



# Bank of the Pacific

2026 CRA Public File





# **WRITTEN COMMENTS**

No CRA Related Public Comments to report



# **CRA PERFORMANCE EVALUATION**

The current examination was completed August 21, 2023 and below you will find a Satisfactory CRA rating from the FDIC.

# **PUBLIC DISCLOSURE**

August 21, 2023

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Bank of the Pacific  
Certificate Number: 23041

300 East Market Street  
Aberdeen, Washington 98520

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

25 Jessie Street at Ecker Square, Suite 2300  
San Francisco, California 94105

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

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## INSTITUTION RATING

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

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

**The Lending Test is rated Satisfactory.**

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and credit needs of its assessment areas.
- The institution made a majority of its home mortgage and small business loans within its assessment areas.
- The geographic distribution of home mortgage and small business loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes.
- The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

**The Community Development Test is rated Satisfactory.**

- The institution's community development performance demonstrates adequate responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas.

## DESCRIPTION OF INSTITUTION

Pacific Financial Corporation, a one-bank holding company located in Aberdeen, Washington, wholly owns Bank of the Pacific. Bank of the Pacific received a Satisfactory rating at its previous FDIC Performance Evaluation dated June 22, 2020, based on Interagency Intermediate Small Institution Examination Procedures.

Bank of the Pacific continues to operate from its main office in Aberdeen, as well as from 15 full-service branches in Washington and Oregon. The bank also operates four loan production offices in Washington and Oregon. Since the prior evaluation, the bank closed a branch in Astoria, Oregon, and re-opened a branch in Warrenton, Oregon; however, neither of these changes affected low- and moderate-income areas.

Bank of the Pacific offers a variety of credit products, including commercial, home mortgage, consumer, and agricultural loans. In addition, the bank offers loan products through various government-sponsored programs and sells home mortgage loans to secondary market investors. Commercial and home mortgage lending continue to be the institution's primary business focuses. Bank of the Pacific also offers a full line of traditional deposit services, including checking, savings, and certificates of deposit accounts. Alternative banking services include 17 deposit-taking ATMs, 2 ITMs, internet and mobile banking, bill payment, mobile check deposit, mobile wallet, electronic periodic statements, and person-to-person transfers.

As of June 30, 2023, Bank of the Pacific reported total assets of \$1.2 billion, total loans of \$658.5 million, and total deposits of \$1.1 billion. Examiners did not identify any financial, legal, or other impediments that affect the institution's ability to meet the credit needs of its assessment areas. The following table illustrates the institution's loan portfolio; however, it does not include home mortgage loans originated by the bank and subsequently sold to secondary market investors.

<b>Loan Portfolio Distribution as of 6/30/2023</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	37,368	5.7
Secured by Farmland	25,880	3.9
Secured by 1-4 Family Residential Properties	87,378	13.3
Secured by Multifamily (5 or more) Residential Properties	42,386	6.4
Secured by Nonfarm Nonresidential Properties	321,055	48.8
<b>Total Real Estate Loans</b>	<b>514,067</b>	<b>78.1</b>
Commercial and Industrial Loans	49,005	7.4
Agricultural Production and Other Loans to Farmers	14,700	2.2
Consumer Loans	69,071	10.5
Obligations of State and Political Subdivisions in the U.S.	3,404	0.5
Other Loans	8,292	1.3
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>658,539</b>	<b>100.0</b>
<i>Source: Report of Condition and Income (6/30/23)</i>		

## **DESCRIPTION OF ASSESSMENT AREAS**

Bank of the Pacific continues to operate in five assessment areas, four in Washington and one in Oregon. The Clatsop County Assessment Area is the sole Oregon assessment area, whereas the Washington assessment areas include the Southwest Washington; Bellingham, WA Metropolitan Statistical Area (MSA); Mount Vernon-Anacortes, WA MSA; and Clark County assessment areas. Ratings are assigned for the states of Washington and Oregon. Further, 2015 American Community Survey (ACS) and 2020 U.S. Census data are referenced throughout this evaluation since the bank's performance spans two sets of census data. Activities related to 2020 and 2021 utilize 2015 ACS data, whereas activities for 2022 and beyond use 2020 Census data. Additional information regarding the assessment areas and rated areas is presented later in the evaluation.

## **SCOPE OF EVALUATION**

### **General Information**

This evaluation covers the period from the prior evaluation dated June 22, 2020, to the current evaluation dated August 21, 2023. Examiners used Interagency Intermediate Small Institution Examination Procedures to evaluate Bank of the Pacific's CRA performance, which include the Lending and Community Development Tests. Refer to the Appendices for information on the procedures.

Examiners used full-scope examination procedures to assess the bank's performance in each assessment area. To assess the bank's overall performance, examiners gave greater weight to the bank's performance in Washington since this is where the majority of the bank's lending, deposit, and branch activity occurs, which is depicted in the following table.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Southwest Washington	232,840	20.3	733,150	60.9	9	56.3
Bellingham, WA MSA	580,892	50.6	231,261	19.2	3	18.8
Mount Vernon-Anacortes, WA MSA	153,930	13.4	63,274	5.3	1	6.2
Clark County	86,885	7.6	42,165	3.5	1	6.2
<b>Washington Subtotal</b>	<b>1,054,547</b>	<b>91.9</b>	<b>1,069,850</b>	<b>88.9</b>	<b>14</b>	<b>87.5</b>
Clatsop County	92,913	8.1	133,888	11.1	2	12.5
<b>Oregon Subtotal</b>	<b>92,913</b>	<b>8.1</b>	<b>133,888</b>	<b>11.1</b>	<b>2</b>	<b>12.5</b>
<b>Total</b>	<b>1,147,460</b>	<b>100.0</b>	<b>1,203,738</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>

*Source: 2020-2022 HMDA, Small Business, and Small Farm Collected Data; FDIC Summary of Deposits (6/30/2022); and Bank Data*

### **Activities Reviewed**

Bank records indicated that the lending focus and product mix remained consistent throughout the evaluation period. As noted earlier, the bank’s primary lending focuses are commercial and home mortgage lending.

The evaluation considered all home mortgage loans reported on the institution’s 2020, 2021, and 2022 Home Mortgage Disclosure Act (HMDA) Loan Application Registers. Specifically, the institution reported 1,786 loans totaling \$554.3 million in 2020; 1,342 loans totaling \$434.6 million in 2021; and 269 loans totaling \$118.2 million in 2022. In addition, examiners analyzed all of the small business and small farm loan data voluntarily collected by the institution for 2020, 2021, and 2022. For small business lending, the bank originated 1,235 loans totaling \$209.8 million in 2020; 901 loans totaling \$144.2 million in 2021; and 285 loans totaling \$71.9 million in 2022. Examiners did not include the small farm lending data in this evaluation since agricultural lending is not a lending focus of the bank and only 347 applicable loans were originated during the review period; however, examiners did not identify any concerns when analyzing this data.

HMDA aggregate lending, 2015 ACS, and 2020 Census data provided a standard of comparison for the home mortgage loans reviewed; examiners placed more weight on the comparison to aggregate lending data since it is typically a better indicator of market conditions and loan demand. In addition, D&B data for 2020, 2021, and 2022 provided a standard of comparison for the small business loans reviewed. While both the number and dollar volume of loans are presented, examiners emphasized performance by number of loans because the number of loans is a better indicator of individuals and businesses served. Further, examiners did not identify any trends between the 2020, 2021, and 2022 HMDA and small business data that materially affected conclusions. Therefore, only 2022 HMDA and small business data is presented for the Geographic Distribution and Borrower Profile criteria. Finally, the bank’s home mortgage and small business lending performance received equal weight when arriving at overall conclusions.

Community development lending, qualified investments, and community development services were considered from the prior evaluation dated June 22, 2020, through the current evaluation dated August 21, 2023. Furthermore, investments that were made before the prior evaluation, and that remain outstanding, are included at the current book values as prior period investments.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

Bank of the Pacific demonstrated reasonable performance under the Lending Test, which is consistent with the conclusions for both Washington and Oregon.

#### Loan-to-Deposit Ratio

The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and credit needs of the assessment areas. As shown in the table below, Bank of the Pacific's net loan-to-deposit ratio averaged 60.8 percent over the past 13 calendar quarters, which is slightly below the two selected comparable institutions. Examiners selected these comparable institutions based on their asset size, branching structure, geographic location, and lending focus. The bank's average net loan-to-deposit ratio has declined for most of the evaluation period; however, the ratio steadily increased since year-end 2022. Further, the Coronavirus pandemic negatively affected the bank's net loan-to-deposit ratio. The Federal government offered various financial assistance programs to individuals and businesses during the pandemic. Many individuals deposited their funds at the bank instead of spending it as they would normally. These changes resulted in an increase to the bank's total deposits, whereas loan demand decreased. Finally, the bank originated and sold 2,538 home mortgage loans totaling \$806.1 million to secondary market investors since the prior evaluation, which are not reflected in the bank's ratio.

<b>Loan-to-Deposit (LTD) Ratio Comparison</b>		
<b>Bank</b>	<b>Total Assets as of 6/30/2023 (\$000s)</b>	<b>Average Net LTD Ratio (%)</b>
<b>Bank of the Pacific, Aberdeen, WA</b>	<b>1,207,740</b>	<b>60.8</b>
Riverview Bank, Vancouver, WA	1,581,229	70.4
Timberland Bank, Hoquiam, WA	1,806,968	70.5

*Source: Reports of Condition and Income 6/30/2020 – 6/30/2023*

#### Assessment Area Concentration

As detailed in the table on the following page, Bank of the Pacific made a majority of its home mortgage and small business loans within its assessment areas.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2020	1,447	81.0	339	19.0	1,786	437,142	78.9	117,192	21.1	554,334
2021	1,057	78.8	285	21.2	1,342	336,234	77.4	98,326	22.6	434,560
2022	174	64.7	95	35.3	269	62,420	52.8	55,761	47.2	118,180
<b>Subtotal</b>	<b>2,678</b>	<b>78.8</b>	<b>719</b>	<b>21.2</b>	<b>3,397</b>	<b>835,796</b>	<b>75.5</b>	<b>271,279</b>	<b>24.5</b>	<b>1,107,074</b>
Small Business										
2020	917	74.3	318	25.7	1,235	140,615	67.0	69,192	33.0	209,807
2021	645	71.6	256	28.4	901	89,798	62.3	54,426	37.7	144,224
2022	206	72.3	79	27.7	285	50,123	69.7	21,813	30.3	71,936
<b>Subtotal</b>	<b>1,768</b>	<b>73.0</b>	<b>653</b>	<b>27.0</b>	<b>2,421</b>	<b>280,536</b>	<b>65.9</b>	<b>145,431</b>	<b>34.1</b>	<b>425,967</b>
<b>Total</b>	<b>4,446</b>	<b>76.4</b>	<b>1,372</b>	<b>23.6</b>	<b>5,818</b>	<b>1,116,332</b>	<b>72.8</b>	<b>416,710</b>	<b>27.2</b>	<b>1,533,041</b>

Source: 2020-2022 HMDA Reported Data and Small Business Collected Data

### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas, which is based solely on the bank's performance in Washington. Examiners focused on the percentage of loans in low- and moderate-income census tracts as applicable. This criterion was not evaluated for Oregon since the institution's Oregon assessment area does not have any low- or moderate-income census tracts. Refer to the Washington section of the evaluation for additional information.

### **Borrower Profile**

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes, which is consistent with the bank's performance in both Washington and Oregon. Examiners focused on the percentage of home mortgage loans to low- and moderate-income borrowers and the percentage of small business loans to businesses with gross annual revenues of \$1 million or less. Detailed discussion of the bank's performance under this criterion is included in the applicable State and assessment area sections of the evaluation.

### **Response to Complaints**

The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

## **COMMUNITY DEVELOPMENT TEST**

Bank of the Pacific's performance under the Community Development Test is Satisfactory, which is consistent with the bank's performance in both Washington and Oregon. The institution demonstrated adequate responsiveness to the community development needs in its assessment areas through community development loans, qualified investments, and community development services.

Examiners considered the institution’s capacity and the need and availability of such opportunities. Since the institution was responsive to the community development needs of its assessment areas, community development activities benefitting the broader statewide areas were also considered in the analysis.

### **Community Development Loans**

Bank of the Pacific originated 41 community development loans totaling \$66.1 million during the evaluation period, which represents 5.5 percent of total assets and 10.2 percent of net loans. These ratios increased since the previous evaluation when community development loans represented 3.6 percent of total assets and 5.1 percent of net loans. The level of community development lending also increased from the prior evaluation, which reported 33 loans totaling \$40.2 million. In addition to its community development lending activity, Bank of the Pacific was responsive to the needs of its assessment areas during the Coronavirus pandemic by offering Small Business Administration Paycheck Protection Program loans to businesses in the area. In 2021, the bank originated 665 applicable loans totaling \$67.4 million to businesses adversely affected by the pandemic. Finally, examiners compared the institution’s level of community development lending to two similarly situated institutions, which revealed similar performance. Specifically, the similarly situated institutions’ community development loans ranged from 2.4 to 5.3 percent of their total assets and 3.7 to 8.9 percent of their net loans. The tables below illustrate the institution’s community development lending activity by rated area and by year.

<b>Community Development Lending by Rated Area</b>										
<b>Rated Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Washington	8	2,726	0	0	24	38,172	6	19,612	<b>38</b>	<b>60,510</b>
Oregon	1	410	0	0	2	5,196	0	0	<b>3</b>	<b>5,606</b>
<b>Total</b>	<b>9</b>	<b>3,136</b>	<b>0</b>	<b>0</b>	<b>26</b>	<b>43,368</b>	<b>6</b>	<b>19,612</b>	<b>41</b>	<b>66,116</b>

*Source: Bank Data*

<b>Community Development Lending by Year</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Total</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2020	1	244	0	0	5	8,625	2	6,039	<b>8</b>	<b>14,908</b>
2021	5	1,403	0	0	8	17,636	1	3,000	<b>14</b>	<b>22,039</b>
2022	2	1,339	0	0	9	12,757	2	5,573	<b>13</b>	<b>19,669</b>
YTD 2023	1	150	0	0	4	4,350	1	5,000	<b>6</b>	<b>9,500</b>
<b>Total</b>	<b>9</b>	<b>3,136</b>	<b>0</b>	<b>0</b>	<b>26</b>	<b>43,368</b>	<b>6</b>	<b>19,612</b>	<b>41</b>	<b>66,116</b>

*Source: Bank Data*

### **Qualified Investments**

Bank of the Pacific made 147 qualified investments \$15.7 million during the evaluation period, which represents 1.3 percent of total assets and 5.7 percent of total securities. These ratios increased since the previous evaluation when qualified investments represented 0.4 percent of total

assets and 3.5 percent of total securities. Furthermore, the level of qualified investments increased from the prior evaluation, which reported 192 qualified investments totaling \$4.2 million. Finally, a review of the similarly situated institutions revealed that qualified investments ranged from 1.1 to 1.3 percent of their total assets and 4.1 to 18.6 percent of their total securities. The tables below illustrate the institution’s qualified investment activity by rated area and by year.

Qualified Investments by Rated Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Washington	23	6,810	65	2,332	7	855	8	14	103	10,011
Oregon	36	4,626	8	1,079	0	855	0	0	44	5,705
<b>Total</b>	<b>59</b>	<b>11,436</b>	<b>73</b>	<b>3,411</b>	<b>7</b>	<b>855</b>	<b>8</b>	<b>14</b>	<b>147</b>	<b>15,716</b>

*Source: Bank Data*

Qualified Investments by Year										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	3	1,680	3	1,119	0	0	0	0	6	2,799
2020	2	40	0	0	0	0	0	0	2	40
2021	15	3,864	3	1,356	2	600	0	0	20	5,820
2022	14	2,361	2	891	0	0	0	0	16	3,252
YTD 2023	13	3,455	0	0	1	249	0	0	14	3,704
<b>Subtotal</b>	<b>47</b>	<b>11,400</b>	<b>8</b>	<b>3,366</b>	<b>3</b>	<b>849</b>	<b>0</b>	<b>0</b>	<b>58</b>	<b>15,615</b>
Grants & Donations	12	36	65	45	4	6	8	14	89	101
<b>Total</b>	<b>59</b>	<b>11,436</b>	<b>73</b>	<b>3,411</b>	<b>7</b>	<b>855</b>	<b>8</b>	<b>14</b>	<b>147</b>	<b>15,716</b>

*Source: Bank Data*

### **Community Development Services**

During the evaluation period, bank employees provided 103 instances of financial expertise or technical assistance to community development organizations in the rated areas totaling 1,970 service hours. The number of service hours decreased from 3,692 at the previous evaluation, but this was largely due to employees’ inability to participate in applicable activities during the Coronavirus pandemic. A review of the similarly situated institutions revealed that those institutions’ employees provided between 2,048 and 2,084 qualified service hours. The following tables illustrate the institution’s community development service activity by rated area and by year.

<b>Community Development Services by Rated Area</b>					
<b>Rated Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>Hours</b>	<b>Hours</b>	<b>Hours</b>	<b>Hours</b>	<b>Hours</b>
Washington	371	218	179	1,187	<b>1,955</b>
Oregon	0	15	0	0	<b>15</b>
<b>Total</b>	<b>371</b>	<b>233</b>	<b>179</b>	<b>1,187</b>	<b>1,970</b>

*Source: Bank Data*

<b>Community Development Services by Year</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Total</b>
	<b>Hours</b>	<b>Hours</b>	<b>Hours</b>	<b>Hours</b>	<b>Hours</b>
2020 (Partial)	62	44	37	174	<b>317</b>
2021	74	75	63	386	<b>598</b>
2022	159	69	42	367	<b>637</b>
2023 (YTD)	76	45	37	260	<b>418</b>
<b>Total</b>	<b>371</b>	<b>233</b>	<b>179</b>	<b>1,187</b>	<b>1,970</b>

*Source: Bank Data*

In addition to community development services, the institution offers alternative banking services that are readily accessible throughout the assessment areas, including to low- and moderate-income individuals. These services include internet and mobile banking, bill payment, mobile check deposit, mobile wallet, electronic periodic statements, and person-to-person transfers. Lastly, five of the bank’s branches and five of its ATMs are located in low- or moderate-income census tracts based on 2020 Census data, whereas seven branches, six ATMs, and one ITM are currently located in distressed census tracts.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The bank’s compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

## WASHINGTON

### CRA RATING FOR WASHINGTON: SATISFACTORY

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN WASHINGTON

Bank of the Pacific maintains the following four assessment areas in Washington: Southwest Washington; Bellingham, WA MSA; Mount Vernon-Anacortes, WA MSA; and Clark County. The bank operates 14 full-service offices in Washington. Details regarding the individual assessment areas are provided in subsequent sections.

