



PUBLIC DISCLOSURE

October 18, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Rabobank, National Association
Charter Number 24583

915 Highland Pointe, Suite 350
Roseville, CA 95678

Office of the Comptroller of the Currency

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Suite 1000
San Francisco, CA 94111

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 **Satisfactory**.

The following table indicates the performance level of **Rabobank, National Association** (RNA or the bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Rabobank, NA Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that were considered in this rating include:

- RNA lending activity, overall, reflects good responsiveness to community credit needs.
- RNA granted a substantial majority of its HMDA and CRA reportable loans within the bank’s combined assessment areas. By number, approximately 93 percent of all reportable loans were within the bank’s combined assessment areas.
- The geographic distribution of RNA’s loans reflects good penetration.
- RNA originated a relatively high level of community development loans. The bank’s community development lending has a positive impact on the bank’s CRA performance.
- RNA makes a significant level of qualified community development investments that are responsive to community needs.
- RNA’s branch and alternative delivery systems are readily accessible to the bank’s geographies and individuals of different income levels. RNA provides a relatively high level of community development services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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 MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development.

Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

Full 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 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancing, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

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

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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

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

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 One 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.

Description of Institution

Rabobank, National Association is an intrastate financial institution and a subsidiary of Utrecht-America Holdings, Inc., a financial services holding company. Utrecht-America is a subsidiary of Rabobank International Holding BV, which is a subsidiary of Cooperative Rabobank U.A. (commonly known as Rabobank Nederland), an international financial services organization founded in the 1890s and headquartered in the Netherlands.

As of December 31, 2016, RNA reported total assets of \$14.5 billion. Total loans, net of unearned income, equaled \$10.3 billion, or 71 percent of total assets. Agricultural and commercial loans comprised the largest segments of RNA's loan portfolio at nearly 80 percent of total loans. The loan portfolio (by dollar volume) comprised 46 percent agricultural, 33 percent commercial, 16 percent one-to-four family residential, 3 percent multifamily residential, 1 percent construction and land development, and less than 1 percent consumer and other miscellaneous loans. Tier one capital equaled \$1.6 billion.

RNA's strategic focus is lending to food and agribusiness companies and commercial businesses. RNA is headquartered in Roseville, California. RNA is a full service banking institution with 101 branch offices in 26 counties throughout the state. The bank offers retail and commercial banking services to individuals, agricultural customers, businesses, and commercial real estate developers while maintaining a strong focus on serving the banking needs of small- to medium-sized businesses. RNA provides a full line of depository, treasury management, and commercial and consumer products, including but not limited to: checking and savings accounts, mortgage loans, home equity loans and lines of credit, operating lines of credit, multi-family housing loans, SBA loans, and USDA loans.

There are no legal or financial constraints that impede the bank's ability to help meet the credit needs of its assessment areas. The bank's CRA performance was rated satisfactory at its last evaluation, prepared as of July 14, 2014, under large bank examination procedures.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We reviewed home mortgage, small business, and small farm loans for the period beginning January 1, 2014 through December 31, 2016. We reviewed CD loans, qualified investments, and CD services for the period beginning July 14, 2014 through October 18, 2017, the beginning of this evaluation.

Data Integrity

Prior to this evaluation, we tested the accuracy of RNA's publicly reported information on home mortgage loans and small loans to businesses and farms. The data we reviewed was collected and reported by the bank during the evaluation period. We determined that the bank's HMDA reporting was reliable. While we identified errors in the bank's small business and small farm lending data, the bank corrected the data and subsequent testing determined the corrected data to be reliable. Additionally, qualified investments and CD loans and services made or rendered during the evaluation period were reviewed to determine their eligibility for consideration.

Selection of Areas for Full-Scope Review

RNA only operates in the State of California. The bank maintains 101 branches serving 21 AAs throughout California. In the State of California, a sample of AAs within the state were selected for full-scope reviews based on branches, deposits, and loan origination volumes. The bank maintains deposit operations in the following MSAs or counties:

Full-Scope:

San Luis Obispo-Paso Robles-Arroyo Grande MSA (42020) - San Luis Obispo County

Salinas MSA (41500) - Monterey County

Santa Maria-Santa Barbara MSA (42200) - Santa Barbara County

Oxnard-Thousand Oaks-Ventura MSA (37100) - Ventura County

El Centro MSA (20940) - Imperial County

Riverside-San Bernardino-Ontario MSA (40140) - Riverside and San Bernardino Counties

Bakersfield MSA (12540) - Kern County

Limited-Scope:

Sacramento-Roseville-Arden Arcade MSA (40900) - Placer and Sacramento Counties only

Chico MSA (17020) - Butte County

Fresno MSA (23420) - Fresno County

Hanford-Corcoran MSA (25260) - Kings County

Merced MSA (32900) - Merced County

Napa MSA (34900) - Napa County

San Jose-Sunnyvale-Santa Clara MSA (41940) - Santa Clara and San Benito Counties

Stockton-Lodi MSA (44700) - San Joaquin County
Santa Cruz-Watsonville MSA (42100) - Santa Cruz County
Santa Rosa MSA (42220) - Sonoma County
Modesto MSA (33700) - Stanislaus County
Yuba City MSA (49700) - Sutter and Yuba Counties
Visalia-Porterville MSA (47300) - Tulare County
CA Non-MSA (99999) - Calaveras, Tehama, and Tuolumne Counties

Please refer to the table in appendix A for more information.

Ratings

RNA's overall rating is a blend of AA ratings. The state rating is based primarily on those areas that received full-scope reviews. Based on branches, deposits, and loan origination volumes, performance in the San Luis Obispo-Paso Robles-Arroyo Grande MSA, the Salinas MSA, and the Santa Maria-Santa Barbara MSA carry the most weight, with secondary weight placed on performance in the Oxnard-Thousand Oaks-Ventura MSA, the El Centro MSA, the Riverside-San Bernardino-Ontario MSA, and the Bakersfield MSA.

Other

We contacted (or utilized other recently prepared community contacts) 11 housing and economic development organizations for this evaluation. The overriding theme among all the contacts is affordable housing and small business lending and support are critical needs of each of the full-scope assessment areas. Financial literacy, small business education, and financial support for social service organizations were also commonly noted. The contacts identified affordable housing construction, mid-sized business loans, financial literacy to teach individuals and businesses how to build creditworthiness and prepare them for applying for credit, and lending, investment, and service support for community-based social service organizations as opportunities for banks to assist in addressing credit needs.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §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 assessment area 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 Consumer Financial Protection Bureau, 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 does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

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.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the San Luis Obispo-Paso Robles-Arroyo Grande MSA, Salinas MSA, Santa Maria-Santa Barbara MSA, Oxnard-Thousand Oaks-Ventura MSA, Riverside-San Bernardino-Ontario MSA, and El Centro MSA is good and in the Bakersfield MSA is adequate.

Lending Activity

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect good responsiveness to the credit needs of the full scope AAs. RNA originated or purchased 4,184 mortgage, small business, and small farm loans totaling \$1.3 billion in the full-scope AAs during the 2014 through 2016 evaluation period. Lending in the full-scope AAs represent 65 percent of the number and 61 percent of dollar volume of total loans granted in all AAs.

San Luis Obispo-Paso Robles-Arroyo Grande MSA

Lending levels in the San Luis Obispo AA reflect good responsiveness. RNA has a deposit market share of 22.4 percent, which ranks first amongst 13 depository institutions operating in the AA as of June 30, 2016. Based on 2016 HMDA aggregate or 2015 small business aggregate lending data, competition for mortgage lending and business lending is high. While there are a limited number of small farm lenders in the AA, competition for small farm loans is tight.

There are 400 HMDA-reporting mortgage lenders in 2016, including megabanks, large regional banks, and numerous non-bank lenders. There are 59 small business lenders reporting CRA data in 2015. The top three competitors hold 54.9 percent of the market of reported small business loans. RNA competes reasonably well, ranking 11 with a market share of 1.5 percent of all reported small business loans granted in 2015. The average loan size of the top ten business lenders is \$16 thousand and ranged between \$4 thousand and \$49 thousand. RNA's average business loan size is \$205 thousand and serves small- to midsize commercial real estate financing needs. There are 14 small farm lenders reporting CRA data in 2015. RNA ranks fourth with 23 small farm loans, or 13.1 percent market share of small farm loans granted in 2015. RNA, along with five other small farm lenders, serves the small farm real estate needs, while the remaining competitors focus on small dollar loans. In terms of total dollar volume, RNA provided more small farm financing (\$4.8 million) in the AA than the top two lenders (Wells Fargo, NA and Bank of America, NA combined) and is only topped by Umpqua Bank, a larger regional bank.

While RNA's lending market share is well below its deposit market share, the bank attained a strong market share rank for all loan products and strong market share percentile rank in mortgage lending and reasonable loan market share percentile rank for small business and small farm lending.

San Luis Obispo-Paso Robles-Arroyo Grande MSA

Product	Number of Loans	Percent of All Loan Products	Market Share	Market Share Rank	Market Share Percentile
Deposits *			22.4	1 of 13	92
Home Mortgage **	702	60.6	1.9	12 of 400	97
Small Business ***	387	33.4	1.5	11 of 59	81
Small Farm***	70	6.0	13.1	4 of 14	71
Community Development	3	NA	NA	NA	NA

* Source: FDIC June 30, 2016 Deposit Market Share

** 2016 HMDA Aggregate

*** 2015 Small Business or Small Farm Aggregate

Salinas MSA

Lending levels in the Salinas AA reflect good responsiveness. RNA has a deposit market share of 13.7 percent, which ranks fourth amongst 13 depository institutions operating in the Salinas AA as of June 30, 2016. Based on 2016 HMDA aggregate or 2015 small business aggregate lending data, competition for mortgage and small business lending is high. While there are a limited number of small farm lenders in the AA, competition is high relative to opportunities.

