,170	32.7		
\$100,001 - \$250,000	123	12.7		20,458	25.6		
\$250,001 - \$1 Million	68	7.0		33,362	41.7		
Total	971	100.0		79,990	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**APPENDIX E: NONMETROPOLITAN LIMITED-SCOPE ASSESSMENT AREAS**

**Table E1**

2022 Combined Demographics Assessment Area: Lenawee County Nonmetropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,048	15.7
Moderate	5	20.0	4,184	16.2	894	21.4	4,905	19.0
Middle	14	56.0	13,669	52.9	873	6.4	5,581	21.6
Upper	6	24.0	7,998	30.9	276	3.5	11,317	43.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>25</b>	<b>100.0</b>	<b>25,851</b>	<b>100.0</b>	<b>2,043</b>	<b>7.9</b>	<b>25,851</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	8,883	4,407	14.6	49.6	3,443	38.8	1,033	11.6
Middle	22,886	16,101	53.5	70.4	4,135	18.1	2,650	11.6
Upper	12,125	9,608	31.9	79.2	999	8.2	1,518	12.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>43,894</b>	<b>30,116</b>	<b>100.0</b>	<b>68.6</b>	<b>8,577</b>	<b>19.5</b>	<b>5,201</b>	<b>11.8</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	800	22.2	724	21.8	70	30.8	6	11.5
Middle	1,871	51.9	1,737	52.2	110	48.5	24	46.2
Upper	936	25.9	867	26.1	47	20.7	22	42.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,607</b>	<b>100.0</b>	<b>3,328</b>	<b>100.0</b>	<b>227</b>	<b>100.0</b>	<b>52</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.3</b>		<b>6.3</b>		<b>1.4</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2	0.6	2	0.6	0	0.0	0	0.0
Middle	187	58.6	183	58.8	4	50.0	0	0.0
Upper	130	40.8	126	40.5	4	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>319</b>	<b>100.0</b>	<b>311</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.5</b>		<b>2.5</b>		<b>0.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table E2**

2021 Combined Demographics Assessment Area: Lenawee County Nonmetropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,132	16.4
Moderate	4	17.4	3,035	12.1	793	26.1	4,368	17.4
Middle	13	56.5	13,842	55.1	1,186	8.6	5,202	20.7
Upper	6	26.1	8,257	32.9	438	5.3	11,432	45.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>23</b>	<b>100.0</b>	<b>25,134</b>	<b>100.0</b>	<b>2,417</b>	<b>9.6</b>	<b>25,134</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	6,694	2,963	10.2	44.3	2,935	43.8	796	11.9
Middle	24,176	16,447	56.4	68.0	4,005	16.6	3,724	15.4
Upper	12,542	9,770	33.5	77.9	1,844	14.7	928	7.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>43,412</b>	<b>29,180</b>	<b>100.0</b>	<b>67.2</b>	<b>8,784</b>	<b>20.2</b>	<b>5,448</b>	<b>12.5</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	650	17.8	591	17.6	57	24.1	2	4.1
Middle	1,973	54.1	1,824	54.2	123	51.9	26	53.1
Upper	1,026	28.1	948	28.2	57	24.1	21	42.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,649</b>	<b>100.0</b>	<b>3,363</b>	<b>100.0</b>	<b>237</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.2</b>		<b>6.5</b>		<b>1.3</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2	0.6	2	0.6	0	0.0	0	0.0
Middle	201	62.8	196	63.0	4	50.0	1	100.0
Upper	117	36.6	113	36.3	4	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>320</b>	<b>100.0</b>	<b>311</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>97.2</b>		<b>2.5</b>		<b>0.3</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table E3**