### SCOPE OF EVALUATION – WASHINGTON

The Southwest Washington Assessment Area and Bellingham, WA MSA received the most weight when arriving at the Washington State rating, whereas the remaining assessment areas received less but equal weight. Examiners placed equal weight on the Southwest Washington and Bellingham, WA MSA assessment areas since the Southwest Washington assessment area has the most deposits and branches, while the Bellingham, WA MSA assessment area has the most loans by dollar volume. Refer to the overall Scope of Evaluation section for additional information.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN WASHINGTON

#### LENDING TEST

Bank of the Pacific demonstrated reasonable performance under the Lending Test in Washington, which is supported by the bank's performance in all of the assessment areas.

#### Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas, which is consistent with the bank's performance in all of the Washington assessment areas.

#### Borrower Profile

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes, which is consistent with the bank's performance in all of the Washington assessment areas.

#### COMMUNITY DEVELOPMENT TEST

Bank of the Pacific's community development performance demonstrated adequate responsiveness to the community development needs in Washington through community development loans, qualified investments, and community development services. This performance is consistent with the bank's performance in all of the Washington assessment areas.

### **Community Development Loans**

Bank of the Pacific originated 38 community development loans totaling \$60.5 million in Washington during the evaluation period. The level of community development lending increased from the previous evaluation, which reported 31 loans totaling \$34.7 million. The table below illustrates the institution's community development lending activity by assessment area.

<b>Community Development Lending by Assessment Area</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Total</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Southwest Washington	2	769	0	0	10	12,070	6	19,612	<b>18</b>	<b>32,451</b>
Bellingham, WA MSA	0	0	0	0	12	21,912	0	0	<b>12</b>	<b>21,912</b>
Mount Vernon-Anacortes, WA MSA	0	0	0	0	1	2,300	0	0	<b>1</b>	<b>2,300</b>
Clark County	1	720	0	0	1	1,890	0	0	<b>2</b>	<b>2,610</b>
Statewide Activities	5	1,237	0	0	0	0	0	0	<b>5</b>	<b>1,237</b>
<b>Total</b>	<b>8</b>	<b>2,726</b>	<b>0</b>	<b>0</b>	<b>24</b>	<b>38,172</b>	<b>6</b>	<b>19,612</b>	<b>38</b>	<b>60,510</b>

*Source: Bank Data*

### **Qualified Investments**

Bank of the Pacific made 103 qualified investments totaling \$10.0 million in Washington during the evaluation period. The level of qualified investments increased from the previous evaluation, which reported 172 qualified investments totaling \$1.4 million. The table below illustrates the institution's qualified investment activity by assessment area.

<b>Qualified Investments by Assessment Area</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Total</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Southwest Washington	5	24	43	313	1	249	8	14	<b>57</b>	<b>600</b>
Bellingham, WA MSA	3	5	12	657	3	6	0	0	<b>18</b>	<b>668</b>
Mount Vernon-Anacortes, WA MSA	1	1	4	845	3	600	0	0	<b>8</b>	<b>1,446</b>
Clark County	3	479	4	271	0	0	0	0	<b>7</b>	<b>750</b>
Statewide Activities	11	6,301	2	246	0	0	0	0	<b>13</b>	<b>6,547</b>
<b>Total</b>	<b>23</b>	<b>6,810</b>	<b>65</b>	<b>2,332</b>	<b>7</b>	<b>855</b>	<b>8</b>	<b>14</b>	<b>103</b>	<b>10,011</b>

*Source: Bank Data*

### **Community Development Services**

During the evaluation period, employees provided 101 instances of financial expertise or technical assistance to community development organizations in Washington totaling 1,955 service hours. The number of service hours decreased from 3,404 at the previous evaluation. Further, five of the bank's Washington branches and five of its ATMs are located in low- or moderate-income census tracts based on 2020 Census data, whereas seven branches, six ATMs, and one ITM are currently

located in distressed census tracts. The following table illustrates the institution’s community development services by assessment area.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Total</b>
	<b>Hours</b>	<b>Hours</b>	<b>Hours</b>	<b>Hours</b>	<b>Hours</b>
Southwest Washington	205	113	122	1,184	<b>1,624</b>
Bellingham, WA MSA	23	60	32	0	<b>115</b>
Mount Vernon-Anacortes, WA MSA	0	8	25	3	<b>36</b>
Clark County	0	0	0	0	<b>0</b>
Statewide Activities	143	37	0	0	<b>180</b>
<b>Total</b>	<b>371</b>	<b>218</b>	<b>179</b>	<b>1,187</b>	<b>1,955</b>
<i>Source: Bank Data</i>					

## **SOUTHWEST WASHINGTON ASSESSMENT AREA – Full-Scope Review**

### **DESCRIPTION OF INSTITUTION’S OPERATIONS IN SOUTHWEST WASHINGTON ASSESSMENT AREA**

The Southwest Washington Assessment Area includes all of Grays Harbor, Pacific, and Wahkiakum Counties in Washington. The assessment area boundaries are unchanged since the previous evaluation; however, census tract income levels have changed between the two census years. According to 2015 ACS data, the assessment area consists of 7 moderate-, 16 middle-, and 1 upper-income census tracts, as well as 2 census tracts with no income designation. Per 2020 Census data, the assessment area consists of 8 moderate-, 23 middle-, and 1 upper-income census tracts, as well as 2 census tracts with no income designation. Further, all of the middle-income census tracts were designated as distressed in both 2020 and 2023. Finally, the bank operates its Aberdeen, Cathlamet, Hoquiam, Long Beach, Montesano, Ocean Park, Ocean Shores, Raymond, and Taholah offices in this assessment area.

#### **Economic and Demographic Data**

Per 2022 D&B data, service industries represent the largest segment of area businesses at 32.9 percent, followed by non-classifiable establishments at 21.7 percent and retail trade at 11.4 percent. In addition, 61.2 percent of area businesses have four or fewer employees and 91.1 percent operate from a single location. The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Southwest Washington Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	0.0	23.5	67.6	2.9	5.9
Population by Geography	103,423	0.0	26.9	69.0	4.1	0.0
Housing Units by Geography	55,107	0.0	29.8	66.6	3.6	0.0
Owner-Occupied Units by Geography	29,948	0.0	24.1	70.0	5.8	0.0
Occupied Rental Units by Geography	11,099	0.0	37.9	60.0	2.0	0.0
Vacant Units by Geography	14,060	0.0	35.4	64.3	0.3	0.0
Businesses by Geography	8,415	0.0	29.7	67.0	3.3	0.0
Farms by Geography	454	0.0	10.6	84.8	4.6	0.0
Family Distribution by Income Level	26,243	21.2	20.7	22.5	35.7	0.0
Household Distribution by Income Level	41,047	25.6	18.2	19.0	37.2	0.0
Median Family Income Non-MSAs - WA		\$70,452	Median Housing Value			\$192,011
			Median Gross Rent			\$812
			Families Below Poverty Level			9.3%

Source: 2020 U.S. Census and 2022 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\*) The NA category consists of geographies that have not been assigned an income classification.

The Federal Financial Institutions Examination Council (FFIEC)-updated median family income level is used to analyze home mortgage loans under the Borrower Profile criterion. The table below illustrates the 2022 median family income ranges for nonmetropolitan Washington.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2022 (\$79,600)	<\$39,800	\$39,800 to <\$63,680	\$63,680 to <\$95,520	≥\$95,520

Source: FFIEC

### **Competition**

The Southwest Washington Assessment Area has a moderate level of competition for financial services. Per 2022 FDIC Deposit Market Share data, 9 financial institutions operate 35 offices within the assessment area. Of these institutions, Bank of the Pacific ranked first with 38.9 percent of the deposit market share. Further, there is a high level of demand and competition for home mortgage loans as 327 lenders reported 4,278 home mortgage loans in the assessment area in 2022, with Bank of the Pacific ranking 14<sup>th</sup> with 1.7 percent of the market share by number.

Bank of the Pacific elected to voluntarily collect but not report its small business loan data, so the analysis of small business loans does not include comparisons against aggregate data. However, the aggregate data is included in some instances to demonstrate the level of demand for these loans.

The 2021 aggregate data, which is the most recent year available, revealed that 53 lenders reported 1,285 small business loans.

**Credit and Community Development Needs and Opportunities**

Considering information from bank management and demographic and economic data, examiners determined that home mortgage and commercial lending represent the primary credit needs in the assessment area. The assessment area’s community development needs primarily relate to economic development, community services, and revitalization or stabilization; however, there is a significant level of competition for the available opportunities.

**CONCLUSIONS ON PERFORMANCE CRITERIA IN SOUTHWEST WASHINGTON ASSESSMENT AREA**

**LENDING TEST**

Bank of the Pacific demonstrated reasonable performance under the Lending Test in the Southwest Washington Assessment Area, which is supported by the Geographic Distribution and Borrower Profile performance.

**Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area, which is consistent with the bank’s home mortgage and small business lending performance.

***Home Mortgage Loans***

As illustrated in the table below, the geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area when compared to aggregate data. The bank’s 2022 lending in moderate-income census tracts slightly exceeded aggregate data.

<b>Geographic Distribution of Home Mortgage Loans</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.0	0.0	0	0.0	0	0.0
Moderate	24.1	33.8	29	40.3	6,216	39.1
Middle	70.0	62.7	42	58.3	9,423	59.2
Upper	5.8	3.5	1	1.4	274	1.7
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>72</b>	<b>100.0</b>	<b>15,913</b>	<b>100.0</b>
<i>Source: 2020 U.S. Census; 2022 HMDA Reported Data, 2022 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%</i>						

### ***Small Business Loans***

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area when compared to D&B data. Bank of the Pacific’s 2022 small business lending slightly exceeded D&B data, as depicted in the following table.

<b>Geographic Distribution of Small Business Loans</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.0	0	0.0	0	0.0
Moderate	29.7	29	34.5	5,088	30.2
Middle	67.0	53	63.1	11,206	66.5
Upper	3.3	2	2.4	550	3.3
Not Available	0.0	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>84</b>	<b>100.0</b>	<b>16,844</b>	<b>100.0</b>

*Source: 2022 D&B Data; 2022 Bank Data*

### **Borrower Profile**

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes, which is consistent with the bank’s home mortgage and small business lending performance.

### ***Home Mortgage Loans***

The distribution of borrowers reflects reasonable penetration among individuals of different income levels when compared to aggregate data, which is depicted in the table below. Bank of the Pacific’s lending to low-income borrowers was double aggregate data, while the institution’s lending to moderate-income borrowers was slightly below aggregate data. Overall, the performance is reasonable.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	21.2	6.2	9	12.5	780	4.9
Moderate	20.7	17.5	9	12.5	1,435	9.0
Middle	22.5	23.4	18	25.0	4,422	27.8
Upper	35.7	37.5	28	38.9	6,570	41.3
Not Available	0.0	15.3	8	11.1	2,706	17.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>72</b>	<b>100.0</b>	<b>15,913</b>	<b>100.0</b>

*Source: 2020 U.S. Census; 2022 HMDA Reported Data, 2022 HMDA Aggregate Data  
Due to rounding, totals may not equal 100.0%*

### ***Small Business Loans***

As illustrated in the following table, the distribution of borrowers reflects reasonable penetration among businesses of different sizes. Although the bank’s performance lags D&B data, revenue

information was not available for 31.0 percent of the institution’s small business loans, which skews the data. Further, the bank’s 2021 performance was comparable to aggregate data. Specifically, Bank of the Pacific made 300 small business loans in the assessment area in 2021, 195 of which (65.0 percent) were to businesses with gross annual revenues of \$1 million or less. The aggregate data revealed that 44.0 percent of small business loans were to businesses with gross annual revenues of \$1 million or less.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	87.7	32	38.1	7,277	43.2
>\$1,000,000	2.9	26	31.0	5,710	33.9
Revenue Not Available	9.4	26	31.0	3,857	22.9
<b>Totals</b>	<b>100.0</b>	<b>84</b>	<b>100.0</b>	<b>16,844</b>	<b>100.0</b>
<i>Source: 2022 D&amp;B Data; 2022 Bank Data Due to rounding, totals may not equal 100.0%</i>					

## **COMMUNITY DEVELOPMENT TEST**

Bank of the Pacific’s community development performance demonstrated adequate responsiveness to community development needs in its Southwest Washington Assessment Area through community development loans, qualified investments, and community development services.

### **Community Development Loans**

Bank of the Pacific originated 18 community development loans totaling \$32.5 million in the assessment area during the evaluation period. Most of the loans promoted economic development and revitalization or stabilization, which is considered responsive as both were identified as community development needs. Finally, the level of community development lending increased from the previous evaluation, which reported 19 loans totaling \$26.0 million. Below are examples of the bank’s community development loans:

- The institution originated four loans totaling \$6.0 million that helped retain a business located in a moderate-income census tract by funding its operations.
- Bank of the Pacific also made eight loans totaling \$10.1 million to fund the operations of two small businesses, which retained jobs in moderate-income census tracts.

### **Qualified Investments**

Bank of the Pacific made 57 qualified investments totaling \$600,000 in the assessment area during the evaluation period, including one prior period investment totaling \$292,000, one newly purchased investment totaling \$249,000, and 55 donations totaling \$59,000. A majority of the qualified investments promoted community services and economic development, which is considered responsive as both were identified as community development needs. Finally, the level of qualified investments is similar to the prior evaluation, which reported 120 qualified investments

totaling \$624,000. The following are examples of the bank's qualified investment and donation activities:

- The institution made one investment totaling \$292,000 in 2023 that renovated a school that primarily serves low- and moderate-income students.
- The institution granted four donations totaling \$12,500 that helped retain a business located in a distressed census tract.

### **Community Development Services**

During the evaluation period, employees provided 58 instances of financial expertise or technical assistance to community development organizations in the assessment area totaling 1,624 service hours. A majority of the community development services promoted revitalization or stabilization, which was identified as a community development need. The number of service hours decreased from 2,997 at the previous evaluation. Below are examples of the bank's community development services:

- Two employees provided 100 hours of Board service to a domestic violence organization.
- Two employees provided 884 hours of Board service to an organization with the mission of revitalizing a community located in a moderate-income census tract.

Lastly, three of the bank's branches in this assessment area and four of its ATMs are located in moderate-income census tracts based on 2020 Census data, whereas seven branches, six ATMs, and one ITM are currently located in distressed census tracts.

## BELLINGHAM, WA MSA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN BELLINGHAM, WA MSA

This assessment area includes all of Whatcom County in Washington, which comprises the Bellingham, WA MSA. The assessment area boundaries are unchanged from the prior evaluation; however, census tract income levels have changed between the two census years. According to 2015 ACS data, the MSA consists of 1 low-, 2 moderate-, 25 middle-, and 5 upper-income census tracts, as well as 1 census tract with no income designation. Per 2020 Census data, the MSA consists of 1 low-, 12 moderate-, 26 middle-, and 14 upper-income census tracts, as well as 1 census tract with no income designation. The bank operates its Bellingham, Hannegan, and Lynden offices in the MSA.

#### **Economic and Demographic Data**

Per 2022 D&B data, service industries represent the largest segment of area businesses at 34.3 percent, followed by non-classifiable establishments at 25.6 percent and finance, insurance, and real estate industries at 9.9 percent. In addition, 61.6 percent of area businesses have four or fewer employees and 95.1 percent operate from a single location. The table below illustrates select demographic characteristics of the MSA.

<b>Demographic Information of the Bellingham, WA MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	54	1.9	22.2	48.1	25.9	1.9
Population by Geography	226,847	0.9	21.5	52.8	23.0	1.9
Housing Units by Geography	98,000	1.4	20.8	50.2	25.7	2.0
Owner-Occupied Units by Geography	55,361	0.1	14.6	54.9	29.2	1.2
Occupied Rental Units by Geography	33,617	3.6	28.6	47.3	17.0	3.6
Vacant Units by Geography	9,022	0.3	30.4	32.0	36.4	0.9
Businesses by Geography	31,465	5.2	14.5	52.7	25.3	2.3
Farms by Geography	1,331	0.5	10.1	60.2	27.7	1.6
Family Distribution by Income Level	53,699	19.0	18.9	23.2	38.9	0.0
Household Distribution by Income Level	88,978	23.9	15.7	18.7	41.7	0.0
Median Family Income MSA - 13380 Bellingham, WA MSA		\$83,751	Median Housing Value			\$364,713
			Median Gross Rent			\$1,124
			Families Below Poverty Level			7.3%
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data                      Due to rounding, totals may not equal 100.0%                      (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The table below illustrates the 2022 FFIEC-estimated median family income levels for the Bellingham, WA MSA.

<b>Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
2022 (\$97,300)	<\$48,650	\$48,650 to <\$77,840	\$77,840 to <\$116,760	≥\$116,760
<i>Source: FFIEC</i>				

**Competition**

The Bellingham, WA MSA is moderately competitive for financial services. Per 2022 FDIC Deposit Market Share data, 14 financial institutions operate 49 offices within the MSA. Of these institutions, Bank of the Pacific ranked 10<sup>th</sup> with 3.9 percent of the deposit market share. Further, there is a high level of demand and competition for home mortgage loans as 322 lenders reported 6,867 home mortgage loans in the MSA in 2022, with Bank of the Pacific ranking 29<sup>th</sup> with 0.7 percent of the market share by number. Finally, there is a high level of demand and competition for small business loans in the MSA as evidenced by the 2021 aggregate data, which revealed that 71 lenders reported 6,234 small business loans.