There are 428 HMDA-reporting mortgage lenders in 2016, including megabanks, large regional banks, and numerous nonbank competitors. There are 64 small business lenders reporting CRA data in 2015 with the top three competitors holding 57.7 percent of the market of reported small business loans. RNA competes well, ranking 12th with a market share of 1.3 percent of all reported small business loans in granted in 2015. The average loan size of the top eleven business lenders is \$22 thousand and ranged between \$4 thousand and \$110 thousand. Only one of these lenders granted a loan over \$49 thousand. RNA's average business loan size is \$226 thousand and serves small- to midsize commercial real estate financing needs. There are 16 small farm lenders reporting CRA data in 2015. RNA ranks third with 23 loans, or 14.0 percent market share of small farm loans granted in 2015. RNA's average small farm loan size is \$299 thousand and serves small farm real estate needs, while most of the top ten competitors focus on small dollar loans. In terms of total dollar volume, RNA provided more small farm financing (\$6.9 million) in the AA than the top two lenders (Wells Fargo, NA and Bank of America, NA combined).

While the bank's lending market share is well below its deposit market share for all loan products except small farm lending, the bank attained a reasonable market share rank for home mortgage loans and strong market share rank for small business and small farm loans. RNA also has a strong market share percentile rank by loan product relative to its deposit market share percentile rank.

Salinas MSA

Product	Number of Loans	Percent of All		Market Share	Market Share
		Loan Products	Market Share	Rank	Percentile
Deposits *			13.7	4 of 13	69
Home Mortgage **	201	35.8	0.5	35 of 428	92
Small Business ***	305	54.4	1.3	12 of 64	81
Small Farm***	55	9.8	14.0	3 of 16	81
Community Development	4	NA	NA	NA	NA

* Source: FDIC June 30, 2016 Deposit Market Share

** 2016 HMDA Aggregate

*** 2015 Small Business or Small Farm Aggregate

Santa Maria-Santa Barbara MSA

Lending levels in the Santa Maria-Santa Barbara AA reflect good responsiveness. RNA has a deposit market share of 9.7 percent, which ranks fifth amongst 19 depository institutions operating in the Santa Maria-Santa Barbara AA as of June 30, 2016. Based on 2016 HMDA aggregate or 2015 small business aggregate lending data, competition for mortgage and small business lending is high. While there are a limited number of small farm lenders in the AA, competition is high relative to opportunities.

There are 412 HMDA-reporting mortgage lenders in 2016, including megabanks, large regional banks, and numerous non-bank lenders. There are 70 small business lenders reporting CRA data in 2015. The top three competitors hold 53.8 percent of the market of reported small business loans. RNA competes reasonably well, ranking 13th with a market share of 1.0 percent of all reported small business loans in granted in 2015. The average loan size of the top 12 business lenders, led by American Express, FSB with 33 percent market share, is \$18 thousand and ranged between \$6 thousand and \$97 thousand. Only one of these lenders has an average loan size greater than \$41 thousand. RNA's average business loan size is \$148 thousand and serves small- to midsize commercial real estate financing needs. There are 19 small farm lenders reporting CRA data in 2015. RNA ranks second with 18.1 percent market share of small farm loans granted in 2015. RNA's average small farm loan size is \$255 thousand and serves small farm real estate needs, while most of the top ten competitors focus on small dollar loans. In terms of total dollar volume, RNA provided more small farm financing (\$6.1 million) in the AA than the remaining top ten small farm lenders, combined (\$3.3 million).

While its home mortgage and small business lending market share relative to deposit market share is low, the bank attained a reasonable market share rank for home mortgage loans and strong market share rank for small business and small farm loans. RNA also has strong market share percentile rank by loan product compared to its deposit market share percentile rank.

Santa Maria-Santa Barbara MSA

Product	Number of Loans	Percent of All Loan Products	Market Share	Market Share Rank	Market Share Percentile
Deposits *			9.7	5 of 19	74
Home Mortgage **	351	46.2	0.9	29 of 412	93
Small Business ***	316	41.6	1.0	13 of 70	81
Small Farm***	92	12.1	18.1	2 of 19	89
Community Development	5	NA	NA	NA	NA

* Source: FDIC June 30, 2016 Deposit Market Share

** 2016 HMDA Aggregate

*** 2015 Small Business or Small Farm Aggregate

Oxnard-Thousand Oaks-Ventura MSA

Lending levels in the Oxnard AA reflect good responsiveness. RNA has a deposit market share of 4.4 percent, which ranks sixth amongst 24 depository institutions operating in the Oxnard AA as of June 30, 2016. Based on 2016 HMDA aggregate or 2015 small business aggregate lending data, competition for mortgage lending and small business lending is high. While there are a limited number of small farm lenders in the AA, competition is high relative to opportunities.

There are 543 HMDA-reporting mortgage lenders in 2016, including megabanks, large regional banks, and numerous non-bank lenders. No mortgage lender has more than a 10.0 percent market share. There are 80 small business lenders reporting CRA data in 2015. The top three competitors hold 57.0 percent of the market of reported small business loans. RNA competes reasonably well, ranking 18th with a market share of 0.5 percent of all reported small business loans in granted in 2015. The top ten small business lenders granted more than 20 thousand small business loans in 2015 with an average loan size of \$18 thousand. RNA's average business loan size is \$151 thousand and serves small- to midsize commercial real estate financing needs. There are 17 small farm lenders reporting CRA data in 2015. The top five competitors hold 79.0 percent of the market of reported small farm loans. RNA ranks sixth with 5.0 percent market share of reported small farm loans granted in 2015. The average small farm loan size for the top five lenders is \$23 thousand. RNA's average small farm loan size is \$311 thousand. Only one other small farm lender in the top ten, other than RNA, granted small farm loans with an average loan size of greater than \$100 thousand. The total volume of RNA's small farm lending (\$2.8 million) in 2015 is slightly below the total dollar volume of small farm loans granted by the top four small farm lenders (\$3.2 million) combined.

While RNA's lending market share for home mortgage and small business is well below its deposit market share, the bank attained a reasonable market share rank for all loan products. RNA also has strong market share percentile rank in mortgage lending and reasonable loan market share percentile rank for small business and small farm lending relative to its deposit market share percentile rank.

Oxnard-Thousand Oaks-Ventura MSA

Product	Number of Loans	Percent of All		Market Share	Market Share
		Loan Products	Market Share	Rank	Percentile
Deposits *			4.4	6 of 24	75
Home Mortgage **	173	30.5	0.2	87 of 543	84
Small Business ***	355	62.6	0.5	18 of 80	78
Small Farm***	39	6.9	5.0	6 of 17	65
Community Development	10	NA	NA	NA	NA

* Source: FDIC June 30, 2016 Deposit Market Share

** 2016 HMDA Aggregate

*** 2015 Small Business or Small Farm Aggregate

Riverside-San Bernardino-Ontario MSA

Lending levels in the Riverside-San Bernardino-Ontario AA reflect good responsiveness. RNA has a deposit market share of 1.0 percent, which ranks 17th amongst 44 depository institutions operating in the Riverside-San Bernardino-Ontario AA as of June 30, 2016. Based on 2016 HMDA aggregate or 2015 small business aggregate lending data, competition for mortgage lending and small business lending is very high and high for small farm lending given the opportunities.

There are 814 HMDA-reporting mortgage lenders in 2016, including megabanks, large regional banks, and numerous non-bank lenders. No mortgage lender has more than a 9.0 percent market share. There are 140 small business lenders reporting CRA data in 2015. The top ten competitors hold 89 percent of the market of reported small business loans. The average loan size of the top ten business lenders is \$16 thousand and ranged between \$4 thousand and \$42 thousand. RNA's average business loan size is \$217 thousand and serves small- to midsize-commercial real estate financing needs. There are 20 small farm lenders reporting CRA data in 2015. The top five competitors hold 82 percent of the market of reported small farm loans. Rabobank ranks sixth with 2.9 percent market share of reported small farm loans granted in 2015. RNA's average small farm loan size is \$290 thousand. RNA, along with one other small farm lender in the top ten, serves the small- to midsize small farm real estate needs, while the remaining competitors focus on small dollar loans. The average small farm loan size for the top ten lenders, including RNA, is \$46 thousand.

While RNA's lending market share is well below its deposit market share for all loan products except small farm lending, the bank's market share percentile rank by loan product is comparable or exceeds its deposit market share percentile rank for each loan product in the AA.

Riverside-San Bernardino-Ontario MSA

Product	Number of Loans	Percent of All Loan Products	Market Share	Market Share Rank	Market Share Percentile
Deposits *			1.0	17 of 44	61
Home Mortgage **	111	34.4	0.01	334 of 814	59
Small Business ***	189	58.5	0.1	37 of 140	74
Small Farm***	23	7.1	2.9	6 of 20	70
Community Development	4	NA	NA	NA	NA

* Source: FDIC June 30, 2016 Deposit Market Share

** 2016 HMDA Aggregate

*** 2015 Small Business or Small Farm Aggregate

El Centro MSA

Lending levels in the El Centro AA reflect good responsiveness. RNA has a deposit market share of 29.3 percent, which ranks first amongst seven depository institutions operating in the El Centro AA as of June 30, 2016. Based on 2016 HMDA aggregate or 2015 small business aggregate lending data, competition for mortgage lending is relatively high and moderate for small business and small farm lending.

