# Office of the Comptroller of the Currency Washington, DC 20219

## INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

April 5, 2021

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Evergreen Federal Bank Charter Number: 702610

969 SE 6th Street Grants Pass, OR 97526

Office of the Comptroller of the Currency

Seattle Field Office 101 Stewart Street, Suite 1010 Seattle, WA 98101

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not 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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## **Overall CRA Rating**

Institution's CRA Rating: This institution is rated Outstanding.

The lending test is rated: Satisfactory
The community development test is rated: Outstanding

The major factors that support this rating include:

#### **Lending Test**

- The Lending Test rating is based solely on the state of Oregon.
- Evergreen Federal Bank (Evergreen, or bank) originated a substantial majority of its loans, by number and dollar amount, inside its assessment areas (AAs) during the evaluation period.
- The bank's loan-to-deposit (LTD) ratio is reasonable given its size, financial condition, and the credit needs of its communities.
- An overall reasonable geographic dispersion of home mortgage loans to individuals.
- An overall reasonable distribution of home mortgage loans among individuals of different incomes levels.

#### **Community Development Test**

- The Community Development (CD) Test rating is based solely on the state of Oregon.
- An overall excellent level of CD loans, including qualifying Paycheck Protection Program (PPP) lending to support economic development and job preservation during the Coronavirus Disease 2019 (COVID-19/COVID) pandemic.
- An overall excellent level of CD services.
- An overall adequate level of qualified investments, consisting entirely of donations.

#### **Loan-to-Deposit Ratio**

Considering the bank's size, financial condition, and credit needs of the AA(s), the LTD ratio is reasonable. The bank's average LTD ratio for the three years ended December 31, 2020, is 84.6 percent. This meets the standard for satisfactory performance given the demographics, lending opportunities, economic conditions, and credit needs of its AAs. We compared Evergreen's average LTD ratio with five similarly situated banks, with sizes and footprints that are similar to Evergreen's profile. These banks had an average LTD ratio of 79.5 percent for the same period. During the evaluation period, the highest quarterly ratio for Evergreen was 90.9 percent, with a low of 69.6 percent. In comparison, the average high for peer banks was 94.5 percent, with the average low ratio being 59.8 percent. All institutions experienced significant decreases in the LTD ratio during 2020 due to unexpected COVID-19 related deposit growth caused by rapidly changing market and economic conditions.

#### **Lending in Assessment Area**

A substantial majority of the bank's loans are inside its assessment area(s).

The bank originated and purchased 98.4 percent of its total loans inside the bank's AAs during the evaluation period. By dollar amount, 97.8 percent of loans benefited individuals inside the bank's combined AAs. This analysis is performed at the bank, rather than the AA, level. This meets the standard for outstanding performance.

	N	lumber o	of Loans			Dollar A	mount o	f Loans \$(	000s)	
Loan Category	Inside		Outsi	Outside		Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage										
2018	293	99.3	2	0.7	295	76,020	98.2	1,380	1.8	77,400
2019	265	97.4	7	2.6	272	71,178	97.3	2,012	2.7	73,190
2020	522	98.3	9	1.7	531	129,832	97.8	2,960	2.2	132,793
Subtotal	1,080	98.4	18	1.6	1,098	277,030	97.8	6,352	2.2	283,382
Total	1,080	98.4	18	1.6	1,098	277,030	97.8	6,352	2.2	283,382

Source: Bank Data

Due to rounding, totals may not equal 100.0%

## **Description of Institution**

Evergreen Federal Bank is an intrastate community bank located in Southern Oregon. The federally chartered institution is a mutual savings association with no holding company. As a mutual savings association, Evergreen is owned by its depositors. The bank was founded in 1934 and has been headquartered in Grants Pass, Oregon since inception. In 2008, the bank changed its name from Evergreen Federal Savings and Loan Association to Evergreen Federal Bank. The bank has one subsidiary, the Evergreen Federal Affordable Housing Company, which did not make any loans during the evaluation period and did not impact this evaluation. Evergreen operates as a full-service bank, providing a variety of financial services to consumers and businesses.

Evergreen currently operates five branches in four communities spread across three counties in the Southwestern region of Oregon. The bank has designated three AAs: Grants Pass Metropolitan Statistical Area (MSA), Medford MSA, and Curry County. There are two branches in Grants Pass and one branch each in Brookings, Medford, and Rogue River. The Medford and Rogue River branches comprise the Medford AA. There were no changes to branch locations, nor any mergers or acquisitions during the evaluation period.

Each branch offers similar products and services, including retail and commercial deposit and loan products. The bank's primary lending product is home mortgage loans; commercial real estate loans are the other significant product. Lending products offered to individuals include fixed and variable rate home mortgage loans, personal loans, home equity lines of credit, and land and construction loans. Business loan types include commercial real estate, multifamily, commercial and industrial, and construction and land development loans. During 2020, Evergreen began offering Small Business Administration (SBA) Paycheck Protection Program loans to small businesses. The bank's suite of deposit products includes checking accounts, savings accounts, certificates of deposit, and individual retirement accounts.