**Community Contact**

Examiners contacted a representative of an organization that promotes economic development in the MSA. The contact stated that current local economic conditions are strong, but limited housing and childcare continue to hinder the economy. The contact noted that many Canadian companies are moving into the U.S. to grow their businesses and to avoid export costs. However, the limited housing stock is affecting business attraction, retention, and recruitment because people cannot afford to live in the area. Per the contact, financial institutions are meeting the area’s credit needs and are active within their communities. The contact added that there is a good amount of competition between financial institutions, which could potentially limit lending and community development opportunities. Lastly, the contact is not aware of any discriminatory practices by any area financial institutions.

**Credit and Community Development Needs and Opportunities**

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that home mortgage and commercial lending represent the primary credit needs in the MSA. The MSA’s community development needs primarily relate to economic development, affordable housing, and community services, however, there is a significant level of competition for the available opportunities.

**CONCLUSIONS ON PERFORMANCE CRITERIA IN BELLINGHAM, WA  
MSA**

**LENDING TEST**

Bank of the Pacific demonstrated reasonable performance under the Lending Test in the Bellingham, WA MSA, which is supported by the Geographic Distribution and Borrower Profile performance.

**Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the MSA, which is consistent with the bank’s home mortgage and small business lending performance.

***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the MSA when compared to aggregate data. The institution’s 2022 lending in moderate-income census tracts slightly exceeded aggregate data. As shown in the following table, there is minimal opportunity to lend in low-income census tracts within the assessment area.

<b>Geographic Distribution of Home Mortgage Loans</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.1	0.1	0	0.0	0	0.0
Moderate	14.6	16.5	9	18.8	3,280	18.2
Middle	54.9	56.8	30	62.5	11,519	63.9
Upper	29.2	25.4	9	18.8	3,238	18.0
Not Available	1.2	1.1	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>48</b>	<b>100.0</b>	<b>18,038</b>	<b>100.0</b>

*Source: 2020 U.S. Census; 2022 HMDA Reported Data, 2022 HMDA Aggregate Data  
Due to rounding, totals may not equal 100.0%*

***Small Business Loans***

The geographic distribution of small business loans reflects reasonable dispersion throughout the MSA when compared to D&B data, which is depicted in the table below. The institution’s 2022 lending in low-income census tracts was slightly below, but within a reasonable range of D&B data. Similarly, Bank of the Pacific’s lending in moderate-income census tracts was below D&B data, but not to an unreasonable degree.

<b>Geographic Distribution of Small Business Loans</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	5.2	2	3.6	69	0.4
Moderate	14.5	5	9.1	625	3.8
Middle	52.7	39	70.9	13,172	79.5
Upper	25.3	8	14.6	2,410	14.5
Not Available	2.3	1	1.8	300	1.8
<b>Total</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>16,576</b>	<b>100.0</b>

*Source: 2022 D&B Data; 2022 Bank Data  
Due to rounding, totals may not equal 100.0%*



## **Borrower Profile**

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes, which is consistent with the bank’s home mortgage and small business lending performance.

### ***Home Mortgage Loans***

The distribution of borrowers reflects reasonable penetration among individuals of different income levels when compared to aggregate data, which is depicted in the table below. The institution’s lending to low-income borrowers was below, but within a reasonable range of aggregate data. Similarly, Bank of the Pacific’s lending to moderate-income borrowers was below aggregate data, but not to an unreasonable degree.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	19.0	5.3	1	2.1	176	1.0
Moderate	18.9	14.6	5	10.4	1,087	6.0
Middle	23.2	24.2	11	22.9	4,622	25.6
Upper	38.9	45.5	30	62.5	11,655	64.6
Not Available	0.0	10.4	1	2.1	499	2.8
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>48</b>	<b>100.0</b>	<b>18,038</b>	<b>100.0</b>

*Source: 2020 U.S. Census; 2022 HMDA Reported Data, 2022 HMDA Aggregate Data*

### ***Small Business Loans***

As illustrated in the table below, the distribution of borrowers reflects reasonable penetration among businesses of different sizes. Although the bank’s performance lags D&B data, revenue information was not available for 14.6 percent of the institution’s small business loans, which somewhat skews the data. Further, the bank’s 2021 performance was comparable to aggregate data. Specifically, Bank of the Pacific made 142 small business loans in the MSA in 2021, 77 of which (54.2 percent) were to businesses with gross annual revenues of \$1 million or less. The aggregate data revealed that 45.0 percent of small business loans were to businesses with gross annual revenues of \$1 million or less.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	92.0	19	34.6	5,122	30.9
>\$1,000,000	2.7	28	50.9	8,456	51.0
Revenue Not Available	5.3	8	14.6	2,998	18.1
<b>Totals</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>16,576</b>	<b>100.0</b>

*Source: 2022 D&B Data; 2022 Bank Data  
Due to rounding, totals may not equal 100.0%*

## **COMMUNITY DEVELOPMENT TEST**

Bank of the Pacific's community development performance demonstrated adequate responsiveness to community development needs in the Bellingham, WA MSA through community development loans, qualified investments, and community development services.

### **Community Development Loans**

Bank of the Pacific originated 12 community development loans totaling \$21.9 million in the MSA during the evaluation period. All of the loans promoted economic development, which is considered responsive as this was identified as a community development need. Finally, the level of community development lending increased from the previous evaluation, which reported one loan totaling \$1.6 million. Below are examples of the bank's community development loans:

- Bank of the Pacific made two loans totaling \$8.2 million to fund the operations of a small business, which retained jobs in a moderate-income census tract.
- The institution originated one SBA 504 loan totaling \$3.6 million to fund the purchase of equipment in 2021.

### **Qualified Investments**

Bank of the Pacific made 18 qualified investments totaling \$668,000 in the MSA during the evaluation period, of which one was a newly purchased investment totaling \$650,000 and 17 were donations totaling \$18,000. Most of the qualified investments promoted community services, which is considered responsive as this was identified as a community development need. Finally, the level of qualified investments increased from the prior evaluation, which reported 17 qualified investments totaling \$10,000. Below are examples of the bank's qualified investment and donation activities:

- The institution made one new investment in 2022 for \$292,000 that renovated a school, which primarily serves low- and moderate-income students.
- The institution made two donations totaling \$3,000 to an organization that provides affordable housing to low- and moderate-income individuals.

### **Community Development Services**

During the evaluation period, employees provided 20 instances of financial expertise or technical assistance to community development organizations in the MSA totaling 115 service hours. A majority of the community development services promoted community services, which was identified as a community development need. The number of service hours is similar to the previous evaluation, which reported 131 service hours. Below are examples of the bank's community development services:

- Three employees provided 32 hours of service to an economic development organization by reviewing loan applications and/or serving on the Loan Committee.
- Six employees provided 28 hours of financial literacy training to the clients of an

organization that serves low- and moderate-income individuals.

Lastly, one of the bank's branches in the MSA and one of its ATMs are located in a low-income census tract based on 2020 Census data.

## **MOUNT VERNON-ANACORTES, WA MSA – Full-Scope Review**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MOUNT VERNON-ANACORTES, WA MSA**

This assessment area includes all of Skagit County in Washington, which comprises the Mount Vernon-Anacortes, WA MSA. The assessment area boundaries are unchanged from the prior evaluation; however, census tract income levels have changed between the two census years. According to 2015 ACS data, the MSA consists of 1 low-, 5 moderate-, 15 middle-, and 8 upper-income census tracts, as well as 1 census tract with no income designation. Per 2020 Census data, the MSA consists of 8 moderate-, 26 middle-, and 7 upper-income census tracts, as well as 1 census tract with no income designation. The bank operates its Anacortes office in the MSA.

#### **Economic and Demographic Data**

Per 2022 D&B data, service industries represent the largest segment of area businesses at 32.7 percent, followed by non-classifiable establishments at 23.8 percent and finance, insurance, and real estate industries at 10.2 percent. In addition, 61.6 percent of area businesses have four or fewer employees and 92.9 percent operate from a single location. The table on the following page illustrates select demographic characteristics of the MSA.

Demographic Information of the Mount Vernon-Anacortes, WA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	0.0	19.0	61.9	16.7	2.4
Population by Geography	129,523	0.0	21.0	60.4	18.6	0.0
Housing Units by Geography	54,317	0.0	20.1	60.3	19.6	0.0
Owner-Occupied Units by Geography	34,465	0.0	16.1	61.3	22.6	0.0
Occupied Rental Units by Geography	14,798	0.0	29.9	59.3	10.8	0.0
Vacant Units by Geography	5,054	0.0	18.9	55.7	25.4	0.0
Businesses by Geography	14,633	0.0	20.4	62.6	17.0	0.0
Farms by Geography	749	0.0	13.6	70.9	15.5	0.0
Family Distribution by Income Level	33,252	17.9	19.4	23.3	39.5	0.0
Household Distribution by Income Level	49,263	22.4	17.3	19.9	40.5	0.0
Median Family Income MSA - 34580 Mount Vernon-Anacortes, WA MSA		\$82,149	Median Housing Value			\$347,325
			Median Gross Rent			\$1,158
			Families Below Poverty Level			6.9%

Source: 2020 U.S. Census and 2022 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\* ) The NA category consists of geographies that have not been assigned an income classification.

The table below illustrates the 2022 FFIEC-estimated median family income levels for the Mount Vernon-Anacortes, WA MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2022 (\$86,100)	<\$43,050	\$43,050 to <\$68,880	\$68,880 to <\$103,320	≥\$103,320

Source: FFIEC

### **Competition**

The Mount Vernon-Anacortes, WA MSA is moderately competitive for financial services. Per 2022 FDIC Deposit Market Share data, 14 financial institutions operate 38 offices within the MSA. Of these institutions, Bank of the Pacific ranked 11<sup>th</sup> with 1.8 percent of the deposit market share. Further, there is a high level of demand and competition for home mortgage loans as 276 lenders reported 4,155 home mortgage loans in the MSA in 2022, with Bank of the Pacific ranking 74<sup>th</sup> with 0.2 percent of the market share by number. Finally, there is a high level of demand and competition for small business loans in the MSA as evidenced by the 2021 aggregate data, which revealed that 64 lenders reported 3,086 small business loans.

### **Credit and Community Development Needs and Opportunities**

Considering information from bank management and demographic and economic data, examiners determined that home mortgage and commercial lending represent the primary credit needs in the

MSA. The MSA's community development needs primarily relate to economic development and community services, however, there is a significant level of competition for the available opportunities.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN MOUNT VERNON-ANACORTES, WA MSA**

### **LENDING TEST**

Bank of the Pacific demonstrated reasonable performance under the Lending Test in the Mount Vernon-Anacortes, WA MSA, which is supported by the Geographic Distribution and Borrower Profile performance.

#### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the MSA, which is consistent with the bank's home mortgage and small business lending performance.

#### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the MSA. The bank originated 10 home mortgage loans totaling \$3.6 million in the MSA in 2022, none of which were located in the moderate-income census tracts. However, the bank's sole office in the MSA is located in a middle-income census tract and is not near the moderate-income census tracts. Further, the bank's 2021 performance was comparable to aggregate data. Specifically, Bank of the Pacific made 159 home mortgage loans in the MSA in 2021, three of which (1.9 percent) were in the low-income census tract and 19 (12.0 percent) were in the moderate-income census tracts. The aggregate data revealed that 1.9 percent and 12.5 percent of home mortgage loans were to individuals located in low- and moderate-income census tracts, respectively.

#### ***Small Business Loans***

The geographic distribution of small business loans reflects reasonable dispersion throughout the MSA. The bank originated only two small business loans totaling \$300,000 in the MSA in 2022, neither of which were located in the moderate-income census tracts. As previously noted, the bank's sole office in the MSA is located in a middle-income census tract and is not near the moderate-income census tracts. Further, the bank's 2021 performance was comparable to aggregate data. Specifically, Bank of the Pacific made 23 loans in the MSA in 2021, none of which were in the low-income census tract and four (17.4 percent) were in the moderate-income census tracts. The aggregate data revealed that 1.8 percent and 18.9 percent of small business loans were to businesses located in low- and moderate-income census tracts, respectively.

#### **Borrower Profile**

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes, which is consistent with the bank's home mortgage and small business lending performance.

### ***Home Mortgage Loans***

The distribution of borrowers reflects reasonable penetration among individuals of different income levels when compared to aggregate data, which is depicted in the table below. While the bank did not originate any home mortgage loans to low-income borrowers, 6.9 percent of families live below the poverty level and likely would not qualify for financing. The bank’s level of lending to moderate-income borrowers was in line with aggregate data. Further, there is a high level of competition for home mortgage loans within the assessment area.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	17.9	4.2	0	0.0	0	0.0
Moderate	19.4	11.3	1	10.0	294	8.1
Middle	23.3	23.9	2	20.0	517	14.3
Upper	39.5	48.8	6	60.0	1,997	55.3
Not Available	0.0	11.8	1	10.0	800	22.2
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>3,608</b>	<b>100.0</b>

*Source: 2020 U.S. Census; 2022 HMDA Reported Data, 2022 HMDA Aggregate Data  
Due to rounding, totals may not equal 100.0%*

### ***Small Business Loans***

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. As previously noted, the bank originated only two small business loans in the MSA in 2022, so an analysis of the 2022 data would not result in meaningful conclusions. The institution’s 2021 small business performance was reasonable when considering additional performance context information. Of the 23 loans made in the MSA in 2021, 15 (65.2 percent) were to businesses with gross annual revenues of \$1 million or less. The aggregate data revealed that 51.6 percent of small business loans were to businesses with gross annual revenues of \$1 million or less.

## **COMMUNITY DEVELOPMENT TEST**

Bank of the Pacific’s community development performance demonstrated adequate responsiveness to community development needs in the Mount Vernon-Anacortes, WA MSA through community development loans, qualified investments, and community development services.

### **Community Development Loans**

Bank of the Pacific originated one community development loan totaling \$2.3 million in the MSA during the evaluation period. The loan promoted economic development, which was identified as a community development need. Specifically, a small farm used the proceeds to expand its operations by purchasing additional real estate, resulting in the creation and retention of jobs for low- and moderate-income individuals. Overall, the level of community development lending increased from the previous evaluation, which did not report any community development loans.

### **Qualified Investments**

Bank of the Pacific made eight qualified investments totaling \$1.4 million in the MSA during the evaluation period, including one prior period investment totaling \$559,000, three newly purchased investments totaling \$881,000, and four donations totaling \$6,000. Most of the qualified investments promoted community services and economic development, which is considered responsive as both were identified as community development needs. The level of qualified investments increased from the prior evaluation, which reported 10 qualified investments totaling \$504,000. Below are examples of the bank's qualified investment and donation activities:

- Bank of the Pacific made two investments totaling \$840,000 that funded the construction of a school that primarily serves low- and moderate-income students.
- The institution also made two investments totaling \$600,000 that funded a small business' operations, which created and retained jobs for low- and moderate-income individuals.

### **Community Development Services**

During the evaluation period, employees provided six instances of financial expertise or technical assistance to community development organizations in the MSA totaling 36 service hours. A majority of the community development services promoted economic development, which was identified as a community development need. The number of service hours decreased from 121 at the previous evaluation. Below are examples of the bank's community development services:

- One employee provided 23 hours of Board service to an organization that promotes the economic viability of small farms, which retains jobs for low- and moderate-income individuals.
- One employee provided 5 hours of Board service to an organization that provides various services to low- and moderate-income individuals.

## **CLARK COUNTY ASSESSMENT AREA – Full-Scope Review**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN CLARK COUNTY ASSESSMENT AREA**

This assessment area includes all of Clark County in Washington, which comprises a portion of the Portland-Vancouver-Hillsboro, OR-WA MSA. The assessment area boundaries are unchanged since the previous evaluation; however, census tract income levels have changed between the two census years. According to 2015 ACS data, the assessment area consists of 2 low-, 29 moderate-, 57 middle-, and 16 upper-income census tracts. Per 2020 Census data, the assessment area consists of 1 low-, 36 moderate-, 59 middle-, and 18 upper-income census tracts, as well as 1 census tract with no income designation. The bank operates its Vancouver office in this assessment area.

### **Economic and Demographic Data**

Per 2022 D&B data, service industries represent the largest segment of area businesses at 33.1 percent, followed by non-classifiable establishments at 26.7 percent and finance, insurance, and real

estate industries at 11.0 percent. In addition, 61.7 percent of area businesses have four or fewer employees and 94.8 percent operate from a single location. The following table illustrates select demographic characteristics of the assessment area.

<b>Demographic Information of the Clark County Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	115	0.9	31.3	51.3	15.7	0.9
Population by Geography	503,311	0.8	30.0	51.3	17.5	0.4
Housing Units by Geography	186,317	0.8	31.7	50.6	16.4	0.5
Owner-Occupied Units by Geography	119,725	0.1	22.6	56.6	20.6	0.1
Occupied Rental Units by Geography	58,753	1.9	50.7	38.6	7.5	1.2
Vacant Units by Geography	7,839	2.1	28.8	48.9	19.5	0.7
Businesses by Geography	56,522	0.4	34.7	46.0	16.6	2.3
Farms by Geography	1,391	0.3	23.8	51.9	22.9	1.1
Family Distribution by Income Level	123,522	20.4	20.7	22.2	36.7	0.0
Household Distribution by Income Level	178,478	21.1	18.3	19.6	41.0	0.0
Median Family Income MSA - 38900 Portland-Vancouver-Hillsboro, OR- WA MSA		\$94,727	Median Housing Value			\$351,585
			Median Gross Rent			\$1,340
			Families Below Poverty Level			6.0%
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The table below illustrates the 2022 FFIEC-estimated median family income levels for the Portland-Vancouver-Hillsboro, OR-WA MSA.