There are 199 HMDA-reporting mortgage lenders in 2016, including megabanks, large regional banks, and numerous non-bank lenders. No mortgage lender has more than a 10.0 percent market share. There are 41 small business lenders reporting CRA data in 2015. The top three competitors hold 54.4 percent of the market of reported small business loans. RNA ranks ninth with a market share of 2.4 percent of all reported small business loans in granted in 2015. The average loan size of the top ten business lenders, excluding RNA, is \$16 thousand and ranged between \$4 thousand and \$51 thousand. RNA's average business loan size is \$226 thousand and serves small- to midsize commercial real estate financing needs. In terms of total dollars, RNA granted \$11 million in the AA in 2015 and is only second behind Wells Fargo, NA (\$15 million) in total dollars lent in the AA in 2015. There are 12 small farm lenders reporting CRA data in 2015. The top five lenders, including RNA, hold 78 percent of the market share of small farm loans in 2015. RNA is the top small farm lender in 2015 with 30.8 percent market share of reported small farm loans granted in 2015. RNA's average small farm loan size is \$299 thousand and serves small- and midsize small farm real estate financing needs. The average small farm loans size for the other top four lenders is \$24 thousand and ranged from \$8 thousand to \$49 thousand.

While RNA's home mortgage and small business loan market share is well below its deposit market share, the bank attained a strong market share rank for small business lending and reasonable market share percentile rank in small business and mortgage lending. RNA's small farm lending market share is comparable to deposit market share and its small farm market share percentile rank exceeds its deposit market share percentile rank.

El Centro MSA

Product	Number of Loans	Percent of All		Market Share	
		Loan Products	Market Share	Rank	Market Share Percentile
Deposits *			29.3	1 of 7	86
Home Mortgage **	42	15.9	0.3	51 of 199	74
Small Business ***	146	55.3	2.4	9 of 41	78
Small Farm***	76	28.8	30.8	1 of 12	92
Community Development	2	NA	NA	NA	NA

* Source: FDIC June 30, 2016 Deposit Market Share

** 2016 HMDA Aggregate

*** 2015 Small Business or Small Farm Aggregate

Bakersfield MSA

Lending levels in the Bakersfield AA reflect good responsiveness. RNA has a deposit market share of 4.9 percent, which ranks seventh amongst 20 depository institutions operating in the Bakersfield AA as of June 30, 2016. Based on 2016 HMDA aggregate or 2015 small business aggregate lending data, competition for mortgage lending and small business lending is high. While there are a limited number of small farm lenders in the AA, competition is high for small farm loans given the opportunities.

There are 451 HMDA-reporting mortgage lenders in 2016, including megabanks, large regional banks, and numerous non-bank lenders. No mortgage lender has more than a 9.0 percent market share. There are 81 small business lenders reporting CRA data in 2015. The top ten competitors hold 88 percent of the market of reported small business loans. RNA ranks sixteenth with a market share of 0.7 percent of all reported small business loans in granted in 2015. The average loan size of the top ten business lenders is \$17 thousand and ranged between \$4 thousand and \$45 thousand. RNA's average business loan size is \$240 thousand and serves small- to midsize commercial real estate financing needs. There are 20 small farm lenders reporting CRA data in 2015. The top three competitors hold 62 percent of the market of reported small farm loans. RNA ranks fourth with a market share of 5.2 percent of all reported small farm loans granted in 2015.

While RNA's lending market share is well below its deposit market share for all loan products except small farm lending, RNA's market share percentile rank by loan product exceeds its deposit market share percentile rank for each loan product.

Bakersfield MSA

Product	Number of Loans	Percent of All		Market Share	
		Loan Products	Market Share	Rank	Market Share Percentile
Deposits *			4.9	7 of 20	65
Home Mortgage **	178	32.3	0.2	87 of 451	81
Small Business ***	343	62.3	0.7	16 of 81	80
Small Farm***	30	5.4	5.2	4 of 20	80
Community Development	3	NA	NA	NA	NA

* Source: FDIC June 30, 2016 Deposit Market Share

** 2016 HMDA Aggregate

*** 2015 Small Business or Small Farm Aggregate

Distribution of Loans by Income Level of the Geography

Overall geographic distribution of loans in the State of California is good. Small business lending is excellent, home mortgage lending is good, and small farm lending is adequate. In the full scope AAs, small business lending represents 49 percent of RNA's total reportable lending, home mortgage lending represents 42 percent of reportable lending and small farm lending represents 9 percent of total reportable lending. As such, small business and home mortgage lending carry the most weight under this performance criterion.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in appendix C for more granular facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Geographic distribution of home mortgage loans is **good**. RNA's home mortgage lending in the seven full scope AAs represent 66 percent of RNA's total home mortgage lending.

San Luis Obispo-Paso Robles-Arroyo Grande MSA

Geographic distribution of home mortgage loans in the San Luis Obispo AA is adequate. RNA's lending in low-income census tracts (0.6 percent) exceeds the percentage of owner-occupied housing units in low-income census tracts (0.3 percent) and is near to or equal to the 2016 HMDA aggregate's lending in low-income tracts (0.5 percent). RNA's lending in moderate-income census tracts (3.8 percent) is below the percentage of owner-occupied units in moderate-income tracts (5.6 percent) and is below the HMDA aggregate's lending results (6.8 percent). RNA's market share of loans in low-income census tracts (4.7 percent) exceeds its overall HMDA market share (1.9 percent) in 2016 and its market share of mortgage loans in moderate-income census tracts (1.2 percent) is slightly below its overall HMDA market share.

Salinas MSA

Geographic distribution of home mortgage loans in the Salinas AA is good based on its strong lending in low-income census tracts. RNA's lending in low-income census tracts (2.0 percent) exceeds the percentage of owner-occupied housing units in low-income tracts (1.8 percent) and exceeds the 2016 HMDA aggregate's lending results (1.2 percent). RNA's lending in moderate-income tracts (10.9 percent) is below the percentage of owner-occupied housing units in moderate-income tracts (16.1 percent) and the 2016 HMDA aggregate's lending results 14.4 percent). RNA's market share of loans in low-income census tracts (1.4 percent) exceeds its overall HMDA market share (0.5 percent) in 2016 and its market share of mortgage loans in moderate-income census tracts (0.6 percent) is comparable to its overall HMDA market share.

Santa Maria-Santa Barbara MSA

Geographic distribution of home mortgage loans in the Santa Maria-Santa Barbara AA is good. RNA's lending in the low-income census tracts (2.0 percent) is slightly below the percentage of owner-occupied housing units in low-income tracts (2.9 percent) and the 2016 HMDA aggregate's lending results (3.4 percent). RNA's lending in the moderate-income census tracts (26.8 percent) exceeds the percentage of owner-occupied housing units in moderate-income tracts (15.1 percent) and the 2016 HMDA aggregate's lending results (17.7 percent). RNA's market share of loans in low-income census tracts (0.6 percent) is below its overall HMDA market share (0.9 percent) in 2016 and its market share of mortgage loans in moderate-income census tracts (1.4 percent) exceeds its overall HMDA market share.

Oxnard-Thousand Oaks-Ventura MSA

Geographic distribution of home mortgage loans in the Oxnard AA is excellent. RNA's lending in low-income census tracts (3.5 percent) exceeds the percentage of owner-occupied housing units in low-income census tracts (1.9 percent) and exceeds the 2016 HMDA aggregate's lending in the low-income census tracts (2.0 percent). RNA's lending in the moderate-income census tract (19.7 percent) exceeds the percentage of owner-occupied housing units in moderate-income tracts (17.1 percent) and also exceeds the 2016 HDMA aggregate's lending results (15.2 percent).

Riverside-San Bernardino-Ontario MSA

Geographic distribution of home mortgages in the Riverside-San Bernardino-Ontario AA is excellent. RNA's lending in the low-income census tracts (8.1 percent) exceeds the percentage of owner-occupied housing units in low-income tracts (2.9 percent) and exceeds the 2016 HMDA aggregate's lending in low-income tracts (2.1 percent). RNA's lending in the moderate-income census tracts (26.1 percent) exceeds the percentage of owner-occupied housing units in moderate-income tracts (21.6 percent) and exceeds the 2016 HMDA aggregate's lending results (15.9 percent).

El Centro MSA

Geographic distribution of home mortgage loans in the El Centro AA is adequate given limited home ownership opportunities in moderate-income census tracts in the AA. The El Centro MSA has no low-income census tracts. For this reason, our analysis only focuses on moderate-income census tracts. RNA's lending in moderate-income census tracts (11.9 percent) is significantly below the percentage of owner-occupied housing units in moderate-income tracts (22.4 percent). However, according to the 2010 US Census, there are only approximately 6,000 owner-occupied units in the moderate-income tracts of the AA. RNA's lending is near to or equal to the 2016 HMDA aggregate's lending in moderate-income tracts (12.6 percent). RNA's market share of loans in moderate-income census tracts (0.2 percent) is below its overall HMDA market share (0.3 percent) in 2016.