Other banking products and services include Automated Teller Machines (ATMs), night depositories, and drive-thru banking. Hours of operation are typically 9:00AM to 5:00PM with extended morning or late afternoon hours via drive-thru banking, or on Fridays. Branch services and operations remained available in-person throughout the pandemic with customers utilizing drive-thru services or branch appointments due to state-mandated operating restrictions. Additional services are offered via the Gold Phone automated customer support phone system, and via online banking. All branches feature one deposit-taking ATM each.

As of December 31, 2020, Evergreen reported total assets of \$579.4 million, total deposits of \$512.1 million, and tier one capital of \$63.7 million. Total loans and leases were \$364.5 million, or 71.2 percent of total deposits. Because Evergreen sells home mortgages on the secondary market, the loan portfolio features a higher proportion of business loans than indicated by recent origination data. The following table summarizes loan portfolio composition as of December 31, 2020.

Loan Portfolio Distribution	Loan Portfolio Distribution										
Loan Category	\$(000)s	%									
Construction, Land Development, and Other Land Loans	24,657	6.8									
Secured by 1-4 Family Properties	132,512	36.4									
Secured by Multifamily Residential Properties	21,141	5.8									
Secured by Non-Farm Non-Residential Properties	172,570	47.3									
Commercial and Industrial Loans	9,018	2.5									
Consumer Loans	1,317	0.4									
Obligations to state and political subdivisions in the United States	3,247	0.9									
TOTAL	364,463	100.0									

Source: Bank Data

Due to rounding, totals may not equal 100.0%

There are no financial or legal impediments which restrict Evergreen's ability to meet the credit needs of its AAs. The bank received an "Outstanding" rating at the prior Community Reinvestment Act (CRA) examination conducted by the Office of the Comptroller of the Currency, dated February 20, 2018.

## **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

The bank's performance was evaluated under the Intermediate Small Bank (ISB) criteria. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities. The CD Test evaluates the bank's record of responding to CD needs in its AAs through CD lending, qualified investments, donations, and services.

Loans Origina	Loans Originated and Purchased by Product Type During Evaluation Period											
	Numbe	er of Loans	Dollar Amount	of Loans \$(000)								
	#	%	\$	%								
Home Mortgage	1122	76.5	265,139	68.1								
Business	325	22.2	122,734	31.5								
Consumer	20	1.4	1,583	0.4								
Agricultural	0	0.0	0	0.0								
TOTAL	1467	100.0	389,456	100.0								

Source: Bank Data. Due to rounding, totals may not equal 100.0%

We determined that Evergreen's primary loan product was home mortgage loans based on bank lending data for the review period. The lending data demonstrates that home mortgage loans represented 76.5 percent of total loans originated or purchased, and 68.1 percent of loans by dollar amount. The table above summarizes lending activity during the review period.

This performance evaluation covers home mortgage loans originated or purchased between January 1, 2018, through December 31, 2020. Business, consumer, and agricultural lending was not evaluated as the volume did not meet the required level for evaluation. We reviewed CD loans, investments, and services for the period February 21, 2018, through December 31, 2020. In instances where the bank has fewer than 20 loans, an analysis will not be performed, as fewer than 20 loans is deemed to be too small for a meaningful analysis.

Evergreen is required to report mortgage lending data by the Home Mortgage Disclosure Act (HMDA). Mortgage data is provided for all areas based on reported HMDA data. For 2020, peer data relied on 2019 data since 2020 data was not yet available at the time of this evaluation. The U.S. Census Bureau's American Community Survey (ACS) 2011-2015 is used as the source of demographic data and census tract (CT) income levels. Prior to this evaluation, we tested the accuracy of Evergreen's publicly filed information on home mortgage loans. The HMDA data we reviewed was collected and reported by the bank over the evaluation period. The testing indicated no substantive inaccuracies in the data for home mortgage loans; therefore, we determined the data is reliable. For CD activities, including PPP lending, a sampling of reported activities was tested and individually verified to confirm CRA eligibility. Our testing results indicated that reported data was accurate and met the qualification requirements under CRA. We included in this evaluation all activities found to meet the definition of CD.

#### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope assessment areas.

#### **Ratings**

Evergreen Federal Bank's overall rating is based solely on the Oregon state ratings, as it is the only rating area for the bank.