<b>Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
2022 (\$106,500)	<\$53,250	\$53,250 to <\$85,200	\$85,200 to <\$127,800	≥\$127,800
<i>Source: FFIEC</i>				

### **Competition**

The Clark County Assessment Area is highly competitive for financial services. Per 2022 FDIC Deposit Market Share data, 17 financial institutions operate 72 offices within the assessment area. Of these institutions, Bank of the Pacific ranked 14<sup>th</sup> with 0.5 percent of the deposit market share. Further, there is a high level of demand and competition for home mortgage loans as 464 lenders reported 20,135 home mortgage loans in the assessment area in 2022, with Bank of the Pacific ranking 159<sup>th</sup> with 0.1 percent of the market share by number. Finally, there is a high level of

demand and competition for small business loans in the assessment area as evidenced by the 2021 aggregate data, which revealed that 101 lenders reported 12,999 small business loans.

### **Community Contact**

Examiners contacted a representative of an organization that promotes economic development in the assessment area. The contact stated that the area's unemployment rate is low, which inhibits the capacity for growth in the economy and makes it hard to attract new employees to the workforce. The contact added that Washington recently implemented a new capital gains tax that has adversely affected the potential for new business expansion in the area. Per the contact, financial institutions should become more active in micro lending or government guaranteed loan programs, so more small businesses have access to affordable credit. Regarding the housing market, the contact stated that limited single-family housing is available, but new apartments and rental properties are being built. Further, the high housing prices and interest rate environment are adversely affecting potential homebuyers. However, Washington recently implemented a new law that mandates building projects include a specified percentage of affordable housing, which should help increase the availability of affordable housing in the area. The contact added that there is a high level of competition between financial institutions, which could potentially limit lending and community development opportunities. Lastly, the contact is not aware of any discriminatory practices by any area financial institutions.

### **Credit and Community Development Needs and Opportunities**

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that home mortgage and commercial lending represent the primary credit needs in the assessment area. The assessment area's community development needs primarily relate to affordable housing, economic development, and community services, however, there is a significant level of competition for the available opportunities.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN CLARK COUNTY ASSESSMENT AREA**

### **LENDING TEST**

Bank of the Pacific demonstrated reasonable performance under the Lending Test in the Clark County Assessment Area, which is supported by the Geographic Distribution and Borrower Profile performance.

### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area, which is consistent with the bank's home mortgage and small business lending performance.

### ***Home Mortgage Loans***

As illustrated in the table on the following page, the geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area when compared to aggregate data. Although the institution's 2022 performance lags aggregate data, there is a significant level of competition for home mortgage loans within the assessment area. Further, the bank's 2021

performance was comparable to aggregate data. Specifically, Bank of the Pacific made 29 home mortgage loans in the assessment area in 2021, none of which were in the low-income census tracts and four (13.8 percent) were in the moderate-income census tracts. The aggregate data revealed that 0.6 percent and 17.9 percent of home mortgage loans were to individuals located in low- and moderate-income census tracts, respectively.

<b>Geographic Distribution of Home Mortgage Loans</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.1	0.2	0	0.0	0	0.0
Moderate	22.6	22.2	1	8.3	720	12.6
Middle	56.6	55.4	9	75.0	4,199	73.6
Upper	20.6	22.0	2	16.7	785	13.8
Not Available	0.1	0.2	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>5,705</b>	<b>100.0</b>

*Source: 2020 U.S. Census; 2022 HMDA Reported Data, 2022 HMDA Aggregate Data*

### ***Small Business Loans***

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area when compared to D&B data, which is depicted in the table below. The bank’s 2022 small business lending within moderate-income census tracts slightly exceeded D&B data. Further, D&B data revealed very limited opportunity to lending in low-income census tracts.

<b>Geographic Distribution of Small Business Loans</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.4	0	0.0	0	0.0
Moderate	34.7	17	37.8	4,197	32.9
Middle	46.0	22	48.9	6,660	52.2
Upper	16.6	6	13.3	1,891	14.8
Not Available	2.3	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>45</b>	<b>100.0</b>	<b>12,748</b>	<b>100.0</b>

*Source: 2022 D&B Data; 2022 Bank Data  
Due to rounding, totals may not equal 100.0%*

### **Borrower Profile**

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes, which is consistent with the bank’s home mortgage lending performance. While small business lending performance was poor, it did not warrant an overall poor assessment.

### ***Home Mortgage Loans***

The distribution of borrowers reflects reasonable penetration among individuals of different income levels when compared to aggregate data, which is depicted in the following table. While the bank did not originate any home mortgage loans to low-income borrowers, 6.0 percent of families live below the poverty level and likely would not qualify for financing, especially considering the high housing prices. Further, there is a significant level of competition for home mortgage loans within the assessment area. The bank’s lending to moderate-income borrowers was slightly below, but within a reasonable range of aggregate data.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	20.4	6.1	0	0.0	0	0.0
Moderate	20.7	18.9	2	16.7	829	14.5
Middle	22.2	25.8	0	0.0	0	0.0
Upper	36.7	38.3	7	58.3	2,855	50.1
Not Available	0.0	10.9	3	25.0	2,020	35.4
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>5,705</b>	<b>100.0</b>

*Source: 2020 U.S. Census; 2022 HMDA Reported Data, 2022 HMDA Aggregate Data*

### ***Small Business Loans***

As illustrated in the table below, the distribution of borrowers reflects poor penetration among businesses of different sizes. However, the bank only has one office and a relatively small presence in this assessment area given the high level of competition. Further, management stated that they are currently rebuilding this market’s commercial lending team. Considering these factors, the bank’s performance is poor.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	92.5	2	4.4	500	3.9
>\$1,000,000	2.3	38	84.4	9,489	74.4
Revenue Not Available	5.2	5	11.1	2,759	21.6
<b>Totals</b>	<b>100.0</b>	<b>45</b>	<b>100.0</b>	<b>12,748</b>	<b>100.0</b>

*Source: 2022 D&B Data; 2022 Bank Data  
Due to rounding, totals may not equal 100.0%*

## **COMMUNITY DEVELOPMENT TEST**

Bank of the Pacific’s community development performance demonstrated adequate responsiveness to community development needs in its Clark County Assessment Area through community development loans, qualified investments, and community development services.

### **Community Development Loans**

Bank of the Pacific originated two community development loans totaling \$2.6 million in the assessment area during the evaluation period. The loans promoted economic development and affordable housing, both of which were identified as community development needs. Specifically, one loan totaling \$720,000 funded the purchase of an apartment building that provides affordable housing to low- and moderate-income individuals in 2022, whereas the other loan totaling \$1.9 million was a SBA 504 loan that funded the purchase of a building in 2021. Finally, the level of community development lending decreased from the previous evaluation, which reported three loans totaling \$5.6 million.

### **Qualified Investments**

Bank of the Pacific made seven qualified investments totaling \$750,000 in the assessment area during the evaluation period, including one prior period investment totaling \$268,000, one newly purchased investment totaling \$476,000, and five donations totaling \$6,000. All of the qualified investments promoted affordable housing and community services, which is considered responsive as both were identified as community development needs. Finally, the level of qualified investments increased from the prior evaluation, which reported two qualified investments totaling \$1,000. Below are examples of the bank's qualified investment and donation activities:

- The institution made one new investment totaling \$476,000 in 2022 to an organization that provides affordable housing to low- and moderate-income individuals.
- Bank of the Pacific granted one donation totaling \$2,500 in 2023 to an organization that provides affordable housing to low- and moderate-income individuals.

### **Community Development Services**

Employees did not provide any instances of financial expertise or technical assistance to community development organizations in the assessment area during the evaluation period. The number of service hours decreased from 137 at the previous evaluation. Management noted that they are currently rebuilding this team. Lastly, the bank's sole branch in this assessment area is located in a moderate-income census tract based on 2020 Census data.

## OREGON

### CRA RATING FOR OREGON: SATISFACTORY

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN OREGON

The Clatsop County Assessment Area includes all of Clatsop County in Oregon. The assessment area boundaries are unchanged from the prior evaluation; however, census tract income levels have changed between the two census years. According to 2015 ACS data, the assessment area consists of eight middle- and three upper-income census tracts, as well as one census tract with no income designation. Per 2020 Census data, the assessment area consists of five middle- and six upper-income census tracts, as well as one census tract with no income designation. The bank operates its Seaside and Warrenton offices in this assessment area.

#### Economic and Demographic Data

The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Clatsop County Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	0.0	41.7	50.0	8.3
Population by Geography	41,072	0.0	0.0	43.8	56.2	0.0
Housing Units by Geography	22,609	0.0	0.0	42.4	57.6	0.0
Owner-Occupied Units by Geography	9,727	0.0	0.0	41.9	58.1	0.0
Occupied Rental Units by Geography	6,292	0.0	0.0	51.5	48.5	0.0
Vacant Units by Geography	6,590	0.0	0.0	34.6	65.4	0.0
Businesses by Geography	5,990	0.0	0.0	41.7	58.0	0.3
Farms by Geography	202	0.0	0.0	42.6	57.4	0.0
Family Distribution by Income Level	9,304	13.8	16.5	18.7	51.0	0.0
Household Distribution by Income Level	16,019	19.3	17.1	17.6	46.1	0.0
Median Family Income Non-MSAs - OR		\$63,625	Median Housing Value			\$324,747
			Median Gross Rent			\$957
			Families Below Poverty Level			4.5%
<small>Source: 2020 U.S. Census and 2022 D&amp;B Data                      Due to rounding, totals may not equal 100.0%                      (*) The NA category consists of geographies that have not been assigned an income classification.</small>						

Per 2022 D&B data, service industries represent the largest segment of businesses at 32.1 percent, followed by non-classifiable establishments at 25.1 percent and retail trade at 13.6 percent. In

addition, 60.8 percent of area businesses have four or fewer employees and 92.9 percent operate from a single location.

The table below illustrates the 2022 FFIEC-estimated median family income levels for nonmetropolitan Oregon.

<b>Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
2022 (\$71,800)	<\$35,900	\$35,900 to <\$57,440	\$57,440 to <\$86,160	≥\$86,160
<i>Source: FFIEC</i>				

**Competition**

The Clatsop County Assessment Area has a moderate level of competition for financial services. Per 2022 FDIC Deposit Market Share data, 6 financial institutions operate 12 offices within the assessment area. Of these institutions, Bank of the Pacific ranked fourth with 13.7 percent of the deposit market share. Further, there is a high level of demand and competition for home mortgage loans as 208 lenders reported 1,569 home mortgage loans in the assessment area in 2022, with Bank of the Pacific ranking 12<sup>th</sup> with 2.0 percent of the market share by number. Finally, there is a high level of demand and competition for small business loans in the assessment area as evidenced by the 2021 aggregate data, which revealed that 50 lenders reported 1,169 small business loans.

**Credit and Community Development Needs and Opportunities**

Considering information from bank management and demographic and economic data, examiners determined that home mortgage and commercial lending represent the primary credit needs in the assessment area. The assessment area’s community development needs primarily relate to affordable housing, economic development, and community services; however, there is a significant level of competition for the available opportunities.

**SCOPE OF EVALUATION – OREGON**

Refer to the overall Scope of Evaluation section for information regarding the review scope.

**CONCLUSIONS ON PERFORMANCE CRITERIA IN OREGON**

**LENDING TEST**

Bank of the Pacific demonstrated reasonable performance under the Lending Test in Oregon, which is supported by the Borrower Profile performance.

**Geographic Distribution**

The assessment area does not include any low- and moderate-income geographies, and a review of the Geographic Distribution criterion would not result in meaningful conclusions. Therefore, this criterion was not evaluated.



**Borrower Profile**

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes, which is consistent with the bank’s home mortgage and small business lending performance.

***Home Mortgage Loans***

As shown in the table below, the distribution of borrowers reflects reasonable penetration among individuals of different income levels when compared to aggregate data. The bank’s 2022 lending to low-income borrowers was in line with aggregate data, while its lending to moderate-income borrowers was slightly below aggregate data. Overall, the bank’s performance is reasonable.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	13.8	3.0	1	3.1	40	0.2
Moderate	16.5	9.5	2	6.3	731	3.8
Middle	18.7	18.7	7	21.9	1,745	9.1
Upper	51.0	56.1	17	53.1	6,333	33.1
Not Available	0.0	12.7	5	15.6	10,308	53.8
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>32</b>	<b>100.0</b>	<b>19,157</b>	<b>100.0</b>

*Source: 2020 U.S. Census; 2022 HMDA Reported Data, 2022 HMDA Aggregate Data*

***Small Business Loans***

As illustrated in the table below, the distribution of borrowers reflects reasonable penetration among businesses of different sizes. Although the bank’s performance lags D&B data, revenue information was not available for 30.0 percent of the institution’s small business loans, which skews the data. Further, the bank’s 2021 performance was comparable to D&B and aggregate data. Specifically, Bank of the Pacific made 101 small business loans in the assessment area in 2021, 86 of which (85.1 percent) were to businesses with gross annual revenues of \$1 million or less. The aggregate data revealed that 57.8 percent of small business loans were to businesses with gross annual revenues of \$1 million or less, whereas D&B data indicated that 89.2 percent of area businesses have gross annual revenues of \$1 million or less.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	90.6	8	40.0	1,884	51.5
>\$1,000,000	2.3	6	30.0	518	14.2
Revenue Not Available	7.2	6	30.0	1,253	34.3
<b>Totals</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>3,655</b>	<b>100.0</b>

*Source: 2022 D&B Data; 2022 Bank Data  
Due to rounding, totals may not equal 100.0%*

## **COMMUNITY DEVELOPMENT TEST**

Bank of the Pacific's community development performance demonstrated adequate responsiveness to the community development needs in Oregon through community development loans, qualified investments, and community development services.

### **Community Development Loans**

Bank of the Pacific originated three community development loans totaling \$5.6 million in the assessment area during the evaluation period. The loans promoted economic development and affordable housing, which is considered responsive as both were identified as community development needs. Finally, the level of community development lending is similar to the prior evaluation, which reported two loans totaling \$5.5 million. Below are examples of the bank's community development loans:

- The institution originated one loan totaling \$4.3 million that funded the remodeling a small business in 2021, which retained jobs for low- and moderate-income individuals.
- Bank of the Pacific also made one loan totaling \$410,000 that funded the purchase of an apartment building that provides affordable housing to low- and moderate-income individuals in 2021.

### **Qualified Investments**

Bank of the Pacific made 44 qualified investments totaling \$5.7 million during the evaluation period in Oregon, of which two were newly purchased investments totaling \$1.1 million and six were donations totaling \$5,000 that directly benefited the assessment area. The remaining 35 investments totaling \$4.6 million, including three prior period investments totaling \$1.7 million, and one donation totaling \$2,000 benefited the broader statewide area. The qualified investments promoted affordable housing and community services, which is considered responsive as both were identified as community development needs. Finally, the level of qualified investments increased from the previous evaluation, which reported 16 qualified investments totaling \$9,000. Below are examples of the bank's qualified investment and donation activities:

- The institution made one investment totaling \$646,000 in 2021 that funded the construction of a school that primarily serves low- and moderate-income students.
- The institution also made one new investment totaling \$429,000 in 2021 that renovated a school that primarily serves low- and moderate-income students.

### **Community Development Services**

During the evaluation period, employees provided two instances of financial expertise or technical assistance to community development organizations in the broader statewide area totaling 15 service hours. The service hours promoted community services, which was identified as a community development need. The number of service hours decreased from 280 at the prior evaluation. Management noted that employees in this market were not documenting most of their service hours as a former manager thought that the activities did not qualify; however, management changed their process at the current evaluation to ensure these are tracked going forward.

## APPENDICES

### INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

#### **Community Development Test**

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

## SUMMARY OF RATINGS FOR RATED AREAS

<b>Rated Area</b>	<b>Lending Test</b>	<b>Community Development Test</b>	<b>Rating</b>
Washington	Satisfactory	Satisfactory	Satisfactory
Oregon	Satisfactory	Satisfactory	Satisfactory

## 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.

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

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

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

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

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

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

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

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

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

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

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

**Community Development Loan:** A loan that:

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

**Community Development Service:** A service that:

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

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

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

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

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

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

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

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

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

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

**Limited-Scope Review:** A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



## **BRANCH INFORMATION**

1. List of branches, their street addresses and geographies.
2. List of branches opened or closed by the bank during the current year and each of the prior two calendar years, their street addresses and geographies.
3. List of Services generally offered at the bank's branches and any material differences in the availability or cost of services at particular branches.