Bakersfield MSA

Geographic distribution of home mortgage loans in the Bakersfield AA is adequate given limited homeownership opportunities in low-income census tracts. Although RNA's lending in low-income census tracts (0.6 percent) is significantly below the percentage of owner-occupied housing units in low-income tracts (2.0 percent), home mortgage lending opportunities are very limited in these areas. According to the 2010 US Census data, only 2 percent of housing units, approximately 3,000 units, in low-income census tracts are owner-occupied. RNA's lending in low-income census tracts is near to the 2016 HMDA aggregate's lending low-income census tracts (0.7 percent). RNA's moderate-income tract lending (12.4 percent) is significantly below the percentage of owner-occupied housing units in moderate-income tracts (23.3 percent) and is slightly below the 2016 HMDA aggregate's lending in moderate-income tracts (14.6 percent). However, RNA's market share of loans granted in moderate-income tracts (0.2 percent) is comparable to its overall HMDA market share (0.2 percent). RNA did not grant any mortgage loans in low-income census tracts in the AA in 2016.

Small Loans to Businesses

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Geographic distribution of small business loans is excellent. RNA's small business lending in the seven full scope AAs represent 70 percent of RNA's total small business lending.

San Luis Obispo-Paso Robles-Arroyo Grande MSA

Geographic distribution of small business loans in the San Luis Obispo AA is excellent. RNA's lending in low-income census tracts (1.6 percent) is slightly below the percentage of businesses in low-income census tracts (1.9 percent) and exceeds the 2015 small business aggregate's lending in low-income tracts (1.4 percent). RNA's lending in moderate-income census tracts (10.6 percent) is near to or equal to the percentage of businesses in moderate-income tracts (10.5 percent) and exceeds the 2015 small business aggregate's lending results (9.3 percent).

Salinas MSA

Geographic distribution of small business loans in the Salinas AA is adequate. RNA's lending in low-income census tracts (0.0 percent) is significantly below both the percentage of businesses in low-income tracts (1.4 percent) and the 2015 small business aggregate's lending results (1.2 percent). However, opportunities to lend in low-income census tracts are limited as only 1.4 percent of businesses operate in low-income census tracts. RNA's lending in moderate-income tracts (27.2 percent) exceeds both the percentage of businesses in moderate-income tracts (18.9 percent) and the 2015 small business aggregate's lending results (17.9 percent).

Santa Maria-Santa Barbara MSA

Geographic distribution of small business loans in the Santa Maria-Santa Barbara AA is good. RNA's lending in the low-income census tracts (9.8 percent) is below the percentage of businesses in low-income tracts (13.2 percent) and slightly below the 2015 small business aggregate's lending in low-income tracts (11.3 percent). RNA's lending in the moderate-income census tracts (31.3 percent) exceeds the percentage of businesses in moderate-income tracts (21.6 percent) and the 2015 small business aggregate's lending results (21.3 percent).

Oxnard-Thousand Oaks-Ventura MSA

Geographic distribution of small business loans in the Oxnard AA is excellent. RNA's lending in low-income census tracts (5.9 percent) exceeds both the percentage of businesses in low-income census tracts (3.4 percent) and the 2015 small business aggregate's lending in the low-income census tracts (3.0 percent). RNA's lending in the moderate-income census tract (30.7 percent) exceeds the percentage of small businesses in moderate-income tracts (18.8 percent) and also exceeds the 2015 small business aggregate's lending results (17.1 percent).

Riverside-San Bernardino-Ontario MSA

Geographic distribution of small business in the Riverside-San Bernardino-Ontario AA is excellent. RNA's lending in the low-income census tracts (6.9 percent) exceeds both the percentage of businesses in low-income tracts (4.4 percent) and the 2015 small business aggregate's lending in low-income tracts (3.3 percent). RNA's lending in the moderate-income census tracts (36.0 percent) exceeds the percentage of small businesses in moderate-income tracts (24.0 percent) and exceeds the 2015 small business aggregate's lending results (21.7 percent).

El Centro MSA

Geographic distribution of small business loans in the El Centro AA is good. The El Centro MSA does not have any low-income census tracts. RNA's lending in moderate-income census tracts (28.8 percent) is slightly below the percentage of businesses in moderate-income tracts (31.6 percent) and exceeds the 2015 small business aggregate's lending in moderate-income tracts (27.0 percent).

Bakersfield MSA

Geographic distribution of small business loans in the Bakersfield AA is good. RNA's lending in low-income census tracts (3.2 percent) is slightly below the percentage of businesses in low-income tracts (3.7 percent) and exceeds the 2015 small business aggregate's lending in low-income census tracts (2.9 percent). RNA's moderate-income tract lending (13.7 percent) is below the percentage of businesses in moderate-income tracts (20.6 percent) and slightly below the 2015 small business aggregate's lending in moderate-income tracts (19.0 percent).

Small Loans to Farms

Refer to Table 7 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Geographic distribution of small farm loans is **adequate**. RNA's small farm lending in the seven full scope AAs represent 45 percent of RNA's total small farm lending.

San Luis Obispo-Paso Robles-Arroyo Grande MSA

Geographic distribution of small farm loans in the San Luis Obispo AA is poor. RNA made 70 small farm loans totaling \$12.2 million in the AA during the evaluation period but none of the farm loans were in low- or moderate-income census tracts. Opportunities to lend in low-income census tracts are limited as only 0.5 percent of farms operate in low-income census tracts. While there appears to be more opportunities to lend in moderate-income census tracts (5.9 percent), the 2015 small farm aggregate's lending in moderate-income census tracts (1.8 percent) demonstrates that other lenders also have difficulties lending in moderate-income census tracts in this AA.

Salinas MSA

Geographic distribution of small farm loans in the Salinas AA is adequate. RNA's lending in low-income census tracts (0.0 percent) is significantly below the 2015 small farm aggregate's lending results in low-income tracts (0.7 percent). However, opportunities to lend in low-income census tracts are limited as only 0.7 percent of farms operate in low-income census tracts. RNA's lending in moderate-income tracts (14.6 percent) is near to both the percentage of farms in moderate-income tracts (15.3 percent) and the 2015 small farm aggregate's lending results (14.8 percent).

Santa Maria-Santa Barbara MSA

Geographic distribution of small farm loans in the Santa Maria-Santa Barbara AA is excellent. RNA's lending in the low-income census tracts (12.0 percent) exceeds the percentage of farms in low-income tracts (6.2 percent) and is near to or equal to the 2015 small farm aggregate's lending in low-income tracts (11.7 percent). RNA's lending in the moderate-income census tracts (18.5 percent) exceeds the percentage of farms in moderate-income tracts (15.8 percent) and the 2015 small farm aggregate's lending results (16.4 percent).

Oxnard-Thousand Oaks-Ventura MSA

Geographic distribution of small farm loans in the Oxnard AA is excellent, given the lending in low-income census tracts. RNA's lending in low-income census tracts (20.5 percent) exceeds both the percentage of farms in low-income census tracts (5.7 percent) and the 2015 small farm aggregate's lending in the low-income census tracts (8.0 percent). RNA's lending in the moderate-income census

tract (20.5 percent) slightly below the percentage of small farms in moderate-income tracts (23.8 percent) and exceeds the 2015 small farm aggregate's lending results (21.0 percent).

Riverside-San Bernardino-Ontario MSA

Geographic distribution of small farm loans in the Riverside-San Bernardino-Ontario AA is excellent. RNA's lending in the low-income census tracts (21.7 percent) exceeds both the percentage of farms in low-income tracts (4.1 percent) and the 2015 small farm aggregate's lending in low-income tracts (5.5 percent). RNA's lending in the moderate-income census tracts (39.1 percent) exceeds the percentage of small farms in moderate-income tracts (22.2 percent) and exceeds the 2015 small farm aggregate's lending results (16.5 percent).

El Centro MSA

Geographic distribution of small farm loans in the El Centro AA is very poor. The El Centro MSA does not have any low-income census tracts. RNA's lending in moderate-income census tracts (4.0 percent) is significantly below both the percentage of farms in moderate-income tracts (18.77 percent) and the 2015 small farm aggregate's lending in moderate-income tracts (20.5 percent). RNA is a top farm lender in this AA but only granted a few loans to farms in moderate-income census tracts.

Bakersfield MSA

Geographic distribution of small farm loans in the Bakersfield AA is adequate, given the performance in moderate-income census tracts. RNA's lending in low-income census tracts (0.0 percent) is significantly below the 2015 small farm aggregate's lending results (1.1 percent). However, opportunities to lend in low-income census tracts are limited as only 1.2 percent of farms operate in low-income census tracts. RNA's lending in moderate-income tracts (26.7 percent) is near to or equal to both the percentage of farms in moderate-income tracts (28.9 percent) and the 2015 small farm aggregate's lending results (28.6 percent).

Lending Gap Analysis

Data detailing RNA's lending activity over the evaluation period for home mortgage loans, small loans to businesses, and small loans to farms were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

We performed an analysis of the inside/outside ratio at the bank level. Information includes the bank's reportable loan originations and purchases only.