2020 Combined Demographics Assessment Area: Lenawee County Nonmetropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,132	16.4
Moderate	4	17.4	3,035	12.1	793	26.1	4,368	17.4
Middle	13	56.5	13,842	55.1	1,186	8.6	5,202	20.7
Upper	6	26.1	8,257	32.9	438	5.3	11,432	45.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	23	100.0	25,134	100.0	2,417	9.6	25,134	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	6,694	2,963	10.2	44.3	2,935	43.8	796	11.9
Middle	24,176	16,447	56.4	68.0	4,005	16.6	3,724	15.4
Upper	12,542	9,770	33.5	77.9	1,844	14.7	928	7.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	43,412	29,180	100.0	67.2	8,784	20.2	5,448	12.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	653	17.6	591	17.3	60	23.6	2	4.1
Middle	1,999	53.9	1,842	54.0	132	52.0	25	51.0
Upper	1,059	28.5	975	28.6	62	24.4	22	44.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,711	100.0	3,408	100.0	254	100.0	49	100.0
Percentage of Total Businesses:				91.8		6.8		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2	0.6	2	0.6	0	0.0	0	0.0
Middle	204	62.2	200	62.7	3	42.9	1	50.0
Upper	122	37.2	117	36.7	4	57.1	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	328	100.0	319	100.0	7	100.0	2	100.0
Percentage of Total Farms:				97.3		2.1		0.6
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table E4A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Lenawee County Nonmetropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	50.0	13.2	104	16.1	7.5	0	0.0	17.6	0	0.0	12.2	14.6
Middle	1	50.0	50.8	540	83.9	52.9	0	0.0	52.4	0	0.0	52.7	53.5
Upper	0	0.0	36.0	0	0.0	39.6	0	0.0	30.0	0	0.0	35.1	31.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	644	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	5.1	0	0.0	2.8	0	0.0	13.1	0	0.0	9.6	14.6
Middle	4	36.4	53.3	482	33.8	53.0	5	55.6	53.6	519	57.4	50.7	53.5
Upper	7	63.6	41.6	944	66.2	44.2	4	44.4	33.3	385	42.6	39.7	31.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	11	100.0	100.0	1,426	100.0	100.0	9	100.0	100.0	904	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	5.0	0	0.0	4.2	0	0.0	8.7	0	0.0	7.6	14.6
Middle	1	50.0	47.8	50	37.3	48.4	0	0.0	59.3	0	0.0	50.5	53.5
Upper	1	50.0	47.2	84	62.7	47.4	3	100.0	32.0	548	100.0	41.9	31.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	134	100.0	100.0	3	100.0	100.0	548	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	25.0	0	0.0	11.9	0	0.0	16.7	0	0.0	0.5	52.3
Middle	0	0.0	37.5	0	0.0	51.7	0	0.0	83.3	0	0.0	99.5	43.2
Upper	0	0.0	37.5	0	0.0	36.4	0	0.0	0.0	0	0.0	0.0	4.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	5.3	8.2	104	3.9	4.9	0	0.0	15.2	0	0.0	9.4	14.6
Middle	9	47.4	52.0	1,472	55.5	52.8	7	50.0	53.6	932	50.0	60.4	53.5
Upper	9	47.4	39.8	1,078	40.6	42.3	7	50.0	31.2	933	50.0	30.1	31.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	19	100.0	100.0	2,654	100.0	100.0	14	100.0	100.0	1,865	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table E4B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Lenawee County Nonmetropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.0	0	0.0	1.4	0	0.0	13.0	0	0.0	9.5	14.6
Middle	3	75.0	50.0	400	88.9	53.6	2	100.0	57.4	413	100.0	57.7	53.5
Upper	1	25.0	48.0	50	11.1	45.1	0	0.0	29.6	0	0.0	32.8	31.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	450	100.0	100.0	2	100.0	100.0	413	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	9.5	0	0.0	3.6	0	0.0	16.2	0	0.0	15.2	14.6
Middle	0	0.0	47.6	0	0.0	45.4	0	0.0	48.6	0	0.0	56.5	53.5
Upper	0	0.0	42.9	0	0.0	51.0	0	0.0	35.1	0	0.0	28.3	31.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.3	0	0.0	5.7	0	0.0	17.9	0	0.0	16.5	14.6
Middle	0	0.0	55.2	0	0.0	53.0	0	0.0	53.6	0	0.0	47.8	53.5
Upper	0	0.0	34.5	0	0.0	41.3	0	0.0	28.6	0	0.0	35.8	31.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													