**Washington State**

Locations	Street	City	State	Zip	MSA	State Code	County Code	Census Tract	Tract Income Level	Lobby Hours	Drive-Up Hours
<b>Aberdeen - Main</b>	300 E Market St	Aberdeen	WA	98520	NA	53	027	0010.00	Moderate	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking (2) Phone: 360-533-8870											
<b>Anacortes</b>	801 Commercial Ave	Anacortes	WA	98221	34580	53	057	9406.00	Middle	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking Phone: 360-588-9383											
<b>Bellingham</b>	100 Grand Ave	Bellingham	WA	98225	13380	53	073	0006.00	Low	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking Phone: 360-734-0544 Includes Admin Center											
<b>Cathlamet</b>	56 Main St	Cathlamet	WA	98612	NA	53	069	9501.00	Middle	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking Phone: 360-795-3228											
<b>Hannegan</b>	4124 Hannegan Rd	Bellingham	WA	98226	13380	53	073	0001.02	Middle	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking Phone: 360-714-8805											
<b>Hoquiam</b>	405 8th St	Hoquiam	WA	98550	NA	53	027	0015.00	Middle	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking Phone: 360-533-7227											
<b>Long Beach</b>	1007 South Pacific Hwy	Long Beach	WA	98631	NA	53	049	9506.00	Middle	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking Phone: 360-642-3777											
<b>Lynden</b>	1800 Front St	Lynden	WA	98264	13380	53	073	0103.01	Middle	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking Phone: 360-318-8780											
<b>Montesano</b>	150 S Main St	Montesano	WA	98563	NA	53	027	0004.02	Middle	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking Phone: 360-249-2499											
<b>Ocean Park</b>	1802 Bay Ave	Ocean Park	WA	98640	NA	53	049	9507.01	Moderate	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking Phone: 360-665-5255											
<b>Ocean Shores</b>	145 W Chance A La Mer NW	Ocean Shores	WA	98569	NA	53	027	0002.01	Moderate	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking Phone: 360-289-2405											
<b>Olympia Commercial Banking Center</b>	520 Union Ave SE	Olympia	WA	98501	36500	53	067	0101.00	Middle	M-F 9:00-5:00	NA
ITM (Interactive Teller Machine) Phone: (253) 964-1082											
<b>Taholah</b>	1214 Aalis, Bldg. C	Taholah	WA	98587	NA	53	027	9400.00	Middle	M-Th 9:30-3:00 F 9:30-5:00	M-Th 9:30-3:30 F 9:00-5:00
No ATM:No deposits/ No cash transactions (drive thru only) Phone: 360-276-4411											
<b>Raymond</b>	560 Commercial St	Raymond	WA	98577	NA	53	049	9502.00	Middle	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking Phone: 360-942-4904											
<b>Vancouver Commercial Banking Center</b>	400 East Mill Plain Blvd Suite 100	Vancouver	WA	98660	38900	53	011	0425.00	Moderate	M-F 9:00-5:00	NA
ITM (Interactive Teller Machine) ATM:Deposit Taking Phone: 360-260-4545											

Oregon State											
Locations	Street	City	State	Zip	MSA/MD	State Code	County Code	Census Tract	Tract Income Level	Lobby Hours	Drive-Up Hours
<b>Seaside</b>	761 Avenue G	Seaside	OR	97138	NA	41	007	9509.00	Middle	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking Phone: 503-738-8341											
<b>Warrenton</b>	651 SE Marlin Ave	Warrenton	OR	97146	NA	41	007	9505.00	Middle	M-F 9:00-5:00	M-Th 9:00-5:00 F 9:00-5:30
ATM:Deposit Taking Phone: 503-861-6525											
<b>Lake Oswego Commercial Banking Center</b>	5335 Meadows Rd Suite 151	Lake Oswego	OR	97035	38900	41	5	203.02	Upper	M-F 9:00-5:00	NA
ITM (Interactive Teller Machine) Phone: 503-523-0123											

Commercial Banking Centers Only											
Locations	Street	City	State	Zip	MSA/MD	State Code	County Code	Census Tract	Tract Income Level	Lobby Hours	Drive-Up Hours
<b>Burlington Commercial Banking Center</b>	404 N Burlington Blvd	Burlington	WA	98233	34580	53	057	9516.00	Middle	24 hour ATM ITM: M-F 9:00-5:00	NA
ITM (Interactive Teller Machine) ATM:Deposit Taking Phone: 360-757-1618											
<b>Salem Commercial Banking Center</b>	1255 Lee St Suite 130	Salem	OR	97302	41420	41	047	0010.00	Moderate	M-F 9:00-5:00	NA
No ATM:No deposits/ No cash transactions Phone: 503-364-1633											

Administrative Offices											
Locations	Street	City	State	Zip	MSA/MD	State Code	County Code	Census Tract	Tract Income Level	Lobby Hours	Drive-Up Hours
<b>Main Administration Building</b>	1216 Skyview Dr	Aberdeen	WA	98520	NA	53	027	0011.00	Middle	M-F 9:00-5:00	NA
ATM:No deposits/ No cash transactions Phone: (360) 537-4061											

ITM / ATM Only											
Locations	Street	City	State	Zip	MSA/MD	State Code	County Code	Census Tract	Tract Income Level	Lobby Hours	Drive-Up Hours
<b>Naselle - ATM Location</b>	309 Knappton Rd	Naselle	WA	98638	NA	53	049	9504.00	Middle	24 hour ATM ITM: M-F 9:00-5:00	NA
ITM (Interactive Teller Machine) ATM:Deposit Taking											

Branch Changes 2024-2025											
Location	Street	City	State	Zip	MSA	State Code	County Code	Census Tract	Tract Income Level	Date Opened, Closed or Relocated	Notes
<b>Sehome</b>	226 36th St	Bellingham	WA	98225	13380	53	073	0012.04	Upper	Closed 01.31.2025	Loan Production Office only, no ATM/ITM Services
<b>Lake Oswego</b>	525 3rd Street #200	Lake Oswego	OR	97034	38900	41	005	020.02	Upper	Opened: 01.31.2024	Branch Opened will be moving in August of 2024
<b>Bellingham Admin Center</b>	100 Grand Ave	Bellingham	WA	98225	13380	53	073	0006.00	Low	Opened: 01.31.2025	Administrative Office only, no ATM/ITM Services



## Products & Services Offered

### Loans

- Consumer Loans
  - Secured
    - Automotive
    - Boat and Recreational Vehicle
    - Cash secured
    - Motorcycle Loans
    - Residential Land Loans
    - Home Equity Lines of Credit
    - Home Equity Term Loan
  - Unsecured
    - Consumer Visa Credit Card
- Business Loans
  - Equipment and Vehicle Loans
  - Term Loans
    - Working Capital
    - Business Expansion
    - Business Acquisition
  - Business Lines of Credit
  - Commercial Real Estate
  - Construction Loans
  - Special Loan Programs, including SBA
  - Agricultural Loans
    - Real Estate Purchases
    - Equipment Purchases
    - Pre-paid Feed Loans
    - Farm Expansion and Acquisition
    - Herd or Crop Replacement
    - Operating Lines of Credit
  - Stand-by Letters of Credit
  - Business VISA Credit Cards

### Checking Accounts

- Personal Checking Accounts
  - Pacific Checking
    - Reduced Rate for 60+
  - Pacific Rewards Checking
  - Pacific Premier Checking
  - Pacific Access Checking
- Business Checking Accounts
  - Essential Business Checking
  - Small Business checking
  - Business Checking
  - Community Checking
  - Business Interest Checking
  - Commercial Checking (analyzed account)

- Public Checking
- Public Now Checking
- Public Analyzed Checking
- Public Money Market
- Now Account Public Sweep
- IOLTA (Interest on Layers' Trust Account)
- IRETA (Interest on Real Estate Trust Account)

## **Savings Accounts**

- Personal Savings Accounts
  - Essential Savings
  - Health Savings Accounts (individual and family)
  - Youth Savings
  - Money Market Savings
  - Investments
    - Certificate of Deposits (CDs)
    - Individual Retirement Accounts (IRAs)
  - TAALA Savings
- Business Savings Accounts
  - Business Savings
  - Business Money Market Account
  - Business Certificate of Deposit

## **Online Banking Services**

- Personal
  - Online/Mobile Banking
    - Mobile Deposit (*mobile app only*)
    - Bill Pay – *Electronic and Check Payments*
    - Text Banking
    - Person-to-Person Transfers with Zelle
  - eStatements
  - Online Loan Payments
- Business
  - Treasury Management Services
    - ACH Origination Service
      - Direct Deposit of Payroll
      - Pre-Authorized Debits
      - Corporate Payments
      - Cash Concentration
      - Federal & State Tax Payments (EFTPS)
      - Same Day ACH
    - Check and ACH Positive Pay
    - Remote Check Capture
    - Sweep Account Services
    - Lockbox Services
    - Electronic data Interchange (EDI)
    - Wire Transfers
  - Merchant Services (*including card processing*)
  - Online Banking with multi-user management
  - Business Bill Pay
  - eStatements
  - Online Loan Payments
  - Ban Control

## **Miscellaneous Services**

- Telephone banking
- Safe Deposit Boxes
- ATM Services
- Night Depository
- Customer Care Center
- Online Chat with customer care
- In-person banking

# Personal Banking

## Schedule of Fees

### ATM Fees

Non-Bank of the Pacific ATM withdrawals	\$2.50 ea.
Non-Bank of the Pacific ATM inquiries	\$2 ea.
Non-Bank of the Pacific ATM transfers	\$2 ea.

### Replacement card **\$7.50 ea.**

VISA check card international service assessment:

*2% of transaction amount*

### Overdraft Fees

Overdraft (paid item) fee*	\$32 per transaction
NSF (returned item) fee*	\$32 per transaction
Overdraft transfer fee*	\$10 per transfer
Maximum overdraft/NSF fee*	\$160 per day

### Statement and Research Fees

Account research and reconciliation	\$40 per hour
<b>Account activity printout</b>	<b>\$2</b>
<b>Image copy</b>	<b>\$2</b>
Monthly paper statement fee (No charge for e-statements)	\$3
<b>Special order statement</b>	<b>\$4 per statement</b>

### Wire Transfer Fees

Incoming	\$20 per wire
Outgoing domestic	\$35 per wire
Outgoing international	\$50 per wire

### Other Fees

Account closed within 90 days of opening	\$50
ACH external transfer fee	\$3
<b>Cashier's checks</b>	<b>\$7 ea.</b>
<b>Money orders</b>	<b>\$5 ea.</b>
Check printing	fee varies depending on style
<b>Counter check</b>	<b>\$2 per sheet</b>
Dormant fees	\$10 per month
Drafts, checks and coupon collection	\$20 per collection
Intuit Direct Connect fee	\$5 per month
<b>Levies, attachments, executions and liens</b>	<b>\$100 ea.</b>
Notary	FREE
Return deposited item fee	\$10
Return mail fee	\$5
<b>Stop payment and renewals (branch)</b>	<b>\$35 per item</b>
Stop payment and renewals (online)	\$27 per item
Telephone transfer (branch assisted)	\$3.50 per transfer

### Non-Account Holder Fees

<b>Notary service</b>	<b>\$10 per notary</b>
Coin counting	\$2 per \$100, \$2 minimum
On-us check cashing fee	\$5 per check
<b>Cash advance fee</b>	<b>\$10</b>

Canadian currency exchange fee:

*2% of amount exchanged, \$2 minimum fee*

### Safe Deposit Box Rent Schedule

The schedule below shows the annual Safe Deposit Box rental rates that are currently in effect. Annual automatic payment from a Bank of the Pacific Account will be established at the time a Box is opened. Otherwise, a manual invoicing fee will be incurred annually.

Box Size (Inches)	Annual Rent
2x5	\$25
3x5	\$35
<b>5x5</b>	<b>\$55</b>
<b>3x10</b>	<b>\$65</b>
<b>5x10</b>	<b>\$75</b>
<b>10x10</b>	<b>\$125</b>
15x10	\$125

<b>Safe Deposit Box drilling fee</b>	<b>\$250</b>
<b>Safe Deposit Box late fee</b>	<b>\$20</b>
<b>Safe Deposit Box key replacement</b>	<b>\$25</b>

\*fee applies to overdrafts created by check, in-person withdrawal, ATM withdrawal or other electronic means.

**BOLD = recent change in account fees and/or structure**

Effective Date: 1/1/26  
Revision Date: 12/1/25

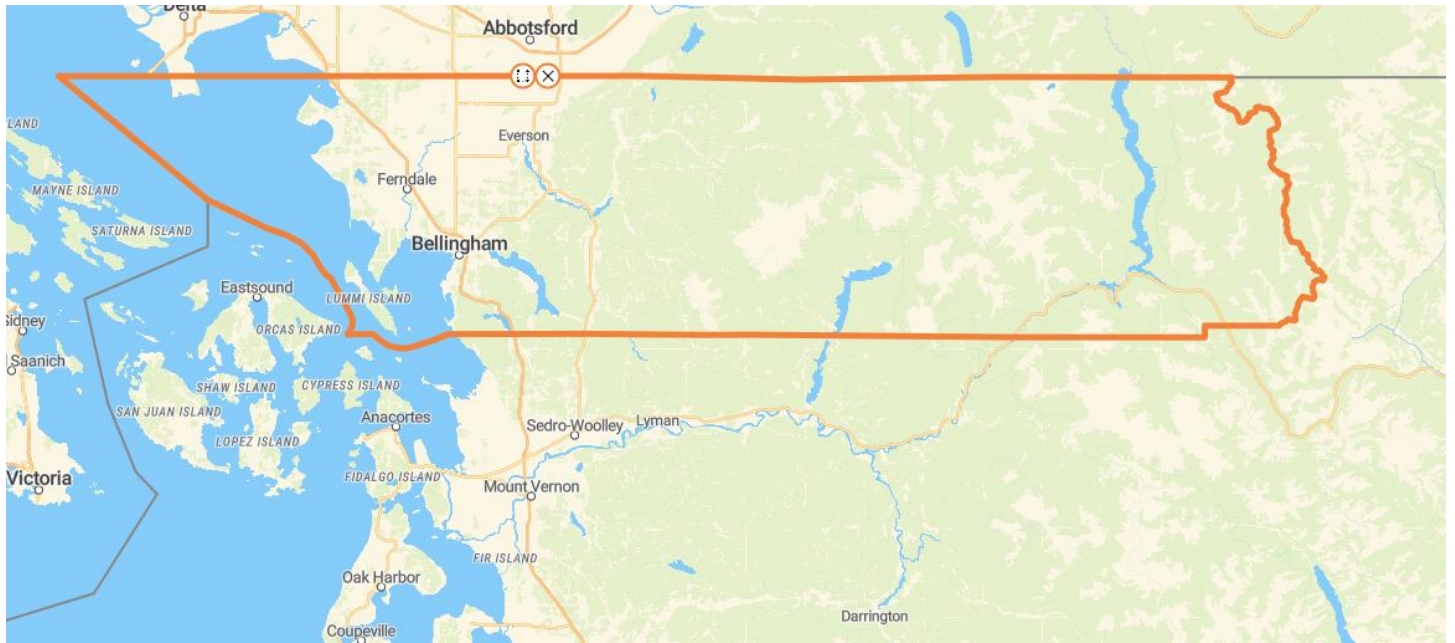


# ASSESSMENT AREAS

Map of each facility-based assessment area showing the boundaries of the area and identifying the geographies contained within the area as identified by the current FFIEC tracts.

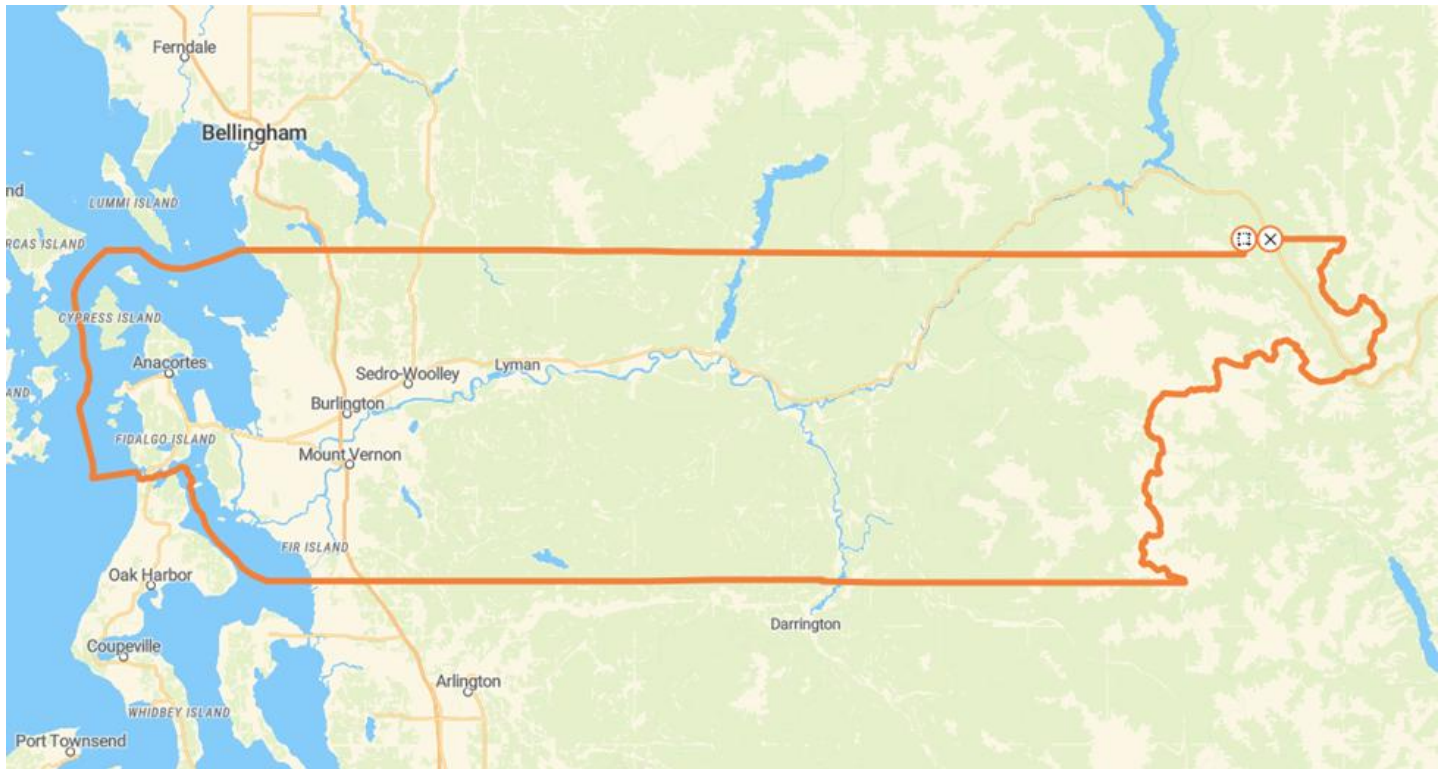
Assessment Area								
Name	County(ies)	# of Census Tracts	Low	Moderate	Middle	Upper	N/A	Distressed Underserved Tracts
13380 - Bellingham, WA MSA/MD	Whatcom	54	1	12	26	14	1	0
34580 - Mt. Vernon-Anacortes, WA MSA/MD	Skagit	42	0	8	26	7	1	0
36500 - Olympia, WA MSA/MD	Thurston	62	0	14	40	7	1	0
38900 - Portland-Vancouver-Hillsboro, OR-WA MSA/MD	Clark, Multnomah, Clackamas	399	11	96	180	108	4	0
Clatsop County, OR (Non-MSA/MD)	Clatsop	12	0	0	4	7	1	0
SW Washington (Non-MSA/MD)	Grays Harbor, Pacific and Wahkiakum	34	0	8	23	1	2	23
<b>Totals</b>		<b>603</b>	<b>12</b>	<b>138</b>	<b>299</b>	<b>144</b>	<b>10</b>	<b>23</b>