A substantial majority of loans are in the institution's assessment area. RNA originated 93 percent of the number of loans and 90 percent of dollar volume of loans within its assessment areas. The table below illustrates the bank's lending inside and outside of its AAs by reportable loan product.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	2,681	91.4	251	8.6	2,932	1,274,644	88.3	169,095	11.7	1,443,739
Small Business	2,921	96.1	117	3.9	3,038	581,995	93.6	39,811	6.4	621,806
Small Farm	856	87.3	124	12.7	980	229,322	87.5	32,831	12.5	262,153
Total	6,458	92.9	492	7.1	6,950	2,085,961	89.6	241,737	10.4	2,327,698

Source: Evaluation Period: 1/1/2014 - 12/31/2016 Bank Data
Due to rounding, totals may not equal 100.0

Distribution of Loans by Income Level of the Borrower

Overall borrower distribution of loans in the State of California is adequate. Home mortgage lending is good, and small business lending and small farm lending are adequate. In the full scope AAs, small business lending represents 49 percent of RNA's total reportable lending, home mortgage lending represents 42 percent of reportable lending and small farm lending represents 9 percent of total reportable lending. As such, small business and home mortgage lending carry the most weight under this performance criterion.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in appendix C for more granular facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution of home mortgage loans is **good**.

San Luis Obispo-Paso Robles-Arroyo Grande MSA

Distribution of home mortgage loans by borrower income in the San Luis Obispo AA is good. RNA's lending to low-income borrowers (3.1 percent) is significantly below the percentage of low-income families (19.8 percent) in the AA but exceeds the 2016 HMDA aggregate's lending to low-income borrowers (2.4 percent). RNA's market share of loans to low-income borrowers (2.6 percent) in 2016 exceeds its overall HMDA market share (1.9 percent) in the San Luis Obispo AA. RNA's lending to moderate-income borrowers (10.0 percent) is below the percentage of moderate-income families (18.2 percent) in the AA but exceeds the 2016 HMDA aggregate's lending results (8.2 percent). RNA's

market share of loans to moderate-income borrowers (2.2 percent) exceeds its overall HMDA market share.

Housing is expensive in this AA. In evaluating the bank's performance, we considered the high median housing price relative to the median family income and the challenges for LMI individuals to accumulate a down payment and afford monthly payment on a tradition mortgage. According to the US Census Bureau's (Census) 2012-2016 American Community Survey (ACS), the median value of owner-occupied housing units is \$471,800 and FFIEC Adjusted Median Family Income (MFI) for 2016 is \$76,400. LMI families earned at most 50 to 80 percent of MFI, or approximately \$38,200 to \$61,100, respectively. Given the high housing costs and impediments faced by LMI individuals, we placed more weight on aggregate lending comparisons over demographic comparisons.

Salinas MSA

Distribution of home mortgage loans by borrower income in the Salinas AA is adequate. RNA's lending to low-income borrowers (0.5 percent) is significantly below the percentage of low-income families (21.8 percent) in the AA. Given high housing values, homeownership opportunities are limited for low-income families in the AA and the HMDA aggregate's penetration of low-income families is also very low. Lending to low-income borrowers by the 2016 HMDA aggregate's lending distribution is 1.8 percent. RNA's lending to moderate-income borrowers (7.0 percent) is significantly below the percentage of moderate-income families in the AA (16.7 percent) but exceeds the 2016 HMDA aggregate's lending to moderate-income borrowers (5.8 percent). RNA's market share of loans to moderate-income borrowers (0.7 percent) in 2016 exceeds its overall HMDA market share (0.5 percent) in the Salinas AA.

Housing is expensive in this AA. In evaluating the bank's performance, we considered the high median housing price relative to the median family income and the challenges for LMI individuals to accumulate a down payment and afford monthly payment on a tradition mortgage. According to the 2012-2016 ACS, the median value of owner-occupied housing units is \$393,300 and FFIEC Adjusted Median Family Income for 2016 is \$63,500. LMI families earned at most 50 to 80 percent of MFI, or approximately \$31,800 to \$50,800, respectively. Given the high housing costs and impediments faced by LMI individuals, we placed more weight on aggregate lending comparisons over demographic comparisons.

Santa Maria-Santa Barbara MSA

Distribution of home mortgage loans by borrower income in the Santa Maria-Santa Barbara AA is excellent. RNA's lending to low-income borrowers (6.8 percent) is significantly below the percentage of low-income families (21.7 percent) in the AA but exceeds the 2016 HMDA aggregate's lending results (2.8 percent). RNA's market share of loans to low-income borrowers (3.0 percent) in 2016 exceeds its overall HMDA market share (0.9 percent) in the Santa Maria-Santa Barbara AA. RNA's lending to moderate-income borrowers (14.8 percent) is slightly below the percentage of moderate-

income families (17.8 percent). RNA's lending to moderate-income borrowers exceeds the 2016 HMDA aggregate's lending performance (10.6 percent). RNA's market share of loans to moderate-income borrowers (1.2 percent) exceeds its overall HMDA market share.

Housing is expensive in this AA. In evaluating the bank's performance, we considered the high median housing price relative to the median family income and the challenges for LMI individuals to accumulate a down payment and afford monthly payment on a tradition mortgage. According to the 2012-2016 ACS, the median value of owner-occupied housing units is \$480,000 and FFIEC Adjusted Median Family Income for 2016 is \$77,100. LMI families earned at most 50 to 80 percent of MFI, or approximately \$38,600 to \$61,700, respectively. Given the high housing costs and impediments faced by LMI individuals, we placed more weight on aggregate lending comparisons over demographic comparisons.

Oxnard-Thousand Oaks-Ventura MSA

Distribution of home mortgage loans by borrower income in the Oxnard AA is excellent. RNA's low-income borrower distribution (8.7 percent) is significantly below the percentage of low-income families in the AA (21.4 percent). RNA's low-income borrower distribution exceeds the 2016 HMDA aggregate's lending to low-income borrowers (2.8 percent). RNA's market share of loans to low-income borrowers (0.7 percent) in 2016 exceeds its overall HMDA market share (0.2 percent) in the Oxnard AA. RNA's moderate-income borrower distribution (15.0 percent) is slightly below the percentage of moderate-income families (17.4 percent) in the AA and exceeds the 2016 HMDA aggregate's lending to moderate-income borrowers (10.7 percent). RNA's market share of loans to moderate-income borrowers (0.3 percent) is near to or equal to its overall HMDA market share.

Housing is expensive in this AA. In evaluating the bank's performance, we considered the high median housing price relative to the median family income and the challenges for LMI individuals to accumulate a down payment and afford monthly payment on a tradition mortgage. According to the 2012-2016 ACS, the median value of owner-occupied housing units is \$481,400 and FFIEC Adjusted Median Family Income for 2016 is \$88,300. LMI families earned at most 50 to 80 percent of MFI, or approximately \$44,200 to \$70,600, respectively. Given the high housing costs and impediments faced by LMI individuals, we placed more weight on aggregate lending comparisons over demographic comparisons.

Riverside-San Bernardino-Ontario MSA

Distribution of home mortgage loans by borrower income in the Riverside AA is adequate. RNA's low-income borrower distribution (1.8 percent) is significantly below the percentage of low-income families (21.8 percent) in the AA. However, homeownership opportunities for low-income families are limited and RNA's results are slightly below the 2016 HMDA aggregate's lending to low-income borrowers (2.2 percent). RNA's lending distribution to moderate-income borrowers (10.8 percent) is well below the percentage of moderate-income families (17.5 percent) in the AA but exceeds the 2016 HMDA

aggregate's lending to moderate-income borrowers (9.5 percent). RNA's market share of loans to moderate-income borrowers (0.01 percent) is equal to its overall HMDA market share (0.01 percent).

Housing is moderately expensive in this AA. In evaluating the bank's performance, we considered the high median housing price relative to the median family income and the challenges for LMI individuals to accumulate a down payment and afford monthly payment on a tradition mortgage. According to the 2012-2016 ACS, the median value of owner-occupied housing units is \$276,300 in Riverside County and \$256,000 in San Bernardino County and FFIEC Adjusted Median Family Income for 2016 is \$61,400. LMI families earned at most 50 to 80 percent of MFI, or approximately \$30,700 to \$49,100, respectively. Given the high housing costs and impediments faced by LMI individuals, we placed more weight on aggregate lending comparisons over demographic comparisons.

El Centro MSA

Distribution of home mortgage loans by borrower income in the El Centro AA is good. RNA's lending to low-income borrowers (4.8 percent) is well below percentage of low-income families (24.4 percent) in the AA but exceeds the 2016 HMDA aggregate's lending to low-income borrowers (1.8 percent). RNA's moderate-income borrower distribution (9.5 percent) is well below the percentage of moderate-income families (17.0 percent) in the AA but exceeds the 2016 HMDA aggregate's lending to moderate-income borrowers (8.0 percent). RNA's market share of loans to moderate-income borrowers (0.6 percent) exceeds its overall 2016 HMDA market share (0.3 percent).

Housing is generally affordable in this AA. In evaluating the bank's performance, we considered the median housing price relative to the median family income and the challenges for LMI individuals to accumulate a down payment and afford monthly payment on a tradition mortgage. According to the 2012-2016 ACS, the median value of owner-occupied housing units is \$159,000 and FFIEC Adjusted Median Family Income for 2016 is \$48,400. LMI families earned at most 50 to 80 percent of MFI, or approximately \$24,200 to \$38,700, respectively. Given challenges for accumulating down payment and building wealth for LMI individuals, we placed more weight on aggregate lending comparisons over demographic comparisons.

Bakersfield MSA

Distribution of home mortgage loans by borrower income in the Bakersfield AA is poor. RNA's lending to low-income borrowers (2.2 percent) is significantly below the percentage of low-income families (23.0 percent) in the AA. RNA's lending to low-income borrowers is slightly below the 2016 HMDA aggregate's lending to low-income borrowers (2.6 percent). RNA's market share of loans to low-income borrowers (0.6 percent) in 2016 exceeds its overall HMDA market share (0.2 percent) in the Bakersfield AA. RNA's lending to moderate-income borrowers (2.8 percent) is significantly below both the percentage of low-income families (17.2 percent) in the AA and the 2016 HMDA aggregate's lending to moderate-income borrowers (9.5 percent). RNA's market share of loans to moderate-income borrowers (0.1 percent) is significantly below its overall HMDA market share.