The state rating is based on performance in all bank AAs. Refer to the *Scope* section under the *Oregon State Rating* section for details regarding how the areas were weighted in arriving at the rating.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## **State Rating**

#### **State of Oregon**

**CRA rating for the State of Oregon<sup>1</sup>:** Outstanding

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The Grants Pass AA is given the greatest weight as the majority of deposits, lending activity, and CD activity occur in Grants Pass. Medford AA is given greater weight than the Curry County AA given overall activity levels in deposits, lending, and CD. The major factors that support this rating include:

#### **Lending Test**

- Evergreen originated a substantial majority of its loans, by number and dollar amount, inside its assessment areas during the evaluation period.
- The bank's loan-to-deposit ratio is reasonable given its size, financial condition, and the credit needs of its communities.
- An overall reasonable geographic dispersion of home mortgage loans to individuals.
- An overall reasonable distribution of home mortgage loans among individuals of different incomes levels.

#### **Community Development Test**

- The Community Development Test rating is based solely on the state of Oregon.
- An overall excellent level of CD loans, including qualifying Paycheck Protection Program lending to support economic development and job preservation during the COVID-19 pandemic.
- An overall excellent level of CD services.
- An overall adequate level of qualified investments, consisting entirely of donations.

## **Description of Institution's Operations in Oregon**

#### **Grants Pass MSA**

The Grants Pass AA includes all of the Grants Pass MSA, which overlays Josephine County, Oregon. Josephine County is in Southwestern Oregon between Curry (west), Douglas (north), and Jackson (east) Counties in Oregon. Josephine County is bordered to the south by California. Grants Pass is the county seat of Josephine County with the remainder of the county primarily composed of small towns, rural areas, or forestland. The majority of the land in the county is owned by the federal government. The area is characterized by the steep hillsides and dense lush lowland forests of the Siskiyou and Klamath Mountains. Contrasting with the hot Mediterranean climate are the cold turbulent waters of scenic Rogue River, which serves as the central artery of the Rogue Valley.

<sup>&</sup>lt;sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Within this AA, Evergreen has two branches in Grants Pass, the economic and population hub of Josephine County. The population of the county is 87,487, including 38,170 residents of Grants Pass. As of 2020, there are 16 census tracts in the county including four moderate-income, 10 middle-income, and two upper-income CTs. There are no low-income tracts. Evergreen has one branch in a moderate-income CT and one in a middle-income CT within the AA. Census data indicates that 12.8 percent of the population lives in low- and moderate-income (LMI) CTs. This AA represents Evergreen's core market area and includes the majority of bank-wide lending and deposit activities. The bank's designated AA complies with the CRA and does not arbitrarily exclude LMI CTs from the AA.

The Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of June 30, 2020, indicates that 10 financial institutions held \$1.8 billion in deposits in the AA. Competition is vibrant as there are 20 branches seeking to obtain local deposits. Regional and national banks are the primary competitors as Evergreen is one of only two community banks operating in the area. Evergreen ranks first in the market with an 18.8 percent share of deposits. Umpqua Bank; U.S. Bank, N.A.; First Interstate Bank; Washington Federal Bank, N.A.; and Wells Fargo Bank, N.A. are the largest competitors with a combined market share of 59 percent of deposits. Evergreen's market penetration is strongest within this AA for lending and deposits. By dollar, 72 percent of the bank's deposits and 61 percent of home mortgage loans originated during the review period were in the Grants Pass AA. Competition for mortgage lending is particularly fierce as the bank also competes against credit unions, brick and mortar mortgage companies, fintechs, and online mortgage providers.

The Federal Financial Institutions Examination Council (FFIEC) Median Family Income (MFI) report indicates the MFI for Grants Pass, was \$46,452 in 2015 and had grown to \$48,800 in 2019. Per capita income is \$25,167. Data collected in the 2015 ACS estimates, relative to the MFI stated above, 19 percent of the families living in the AA are low-income, 20 percent are moderate-income, 20 percent are middle-income, and 41 percent are upper-income. In total, 39 percent of families have income levels that are LMI. Approximately 16 percent of households have income levels that fall below the poverty line.

According to Moody's Analytics, top employers in the MSA include Three Rivers Community Hospital, Rogue Community College, Master Brand Cabinet Co., Walmart Inc., and Colvin Oil. The economy is recovering from the 2020 pandemic related recession with elevated unemployment and volatile market conditions. Key industries include education and health services, retail trade, leisure and hospitality services, government services, and manufacturing. Manufacturing, medical services, and the status as a retirement haven are crucial for local economic vitality. As of February 2021, U.S. Bureau of Labor Statistics data estimates the unemployment rate was 7.4 percent, which lags the national unemployment rate of 6.6 percent. Historically, the economy has relied upon timber production and natural resources, but this importance has waned as service sector employment increased over time.

There are 39,641 housing units in the Grants Pass AA. The median home value in 2019 was \$265,500. When compared to the adjusted 2019 Median Family Income (MFI), home affordability likely impacts low- and moderate-income borrowers' ability to purchase homes. The 2019 adjusted MFI showed low-income people made less than \$24,400, which results in a home affordability ratio of at least 10.9x for low-income borrowers. The 2019 adjusted moderate-income MFI range was \$24,400 to \$39,040, which results in a home affordability ratio of 10.9x to 6.8x. Housing affordability has continued to deteriorate during 2020 and 2021 due to pandemic related impacts on mortgages rates that increased demand, limited housing supply, and the displaced individuals from the Almeda Fire. In the fall of 2020, the Almeda Fire destroyed 2,700 structures and displaced approximately 3,000 residents.