Year	MSA/MD code	State code	County code	Tract	MSA/MD name	State	County name	MSA/MD MFI	Tract MFI	Tract income %	Tract income level
2025	13380	53	073	0006.00	BELLINGHAM	WA	WHATCOM	83751	37143	44.34	Low
2025	13380	53	073	0001.01	BELLINGHAM	WA	WHATCOM	83751	100495	119.99	Middle
2025	13380	53	073	0001.02	BELLINGHAM	WA	WHATCOM	83751	69195	82.61	Middle
2025	13380	53	073	0002.02	BELLINGHAM	WA	WHATCOM	83751	76024	90.77	Middle
2025	13380	53	073	0003.01	BELLINGHAM	WA	WHATCOM	83751	72917	87.06	Middle
2025	13380	53	073	0004.01	BELLINGHAM	WA	WHATCOM	83751	92599	110.56	Middle
2025	13380	53	073	0005.01	BELLINGHAM	WA	WHATCOM	83751	91875	109.70	Middle
2025	13380	53	073	0005.02	BELLINGHAM	WA	WHATCOM	83751	85333	101.88	Middle
2025	13380	53	073	0008.03	BELLINGHAM	WA	WHATCOM	83751	88416	105.57	Middle
2025	13380	53	073	0008.04	BELLINGHAM	WA	WHATCOM	83751	95385	113.89	Middle
2025	13380	53	073	0008.05	BELLINGHAM	WA	WHATCOM	83751	83605	99.82	Middle
2025	13380	53	073	0008.09	BELLINGHAM	WA	WHATCOM	83751	79178	94.53	Middle
2025	13380	53	073	0101.01	BELLINGHAM	WA	WHATCOM	83751	80769	96.43	Middle
2025	13380	53	073	0102.01	BELLINGHAM	WA	WHATCOM	83751	69375	82.83	Middle
2025	13380	53	073	0102.02	BELLINGHAM	WA	WHATCOM	83751	80977	96.68	Middle
2025	13380	53	073	0103.01	BELLINGHAM	WA	WHATCOM	83751	85993	102.67	Middle
2025	13380	53	073	0103.02	BELLINGHAM	WA	WHATCOM	83751	81935	97.83	Middle
2025	13380	53	073	0103.03	BELLINGHAM	WA	WHATCOM	83751	90675	108.26	Middle
2025	13380	53	073	0104.05	BELLINGHAM	WA	WHATCOM	83751	87665	104.67	Middle
2025	13380	53	073	0104.06	BELLINGHAM	WA	WHATCOM	83751	76198	90.98	Middle
2025	13380	53	073	0104.08	BELLINGHAM	WA	WHATCOM	83751	75515	90.16	Middle
2025	13380	53	073	0104.09	BELLINGHAM	WA	WHATCOM	83751	77778	92.86	Middle
2025	13380	53	073	0104.10	BELLINGHAM	WA	WHATCOM	83751	70307	83.94	Middle
2025	13380	53	073	0105.03	BELLINGHAM	WA	WHATCOM	83751	85859	102.51	Middle
2025	13380	53	073	0105.05	BELLINGHAM	WA	WHATCOM	83751	89855	107.28	Middle
2025	13380	53	073	0105.06	BELLINGHAM	WA	WHATCOM	83751	70956	84.72	Middle
2025	13380	53	073	0107.02	BELLINGHAM	WA	WHATCOM	83751	72415	86.46	Middle
2025	13380	53	073	0002.03	BELLINGHAM	WA	WHATCOM	83751	55806	66.63	Moderate
2025	13380	53	073	0003.02	BELLINGHAM	WA	WHATCOM	83751	65750	78.50	Moderate
2025	13380	53	073	0007.00	BELLINGHAM	WA	WHATCOM	83751	59408	70.93	Moderate
2025	13380	53	073	0009.03	BELLINGHAM	WA	WHATCOM	83751	59056	70.51	Moderate
2025	13380	53	073	0010.00	BELLINGHAM	WA	WHATCOM	83751	62724	74.89	Moderate
2025	13380	53	073	0012.03	BELLINGHAM	WA	WHATCOM	83751	66250	79.10	Moderate
2025	13380	53	073	0101.02	BELLINGHAM	WA	WHATCOM	83751	50700	60.53	Moderate
2025	13380	53	073	0101.03	BELLINGHAM	WA	WHATCOM	83751	42708	50.99	Moderate
2025	13380	53	073	0104.11	BELLINGHAM	WA	WHATCOM	83751	67000	79.99	Moderate
2025	13380	53	073	0105.04	BELLINGHAM	WA	WHATCOM	83751	62056	74.09	Moderate
2025	13380	53	073	9400.01	BELLINGHAM	WA	WHATCOM	83751	66375	79.25	Moderate
2025	13380	53	073	9400.02	BELLINGHAM	WA	WHATCOM	83751	57500	68.65	Moderate
2025	13380	53	073	0002.01	BELLINGHAM	WA	WHATCOM	83751	0	0.00	Unknown
2025	13380	53	073	0004.02	BELLINGHAM	WA	WHATCOM	83751	106486	127.14	Upper
2025	13380	53	073	0008.07	BELLINGHAM	WA	WHATCOM	83751	106583	127.26	Upper
2025	13380	53	073	0008.08	BELLINGHAM	WA	WHATCOM	83751	102384	122.24	Upper
2025	13380	53	073	0009.02	BELLINGHAM	WA	WHATCOM	83751	119167	142.28	Upper
2025	13380	53	073	0009.04	BELLINGHAM	WA	WHATCOM	83751	140192	167.39	Upper
2025	13380	53	073	0011.01	BELLINGHAM	WA	WHATCOM	83751	110298	131.69	Upper
2025	13380	53	073	0011.02	BELLINGHAM	WA	WHATCOM	83751	164830	196.80	Upper
2025	13380	53	073	0012.02	BELLINGHAM	WA	WHATCOM	83751	107036	127.80	Upper
2025	13380	53	073	0012.04	BELLINGHAM	WA	WHATCOM	83751	135307	161.55	Upper
2025	13380	53	073	0104.07	BELLINGHAM	WA	WHATCOM	83751	101810	121.56	Upper
2025	13380	53	073	0106.00	BELLINGHAM	WA	WHATCOM	83751	108472	129.51	Upper
2025	13380	53	073	0107.01	BELLINGHAM	WA	WHATCOM	83751	105123	125.51	Upper
2025	13380	53	073	0109.00	BELLINGHAM	WA	WHATCOM	83751	113438	135.44	Upper
2025	13380	53	073	0110.00	BELLINGHAM	WA	WHATCOM	83751	112656	134.51	Upper



\* End of 13380 Bellingham, WA MSA/MD \*

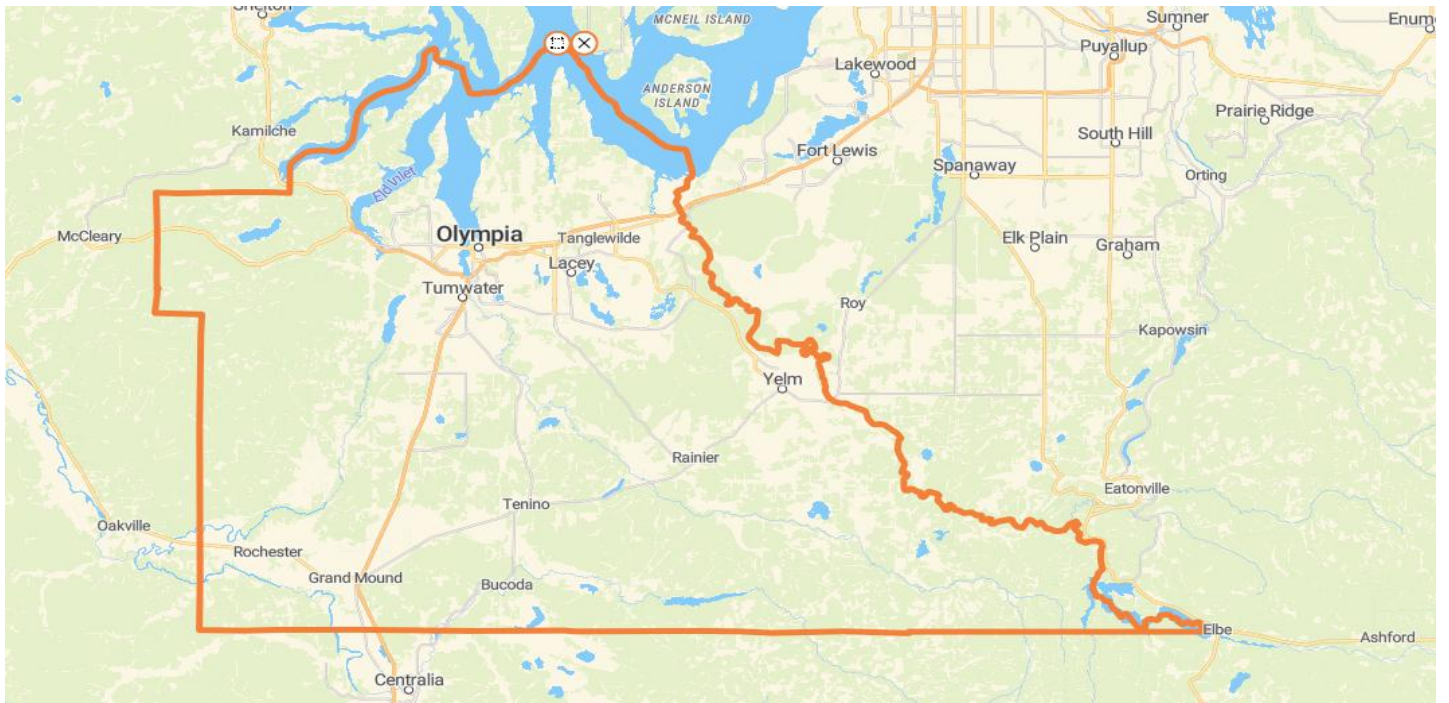
Year	MSA/MD code	State code	County code	Tract	MSA/MD name	State	County name	MSA/MD MFI	Tract MFI	Tract income %	Tract income level
2025	34580	53	057	9402.01	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	88650	107.91	Middle
2025	34580	53	057	9404.02	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	80197	97.62	Middle
2025	34580	53	057	9405.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	67422	82.07	Middle
2025	34580	53	057	9406.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	75227	91.57	Middle
2025	34580	53	057	9407.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	82434	100.34	Middle
2025	34580	53	057	9408.01	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	83516	101.66	Middle
2025	34580	53	057	9408.02	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	82250	100.12	Middle
2025	34580	53	057	9501.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	91875	111.83	Middle
2025	34580	53	057	9508.02	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	91667	111.58	Middle
2025	34580	53	057	9508.03	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	77521	94.36	Middle
2025	34580	53	057	9509.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	81625	99.36	Middle
2025	34580	53	057	9510.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	89375	108.79	Middle
2025	34580	53	057	9513.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	94531	115.07	Middle
2025	34580	53	057	9515.02	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	77048	93.79	Middle
2025	34580	53	057	9515.03	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	68143	82.95	Middle
2025	34580	53	057	9516.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	86375	105.14	Middle
2025	34580	53	057	9517.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	69917	85.10	Middle
2025	34580	53	057	9518.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	74397	90.56	Middle
2025	34580	53	057	9519.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	94722	115.30	Middle
2025	34580	53	057	9521.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	81915	99.71	Middle
2025	34580	53	057	9523.03	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	73750	89.77	Middle
2025	34580	53	057	9524.01	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	85406	103.96	Middle
2025	34580	53	057	9524.03	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	79849	97.20	Middle
2025	34580	53	057	9524.05	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	67313	81.94	Middle
2025	34580	53	057	9526.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	85188	103.69	Middle
2025	34580	53	057	9527.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	92222	112.26	Middle
2025	34580	53	057	9511.01	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	60688	73.87	Moderate
2025	34580	53	057	9511.02	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	59613	72.56	Moderate
2025	34580	53	057	9514.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	64973	79.09	Moderate
2025	34580	53	057	9515.01	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	63099	76.81	Moderate
2025	34580	53	057	9522.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	49650	60.43	Moderate
2025	34580	53	057	9523.01	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	54063	65.81	Moderate
2025	34580	53	057	9524.04	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	48161	58.62	Moderate
2025	34580	53	057	9525.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	61635	75.02	Moderate
2025	34580	53	057	9901.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	0	0.00	Unknown
2025	34580	53	057	9403.01	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	106136	129.19	Upper
2025	34580	53	057	9403.02	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	102569	124.85	Upper
2025	34580	53	057	9404.01	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	115455	140.54	Upper
2025	34580	53	057	9404.03	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	99630	121.27	Upper
2025	34580	53	057	9508.01	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	114828	139.78	Upper
2025	34580	53	057	9512.00	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	108750	132.38	Upper
2025	34580	53	057	9523.04	MOUNT VERNON-ANACORTES	WA	SKAGIT	82149	111359	135.55	Upper



\* End of 34580 Mt. Vernon-Anacortes, WA MSA/MD \*

Year	MSA/MD code	State code	County code	Tract	MSA/MD name	State	County name	MSA/MD MFI	Tract MFI	Tract income %	Tract income level
2025	36500	53	067	0101.00	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	103750	113.85	Middle
2025	36500	53	067	0102.00	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	100972	110.80	Middle
2025	36500	53	067	0106.00	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	73621	80.79	Middle
2025	36500	53	067	0107.00	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	102963	112.99	Middle
2025	36500	53	067	0108.02	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	95859	105.19	Middle
2025	36500	53	067	0109.10	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	88828	97.47	Middle
2025	36500	53	067	0109.20	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	91667	100.59	Middle
2025	36500	53	067	0110.00	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	99250	108.91	Middle
2025	36500	53	067	0111.00	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	107426	117.88	Middle
2025	36500	53	067	0114.21	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	89146	97.82	Middle
2025	36500	53	067	0114.22	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	103144	113.18	Middle
2025	36500	53	067	0115.00	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	80045	87.84	Middle
2025	36500	53	067	0116.22	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	86198	94.59	Middle
2025	36500	53	067	0116.23	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	93056	102.11	Middle
2025	36500	53	067	0116.24	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	100719	110.52	Middle
2025	36500	53	067	0116.26	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	87911	96.47	Middle
2025	36500	53	067	0116.27	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	79335	87.06	Middle
2025	36500	53	067	0116.28	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	94529	103.73	Middle
2025	36500	53	067	0117.20	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	103958	114.08	Middle
2025	36500	53	067	0117.21	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	92425	101.42	Middle
2025	36500	53	067	0117.22	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	99167	108.82	Middle
2025	36500	53	067	0118.22	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	100536	110.32	Middle
2025	36500	53	067	0119.01	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	108350	118.90	Middle
2025	36500	53	067	0120.01	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	96688	106.10	Middle
2025	36500	53	067	0122.11	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	92267	101.25	Middle
2025	36500	53	067	0122.21	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	100338	110.11	Middle
2025	36500	53	067	0122.24	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	101188	111.04	Middle
2025	36500	53	067	0122.25	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	98173	107.73	Middle
2025	36500	53	067	0122.26	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	96890	106.32	Middle
2025	36500	53	067	0123.20	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	89420	98.12	Middle
2025	36500	53	067	0123.31	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	100663	110.46	Middle
2025	36500	53	067	0123.32	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	101174	111.02	Middle
2025	36500	53	067	0124.12	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	88333	96.93	Middle
2025	36500	53	067	0124.20	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	106984	117.40	Middle
2025	36500	53	067	0124.21	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	79557	87.30	Middle
2025	36500	53	067	0125.10	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	78571	86.22	Middle
2025	36500	53	067	0125.30	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	90203	98.98	Middle
2025	36500	53	067	0125.32	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	91768	100.70	Middle
2025	36500	53	067	0127.10	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	74547	81.80	Middle
2025	36500	53	067	0127.30	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	96765	106.18	Middle
2025	36500	53	067	0103.00	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	62549	68.64	Moderate
2025	36500	53	067	0105.10	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	52567	57.68	Moderate
2025	36500	53	067	0105.20	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	52183	57.26	Moderate
2025	36500	53	067	0108.01	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	55032	60.39	Moderate
2025	36500	53	067	0112.00	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	59049	64.80	Moderate
2025	36500	53	067	0113.00	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	54771	60.10	Moderate
2025	36500	53	067	0114.10	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	65694	72.09	Moderate

2025	36500	53	067	0116.25	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	65455	71.82	Moderate
2025	36500	53	067	0118.21	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	71492	78.45	Moderate
2025	36500	53	067	0122.23	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	69595	76.37	Moderate
2025	36500	53	067	0123.30	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	67742	74.33	Moderate
2025	36500	53	067	0124.22	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	69087	75.81	Moderate
2025	36500	53	067	0126.20	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	68438	75.10	Moderate
2025	36500	53	067	0127.20	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	72063	79.08	Moderate
2025	36500	53	067	9901.00	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	0	0.00	Unknown
2025	36500	53	067	0104.00	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	116065	127.36	Upper
2025	36500	53	067	0118.10	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	127072	139.44	Upper
2025	36500	53	067	0119.02	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	115056	126.26	Upper
2025	36500	53	067	0120.02	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	134330	147.41	Upper
2025	36500	53	067	0121.00	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	115894	127.18	Upper
2025	36500	53	067	0125.31	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	115395	126.63	Upper
2025	36500	53	067	0126.10	OLYMPIA-LACEY-TUMWATER	WA	THURSTON	91125	115741	127.01	Upper