Small Loans to Businesses

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Borrower distribution of small business loans is **adequate**. RNA's small business lending in the seven full scope AAs represent 70 percent of RNA's total small business lending.

San Luis Obispo-Paso Robles-Arroyo Grande MSA

Distribution of small business loans to businesses in different sizes in the San Luis Obispo AA is adequate. RNA's lending to small businesses (49.6 percent) is below the percentage of small businesses (87.4 percent) in the AA and is slightly below the 2015 small business aggregate's lending to small businesses (54.9 percent). RNA's market share of small loans to small businesses (1.2 percent) is slightly below its overall small business loan market share (1.5 percent).

Salinas MSA

Distribution of small business loans to businesses in different sizes in the Salinas AA is adequate. RNA's lending to small businesses (16.4 percent) is below the percentage of small businesses (82.8 percent) in the AA and is slightly below the 2015 small business aggregate's lending to small businesses (35.3 percent). RNA's market share of small loans to small businesses (1.1 percent) is slightly below to its overall small business loan market share (1.2 percent).

Santa Maria-Santa Barbara MSA

Distribution of small business loans to businesses in different sizes in the Santa Maria-Santa Barbara AA is adequate. RNA's lending to small businesses (45.6 percent) is well below the percentage of small businesses (84.7 percent) in the AA and is slightly below the 2015 small business aggregate's lending to small businesses (53.0 percent). RNA's market share of small loans to small businesses (0.8 percent) is slightly below to its overall small business loan market share (0.9 percent).

Oxnard-Thousand Oaks-Ventura MSA

Distribution of small business loans to businesses in different sizes in the Oxnard AA is adequate. RNA's lending to small businesses (48.5 percent) is well below the percentage of small businesses (86.6 percent) and slightly below the 2015 small business aggregate's lending to small businesses (54.7 percent). RNA's market share of small loans to small businesses (0.4 percent) is slightly below to its overall small business loan market share (0.5 percent).

Riverside-San Bernardino-Ontario MSA

Distribution of small business loans to businesses in different sizes in the Riverside-San Bernardino-Ontario AA is adequate. RNA's lending to small businesses (41.3 percent) is well below the percentage

of small businesses (86.1 percent) in the AA and below the 2015 small business aggregate's lending to small businesses (54.6 percent). RNA's market share of small loans to small businesses (0.1 percent) is equal to its overall small business loan market share (0.1 percent).

El Centro MSA

Distribution of small business loans to businesses in different sizes in the El Centro AA is adequate. RNA's lending to small businesses (47.4 percent) is well below the percentage of small businesses (76.3 percent) in the AA and below the 2015 small business aggregate's lending to small businesses (27.3 percent). RNA's market share of small loans to small businesses (2.6 percent) exceeds its overall small business loan market share (2.4 percent).

Bakersfield MSA

Distribution of small business loans to businesses in different sizes in the Bakersfield AA is poor. RNA's lending to small businesses (33.3 percent) is well below both the percentage of small businesses (88.2 percent) and the 2015 small business aggregate's lending to small businesses (44 percent). RNA's market share of small loans to small businesses (0.3 percent) is significantly below its overall small business loan market share (0.7 percent).

Small Loans to Farms

Refer to Table 12 in the appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

Borrower distribution of small farm loans is adequate. RNA's small farm lending in the seven full scope AAs represent 45 percent of RNA's total small farm lending.

San Luis Obispo-Paso Robles-Arroyo Grande MSA

Distribution of small farm loans to farms in different sizes in the San Luis Obispo AA is good. RNA's lending to small farms (65.7 percent) is below the percentage of small farms (94.3 percent) in the AA but exceeds the 2015 small farm aggregate's lending to small farms (55.9 percent). RNA's market share of small loans to small farms (17.2 percent) exceeds its overall small farm loan market share (13.1 percent).

Salinas MSA

Distribution of small farm loans to farms in different sizes in the Salinas AA is very poor. RNA's lending to small farms (16.4 percent) is significantly below the percentage of small farms (82.8 percent) in the AA and is slightly below the 2015 small farm aggregate's lending to small farms (55.4 percent). RNA's market share of small loans to small farms (7.0 percent) is significantly below to its overall small farm loan market share (14.0 percent). Out of 16 small farm reporters, only five granted loans to small farms with Wells Fargo and Bank of America achieving nearly 80 percent of small farm loans to small farms.

Santa Maria-Santa Barbara MSA

Distribution of small farm loans to farms in different sizes in the Santa Maria-Santa Barbara AA is excellent. RNA's lending to small farms (57.6 percent) is well below the percentage of small farms (89.7 percent) in the AA but exceeds the 2015 small farm aggregate's lending to small farms (46.1 percent). RNA ranked second behind Wells Fargo for both making small farm loans and for lending to small farm borrowers in 2015. RNA's market share of small loans to small farms (21.7 percent) exceeds its overall small farm loan market share (18.1 percent).

Given RNA's strong market share of small farm loans in 2015 and stronger market share of small farm loans to small farm borrowers, we placed more weight on the bank's aggregate and market share comparators than the demographic comparators.

Oxnard-Thousand Oaks-Ventura MSA

Distribution of small farm loans to farms in different sizes in the Oxnard AA is adequate. RNA's lending to small farms (41.0 percent) is significantly below the percentage of small farms (90.3 percent) but is near to or equal to the 2015 small farm aggregate's lending to small farms (39.2 percent). RNA's market share of small loans to small farms (6.9 percent) exceeds its overall small farm loan market share (5.0 percent).

Riverside-San Bernardino-Ontario MSA

Distribution of small farm loans to farms in different sizes in the Riverside-San Bernardino-Ontario AA is adequate. RNA's lending to small farms (43.5 percent) is significantly below the percentage of small farms (93.3 percent) in the AA and is below the 2015 small farm aggregate's lending to small farms (57.2 percent). RNA's market share of small loans to small farms (3.6 percent) exceeds its overall small farm loan market share (2.9 percent).

El Centro MSA

Distribution of small farm loans to farms in different sizes in the El Centro AA is adequate. RNA's lending to small farms (41.1 percent) is below the percentage of small farms (76.0 percent) in the AA and below the 2015 small farm aggregate's lending to small farms (51.4 percent). However, RNA is the top small farm lender for both making small farm loans and for lending to small farm borrowers in 2015. RNA is one of only four small farm lenders in 2015 making small farm loans to small farm borrowers in the AA. RNA lent \$2.2 million to small farm borrowers and this volume is four times more than the second top lender (Wells Fargo, NA). RNA's market share of small loans to small farms (46.2 percent) exceeds its overall small farm loan market share (30.1 percent).

Given RNA's strong market share of small farm loans in 2015 and stronger market share of small farm loans to small farm borrowers, we placed more weight on the bank's market share comparators than the demographic comparators.

Bakersfield MSA

Distribution of small farm loans to farms in different sizes in the Bakersfield AA is poor. RNA's lending to small farms (25.4 percent) is significantly below both the percentage of small farms (84.6 percent) and the 2015 small farm aggregate's lending to small farms (51.5 percent). RNA's market share of small loans to small farms (7.3 percent) exceeds its overall small farm loan market share (5.2 percent).

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

RNA provides a relatively high level of community development loans in the State of California and this activity positively impacts the bank's lending test performance. RNA funded 32 CD loans totaling \$194.5 million in its full-scope AAs and 24 CD loans totaling \$99.3 million in its limited-scope AAs. RNA also funded two CD loans for affordable housing totaling \$4.0 million serving a broader statewide or regional area that included the bank's AAs. RNAs CDs loans predominately served affordable housing needs but also promoted economic development/small business development. Further details on the CD loans are listed below for the full-scope AAs.

San Luis Obispo-Paso Robles-Arroyo Grande MSA

RNA's community development lending has a positive impact on the bank's lending performance. RNA originated three CD loans totaling \$23.5 million. All of the loans were for the construction of affordable housing for low- and moderate-income individuals, creating approximately 170 affordable housing units. Affordable housing is an identified and critical need within the AA.

Salinas MSA

RNA's community development lending has a positive impact on the bank's lending performance. RNA originated four CD loans totaling \$42.6 million. RNA's CD lending included two constructions loans totaling \$38.3 million for the development of 104 affordable housing units for low- and moderate-income individuals and three loans totaling \$4.2 million for economic development. Affordable housing is an identified and critical need within the AA. Small business loans and business education are also needs of the community.

Santa Maria-Santa Barbara MSA

RNA's community development lending has a positive impact on the bank's lending performance. RNA originated five CD loans totaling \$21.0 million. RNA's CD lending included four loans totaling \$18.0 million for the construction of 166 affordable housing units for low- and moderate-income individuals and a \$3.0 million revolving line of credit for general operating expenses of an affordable housing developer. Affordable housing is an identified and critical need within the AA.

Oxnard-Thousand Oaks-Ventura MSA

RNA's community development lending has a positive impact on the bank's lending performance. RNA originated ten CD loans totaling \$37.6 million. RNA's CD loans included four loans totaling \$25.5 million providing 177 units of affordable housing for low- and moderate-income individuals and six loans totaling \$12.1 million for economic development. Affordable housing is an identified and critical need within the AA.