We conducted one community contact interview in conjunction with this examination. The contact manages a non-profit organization that serves Josephine County. The contact stated the economic conditions are difficult for lower income individuals, as wages were not in-line with the cost of living. A primary concern is the lack of affordable housing, which was impacted further by recent wildfires experienced in 2020. While the contact mentioned these issues are common to both Josephine and Jackson counties, they felt the situation is worse in Josephine, and that the area would benefit from increased housing development and more jobs. The contact had a favorable perception of the local financial institutions and their involvement in meeting the community's credit needs.

Table A – Dem	ographic I	nformatio	n of the Ass	essment Aı	rea	
Ass	sessment A	rea: Grai	nts Pass MS	A		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	12.5	62.5	25.0	0.0
Population by Geography	83,409	0.0	12.8	65.1	22.2	0.0
Housing Units by Geography	38,028	0.0	11.6	66.4	22.0	0.0
Owner-Occupied Units by Geography	22,919	0.0	6.9	66.2	26.9	0.0
Occupied Rental Units by Geography	11,608	0.0	21.4	66.2	12.3	0.0
Vacant Units by Geography	3,501	0.0	9.3	68.0	22.8	0.0
Businesses by Geography	7,958	0.0	20.6	61.1	18.3	0.0
Farms by Geography	515	0.0	4.5	69.1	26.4	0.0
Family Distribution by Income Level	22,089	19.4	19.5	19.7	41.4	0.0
Household Distribution by Income Level	34,527	23.0	17.1	18.4	41.6	0.0
Median Family Income MSA - 24420 Grants Pass, OR MSA		\$46,452	Median Hou	\$216,290		
			Median Gro	ss Rent		\$833
			Families Be	low Poverty	y Level	14.0%

Source: 2015 ACS and 2020 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.

#### **Medford MSA**

The Medford AA includes all of the Medford MSA, which overlays Jackson County, Oregon. Jackson County is in Southwestern Oregon between Josephine (west), Douglas (north), and Klamath (east) Counties in Oregon. Jackson County is bordered to the south by California. Medford is the county seat of Jackson County with Ashland as the second largest population center in the county. Rogue River is a

small town located in western Jackson County along its namesake river and the I-5 corridor. While similar in many respects to Grants Pass, the Medford area has a larger population base and more urban/suburban communities with considerable growth in the corridor between Medford and Ashland. Additionally, the economy is more diversified and median income levels are higher than Grants Pass.

Within this AA, Evergreen has one branch in Medford and one branch in Rogue River. The population of the county is 220,944 including 83,072 residents of Medford and 2,410 residents of Rogue River. As of 2020, there are 41 census tracts in the county including one low-income, eight moderate-income, 23 middle-income, and nine upper-income CTs. The Medford branch is in a moderate-income CT while the Rogue River branch is in a middle-income CT. Within the AA, eight of the nine LMI CTs are in, or near to, Medford. The local area, easily served by the Rogue River branch in the western portion of Jackson County, is entirely middle-income CTs. Census data indicates that 17.6 percent of the population lives in low- and moderate-income CTs. The bank's designated AA complies with the CRA and does not arbitrarily exclude LMI CTs from the AA.

The Federal Deposit Insurance Corporation Deposit Market Share Report as of June 30, 2020, indicates that 12 financial institutions held \$4.3 billion in deposits in the AA. Competition is strong as there are 58 branches seeking to obtain local deposits. National and regional banks are the primary competitors as Evergreen is one of only three community banks in the Medford MSA. Evergreen ranks 10th in the market with a 2.2 percent share of deposits. J.P. Morgan Chase Bank, N.A.; Umpqua Bank; U.S. Bank, N.A.; Wells Fargo Bank, N.A.; and People's Bank of Commerce are the leading competitors with a combined market share of 72 percent of deposits. By dollar, 20 percent of the bank's deposits and 36 percent of home mortgage loans originated during the review period were in the Medford AA. Competition for mortgage lending is robust with numerous lenders serving the AA.

The FFIEC MFI report indicates the MFI for Medford, was \$53,441 in 2015 and had grown to \$66,300 in 2019. Per capita income is \$27,061. Data collected in the 2015 ACS estimates, relative to the MFI stated above, 21 percent of the families living in the AA are low-income, 18 percent are moderate-income, 20 percent are middle-income, and 41 percent are upper-income. In total, 39 percent of families have income levels that are LMI. Approximately 14 percent of households in the AA have income levels that fall below the poverty line.