\* End of 36500 Olympia, WA MSA/MD \*

Year	MSA/M D code	Count			Tract	MSA/MD name	County State name	MSA/M D MFI	Tract MFI	Tract income %	Tract income level
		State y code	y code	Tract							
2025	38900	41	005	0222.01	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	44176	46.63	Low
2025	38900	41	051	0041.04	PORTLAND-VANCOUVER-HILLSBORO	OR	MULTNOMAH	94727	31271	33.01	Low
2025	38900	41	051	0049.02	PORTLAND-VANCOUVER-HILLSBORO	OR	MULTNOMAH	94727	28550	30.13	Low
2025	38900	41	051	0082.04	PORTLAND-VANCOUVER-HILLSBORO	OR	MULTNOMAH	94727	37172	39.24	Low
2025	38900	41	051	0090.02	PORTLAND-VANCOUVER-HILLSBORO	OR	MULTNOMAH	94727	37872	39.98	Low
2025	38900	41	051	0097.04	PORTLAND-VANCOUVER-HILLSBORO	OR	MULTNOMAH	94727	46208	48.78	Low
2025	38900	41	051	0098.01	PORTLAND-VANCOUVER-HILLSBORO	OR	MULTNOMAH	94727	39550	41.75	Low
2025	38900	41	051	0100.01	PORTLAND-VANCOUVER-HILLSBORO	OR	MULTNOMAH	94727	42500	44.86	Low
2025	38900	41	051	0104.08	PORTLAND-VANCOUVER-HILLSBORO	OR	MULTNOMAH	94727	45735	48.28	Low
2025	38900	41	051	0104.10	PORTLAND-VANCOUVER-HILLSBORO	OR	MULTNOMAH	94727	43986	46.43	Low
2025	38900	53	011	0411.11	PORTLAND-VANCOUVER-HILLSBORO	WA	CLARK	94727	45998	48.55	Low
2025	38900	41	005	0210.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	91033	96.10	Middle
2025	38900	41	005	0211.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	92500	97.64	Middle
2025	38900	41	005	0212.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	85386	90.13	Middle
2025	38900	41	005	0214.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	98456	103.93	Middle
2025	38900	41	005	0215.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	84336	89.03	Middle
2025	38900	41	005	0217.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	80556	85.04	Middle
2025	38900	41	005	0220.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	99939	105.50	Middle
2025	38900	41	005	0221.01	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	87820	92.70	Middle
2025	38900	41	005	0221.05	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	104782	110.61	Middle
2025	38900	41	005	0221.08	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	78796	83.18	Middle
2025	38900	41	005	0221.09	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	95486	100.80	Middle
2025	38900	41	005	0221.10	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	101301	106.93	Middle
2025	38900	41	005	0223.01	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	93393	98.59	Middle
2025	38900	41	005	0223.02	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	93882	99.10	Middle
2025	38900	41	005	0224.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	77134	81.42	Middle
2025	38900	41	005	0225.01	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	82944	87.56	Middle
2025	38900	41	005	0225.02	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	86419	91.22	Middle
2025	38900	41	005	0226.02	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	105768	111.65	Middle
2025	38900	41	005	0226.03	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	93255	98.44	Middle
2025	38900	41	005	0226.05	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	91000	96.06	Middle
2025	38900	41	005	0226.06	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	103534	109.29	Middle
2025	38900	41	005	0227.10	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	90083	95.09	Middle
2025	38900	41	005	0228.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	103681	109.45	Middle
2025	38900	41	005	0229.01	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	109375	115.46	Middle
2025	38900	41	005	0229.05	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	99262	104.78	Middle
2025	38900	41	005	0229.06	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	88125	93.03	Middle
2025	38900	41	005	0230.01	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	101045	106.66	Middle
2025	38900	41	005	0230.02	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	103313	109.06	Middle
2025	38900	41	005	0231.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	95667	100.99	Middle
2025	38900	41	005	0232.02	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	107539	113.52	Middle
2025	38900	41	005	0233.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	107917	113.92	Middle
2025	38900	41	005	0234.01	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	97961	103.41	Middle
2025	38900	41	005	0234.03	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	84803	89.52	Middle
2025	38900	41	005	0234.04	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	93482	98.68	Middle
2025	38900	41	005	0235.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	84983	89.71	Middle
2025	38900	41	005	0236.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	76023	80.25	Middle
2025	38900	41	005	0237.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	94333	99.58	Middle
2025	38900	41	005	0238.00	PORTLAND-VANCOUVER-HILLSBORO	OR	CLACKAMAS	94727	96297	101.65	Middle

2025	38900	41	005	0239.01	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	92951	98.12	Middle
2025	38900	41	005	0240.0C	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	84417	89.11	Middle
2025	38900	41	005	0241.00	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	79464	83.88	Middle
2025	38900	41	005	0243.02	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	90367	95.39	Middle
2025	38900	41	005	0243.04	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	89145	94.10	Middle
2025	38900	41	005	0244.02	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	87109	91.95	Middle
2025	38900	41	051	0002.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	111188	117.37	Middle
2025	38900	41	051	0003.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	104110	109.90	Middle
2025	38900	41	051	0004.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	92028	97.15	Middle
2025	38900	41	051	0004.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	90995	96.06	Middle
2025	38900	41	051	0005.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	98523	104.00	Middle
2025	38900	41	051	0005.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	81658	86.20	Middle
2025	38900	41	051	0007.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	101313	106.95	Middle
2025	38900	41	051	0007.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	76563	80.82	Middle
2025	38900	41	051	0008.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	89137	94.09	Middle
2025	38900	41	051	0009.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	91369	96.45	Middle
2025	38900	41	051	0010.00	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	101900	107.57	Middle
2025	38900	41	051	0011.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	96111	101.46	Middle
2025	38900	41	051	0012.03	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	93889	99.11	Middle
2025	38900	41	051	0016.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	107672	113.66	Middle
2025	38900	41	051	0017.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	87557	92.43	Middle
2025	38900	41	051	0017.04	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	77384	81.69	Middle
2025	38900	41	051	0018.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	88819	93.76	Middle
2025	38900	41	051	0020.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	92698	97.85	Middle
2025	38900	41	051	0022.03	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	112083	118.32	Middle
2025	38900	41	051	0023.03	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	97292	102.70	Middle
2025	38900	41	051	0025.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	99892	105.45	Middle
2025	38900	41	051	0027.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	84644	89.35	Middle
2025	38900	41	051	0029.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	98452	103.93	Middle
2025	38900	41	051	0029.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	91920	97.03	Middle
2025	38900	41	051	0029.03	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	78750	83.13	Middle
2025	38900	41	051	0033.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	84844	89.56	Middle
2025	38900	41	051	0034.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	84357	89.05	Middle
2025	38900	41	051	0035.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	90694	95.74	Middle
2025	38900	41	051	0035.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	109891	116.00	Middle
2025	38900	41	051	0036.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	91797	96.90	Middle
2025	38900	41	051	0036.03	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	94500	99.76	Middle
2025	38900	41	051	0037.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	83542	88.19	Middle
2025	38900	41	051	0038.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	104375	110.18	Middle
2025	38900	41	051	0038.03	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	108271	114.29	Middle
2025	38900	41	051	0039.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	112656	118.92	Middle
2025	38900	41	051	0039.03	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	86587	91.40	Middle
2025	38900	41	051	0039.04	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	94036	99.27	Middle
2025	38900	41	051	0040.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	107841	113.84	Middle
2025	38900	41	051	0041.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	79773	84.21	Middle
2025	38900	41	051	0041.03	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	84512	89.21	Middle
2025	38900	41	051	0042.0C	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	107993	114.00	Middle
2025	38900	41	051	0048.0C	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	75804	80.02	Middle
2025	38900	41	051	0051.03	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	95189	100.48	Middle
2025	38900	41	051	0052.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	98306	103.77	Middle

2025	38900	41	051	0055.00	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	96745	102.13	Middle
2025	38900	41	051	0056.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	111875	118.10	Middle
2025	38900	41	051	0057.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	102663	108.37	Middle
2025	38900	41	051	0064.03	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	102284	107.97	Middle
2025	38900	41	051	0066.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	107019	112.97	Middle
2025	38900	41	051	0067.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	101848	107.51	Middle
2025	38900	41	051	0071.00	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	91667	96.76	Middle
2025	38900	41	051	0072.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	106125	112.03	Middle
2025	38900	41	051	0072.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	94773	100.04	Middle
2025	38900	41	051	0073.0C	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	82250	86.82	Middle
2025	38900	41	051	0075.00	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	85118	89.85	Middle
2025	38900	41	051	0078.0C	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	93571	98.77	Middle
2025	38900	41	051	0080.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	86875	91.71	Middle
2025	38900	41	051	0082.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	86161	90.95	Middle
2025	38900	41	051	0087.0C	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	76510	80.76	Middle
2025	38900	41	051	0089.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	80227	84.69	Middle
2025	38900	41	051	0089.03	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	111296	117.49	Middle
2025	38900	41	051	0091.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	89808	94.80	Middle
2025	38900	41	051	0099.03	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	106803	112.74	Middle
2025	38900	41	051	0099.04	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	84453	89.15	Middle
2025	38900	41	051	0099.05	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	81594	86.13	Middle
2025	38900	41	051	0099.07	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	89102	94.06	Middle
2025	38900	41	051	0100.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	81888	86.44	Middle
2025	38900	41	051	0101.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	98750	104.24	Middle
2025	38900	41	051	0102.00	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	87332	92.19	Middle
2025	38900	41	051	0103.03	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	77841	82.17	Middle
2025	38900	41	051	0103.05	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	85978	90.76	Middle
2025	38900	41	051	0103.06	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	93942	99.17	Middle
2025	38900	41	051	0104.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	108519	114.55	Middle
2025	38900	41	051	0104.07	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	91307	96.38	Middle
2025	38900	41	051	0104.12	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	108142	114.16	Middle
2025	38900	41	051	0104.13	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	93583	98.79	Middle
2025	38900	41	051	0105.00	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	102143	107.82	Middle
2025	38900	53	011	0401.01	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	91063	96.13	Middle
2025	38900	53	011	0401.02	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	80521	85.00	Middle
2025	38900	53	011	0402.02	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	91066	96.13	Middle
2025	38900	53	011	0402.03	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	101481	107.12	Middle
2025	38900	53	011	0403.03	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	109211	115.29	Middle
2025	38900	53	011	0403.05	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	90689	95.73	Middle
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2025	38900	53	011	0404.07	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	83289	87.92	Middle
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2025	38900	53	011	0404.11	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	79400	83.81	Middle
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2025	38900	53	011	0405.04	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	102835	108.55	Middle
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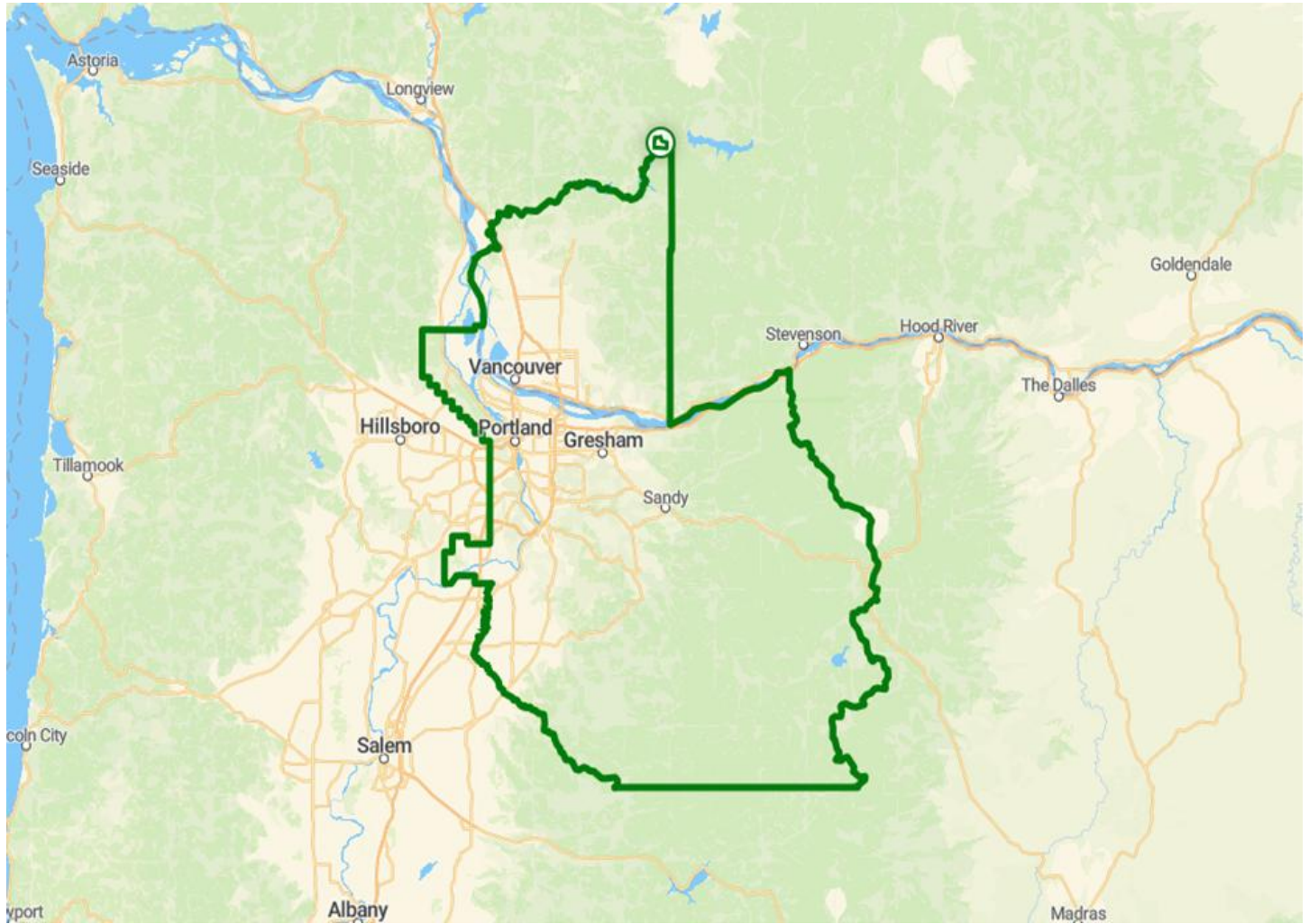
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2025	38900	53	011	0406.04	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	93618	98.82	Middle
2025	38900	53	011	0407.07	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	78605	82.98	Middle
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2025	38900	53	011	0414.00	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	99118	104.63	Middle
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2025	38900	41	005	0209.0C	PORTLAND-VANCOUVER-HILLSBORC	OR	CLACKAMAS	94727	72500	76.53	Moderate
2025	38900	41	005	0213.00	PORTLAND-VANCOUVER-HILLSBORC	OR	CLACKAMAS	94727	69754	73.63	Moderate
2025	38900	41	005	0216.01	PORTLAND-VANCOUVER-HILLSBORC	OR	CLACKAMAS	94727	61694	65.12	Moderate
2025	38900	41	005	0216.02	PORTLAND-VANCOUVER-HILLSBORC	OR	CLACKAMAS	94727	71789	75.78	Moderate
2025	38900	41	005	0218.02	PORTLAND-VANCOUVER-HILLSBORC	OR	CLACKAMAS	94727	56820	59.98	Moderate
2025	38900	41	005	0219.00	PORTLAND-VANCOUVER-HILLSBORC	OR	CLACKAMAS	94727	49219	51.95	Moderate
2025	38900	41	005	0221.07	PORTLAND-VANCOUVER-HILLSBORC	OR	CLACKAMAS	94727	70682	74.61	Moderate

2025	38900	41	005	0229.04	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	75737	79.95	Moderate
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2025	38900	41	005	0242.00	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	73838	77.94	Moderate
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2025	38900	41	051	0016.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAH	94727	69163	73.01	Moderate
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2025	38900	41	051	0033.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAH	94727	64926	68.54	Moderate
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2025	38900	41	051	0103.04	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAH	94727	58310	61.55	Moderate

2025	38900	41	051	0104.05	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAH	94727	65350	68.98	Moderate
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2025	38900	53	011	0405.07	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	60521	63.88	Moderate
2025	38900	53	011	0407.03	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	75738	79.95	Moderate
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2025	38900	53	011	0408.08	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	73977	78.09	Moderate
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2025	38900	53	011	0410.05	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	49000	51.72	Moderate
2025	38900	53	011	0410.07	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	69591	73.46	Moderate
2025	38900	53	011	0410.09	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	71510	75.49	Moderate
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2025	38900	53	011	0410.11	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	74406	78.54	Moderate
2025	38900	53	011	0411.04	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	59912	63.24	Moderate
2025	38900	53	011	0411.13	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	47772	50.43	Moderate
2025	38900	53	011	0411.14	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	60683	64.06	Moderate
2025	38900	53	011	0412.03	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	68462	72.27	Moderate
2025	38900	53	011	0412.05	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	68640	72.46	Moderate
2025	38900	53	011	0412.06	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	63685	67.23	Moderate
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2025	38900	53	011	0418.00	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	57794	61.01	Moderate
2025	38900	53	011	0425.00	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	60625	63.99	Moderate
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2025	38900	53	011	0426.02	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	58803	62.07	Moderate
2025	38900	53	011	0427.00	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	49798	52.57	Moderate
2025	38900	41	005	9800.0C	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	0	0.00	Unknown
2025	38900	41	051	0106.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAH	94727	0	0.00	Unknown
2025	38900	41	051	9800.0C	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAH	94727	0	0.00	Unknown
2025	38900	53	011	0424.00	PORTLAND-VANCOUVER-HILLSBORC WA	CLARK	94727	0	0.00	Unknown
2025	38900	41	005	0201.01	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	163984	173.11	Upper
2025	38900	41	005	0201.02	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	157625	166.39	Upper
2025	38900	41	005	0202.01	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	128882	136.05	Upper
2025	38900	41	005	0202.02	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	156964	165.70	Upper
2025	38900	41	005	0203.02	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	144732	152.78	Upper
2025	38900	41	005	0203.03	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	128788	135.95	Upper
2025	38900	41	005	0203.04	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	119099	125.72	Upper
2025	38900	41	005	0204.01	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	133750	141.19	Upper