Table E5A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Lenawee County Nonmetropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	100.0	11.1	61	100.0	5.9	10.2
Middle	0	0.0	52.5	0	0.0	54.2	56.4
Upper	0	0.0	36.3	0	0.0	39.9	33.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	61	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.6	0	0.0	2.4	10.2
Middle	1	16.7	53.2	120	16.8	52.8	56.4
Upper	5	83.3	42.2	593	83.2	44.8	33.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	6	100.0	100.0	713	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.1	0	0.0	3.1	10.2
Middle	2	50.0	56.2	71	26.2	60.5	56.4
Upper	2	50.0	39.7	200	73.8	36.4	33.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	271	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	30.0	0	0.0	29.0	44.5
Middle	0	0.0	50.0	0	0.0	24.9	39.5
Upper	0	0.0	20.0	0	0.0	46.1	16.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	1	5.6	7.0	61	3.8	4.3	10.2
Middle	9	50.0	53.0	709	43.6	52.9	56.4
Upper	8	44.4	40.0	855	52.6	42.7	33.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	18	100.0	100.0	1,625	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E5B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Lenawee County Nonmetropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.3	0	0.0	3.3	10.2
Middle	6	85.7	47.1	518	89.3	49.1	56.4
Upper	1	14.3	50.6	62	10.7	47.6	33.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	580	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	10.2
Middle	0	0.0	63.9	0	0.0	69.8	56.4
Upper	0	0.0	36.1	0	0.0	30.2	33.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.3	0	0.0	3.3	10.2
Middle	0	0.0	52.2	0	0.0	49.0	56.4
Upper	0	0.0	43.5	0	0.0	47.6	33.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table E6**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Lenawee County Nonmetropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$ (000)	%	%	#	%	%	\$ (000)	%	%	
By Revenue													
\$1 Million or Less	5	27.8	50.2	227	6.2	33.5	6	40.0	59.6	1,571	43.0	52.0	92.3
Over \$1 Million	11	61.1		3,379	92.7		9	60.0		2,085	57.0		6.3
Revenue Unknown	2	11.1		41	1.1		0	0.0		0	0.0		1.4
Total	18	100.0		3,647	100.0		15	100.0		3,656	100.0		100.0
By Loan Size													
\$100,000 or Less	10	55.6	92.6	504	13.8	42.1	5	33.3	94.8	320	8.8	44.4	
\$100,001 - \$250,000	3	16.7	4.7	577	15.8	22.0	6	40.0	3.3	1,136	31.1	21.4	
\$250,001 - \$1 Million	5	27.8	2.7	2,566	70.4	35.9	4	26.7	1.9	2,200	60.2	34.2	
Total	18	100.0	100.0	3,647	100.0	100.0	15	100.0	100.0	3,656	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	5	100.0		227	100.0		2	33.3		85	5.4		
\$100,001 - \$250,000	0	0.0		0	0.0		3	50.0		486	30.9		
\$250,001 - \$1 Million	0	0.0		0	0.0		1	16.7		1,000	63.7		
Total	5	100.0		227	100.0		6	100.0		1,571	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table E7**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Lenawee County Nonmetropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	8	42.1	31.4	428	13.4	22.8	91.8
Over \$1 Million	10	52.6		2,763	86.3		6.8
Revenue Unknown	1	5.3		11	0.3		1.3
Total	19	100.0		3,202	100.0		100.0
By Loan Size							
\$100,000 or Less	10	52.6	89.6	457	14.3	36.1	
\$100,001 - \$250,000	5	26.3	6.3	779	24.3	20.7	
\$250,001 - \$1 Million	4	21.1	4.1	1,966	61.4	43.2	
Total	19	100.0	100.0	3,202	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	6	75.0		187	43.7		
\$100,001 - \$250,000	2	25.0		241	56.3		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	8	100.0		428	100.0		
Source: 2020 FFIEC Census Data							
2020 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E8A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Lenawee County Nonmetropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	7.3	0	0.0	3.7	0	0.0	5.4	0	0.0	2.7	15.7
Moderate	0	0.0	21.5	0	0.0	15.4	0	0.0	20.0	0	0.0	13.4	19.0
Middle	1	50.0	22.9	104	16.1	21.4	0	0.0	23.6	0	0.0	21.2	21.6
Upper	1	50.0	32.7	540	83.9	44.4	0	0.0	32.6	0	0.0	45.6	43.8
Unknown	0	0.0	15.6	0	0.0	15.1	0	0.0	18.4	0	0.0	17.1	0.0
Total	2	100.0	100.0	644	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.4	0	0.0	2.3	0	0.0	9.4	0	0.0	5.8	15.7
Moderate	1	9.1	16.0	100	7.0	11.3	4	44.4	22.3	275	30.4	16.8	19.0
Middle	4	36.4	23.4	307	21.5	20.4	3	33.3	25.9	479	53.0	23.4	21.6
Upper	4	36.4	40.0	727	51.0	48.3	2	22.2	33.3	150	16.6	39.9	43.8
Unknown	2	18.2	16.3	292	20.5	17.8	0	0.0	9.1	0	0.0	14.0	0.0
Total	11	100.0	100.0	1,426	100.0	100.0	9	100.0	100.0	904	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.4	0	0.0	3.5	0	0.0	6.9	0	0.0	4.6	15.7
Moderate	0	0.0	15.6	0	0.0	14.2	0	0.0	21.6	0	0.0	15.5	19.0
Middle	0	0.0	19.4	0	0.0	18.5	1	33.3	22.9	77	14.1	18.8	21.6
Upper	2	100.0	58.3	134	100.0	62.1	1	33.3	44.6	383	69.9	51.5	43.8
Unknown	0	0.0	2.2	0	0.0	1.7	1	33.3	3.9	88	16.1	9.6	0.0
Total	2	100.0	100.0	134	100.0	100.0	3	100.0	100.0	548	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	5.3	5.5	50	1.9	2.9	0	0.0	7.1	0	0.0	3.7	15.7
Moderate	2	10.5	18.1	200	7.5	13.1	4	28.6	20.7	275	14.7	14.4	19.0
Middle	6	31.6	22.9	511	19.3	20.7	4	28.6	24.4	556	29.8	21.7	21.6
Upper	8	42.1	37.8	1,601	60.3	46.9	5	35.7	33.8	946	50.7	44.2	43.8
Unknown	2	10.5	15.6	292	11.0	16.4	1	7.1	14.1	88	4.7	16.0	0.0
Total	19	100.0	100.0	2,654	100.0	100.0	14	100.0	100.0	1,865	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table E8B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Lenawee County Nonmetropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	1	25.0	7.8	50	11.1	3.2	0	0.0	11.3	0	0.0	6.2	15.7
Moderate	1	25.0	21.6	100	22.2	17.7	0	0.0	18.3	0	0.0	15.8	19.0
Middle	1	25.0	20.6	100	22.2	17.0	0	0.0	30.4	0	0.0	27.4	21.6
Upper	1	25.0	46.1	200	44.4	60.6	2	100.0	38.3	413	100.0	49.6	43.8
Unknown	0	0.0	3.9	0	0.0	1.5	0	0.0	1.7	0	0.0	0.9	0.0
Total	4	100.0	100.0	450	100.0	100.0	2	100.0	100.0	413	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	7.1	0	0.0	4.1	0	0.0	8.1	0	0.0	5.6	15.7
Moderate	0	0.0	19.0	0	0.0	10.0	0	0.0	18.9	0	0.0	8.6	19.0
Middle	0	0.0	31.0	0	0.0	21.2	0	0.0	24.3	0	0.0	14.9	21.6
Upper	0	0.0	38.1	0	0.0	62.5	0	0.0	45.9	0	0.0	69.5	43.8
Unknown	0	0.0	4.8	0	0.0	2.3	0	0.0	2.7	0	0.0	1.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	15.7
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.6
Upper	0	0.0	3.4	0	0.0	5.6	0	0.0	0.0	0	0.0	0.0	43.8
Unknown	0	0.0	96.6	0	0.0	94.4	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table E9A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Lenawee County Nonmetropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	6.5	0	0.0	3.6	16.4
Moderate	0	0.0	22.1	0	0.0	15.6	17.4
Middle	0	0.0	25.7	0	0.0	23.9	20.7
Upper	1	100.0	33.4	61	100.0	44.8	45.5
Unknown	0	0.0	12.3	0	0.0	12.1	0.0
Total	1	100.0	100.0	61	100.0	100.0	100.0
Refinance Loans							
Low	1	16.7	3.1	80	11.2	1.5	16.4
Moderate	1	16.7	11.3	90	12.6	7.3	17.4
Middle	1	16.7	19.5	120	16.8	16.3	20.7
Upper	3	50.0	40.3	423	59.3	49.0	45.5
Unknown	0	0.0	25.8	0	0.0	25.9	0.0
Total	6	100.0	100.0	713	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	9.1	0	0.0	7.8	16.4
Moderate	0	0.0	15.7	0	0.0	11.9	17.4
Middle	1	25.0	22.3	50	18.5	18.1	20.7
Upper	3	75.0	52.1	221	81.5	60.1	45.5
Unknown	0	0.0	0.8	0	0.0	2.1	0.0
Total	4	100.0	100.0	271	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	5.6	4.6	80	4.9	2.4	16.4
Moderate	3	16.7	15.3	255	15.7	10.7	17.4
Middle	4	22.2	21.7	320	19.7	19.2	20.7
Upper	10	55.6	37.6	970	59.7	47.0	45.5
Unknown	0	0.0	20.8	0	0.0	20.7	0.0
Total	18	100.0	100.0	1,625	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