According to Moody's Analytics, top employers in the MSA include Asante Health System, Lithia Motors, Harry & David Operations Corp., Rogue Valley Medical Center, and Allegiant Air. The economy is continuing efforts to recover from the 2020 pandemic related recession with elevated unemployment, and volatile market conditions characterized by considerable uncertainty. Key industries include education and health services, retail trade, leisure and hospitality services, government services, and manufacturing. Manufacturing, agriculture (including logging and fishing), and the status as a retirement haven are key economic drivers. As of February 2021, U.S. Bureau of Labor Statistics data estimates the unemployment rate was 6.8 percent as of February 2021, which is slightly higher than the national unemployment rate of 6.6 percent.

There are 91,782 housing units in the Medford AA. The median home value in 2019 was \$280,300. When compared to the adjusted 2019 Median Family Income, home affordability likely impacts low-and moderate-income borrowers' ability to purchase homes. The 2019 adjusted MFI showed low-income people made less than \$33,150, which results in a home affordability ratio of at least 8.5x for low-income borrowers. The 2019 adjusted moderate-income MFI range was \$33,150 to \$53,040, which results in a home affordability ratio of 9.1x to 5.3x. Housing affordability has continued to deteriorate

during 2020 and 2021 due to pandemic related impacts on mortgages rates that increased demand and limited new housing supply due to construction disruptions.

Jackson County lost a total of 2,482 residential housing units during 2020 wildfires, primarily due to the Almeda Fire in the Phoenix/Talent corridor. The destroyed properties include multifamily, mobile home, and single family residences concentrated in a moderate-income tract with an FFIEC 2019 MFI of \$49,818. This event occurred in September 2020 and therefore impacted the latter portion of the current evaluation period. There will likely be a continued impact on housing affordability, due to the high number of displaced individuals and disproportionate impact on relatively affordable housing units.

We conducted one community contact interview in conjunction with this examination. The contact is involved in economic development activities. The contact described the economic condition in Medford as trailing other larger metropolitan areas in Oregon, such as Eugene, Salem, and Portland, but noted that economic vitality exceeds that of more rural areas. The contact stated Medford has steady population growth, but an ongoing shortage in housing availability. The contact indicated the biggest opportunity for local financial institutions is lending to small businesses who are unable to demonstrate traditional creditworthiness, and for increased home mortgage lending for individuals.

Table A – Den	nographic I	nformation	of the Assessn	nent Area		
A	Assessment	Area: Medf	ford MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	41	2.4	19.5	56.1	22.0	0.0
Population by Geography	208,363	1.0	16.6	57.2	25.2	0.0
Housing Units by Geography	91,782	1.0	17.1	56.6	25.4	0.0
Owner-Occupied Units by Geography	51,746	0.2	12.2	59.0	28.6	0.0
Occupied Rental Units by Geography	31,741	2.3	23.8	53.7	20.2	0.0
Vacant Units by Geography	8,295	0.9	21.5	52.5	25.1	0.0
Businesses by Geography	23,923	5.6	15.0	54.2	25.2	0.0
Farms by Geography	1,181	1.7	10.8	67.0	20.6	0.0
Family Distribution by Income Level	53,375	21.2	18.2	19.6	41.1	0.0
Household Distribution by Income Level	83,487	23.9	16.2	17.7	42.2	0.0
Median Family Income MSA - 32780 Medford, OR MSA		\$53,441	Median Housi		\$224,271	
			Median Gross		\$906	
			Families Belo	13.6%		

Source: 2015 ACS and 2020 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.

### **Scope of Evaluation in Oregon**

Ratings in the state of Oregon are based primarily on the bank's performance in the full-scope AAs, the Grants Pass MSA, and the Medford MSA. We selected the Grants Pass MSA for a full-scope review because the AA represents a majority of Evergreen's deposits, home mortgage loans, and CD activity. The Grants Pass MSA was given the greatest weight in our conclusions. The Medford MSA was selected for a full-scope review because it represents a substantial minority of home mortgage lending and CD activity. The OCC also considered the bank's performance in the limited-scope AA of Curry County, but this was given limited weight as activities in the Curry County AA are a small portion of overall bank operations. Refer to Appendix A of this evaluation for a list of all AAs under review.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OREGON

#### LENDING TEST

The bank's performance under the Lending Test in Oregon is rated Satisfactory.

#### **Conclusions for Areas Receiving a Full-Scope Review**

Based on full- and limited-scope reviews, the bank's lending performance in the state of Oregon is reasonable.

#### Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

#### Home Mortgage Loans

Refer to Table O in the state of Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans to CTs of different income levels indicates reasonable dispersion to CTs of all income levels. Our analysis is conducted utilizing aggregated data across the entire three-year review period.

#### Grants Pass MSA

In the Grants Pass MSA, there are no low income CTs. Evergreen originated 13.7 percent of home mortgage loans by number in moderate-income CTs. This is above the HMDA peer average of 12.6 percent. The census data indicates that 6.9 percent of owner-occupied housing units are located in moderate-income CTs. Given the limited availability of owner-occupied housing units and the performance above peer this meets the standard for excellent performance.