2025	38900	41	005	0204.03	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	164833	174.00	Upper
2025	38900	41	005	0204.04	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	178194	188.11	Upper
2025	38900	41	005	0205.03	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	184931	195.22	Upper
2025	38900	41	005	0205.04	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	143782	151.78	Upper
2025	38900	41	005	0205.05	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	140139	147.93	Upper
2025	38900	41	005	0205.06	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	141589	149.47	Upper
2025	38900	41	005	0205.07	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	167266	176.57	Upper
2025	38900	41	005	0206.01	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	129015	136.19	Upper
2025	38900	41	005	0206.02	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	139669	147.44	Upper
2025	38900	41	005	0207.0C	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	133468	140.89	Upper
2025	38900	41	005	0218.01	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	115878	122.32	Upper
2025	38900	41	005	0222.05	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	133125	140.53	Upper
2025	38900	41	005	0222.06	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	124688	131.62	Upper
2025	38900	41	005	0222.07	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	132238	139.59	Upper
2025	38900	41	005	0222.08	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	125625	132.61	Upper
2025	38900	41	005	0227.02	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	159826	168.72	Upper
2025	38900	41	005	0227.07	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	120000	126.67	Upper
2025	38900	41	005	0227.08	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	129821	137.04	Upper
2025	38900	41	005	0232.01	PORTLAND-VANCOUVER-HILLSBORC OR	CLACKAMAS	94727	121629	128.39	Upper
2025	38900	41	051	0001.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	130339	137.59	Upper
2025	38900	41	051	0001.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	156618	165.33	Upper
2025	38900	41	051	0002.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	157734	166.51	Upper
2025	38900	41	051	0003.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	160982	169.94	Upper
2025	38900	41	051	0008.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	114681	121.06	Upper
2025	38900	41	051	0009.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	130739	138.01	Upper
2025	38900	41	051	0011.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	149167	157.47	Upper
2025	38900	41	051	0012.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	159341	168.21	Upper
2025	38900	41	051	0013.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	116705	123.20	Upper
2025	38900	41	051	0013.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	120804	127.52	Upper
2025	38900	41	051	0014.00	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	119005	125.62	Upper
2025	38900	41	051	0015.00	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	152188	160.65	Upper
2025	38900	41	051	0018.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	118000	124.56	Upper
2025	38900	41	051	0019.00	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	180852	190.91	Upper
2025	38900	41	051	0021.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	130974	138.26	Upper
2025	38900	41	051	0024.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	152708	161.20	Upper
2025	38900	41	051	0024.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	140000	147.79	Upper
2025	38900	41	051	0025.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	205556	216.99	Upper
2025	38900	41	051	0026.0C	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	126840	133.90	Upper
2025	38900	41	051	0027.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	191394	202.04	Upper
2025	38900	41	051	0028.01	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	146250	154.39	Upper
2025	38900	41	051	0028.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	132438	139.81	Upper
2025	38900	41	051	0030.0C	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	117381	123.91	Upper
2025	38900	41	051	0031.00	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	144500	152.54	Upper
2025	38900	41	051	0032.0C	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	148264	156.51	Upper
2025	38900	41	051	0034.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	118214	124.79	Upper
2025	38900	41	051	0036.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	131455	138.77	Upper
2025	38900	41	051	0037.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	146250	154.39	Upper
2025	38900	41	051	0038.02	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	124091	130.99	Upper
2025	38900	41	051	0043.0C	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	168059	177.41	Upper
2025	38900	41	051	0045.00	PORTLAND-VANCOUVER-HILLSBORC OR	MULTNOMAF	94727	158611	167.44	Upper

2025	38900	41	051	0046.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	250001	263.91	Upper
2025	38900	41	051	0046.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	230882	243.73	Upper
2025	38900	41	051	0047.0C	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	176520	186.34	Upper
2025	38900	41	051	0049.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	147330	155.53	Upper
2025	38900	41	051	0050.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	151042	159.44	Upper
2025	38900	41	051	0050.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	131573	138.89	Upper
2025	38900	41	051	0051.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	198420	209.46	Upper
2025	38900	41	051	0051.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	147857	156.08	Upper
2025	38900	41	051	0052.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	118015	124.58	Upper
2025	38900	41	051	0057.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	233668	246.67	Upper
2025	38900	41	051	0058.00	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	208486	220.09	Upper
2025	38900	41	051	0059.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	114663	121.04	Upper
2025	38900	41	051	0059.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	168553	177.93	Upper
2025	38900	41	051	0059.03	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	142717	150.66	Upper
2025	38900	41	051	0060.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	139000	146.73	Upper
2025	38900	41	051	0060.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	137596	145.25	Upper
2025	38900	41	051	0061.00	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	161429	170.41	Upper
2025	38900	41	051	0062.0C	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	123636	130.51	Upper
2025	38900	41	051	0063.0C	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	187895	198.35	Upper
2025	38900	41	051	0064.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	158656	167.48	Upper
2025	38900	41	051	0064.04	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	122750	129.58	Upper
2025	38900	41	051	0065.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	138284	145.98	Upper
2025	38900	41	051	0065.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	137375	145.02	Upper
2025	38900	41	051	0066.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	141890	149.78	Upper
2025	38900	41	051	0067.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	149438	157.75	Upper
2025	38900	41	051	0068.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	197750	208.75	Upper
2025	38900	41	051	0068.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	157500	166.26	Upper
2025	38900	41	051	0069.0C	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	209118	220.75	Upper
2025	38900	41	051	0070.01	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	218224	230.37	Upper
2025	38900	41	051	0070.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	241510	254.95	Upper
2025	38900	41	051	0099.06	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	124083	130.99	Upper
2025	38900	41	051	0106.02	PORTLAND-VANCOUVER-HILLSBORC	OR	MULTNOMAF	94727	210179	221.87	Upper
2025	38900	53	011	0402.01	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	117857	124.41	Upper
2025	38900	53	011	0403.01	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	133681	141.12	Upper
2025	38900	53	011	0403.04	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	129778	137.00	Upper
2025	38900	53	011	0404.12	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	115015	121.41	Upper
2025	38900	53	011	0405.05	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	128854	136.02	Upper
2025	38900	53	011	0405.10	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	116023	122.48	Upper
2025	38900	53	011	0405.11	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	121667	128.43	Upper
2025	38900	53	011	0406.03	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	131641	138.96	Upper
2025	38900	53	011	0406.05	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	124978	131.93	Upper
2025	38900	53	011	0406.08	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	129922	137.15	Upper
2025	38900	53	011	0406.09	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	160625	169.56	Upper
2025	38900	53	011	0406.10	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	151534	159.96	Upper
2025	38900	53	011	0407.13	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	124638	131.57	Upper
2025	38900	53	011	0408.10	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	116793	123.29	Upper
2025	38900	53	011	0409.07	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	148882	157.16	Upper
2025	38900	53	011	0409.08	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	125125	132.09	Upper
2025	38900	53	011	0409.10	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	114321	120.68	Upper
2025	38900	53	011	0428.00	PORTLAND-VANCOUVER-HILLSBORC	WA	CLARK	94727	117660	124.20	Upper



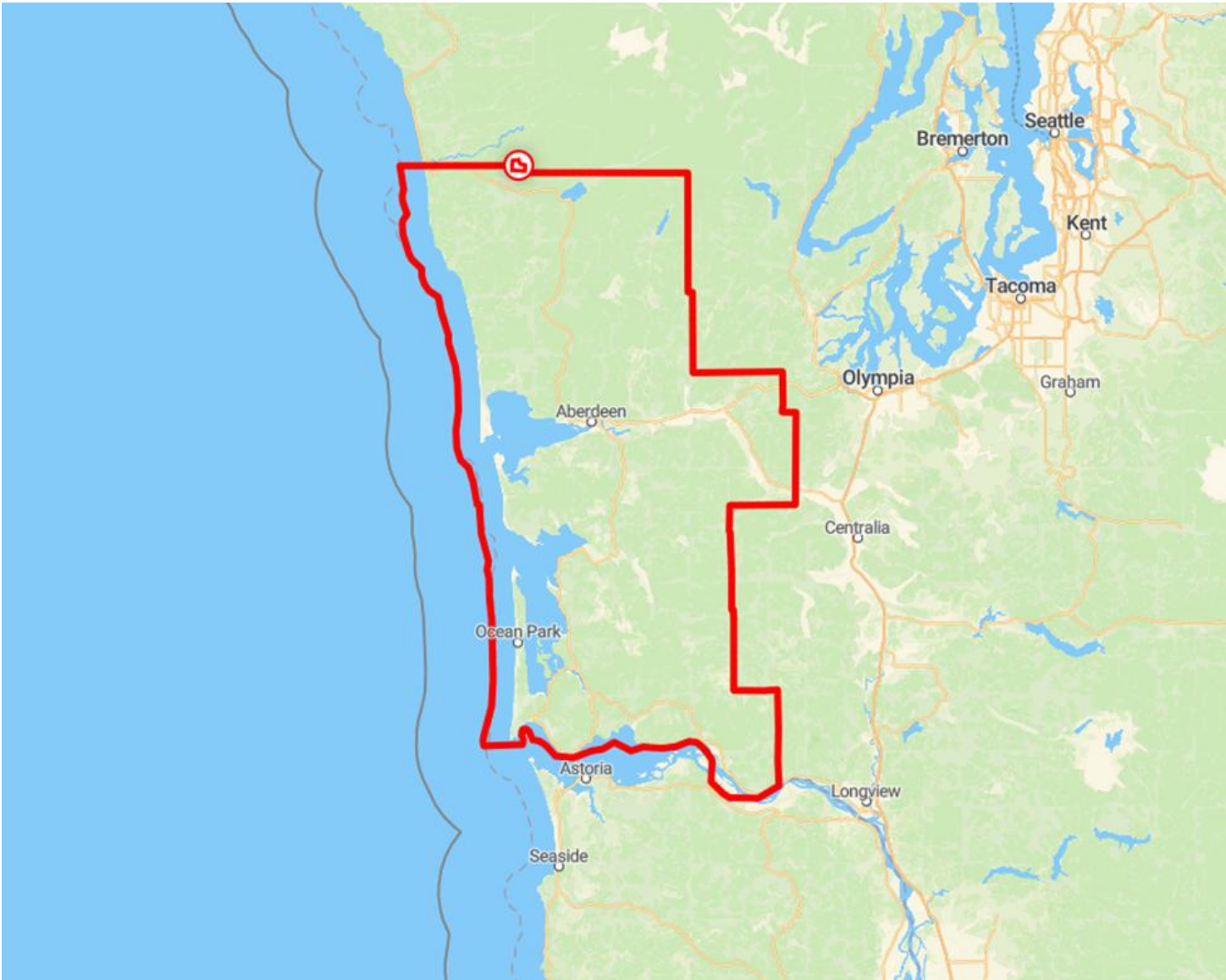
\* End of 38900 Portland-Vancouver-Hillsboro, OR MSA/MD \*

Year	MSA/MD code	State code	County code	Tract	MSA/MD name	State	County name	MSA/MD MFI	Tract MFI	Tract income %	Tract income level
2025	99999	41	007	9503.00	N/A	OR	CLATSOP	62963	71250	113.16	Middle
2025	99999	41	007	9506.00	N/A	OR	CLATSOP	62963	74966	119.06	Middle
2025	99999	41	007	9509.00	N/A	OR	CLATSOP	62963	71264	113.18	Middle
2025	99999	41	007	9512.00	N/A	OR	CLATSOP	62963	66357	105.39	Middle
2025	99999	41	007	9900.00	N/A	OR	CLATSOP	62963	0	0.00	Unknown
2025	99999	41	007	9501.00	N/A	OR	CLATSOP	62963	76250	121.10	Upper
2025	99999	41	007	9502.00	N/A	OR	CLATSOP	62963	78063	123.98	Upper
2025	99999	41	007	9504.00	N/A	OR	CLATSOP	62963	80909	128.50	Upper
2025	99999	41	007	9505.00	N/A	OR	CLATSOP	62963	77846	123.63	Upper
2025	99999	41	007	9507.00	N/A	OR	CLATSOP	62963	103158	163.83	Upper
2025	99999	41	007	9511.00	N/A	OR	CLATSOP	62963	91413	145.18	Upper
2025	99999	41	007	9513.00	N/A	OR	CLATSOP	62963	79375	126.06	Upper



\* End of Clatsop County, OR (Non-MSA/MD) \*

Year	MSA/MD code	State code	County code	Tract	MSA/MD name	State	County name	MSA/MD MFI	Tract MFI	Tract income %	Tract income level
2025	99999	53	027	0002.02*	N/A	WA	GRAYS HARBOR	70452	72704	103.19	Middle
2025	99999	53	027	0003.00*	N/A	WA	GRAYS HARBOR	70452	64833	92.02	Middle
2025	99999	53	027	0004.01*	N/A	WA	GRAYS HARBOR	70452	79028	112.17	Middle
2025	99999	53	027	0004.02*	N/A	WA	GRAYS HARBOR	70452	64719	91.86	Middle
2025	99999	53	027	0005.01*	N/A	WA	GRAYS HARBOR	70452	66989	95.08	Middle
2025	99999	53	027	0005.02*	N/A	WA	GRAYS HARBOR	70452	80341	114.03	Middle
2025	99999	53	027	0006.00*	N/A	WA	GRAYS HARBOR	70452	67530	95.85	Middle
2025	99999	53	027	0007.00*	N/A	WA	GRAYS HARBOR	70452	77692	110.27	Middle
2025	99999	53	027	0011.00*	N/A	WA	GRAYS HARBOR	70452	76250	108.22	Middle
2025	99999	53	027	0013.00*	N/A	WA	GRAYS HARBOR	70452	57955	82.26	Middle
2025	99999	53	027	0015.00*	N/A	WA	GRAYS HARBOR	70452	69572	98.75	Middle
2025	99999	53	027	0016.01*	N/A	WA	GRAYS HARBOR	70452	75931	107.77	Middle
2025	99999	53	027	0016.02*	N/A	WA	GRAYS HARBOR	70452	61250	86.93	Middle
2025	99999	53	027	9400.00*	N/A	WA	GRAYS HARBOR	70452	58000	82.32	Middle
2025	99999	53	049	9502.00*	N/A	WA	PACIFIC	70452	69912	99.23	Middle
2025	99999	53	049	9503.01*	N/A	WA	PACIFIC	70452	61964	87.95	Middle
2025	99999	53	049	9503.02*	N/A	WA	PACIFIC	70452	60536	85.92	Middle
2025	99999	53	049	9504.00*	N/A	WA	PACIFIC	70452	72391	102.75	Middle
2025	99999	53	049	9505.01*	N/A	WA	PACIFIC	70452	66573	94.49	Middle
2025	99999	53	049	9506.00*	N/A	WA	PACIFIC	70452	62857	89.21	Middle
2025	99999	53	049	9508.01*	N/A	WA	PACIFIC	70452	78826	111.88	Middle
2025	99999	53	049	9508.02*	N/A	WA	PACIFIC	70452	80698	114.54	Middle
2025	99999	53	069	9501.00*	N/A	WA	WAHKIAKUM	70452	66214	93.98	Middle
2025	99999	53	027	0002.01	N/A	WA	GRAYS HARBOR	70452	55130	78.25	Moderate
2025	99999	53	027	0009.00	N/A	WA	GRAYS HARBOR	70452	55221	78.38	Moderate
2025	99999	53	027	0010.00	N/A	WA	GRAYS HARBOR	70452	41471	58.86	Moderate
2025	99999	53	027	0012.00	N/A	WA	GRAYS HARBOR	70452	54051	76.72	Moderate
2025	99999	53	027	0014.00	N/A	WA	GRAYS HARBOR	70452	53750	76.29	Moderate
2025	99999	53	049	9505.02	N/A	WA	PACIFIC	70452	43438	61.65	Moderate
2025	99999	53	049	9507.01	N/A	WA	PACIFIC	70452	55697	79.05	Moderate
2025	99999	53	049	9507.02	N/A	WA	PACIFIC	70452	49688	70.52	Moderate
2025	99999	53	027	9900.00	N/A	WA	GRAYS HARBOR	70452	0	0.00	Unknown
2025	99999	53	049	9901.00	N/A	WA	PACIFIC	70452	0	0.00	Unknown
2025	99999	53	027	0008.00	N/A	WA	GRAYS HARBOR	70452	94286	133.83	Upper



\* End of SW Washington (Non-MSA/MD) \*



# HMDA DISCLOSURE STATEMENT

Bank of the Pacific is a HMDA reportable bank. Below is our Public notice we provide to the public in regards to the data we make public per Regulation C.



## Home Mortgage Disclosure Act Notice

The HMDA data about our residential mortgage lending are available online for review. The data shows geographic distribution of loans and applications, ethnicity, race, sex, age and income of applicants and borrowers; and information about loan approvals and denials. This data is available online at the Consumer Financial Protection Bureau ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)). HMDA data for many other financial institutions are also available at this web site.





# LOAN-TO-DEPOSIT RATIO

The Bank's loan-to-deposit ratio for each quarter of the prior calendar year as well as the average for the prior three years.

<b>Loan to Deposit Ratio</b>	
Quarter Ending 12/31/2025	68.19%
Quarter Ending 9/30/2025	68.39%
Quarter Ending 6/30/2025	68.78%
Quarter Ending 3/31/2025	64.88%
Quarter Ending 12/31/2024	68.50%
Quarter Ending 12/31/2023	67.05%
<b>Average LTD from 2023-2025:</b>	<b>67.91%</b>



## COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Board also takes this record into account when deciding on certain applications submitted by US.

### **Your involvement is encouraged.**

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC; and comments received from the public relating to our performance in helping to meet the community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Director, Division of Compliance and Consumer Affairs, FDIC, 25 Jessie Street at Ecker Square, Suite 2300, San Francisco, CA 94105-2780. You may send written comments about our performance in helping to meet community credit needs to the Chief Operating Officer of Peoples Bank, PO Box 32210, Bellingham, WA 98228 and FDIC Regional Director. You may also submit comments electronically through the FDIC's website at [www.fdic.gov/regulations/cra](http://www.fdic.gov/regulations/cra). Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of Peoples Bancorp, a bank holding company. You may request from the Community Affairs Officer, Federal Reserve Bank of San Francisco, 101 Market Street, San Francisco, CA 94105 an announcement of applications covered by the CRA filed by bank holding companies.