**Table E9B**

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Lenawee County Nonmetropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	2.3	0	0.0	1.2	16.4
Moderate	2	28.6	10.3	165	28.4	6.5	17.4
Middle	2	28.6	21.8	150	25.9	16.1	20.7
Upper	3	42.9	62.1	265	45.7	73.1	45.5
Unknown	0	0.0	3.4	0	0.0	3.0	0.0
Total	7	100.0	100.0	580	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	5.6	0	0.0	2.6	16.4
Moderate	0	0.0	11.1	0	0.0	11.1	17.4
Middle	0	0.0	30.6	0	0.0	24.6	20.7
Upper	0	0.0	44.4	0	0.0	54.5	45.5
Unknown	0	0.0	8.3	0	0.0	7.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.1	0	0.0	0.3	16.4
Moderate	0	0.0	0.0	0	0.0	0.0	17.4
Middle	0	0.0	0.0	0	0.0	0.0	20.7
Upper	0	0.0	0.0	0	0.0	0.0	45.5
Unknown	0	0.0	98.9	0	0.0	99.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table E10**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Lenawee County Nonmetropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	5	27.8	50.2	227	6.2	33.5	6	40.0	59.6	1,571	43.0	52.0	92.3
Over \$1 Million	11	61.1		3,379	92.7		9	60.0		2,085	57.0		6.3
Revenue Unknown	2	11.1		41	1.1		0	0.0		0	0.0		1.4
Total	18	100.0		3,647	100.0		15	100.0		3,656	100.0		100.0
By Loan Size													
\$100,000 or Less	10	55.6	92.6	504	13.8	42.1	5	33.3	94.8	320	8.8	44.4	
\$100,001 - \$250,000	3	16.7	4.7	577	15.8	22.0	6	40.0	3.3	1,136	31.1	21.4	
\$250,001 - \$1 Million	5	27.8	2.7	2,566	70.4	35.9	4	26.7	1.9	2,200	60.2	34.2	
Total	18	100.0	100.0	3,647	100.0	100.0	15	100.0	100.0	3,656	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	5	100.0		227	100.0		2	33.3		85	5.4		
\$100,001 - \$250,000	0	0.0		0	0.0		3	50.0		486	30.9		
\$250,001 - \$1 Million	0	0.0		0	0.0		1	16.7		1,000	63.7		
Total	5	100.0		227	100.0		6	100.0		1,571	100.0		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table E11**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Lenawee County Nonmetropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	##	##	\$(000)	%	%	
By Revenue							
\$1 Million or Less	8	42.1	31.4	428	13.4	22.8	91.8
Over \$1 Million	10	52.6		2,763	86.3		6.8
Revenue Unknown	1	5.3		11	0.3		1.3
Total	19	100.0		3,202	100.0		100.0
By Loan Size							
\$100,000 or Less	10	52.6	89.6	457	14.3	36.1	
\$100,001 - \$250,000	5	26.3	6.3	779	24.3	20.7	
\$250,001 - \$1 Million	4	21.1	4.1	1,966	61.4	43.2	
Total	19	100.0	100.0	3,202	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	6	75.0		187	43.7		
\$100,001 - \$250,000	2	25.0		241	56.3		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	8	100.0		428	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