Riverside-San Bernardino-Ontario MSA

RNA's community development lending has a positive impact on the bank's lending performance. RNA originated four CD loans totaling \$23.4 million. RNA's CD lending included two loans totaling \$20.7 million for the construction or preservation of affordable housing for low- and moderate-income individuals and two loans totaling \$2.7 million for economic development. Affordable housing is an identified and critical need within the AA. Small business financing and business education are also needs of the community.

El Centro MSA

RNA's community development lending has a neutral impact on the bank's lending performance. RNA originated two CD loans totaling \$18.2 million. Both loans were for the construction of 104 affordable housing units for low- and moderate-income individuals.

Bakersfield MSA

RNA's community development lending has a positive impact on the bank's lending performance. RNA originated three CD loans totaling \$28.2 million. The three loans were for the construction of 181 affordable housing units for low- and moderate-income individuals. Affordable housing is an identified and critical need within the AA.

Product Innovation and Flexibility

HomeReady mortgage. RNA began offering Fannie Mae's HomeReady mortgage product in 2016. This product is an affordable, low down payment mortgage program designed for creditworthy low- and moderate-income borrowers, with expanded eligibility for financing homes in low-income communities.

Small Business Administration ("SBA") 7A and 504 Loan Programs. RNA is as a Preferred Lender by the SBA, which allows the bank to make direct credit decisions on SBA loans without having to submit the application for agency approval.

- Under the 7A Program, the bank funds working capital, equipment purchases, and inventory financing needs of small businesses. These loans demonstrate the bank's flexible underwriting as borrowers generally do not qualify under traditional underwriting criteria. The SBA guarantee mitigates the credit risk of these loans and helps the bank meet the credit needs of its communities.

- The SBA 504 Program provides growing businesses with fixed asset financing for the acquisition of existing buildings and improvements, new building construction, and the purchase of machinery and equipment with a useful life of at least 10 years. This program is advantageous to small businesses in that it offers long-term maturities of up to 25 years resulting in reduced debt service and low down payment, usually 10 percent, which preserves cash in the business.

While neither of the SBA loan programs are particularly innovative, nor are they unique to RNA, these programs do provide flexible underwriting criteria that benefit small businesses that would not otherwise qualify under normal guidelines for conventional business loans.

Federal Home Loan Bank (“FHLB”) Affordable Housing Program. As a member of the FHLB, RNA is able to apply for subsidized financing for affordable housing projects on behalf of community development organizations. The goal of the Affordable Housing Program (“AHP”) is to subsidize financing of home ownership for households with income at or below 80 percent of the area median income, and rental housing in which at least 20 percent of the units are households with incomes that do not exceed 50 percent of the area median income. Under this program during the assessment period, RNA was awarded and able to utilize subsidized financing totaling over \$4 million for the financing of five projects. These projects created 297 units of affordable housing (86 units in the El Centro MSA, 56 units in the Fresno MSA, 20 units in the Riverside-San Bernardino-Ontario MSA, and 135 units in the San Jose-Sunnyvale-Santa Clara MSA).

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the lending test in the Chico MSA, Fresno MSA, Merced MSA, Fresno MSA, Santa Cruz-Watsonville MSA, Stockton-Lodi MSA, Yuba City MSA, and non-MSA AAs is not inconsistent with the bank’s overall high satisfactory performance under the lending test. In the San Jose-Sunnyvale-Santa Clara MSA, Santa Rosa MSA, Visalia-Porterville MSA, Modesto MSA, Placer and Sacramento Counties AA, and Hanford-Corcoran MSA, the bank’s performance is weaker than the overall performance. The AAs with weaker performance do not negatively impact the overall lending test rating. The AA with weaker performance represent 8.5 percent of total retail deposits and three of those AAs (with 5.1 percent of retail deposits) demonstrated adequate performance. The AAs with poorer performance represent less than 4.0 percent of retail deposits. Refer to Tables 1 through 13 in appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

RNA’s performance under the Investment Test is rated “Outstanding.” Based on full-scope reviews, the bank’s performance in the Oxnard-Thousand Oaks-Ventura MSA, and Riverside-San Bernardino-Ontario MSA is excellent. In the El Centro MSA, San Luis Obispo-Paso Robles-Arroyo Grande MSA,

and Santa Maria-Santa Barbara MSA, the bank's performance is good. In the Salinas MSA, and the Bakersfield MSA, the bank's performance is adequate. We also considered investments across California that includes the assessment areas and these investments have a significantly positive impact on overall Investment Test conclusions.

RNA made a significant level of qualified investments, particularly those that are not routinely provided by private investors. RNA was occasionally in a leadership position when making CD investments. RNA makes extensive use of complex investments to serve CD needs of statewide areas that include the bank's AAs. RNA demonstrated a good responsiveness to credit and community development needs. In the full scope AAs during the evaluation period, qualified investments and donations totaled \$56.4 million, which represents 4.9 percent of tier one capital. Direct investments in all AAs totaling, \$90.7 million represent 6.0 percent of tier one capital. Direct investments in the AAs plus qualifying broader statewide and regional investments of \$59.1 million represent 10.0 percent of tier one capital.

Qualified investments have been responsive to community needs and focused on affordable housing and small business, and small farm assistance. Donations provided community services to low- and moderate-income individuals and supported economic development. Additionally, the bank has a significant volume of unfunded commitments which were also considered in arriving at the overall Investment Test conclusion.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

San Luis Obispo-Paso Robles-Arroyo Grande MSA

RNA has a significant volume of qualified investments, including grants and donations, with characteristics that exhibit good responsiveness to the credit and CD needs in the San Luis Obispo AA. Qualified investments include \$2.7 million in current period advances and \$3.4 million in unfunded commitments to invest. Investments benefiting the San Luis Obispo AA during the evaluation period represented 2.3 percent of allocated tier 1 capital. Investments are responsive and reflect a low level of complexity. While the dollar volume is adequate, given the limited opportunities for CD investments, RNA investment of \$4 million in a tax credit fund aimed at construction of 30-unit apartment building aimed at low- and moderate-income individuals is especially impactful. Affordable housing is a need in this AA and RNA's investments addresses this need.

Salinas MSA

RNA makes an adequate volume of qualified investments, including grants and donations, with characteristics that exhibit good responsiveness to the credit and CD needs in the Salinas AA. Qualified investments include \$6.6 million in current and outstanding prior period advances. We considered the numerous investment opportunities within the AA as well as state and regional areas against the bank's capacity to address credit needs. Investments benefiting the Salinas AA during the evaluation period

represented 2.8 percent of allocated tier 1 capital. Investments are responsive and reflect a low level of complexity.

Santa Maria-Santa Barbara MSA

RNA makes a significant volume of qualified investments, including grants and donations, with characteristics that exhibit good responsiveness to the credit and CD needs in the Santa Maria-Santa Barbara AA. Qualified investments include \$574 thousand in current period advances and \$4.0 million in commitments to invest. We considered the numerous investment opportunities within the AA as well as state and regional areas against the bank's capacity to address credit needs. One significant investment is the binding commitment to invest in a LIHTC fund totaling \$4 million that focuses on the development of houses for individuals earning 30 to 60 percent of the Area Median Income. Investments benefiting the Santa Maria AA during the evaluation period represented 2.0 percent of allocated tier 1 capital. Investments are responsive and reflect a low level of complexity.

Oxnard-Thousand Oaks-Ventura MSA

RNA makes an excellent volume of qualified investments, including grants and donations, with characteristics that exhibit good responsiveness to the credit and CD needs in the Oxnard AA. Qualified investments include \$10.1 million in current and outstanding prior period advances and \$6.0 million in commitments to invest. We considered the investment opportunities within the AA as well as state and regional areas against the bank's capacity to address credit needs. Investments benefiting the Oxnard AA during the evaluation period represented 10.3 percent of allocated tier 1 capital. Investments are responsive and reflect a moderate to high level of complexity. RNA purchased \$15 million in mortgage revenue bonds for the provision of financing to an entity engaged in affordable housing development.

Riverside-San Bernardino-Ontario MSA

RNA makes an excellent volume of qualified investments, including grants and donations, with characteristics that exhibit good responsiveness to the credit and CD needs in the Riverside-San Bernardino AA. Qualified investments include \$7.2 million in current and outstanding prior period advances and \$2.5 million in commitments to invest. Investments benefiting the Riverside-San Bernardino AA during the evaluation period represented 9.7 percent of allocated tier 1 capital. Investments are responsive and reflect a moderate level of complexity. RNA originated a \$3 million EQ2 investment in a local preservation equity fund that focuses on affordable housing with proceeds directed projects in the Riverside-San Bernardino AA.

El Centro MSA

RNA makes a significant volume of qualified investments, including grants and donations, with characteristics that exhibit good responsiveness to the credit and CD needs in the El Centro AA. Qualified investments include \$10.7 million in current and outstanding prior period investments and

\$515 thousand in commitments to invest. We considered the numerous investment opportunities within the AA as well as state and regional areas against the bank's capacity to address credit needs.

Investments benefiting the El Centro AA during the evaluation period represented 11.7 percent of allocated tier 1 capital. Investments are responsive and reflect a low level of complexity. RNA made an investment in a limited partnership to acquire partnership interest in other limited partnerships developing affordable housing projects. The investment will acquire an interest in a 72-unit project in Brawley (Imperial County).