#### Medford MSA

In the Medford MSA, there is one low-income CT. The bank did not originate any home mortgage loans in this CT during the review period. We placed minimal weight on the level of bank lending in low-income CTs within the AA as the demographic comparator is also very low at 0.2 percent. Similarly, the census data indicates that only 0.2 percent of owner-occupied housing units are located in low-income tracts in the Medford MSA. In moderate-income tracts, the bank originated 9.1 percent of loans in the Medford MSA. This is reasonable performance, but below the peer comparator of 12.1 percent for other lenders subject to HMDA. The percentage of owner-occupied housing units in the Medford MSA is 12.2 percent.

#### Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

#### Home Mortgage Loans

Refer to Table P in the state of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Our review of home mortgage lending showed a reasonable borrower penetration to individuals of all income levels. Our analysis is conducted utilizing aggregated data across the entire three-year review period.

#### Grants Pass MSA

The distribution of residential mortgage lending in the Grants Pass MSA is reasonable when considering performance context factors. Evergreen originated 1.7 percent of loans to low-income individuals, which is slightly below the peer comparator of 2.6 percent. The bank's percentage of loans to moderate-income individuals is 5.5 percent compared to 8.9 percent. We considered the challenging performance context in Grants Pass MSA as a factor given the strong competition among mortgage lenders and the scarcity of affordable housing for LMI individuals in our conclusions.

#### Medford MSA

Home mortgage lending in the Medford MSA indicates a poor penetration to low-income individuals. The bank's percentage of loans to low-income individuals is 1.8 percent compared to the peer average of 3.7 percent. For moderate-income individuals, Evergreen originated 5.6 percent of home mortgages versus the peer comparator of 15.6 percent. Notably, the high volume of loans with no income reported (50.9 percent) versus the peer average of 14.5 percent significantly impacted the data analysis. Because only 49.1 percent of Evergreen's mortgage loans in the Medford MSA had available income information, the resulting percentages at all income levels are lower than for the peer comparator. If adjusted for the percentage of loans with available income information, the percentage of lending to LMI individuals by Evergreen is 15.1 percent of loans with reported income, which falls below the peer average of 22.8 percent by a smaller margin. Strong competition and a lack of affordable housing were also given consideration as performance context.

#### **Responses to Complaints**

There have been no consumer complaints relating to the bank's Community Reinvestment Act performance during the evaluation period.

### **Conclusions for Areas Receiving a Limited Scope Review**

Based on a limited-scope review, the bank's performance under the Lending Test in the Curry County AA did not have any impact on Lending Test conclusions. There are no LMI CTs in Curry County so the analysis of geographic distribution of loans is not applicable. The volume of lending was too low to complete an analysis of the distribution of loans by income level of the borrower in Curry County.

#### COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Oregon is rated Outstanding.

## Conclusions for Areas Receiving a Full-Scope Review

Based on full-scope and limited-scope reviews, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity, and the need and availability, of such opportunities for community development in the bank's assessment area(s).

#### **Number and Amount of Community Development Loans**

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Develop	Community Development Loans											
	Total											
Assessment Area	#	% of Total #	\$(000's)	% of Total \$								
Grants Pass MSA	47	71.2%	\$20,994	55.7%								
Medford MSA	14	21.2%	\$14,643	38.9%								
Curry County	2	3.0%	\$732	1.9%								
Oregon Statewide	3	4.5%	\$1,300	3.5%								
TOTALS	66	100.0%	\$37,669	100.0%								

The PPP Table, shown below, sets forth separately additional CD lending data related to the PPP that was used to evaluate the bank's level of CD lending.

Paycheck Protection Program Loans												
Assessment Area	#	% of Total #	\$(000's)	% of Total \$								
Grants Pass MSA	83	69.7%	\$6,852	83.2%								
Medford MSA	26	21.8%	\$899	10.9%								
Curry County	7	5.9%	\$321	3.9%								
Oregon Statewide	3	2.5%	\$161	2.0%								
TOTALS	119	100.0%	\$8,232	100.0%								

Evergreen's CD lending performance demonstrates excellent responsiveness to meeting the credit and community service needs of its AAs. This meets the standard for outstanding performance.

#### **Grants Pass MSA**

The volume of CD lending in the Grants Pass MSA demonstrates excellent responsiveness to local CD credit needs. During the evaluation period, the bank originated 130 CD loans, totaling \$27.8 million. This amount includes qualifying PPP lending conducted to retain jobs during the pandemic. This meets the standard for outstanding performance.