Table E12

2022 Combined Demographics								
Assessment Area: Bank of the Hills Nonmetropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,595	17.6
Moderate	2	14.3	1,825	12.4	457	25.0	2,620	17.8
Middle	6	42.9	5,997	40.8	545	9.1	2,789	19.0
Upper	6	42.9	6,890	46.8	296	4.3	6,708	45.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>14</b>	<b>100.0</b>	<b>14,712</b>	<b>100.0</b>	<b>1,298</b>	<b>8.8</b>	<b>14,712</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,146	1,358	9.3	43.2	1,651	52.5	137	4.4
Middle	10,100	5,788	39.8	57.3	3,041	30.1	1,271	12.6
Upper	11,550	7,415	50.9	64.2	2,025	17.5	2,110	18.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>24,796</b>	<b>14,561</b>	<b>100.0</b>	<b>58.7</b>	<b>6,717</b>	<b>27.1</b>	<b>3,518</b>	<b>14.2</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or =		Over \$1 Million		Revenue Not	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	532	17.6	489	17.3	35	21.7	8	20.5
Middle	1,148	38.0	1,061	37.6	72	44.7	15	38.5
Upper	1,342	44.4	1,272	45.1	54	33.5	16	41.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,022</b>	<b>100.0</b>	<b>2,822</b>	<b>100.0</b>	<b>161</b>	<b>100.0</b>	<b>39</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.4</b>		<b>5.3</b>		<b>1.3</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	7	6.0	7	6.1	0	0.0	0	0.0
Middle	32	27.6	32	27.8	0	0.0	0	0.0
Upper	77	66.4	76	66.1	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>116</b>	<b>100.0</b>	<b>115</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>99.1</b>		<b>0.9</b>		<b>0.0</b>
Source: 2022 FFIEC Census Data								
2022 Dun & Bradstreet Data								
2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table E13**

2021 Combined Demographics								
Assessment Area: Bank of the Hills Nonmetropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,592	19.7
Moderate	3	30.0	4,197	32.0	830	19.8	2,369	18.0
Middle	4	40.0	4,556	34.7	658	14.4	2,335	17.8
Upper	3	30.0	4,377	33.3	178	4.1	5,834	44.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>10</b>	<b>100.0</b>	<b>13,130</b>	<b>100.0</b>	<b>1,666</b>	<b>12.7</b>	<b>13,130</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied				Rental		Vacant
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	7,668	3,679	26.0	48.0	3,009	39.2	980	12.8
Middle	8,027	5,063	35.8	63.1	1,707	21.3	1,257	15.7
Upper	8,282	5,408	38.2	65.3	1,450	17.5	1,424	17.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>23,977</b>	<b>14,150</b>	<b>100.0</b>	<b>59.0</b>	<b>6,166</b>	<b>25.7</b>	<b>3,661</b>	<b>15.3</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or =		Over \$1 Million		Revenue Not	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,050	33.6	978	33.5	58	34.9	14	36.8
Middle	1,150	36.8	1,078	36.9	59	35.5	13	34.2
Upper	927	29.6	867	29.7	49	29.5	11	28.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,127</b>	<b>100.0</b>	<b>2,923</b>	<b>100.0</b>	<b>166</b>	<b>100.0</b>	<b>38</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.5</b>		<b>5.3</b>		<b>1.2</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	20	16.8	20	16.9	0	0.0	0	0.0
Middle	42	35.3	42	35.6	0	0.0	0	0.0
Upper	57	47.9	56	47.5	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>119</b>	<b>100.0</b>	<b>118</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>99.2</b>		<b>0.8</b>		<b>0.0</b>
Source: 2021 FFIEC Census Data								
2021 Dun & Bradstreet Data								
2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table E14

2020 Combined Demographics								
Assessment Area: Bank of the Hills Nonmetropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,592	19.7
Moderate	3	30.0	4,197	32.0	830	19.8	2,369	18.0
Middle	4	40.0	4,556	34.7	658	14.4	2,335	17.8
Upper	3	30.0	4,377	33.3	178	4.1	5,834	44.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	10	100.0	13,130	100.0	1,666	12.7	13,130	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	7,668	3,679	26.0	48.0	3,009	39.2	980	12.8
Middle	8,027	5,063	35.8	63.1	1,707	21.3	1,257	15.7
Upper	8,282	5,408	38.2	65.3	1,450	17.5	1,424	17.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	23,977	14,150	100.0	59.0	6,166	25.7	3,661	15.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or =		Over \$1 Million		Revenue Not	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,061	33.7	991	33.7	61	34.7	9	32.1
Middle	1,150	36.6	1,077	36.6	64	36.4	9	32.1
Upper	933	29.7	872	29.7	51	29.0	10	35.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,144	100.0	2,940	100.0	176	100.0	28	100.0
Percentage of Total Businesses:				93.5		5.6		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	23	18.3	23	18.4	0	0.0	0	0.0
Middle	46	36.5	46	36.8	0	0.0	0	0.0
Upper	57	45.2	56	44.8	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	126	100.0	125	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.2		0.8		0.0
Source: 2020 FFIEC Census Data								
2020 Dun & Bradstreet Data								
2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table E15A

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Bank of the Hills Nonmetropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	29.8	0	0.0	23.9	0	0.0	9.2	0	0.0	8.5	9.3
Middle	0	0.0	29.3	0	0.0	30.8	2	100.0	40.7	975	100.0	36.4	39.8
Upper	1	100.0	40.9	350	100.0	45.3	0	0.0	50.1	0	0.0	55.2	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	350	100.0	100.0	2	100.0	100.0	975	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	23.1	23.1	443	25.9	20.2	0	0.0	6.3	0	0.0	4.4	9.3
Middle	2	15.4	35.5	395	23.1	37.6	2	22.2	42.5	230	13.0	39.0	39.8
Upper	8	61.5	41.4	874	51.1	42.2	7	77.8	51.2	1,545	87.0	56.6	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	13	100.0	100.0	1,712	100.0	100.0	9	100.0	100.0	1,775	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	22.2	21.7	130	12.9	5.9	1	11.1	4.0	324	21.2	4.5	9.3
Middle	4	44.4	47.8	676	67.1	42.7	2	22.2	32.0	150	9.8	30.2	39.8
Upper	3	33.3	30.4	202	20.0	51.4	6	66.7	64.0	1,051	68.9	65.3	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	9	100.0	100.0	1,008	100.0	100.0	9	100.0	100.0	1,525	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	50.0	0	0.0	61.0	0	0.0	33.3	0	0.0	61.7	41.6
Middle	0	0.0	50.0	0	0.0	39.0	0	0.0	16.7	0	0.0	7.1	34.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	50.0	0	0.0	31.2	23.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	9	31.0	26.7	1,220	31.1	23.2	1	4.0	8.1	324	6.2	10.8	9.3
Middle	7	24.1	32.4	1,193	30.4	34.0	6	24.0	40.9	1,355	26.1	35.1	39.8
Upper	13	44.8	40.9	1,506	38.4	42.8	18	72.0	51.0	3,513	67.7	54.1	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	29	100.0	100.0	3,919	100.0	100.0	25	100.0	100.0	5,192	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table E15B

Distribution of 2021 and 2022 Home Mortgage Lending by Income Level of Geography Assessment Area: Bank of the Hills Nonmetropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	66.7	0.0	647	76.2	0.0	0	0.0	16.7	0	0.0	10.1	9.3
Middle	1	16.7	25.0	122	14.4	24.2	0	0.0	50.0	0	0.0	20.8	39.8
Upper	1	16.7	75.0	80	9.4	75.8	5	100.0	33.3	917	100.0	69.1	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	849	100.0	100.0	5	100.0	100.0	917	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	20.0	0	0.0	10.3	0	0.0	0.0	0	0.0	0.0	9.3
Middle	0	0.0	33.3	0	0.0	41.9	0	0.0	35.3	0	0.0	40.8	39.8
Upper	0	0.0	46.7	0	0.0	47.8	0	0.0	64.7	0	0.0	59.2	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	60.9	0	0.0	63.4	0	0.0	9.5	0	0.0	8.1	9.3
Middle	0	0.0	17.4	0	0.0	16.6	0	0.0	52.4	0	0.0	45.8	39.8
Upper	0	0.0	21.7	0	0.0	20.0	0	0.0	38.1	0	0.0	46.1	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table E16A

Distribution of 2020 Home Mortgage Lending by Income Level of Geography							
Assessment Area: Bank of the Hills Nonmetropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	20.0	28.3	110	8.7	24.4	26.0
Middle	2	40.0	28.2	579	45.6	28.9	35.8
Upper	2	40.0	43.5	582	45.8	46.6	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	1,271	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	25.0	23.2	252	24.8	19.1	26.0
Middle	3	37.5	32.8	487	47.9	34.9	35.8
Upper	3	37.5	44.0	277	27.3	46.0	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	8	100.0	100.0	1,016	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	25.0	24.2	250	60.2	16.0	26.0
Middle	2	50.0	33.3	115	27.7	44.6	35.8
Upper	1	25.0	42.4	50	12.0	39.4	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	415	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	55.1
Middle	0	0.0	75.0	0	0.0	67.2	35.8
Upper	0	0.0	25.0	0	0.0	32.8	9.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	5	20.8	26.5	642	18.8	21.5	26.0
Middle	7	29.2	30.5	1,181	34.7	32.8	35.8
Upper	12	50.0	43.0	1,584	46.5	45.7	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	24	100.0	100.0	3,407	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E16B

Distribution of 2020 Home Mortgage Lending by Income Level of Geography Assessment Area: Bank of the Hills Nonmetropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	14.3	33.3	30	4.3	15.6	26.0
Middle	0	0.0	16.7	0	0.0	23.9	35.8
Upper	6	85.7	50.0	675	95.7	60.5	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	705	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	40.0	0	0.0	23.0	26.0
Middle	0	0.0	20.0	0	0.0	14.8	35.8
Upper	0	0.0	40.0	0	0.0	62.2	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	51.0	0	0.0	23.5	26.0
Middle	0	0.0	28.6	0	0.0	51.1	35.8
Upper	0	0.0	20.4	0	0.0	25.3	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table E17**

Distribution of 2021 and 2022 Small Business Lending by Income Level of Geography													
Assessment Area: Bank of the Hills Nonmetropolitan													
Geographic Income Level	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	42.9	29.6	1,002	70.5	31.1	4	30.8	15.8	565	27.9	20.1	17.6
Middle	4	28.6	37.0	181	12.7	40.7	4	30.8	39.7	731	36.1	39.3	38.0
Upper	4	28.6	30.7	239	16.8	27.8	5	38.5	42.9	731	36.1	40.2	44.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	14	100.0	100.0	1,422	100.0	100.0	13	100.0	100.0	2,027	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table E18**