Examples of CD loans made during the evaluation period include:

- A \$453 thousand loan for the purchase of an eight-unit affordable housing property targeted at LMI individuals.
- A \$1.4 million loan for the purchase of a 23 unit multifamily apartment building that provides affordable housing to LMI individuals.
- A \$350 thousand loan to purchase real estate property for expansion of services by a local non-profit community organization.
- A \$1.5 million PPP loan to a non-profit organization for job retention of LMI employees. The non-profit organization remained in operation during the pandemic and continued to provide medical and mental health services in Southern Oregon.
- A \$545 thousand loan to purchase real estate and expand operations for a non-profit organization that provides educational opportunities and scholarships for LMI students.

#### Medford MSA

The volume of CD lending in the Medford MSA demonstrates excellent responsiveness to local CD credit needs. During the evaluation period, the bank originated 40 CD loans, totaling \$15.5 million. This amount includes qualifying PPP lending conducted to retain jobs during the pandemic. This meets the standard for outstanding performance.

Examples of CD loans made during the evaluation period include:

- A \$6 million loan to construct a 33 unit multifamily property providing affordable rent for LMI individuals.
- A \$550 thousand PPP loan to a small business for job retention of LMI employees.
- A \$2 million loan for construction of a new small business that will create jobs for LMI individuals.

Qualified CD lending within the broader statewide or regional area that does not have a purpose, mandate, or function to serve the bank's AAs may receive consideration if the bank has been responsive to the needs and opportunities of its AAs. Because the level of qualified CD lending in the AAs meets

the standard for excellent performance, the CD loans with broader statewide impact receive consideration. This had a positive effect on the bank's overall performance under the CD Test.

#### **Number and Amount of Qualified Investments**

Qualified Investr	Qualified Investments												
	Pric	r Period*	C	Current		,	Unfunded						
Assessment			I	Period				Com	mitments**				
Area	#	\$(000's)	s) # \$(000's)		#	% of	\$(000's)	% of	#	\$(000's)			
						Total #		Total \$					
Grants Pass	0	¢ο	205	<b>\$</b> 2</td <td>205</td> <td>CO 10/</td> <td>\$660</td> <td>01.00/</td> <td>0</td> <td>¢Ω</td>	205	CO 10/	\$660	01.00/	0	¢Ω			
MSA	0	\$0	205	\$662	205	68.1%	\$662	81.9%	0	\$0			
Medford MSA	0	\$0	68	\$131	68	22.6%	\$131	16.2%	0	\$0			
Curry County	0	\$0	22	\$13	22	7.3%	\$13	1.6%	0	\$0			
Oregon	0	¢ο		ФО.		2.00/	\$2	0.20/	0	ΦΩ.			
Statewide	0	\$0	6	\$2	6	2.0%	\$2	0.2%	0	\$0			
TOTALS	0	\$0	301	\$808	301	100.0%	\$808	100.0%	0	\$0			

<sup>\* &#</sup>x27;Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank's performance under the Investment Test demonstrates adequate responsiveness to community service needs.

#### Grants Pass MSA

The volume of CD Investments in the Grants Pass MSA demonstrates adequate responsiveness of local CD investment needs in the bank's AAs. During the evaluation period, the bank invested \$662 thousand in donations to meet the needs of the community. All investments consisted of donated funds, which are more impactful as they do not require repayment by the recipients. There were no prior period investments and no unfunded commitments. This meets the standard for satisfactory performance.

Examples of investments made during the evaluation period include:

- A \$70 thousand donation to support school facilities in an area with a high percentage of LMI children.
- A \$50 thousand donation to a non-profit organization that provides services and housing to LMI women impacted by domestic violence.
- An \$18 thousand donation to a health care services organization that helps meet the medical needs of LMI individuals.
- A \$25,250 donation to an organization that creates affordable housing and facilitates home ownership for LMI individuals.

#### Medford MSA

The volume of CD Investments in the Medford MSA demonstrates adequate responsiveness of local CD investment needs in the bank's AAs. During the evaluation period, the bank invested \$131 thousand in donations to meet the needs of the community. All investments consisted of donated funds, which are more impactful as they do not require repayment by the recipients. There were no prior period investments and no unfunded commitments. This meets the standard for satisfactory performance.

Examples of investments made during the evaluation period include:

- \$70 thousand in donations to various organizations that provide disaster relief and housing assistance to displaced LMI individuals impacted by wildfires.
- A \$7,500 donation for scholarships for LMI students.
- A \$9,000 in-kind donation for use of the Bear Hotel meeting space to raise \$472 thousand for local mental health organizations that serve LMI individuals.

Qualified investments that are in the broader statewide or regional area that do not have a purpose, mandate, or function to serve the bank's AAs may receive consideration if the bank has been responsive to the needs and opportunities of its AAs. Because the level of qualified investments in the AAs meets the standard for satisfactory performance, the investments with broader statewide impact receive consideration. This had a nominal positive effect on the bank's overall performance under the Investment Test.

#### **Extent to Which the Bank Provides Community Development Services**

Evergreen is a leader in providing CD services.