Table 2-10

Distribution of 2020 Small Business Lending by Income Level of Geography Assessment Area: Bank of the Hills Nonmetropolitan							
Geographic Income Level	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	14	35.0	31.2	701	22.4	27.5	33.7
Middle	11	27.5	36.2	1,675	53.5	34.7	36.6
Upper	15	37.5	30.0	756	24.1	34.2	29.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	40	100.0	100.0	3,132	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							



Table E19A

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level													
Assessment Area: Bank of the Hills Nonmetropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	2.0	0	0.0	0.8	0	0.0	0.8	0	0.0	0.2	17.6
Moderate	0	0.0	7.7	0	0.0	4.3	0	0.0	8.8	0	0.0	4.3	17.8
Middle	0	0.0	19.4	0	0.0	14.4	1	50.0	17.2	100	10.3	12.4	19.0
Upper	1	100.0	51.9	350	100.0	62.5	1	50.0	52.9	875	89.7	63.5	45.6
Unknown	0	0.0	19.0	0	0.0	17.9	0	0.0	20.3	0	0.0	19.6	0.0
Total	1	100.0	100.0	350	100.0	100.0	2	100.0	100.0	975	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.9	0	0.0	0.9	0	0.0	3.3	0	0.0	1.7	17.6
Moderate	4	30.8	8.6	471	27.5	5.1	2	22.2	15.9	230	13.0	10.0	17.8
Middle	1	7.7	15.9	147	8.6	11.3	1	11.1	14.2	150	8.5	10.0	19.0
Upper	7	53.8	46.3	1,000	58.4	54.1	5	55.6	48.8	905	51.0	60.5	45.6
Unknown	1	7.7	27.2	94	5.5	28.6	1	11.1	17.8	490	27.6	17.7	0.0
Total	13	100.0	100.0	1,712	100.0	100.0	9	100.0	100.0	1,775	100.0	100.0	100.0
Home Improvement Loans													
Low	1	11.1	13.0	20	2.0	5.1	0	0.0	0.0	0	0.0	0.0	17.6
Moderate	3	33.3	13.0	217	21.5	6.5	1	11.1	8.0	137	9.0	5.4	17.8
Middle	3	33.3	21.7	371	36.8	19.7	3	33.3	22.0	424	27.8	17.9	19.0
Upper	2	22.2	47.8	400	39.7	65.4	4	44.4	70.0	864	56.7	76.7	45.6
Unknown	0	0.0	4.3	0	0.0	3.3	1	11.1	0.0	100	6.6	0.0	0.0
Total	9	100.0	100.0	1,008	100.0	100.0	9	100.0	100.0	1,525	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	3.4	2.1	20	0.5	0.9	0	0.0	1.5	0	0.0	0.6	17.6
Moderate	9	31.0	8.2	931	23.8	4.7	4	16.0	10.8	467	9.0	5.9	17.8
Middle	5	17.2	17.7	640	16.3	13.0	7	28.0	16.3	1,091	21.0	11.8	19.0
Upper	13	44.8	49.0	2,234	57.0	58.7	12	48.0	52.1	3,044	58.6	62.7	45.6
Unknown	1	3.4	23.0	94	2.4	22.7	2	8.0	19.2	590	11.4	19.0	0.0
Total	29	100.0	100.0	3,919	100.0	100.0	25	100.0	100.0	5,192	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table E19B

Distribution of 2021 and 2022 Home Mortgage Lending by Borrower Income Level Assessment Area: Bank of the Hills Nonmetropolitan													
Borrower Income Level	Bank and Aggregate Loans by Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose Lines of Credit													
Low	0	0.0	12.5	0	0.0	17.6	0	0.0	0.0	0	0.0	0.0	17.6
Moderate	2	33.3	0.0	243	28.6	0.0	1	20.0	16.7	100	10.9	39.5	17.8
Middle	1	16.7	50.0	122	14.4	50.2	2	40.0	16.7	417	45.5	10.1	19.0
Upper	3	50.0	25.0	484	57.0	29.3	2	40.0	66.7	400	43.6	50.4	45.6
Unknown	0	0.0	12.5	0	0.0	3.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	6	100.0	100.0	849	100.0	100.0	5	100.0	100.0	917	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.6
Moderate	0	0.0	13.3	0	0.0	8.1	0	0.0	5.9	0	0.0	3.8	17.8
Middle	0	0.0	13.3	0	0.0	8.6	0	0.0	11.8	0	0.0	7.3	19.0
Upper	0	0.0	73.3	0	0.0	83.3	0	0.0	82.4	0	0.0	88.9	45.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.6
Moderate	0	0.0	4.3	0	0.0	2.2	0	0.0	0.0	0	0.0	0.0	17.8
Middle	0	0.0	13.0	0	0.0	13.2	0	0.0	14.3	0	0.0	9.9	19.0
Upper	0	0.0	39.1	0	0.0	36.6	0	0.0	14.3	0	0.0	9.9	45.6
Unknown	0	0.0	43.5	0	0.0	48.0	0	0.0	71.4	0	0.0	80.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table E20A

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Bank of the Hills Nonmetropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	1.9	0	0.0	0.8	19.7
Moderate	0	0.0	10.7	0	0.0	6.2	18.0
Middle	0	0.0	22.3	0	0.0	16.1	17.8
Upper	3	60.0	56.4	961	75.6	68.5	44.4
Unknown	2	40.0	8.8	310	24.4	8.4	0.0
Total	5	100.0	100.0	1,271	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.3	0	0.0	1.5	19.7
Moderate	1	12.5	6.3	87	8.6	3.7	18.0
Middle	2	25.0	15.3	362	35.6	10.8	17.8
Upper	3	37.5	49.2	427	42.0	56.2	44.4
Unknown	2	25.0	26.9	140	13.8	27.8	0.0
Total	8	100.0	100.0	1,016	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	9.1	0	0.0	3.3	19.7
Moderate	2	50.0	9.1	115	27.7	5.0	18.0
Middle	0	0.0	9.1	0	0.0	4.1	17.8
Upper	0	0.0	63.6	0	0.0	64.0	44.4
Unknown	2	50.0	9.1	300	72.3	23.6	0.0
Total	4	100.0	100.0	415	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	2.1	0	0.0	1.1	19.7
Moderate	4	16.7	8.4	287	8.4	4.9	18.0
Middle	6	25.0	18.1	727	21.3	13.1	17.8
Upper	8	33.3	52.3	1,643	48.2	61.7	44.4
Unknown	6	25.0	19.1	750	22.0	19.2	0.0
Total	24	100.0	100.0	3,407	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Table E20B

Distribution of 2020 Home Mortgage Lending by Borrower Income Level Assessment Area: Bank of the Hills Nonmetropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose Lines of Credit							
Low	0	0.0	0.0	0	0.0	0.0	19.7
Moderate	1	14.3	0.0	85	12.1	0.0	18.0
Middle	4	57.1	33.3	365	51.8	13.1	17.8
Upper	2	28.6	66.7	255	36.2	86.9	44.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	705	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	19.7
Moderate	0	0.0	20.0	0	0.0	7.8	18.0
Middle	0	0.0	0.0	0	0.0	0.0	17.8
Upper	0	0.0	80.0	0	0.0	92.2	44.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	19.7
Moderate	0	0.0	2.0	0	0.0	1.1	18.0
Middle	0	0.0	2.0	0	0.0	0.4	17.8
Upper	0	0.0	20.4	0	0.0	15.4	44.4
Unknown	0	0.0	75.5	0	0.0	83.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table E21**

Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses													
Assessment Area: Bank of the Hills Nonmetropolitan													
	Bank and Aggregate Loans by Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	8	57.1	46.4	663	46.6	35.4	6	46.2	53.2	1,016	50.1	37.7	93.4
Over \$1 Million	3	21.4		676	47.5		5	38.5		845	41.7		5.3
Revenue Unknown	3	21.4		83	5.8		2	15.4		166	8.2		1.3
Total	14	100.0		1,422	100.0		13	100.0		2,027	100.0		100.0
By Loan Size													
\$100,000 or Less	11	78.6	90.1	564	39.7	33.5	6	46.2	89.2	371	18.3	27.3	
\$100,001 - \$250,000	2	14.3	5.3	458	32.2	17.9	4	30.8	5.7	725	35.8	19.7	
\$250,001 - \$1 Million	1	7.1	4.6	400	28.1	48.6	3	23.1	5.1	931	45.9	53.0	
Total	14	100.0	100.0	1,422	100.0	100.0	13	100.0	100.0	2,027	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	7	87.5		431	65.0		2	33.3		130	12.8		
\$100,001 - \$250,000	1	12.5		232	35.0		2	33.3		355	34.9		
\$250,001 - \$1 Million	0	0.0		0	0.0		2	33.3		531	52.3		
Total	8	100.0		663	100.0		6	100.0		1,016	100.0		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table E22**

Distribution of 2020 Small Business Lending by Revenue Size of Businesses							
Assessment Area: Bank of the Hills Nonmetropolitan							
	Bank and Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	23	57.5	47.5	791	25.3	44.1	93.5
Over \$1 Million	6	15.0		1,912	61.0		5.6
Revenue Unknown	11	27.5		429	13.7		0.9
Total	40	100.0		3,132	100.0		100.0
By Loan Size							
\$100,000 or Less	34	85.0	91.4	1,171	37.4	43.8	
\$100,001 - \$250,000	5	12.5	5.2	961	30.7	19.2	
\$250,001 - \$1 Million	1	2.5	3.4	1,000	31.9	37.1	
Total	40	100.0	100.0	3,132	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	22	95.7		646	81.7		
\$100,001 - \$250,000	1	4.3		145	18.3		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	23	100.0		791	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

## 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.

**Census tract:** A small, relatively permanent statistical subdivision of a county. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts average about 4,000 inhabitants, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to the population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** All Agencies have adopted the following language:

1. Affordable housing (including multi-family rental housing) for low- or moderate-income individuals.
2. Community services targeted to low- or moderate-income individuals.
3. Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less.
4. Activities that revitalize or stabilize –
  - a. Low- or moderate-income geographies.
  - b. Designated disaster areas.
  - c. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
    - i. Rates of poverty, unemployment, and population loss.
    - ii. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**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.

**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, which 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).

**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 income of the applicants; the amount of loan requested; and the disposition of the application (for example, approved, denied, or withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**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.

**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.

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

**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 percent 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 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Other products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA evaluation. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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 qualified investment is defined as any 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.

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small loan(s) to farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Call Report. These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**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.