#### Grants Pass MSA

The bank provided an excellent level of CD services in the Grants Pass MSA. Bank employees contributed a total of 3,461 hours of CD services to 24 community organizations in the AA. CD services were conferred to 22 community organizations that target community services to low- or moderate-income individuals, and to two organizations that support affordable housing to low- or moderate-income individuals as well.

#### Examples of these services include:

- An employee provided 338 hours as a board member of a non-profit organization that provides affordable housing to the community.
- Two employees provided 76 hours of marketing services to a local food bank that provides meals to LMI individuals and families.
- Three employees provided 229 hours to a non-profit organization that helps victims of domestic abuse by providing LMI individuals safe shelter and advocacy.
- Two employees provided 66 hours of service hours to a non-profit organization that provides disabled children, particularly LMI individuals, with trained service dogs.

#### Medford MSA

The bank provided an excellent level of CD services in the Medford MSA. Bank employees contributed a total of 407 hours of CD services to four community organizations in the AA. CD services were bestowed to three community organizations that target community services to low- or moderate-income individuals, and to one organization that promotes economic development activities.

#### Examples of these services include:

- One employee provided 72 hours as a board member to a non-profit organization that supports local small businesses and job creation.
- One employee contributed 321 hours to a non-profit organization that supports LMI children by donating bedding and furniture to improve their living conditions.

## Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Curry County AA is strong, but weaker than the bank's overall performance under the CD Test in the full scope area(s).

## **Appendix A: Scope of Examination**

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

Time Period Reviewed:	(01/01/2018 to 12/31/2020)									
Bank Products Reviewed:	Home mortgage									
	Community development lo	oans, qualified investments, community development								
	services	services								
Affiliate(s)	Affiliate Relationship	Products Reviewed								
List of Assessment Areas and Type	e of Examination									
Rating and Assessment Areas	Type of Exam	Other Information								
Oregon										
Curry County	Limited-scope									
Grants Pass	Full-scope									
Medford	Full-scope									

# **Appendix B: Summary of MMSA and State Ratings**

RATINGS Evergreen Federal Bank												
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank Rating									
Evergreen Federal Bank	Satisfactory	Outstanding	Outstanding									
MMSA or State:												
State of Oregon	Satisfactory	Outstanding	Outstanding									

<sup>(\*)</sup> The Lending Test and Community Development Test carry equal weight in the overall rating.

## **Appendix C: Definitions and Common Abbreviations**

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**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, other secured consumer loans, and other unsecured consumer loans.

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

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, 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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

**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 state/assessment area.

**Median Family Income** (**MFI**): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties 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 percent and less than 120 percent, in the case of a geography

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

Multifamily: Refers to a residential structure that contains five or more units.

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

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

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

**Small Loan(s) to Farm(s):** 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, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## **Appendix D: Tables of Performance Data**

#### **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- **Table O.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- **Table P.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- **Table Q.** Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because arrogate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal

to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- **Table U.** Assessment Area Distribution of Consumer Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- **Table V.** Assessment Area Distribution of Consumer Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2018-20

	Tota	al Home Mo	ortgage	Loans	Low-I	ncome Tracts Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate		% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate		% Bank Loans	Aggregate
Grants Pass MSA	710	170,247	65.7	3,097	0.0	0.0	0.0	6.9	13.7	12.6	66.2	57.3	62.0	26.9	29.0	25.4	0.0	0.0	0.0
Medford MSA	342	99,337	31.7	8,918	0.2	0.0	0.2	12.2	9.1	12.1	59.0	64.6	56.6	28.6	26.3	31.1	0.0	0.0	0.0
Curry County	28	7,446	2.6	789	0.0	0.0	0.0	0.0	0.0	0.0	75.6	96.4	77.1	24.4	3.6	22.9	0.0	0.0	0.0
Total	1,080	277,030	100.0	12,804	0.1	0.0	0.1	9.7	11.9	11.5	62.4	60.6	59.2	27.7	27.5	29.2	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Evergreen Federal Bank (10000702610) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2018-20

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
1GrantsPass M SA	710	170,247	65.7	3,097	19.4	1.7	2.6	19.5	5.5	8.9	19.7	12.8	18.9	41.4	55.5	54.1	0.0	24.5	15.5
2Medford MSA	342	99,337	31.7	8,918	21.2	1.8	3.7	18.2	5.6	15.6	19.6	6.1	23.0	41.1	35.7	43.1	0.0	50.9	14.5
3Curry County	28	7,446	3.4	789	20.4	-	3.9	18.1	15.8	11.7	22.0	15.8	20.9	39.4	53.6	54.1	0.0	25.0	9.4
Total	1,080	277,030	100.0	12,804	20.6	1.7	3.4	18.5	5.6	13.8	19.8	10.6	21.9	41.1	49.2	46.5	0.0	32.9	14.4

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Evergreen Federal Bank (10000702610) excluded from Aggregate