Bakersfield MSA

RNA makes an adequate volume of qualified investments, including grants and donations, with characteristics that exhibit good responsiveness to the credit and CD needs in the Bakersfield AA. Qualified investments include \$2.1 million in current period investments. We considered the investment opportunities within the AA as well as state and regional areas against the bank's capacity to address credit needs. Investments benefiting the Bakersfield AA during the evaluation represented 2.7 percent of allocated tier 1 capital. Investments are responsive and reflect a moderate level of complexity. RNA holds \$2 million in preferred shares of a public traded company that designates funds to specifically named multifamily housing complexes that serve low- and moderate-income individuals.

Regional or Statewide

RNA satisfactorily provides qualified investments within its combined AAs. As such, we considered RNA's investments in statewide and regional initiatives that included the bank's AAs in meeting credit needs in this evaluation. RNA made several statewide qualified investments totaling \$45.8 million in current and outstanding prior period advances and has \$13.3 million in binding commitments to invest in statewide and regional funds that have a purpose, mandate or function that serves one or more of the bank's AAs. One prior period statewide investment that serves one or more of the bank's AAs with a book value of \$2.6 million remained outstanding through the evaluation period. Statewide investments involved LIHTCs that helped fund the development of affordable housing units in Santa Barbara, Riverside, Placer and other counties across California.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, RNA's performance under the Investment Test in the Chico MSA, Fresno MSA, Hanford-Corcoran MSA, Merced MSA, Modesto MSA, Placer and Sacramento Counties AA, San Jose-Sunnyvale-Santa Clara MSA, Santa Rosa MSA, and Yuba City MSA is consistent with the bank's overall "High Satisfactory" performance. In the Napa MSA, Santa Cruz-Watsonville MSA, non-MSA AAs, Stockton-Lodi MSA, and Visalia-Porterville MSA, performance is weaker than the bank's overall performance. The AAs with weaker performance do not negatively impact the overall investment test rating. The AAs with weaker performance represent 9.0 percent of total retail deposits and three of those AAs (with 5.6 percent of retail deposits) demonstrated adequate performance. The AAs with poorer performance represent less than 4.0 percent of retail deposits.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the San Luis Obispo-Paso Robles-Arroyo Grande MSA, Salinas MSA, Santa Maria-Santa Barbara MSA, Oxnard-Thousand Oaks-Ventura MSA, El Centro MSA, and Bakersfield MSA is good. In the Riverside-San Bernardino-Ontario MSA, the bank's performance is adequate.

Retail Banking Services

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

RNA's delivery systems are readily accessible to all portions of the bank's assessment areas. Two upper-income branches were opened during the assessment period and ten branches were closed or relocated. The closures included one low-income branch, four moderate-income branches, two middle-income branches, and three upper-income branches. RNA also sold one upper-income branch to another financial institution. Although the bank closed five low- and moderate-income branches during the evaluation period, RNA maintains strong branch distributions in the AAs impacted by those closures. The majority of RNA branches maintain the same hours of operation and reasonable explanation for the few branches with differing hours. The availability of products and services and access to alternative delivery systems do not vary by branch.

Alternative Delivery Systems

RNA's delivery systems, including alternative delivery systems, is good. RNA's delivery systems include 101 full service branches; 115 automated teller machines (ATM), including 16 off-site ATMs; telephone banking; online banking and mobile banking for personal and business customers; and banking by mail. RNA participates in the Cirrus and Plus ATM Networks, which provide access to millions of ATMs worldwide. RNA also offers a number of Spanish language options to its customers.

RNA did not maintain specific information to determine the value and effectiveness of its alternative delivery systems to low- and moderate-income individuals and the off-site ATMs serve as cash dispensers only and are not considered an effective means of delivering services. As such, little weight is given to the bank's alternative delivery systems in concluding on the bank's retail services performance.

Positive consideration is given to RNA's participation in the California Electronic Benefit Transfer (EBT) system. EBT is used for the delivery, redemption, and reconciliation of issued public assistance benefits, such as CalFresh benefits (formerly known as Food Stamps and currently known federally as Supplemental Nutrition Assistance Program or SNAP benefits), California Food Assistance Program

benefits, and cash aid benefits. RNA ATMs provide access to these government benefits free of ATM fees. This service is a tremendous benefit to low- and moderate-income individuals as many ATMs allow benefit transfers but impose a fee ranging from \$0.25 to \$5, or an average fee of \$2.53. During the evaluation period, 205,704 separate transactions were made at RNA ATMs to withdraw a total of \$54.3 million in EBT benefits. The bank waived \$617,112 in ATM fees to provide this service.

Reasonableness of Services and Hours of Operations

Branch services and hours do not vary in a way that would inconvenience certain portions of the AAs, particularly LMI individuals or geographies. RNA offers a variety of financial services through its branch network designed to meet the various deposit and credit needs of its AAs. Deposit services include checking and savings accounts, certificates of deposit, ATM services, and individual retirement accounts. RNA branches are open each weekday, with the majority of branches maintaining the same hours of operation. Three branches maintained slightly varied hours of operations, of which two are due to Walmart in-store locations. The bank's retail banking services are further discussed by AA below.

Branch Network

San Luis Obispo-Paso Robles-Arroyo Grande MSA

Distribution of Branches

RNA's distribution of branches is excellent and is readily accessible to geographies and individuals of different income levels. RNA operates 14 branch offices each with a full service onsite ATM. As of 2017 updated income data, there are no low-income census tracts in the AA. For context, however, RNA's Morro Bay branch was previously located in the only low-income tract in the AA and now the tract is designated as moderate-income. The proportion of branches in moderate-income census tracts is excellent with the proportion of branches in moderate-income census tracts exceeding the percentage of the population in these tracts.

Record of Opening and Closing Branches

RNA's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income families. RNA closed one branch in a middle-income geography and one branch in an upper-income geography.

Branch Hours and Services

Business hours and services are reasonable and do not vary in a way that inconveniences certain portion of the bank's assessment area, particularly low- and moderate-income geographies and individuals. Branch lobby hours are open Monday-Thursday 9AM-5PM and Friday 9AM-6PM. Drive-up/walkup hours are offered in all but two locations (middle- and upper-income geographies). Business hours and services are reasonable and do not vary in a way that inconveniences certain portion of the bank's assessment area, particularly low- and moderate-income geographies and/or individuals.

Salinas MSA*Distribution of Branches*

RNA's distribution of branches is excellent. RNA operates nine branch offices each with a full service onsite ATM. The bank also operates three offsite ATMs, one each in low-, moderate-, and middle-income geographies. The proportion of branches in LMI census tracts is excellent with the proportion of AA branches exceeding the percentage of population in LMI tracts.

Record of Opening and Closing Branches

RNA's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income families. While RNA closed one branch in a moderate-income tract, the bank continues to operate five branches in moderate-income tracts.

Branch Hours and Services

Branch lobby hours are open Monday-Thursday 9AM-5PM and Friday 9AM-6PM. One branch offers drive-up/walk-up hours. Business hours and services are reasonable and do not vary in a way that inconveniences any portion of the bank's assessment area or any group of individuals.

Santa Maria-Santa Barbara MSA*Distribution of Branches*

RNA's distribution of branches is excellent. RNA operates 14 branch offices each with a full service onsite ATM and the bank also operates one offsite ATM in a middle-income geography. The proportion of branches in both low- and moderate-income census tracts exceeds the percentage of the population residing in these tracts.

Record of Opening and Closing Branches

RNA's record of opening and closing branches has generally not adversely affected the accessibility of delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income families. The bank relocated one low-income branch to an upper-income census tract. RNA also closed three branches, one each in moderate-, middle-, and upper-income census tracts. While RNA closed one branch in each of a low- and a moderate-income tract, the bank continues to operate seven branches in low- or moderate-income tracts.

Branch Hours and Services

Branch lobby hours are generally Monday-Thursday 9AM-5PM and Friday 9AM-6PM. One branch is open 9AM-5 PM Monday-Friday. Drive-up/walkup hours are offered ten locations, including moderate-, middle-, and upper-income geographies. Business hours and services are reasonable and do not vary in a way that would inconvenience any portion of the bank's assessment area or any group of individuals.

Oxnard-Thousand Oaks-Ventura MSA*Distribution of Branches*

RNA's distribution of branches is excellent. RNA operates ten branch offices each with a full service onsite ATM. The bank also operates two offsite ATMs, one each is located in a moderate- and upper-income geography. The proportion of branches in both low- and moderate-income census tracts exceeds the percentage of the population residing in these tracts.

Record of Opening and Closing Branches

RNA's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income families. RNA opened one branch in an upper-income census tract and closed one upper income branch.

Branch Hours and Services

Branch lobby hours are Monday-Thursday 9AM-5PM and Friday 9AM-6PM. Drive-up/walk-up hours are offered at five locations, including geographies in all income-level categories. Business hours and services are reasonable and do not vary in a way that would inconvenience any portion of the bank's assessment area or any group of individuals.

Riverside-San Bernardino-Ontario MSA*Distribution of Branches*

RNA's distribution of branches is adequate. RNA operates eight branch offices and all but one branch maintain a full service onsite ATM. The bank also operates two offsite ATMs in a moderate- and upper-income geography. The proportion of branches in low-income census tracts is adequate. While the bank does not operate any branches in low-income tracts, less than six percent of the population resides in low-income tracts. The proportion of branches in moderate-income census tracts is excellent with the proportion of AA branches exceeding the percentage of the population in moderate-income tracts.

Record of Opening and Closing Branches

RNA's record of opening and closing branches has generally not adversely affected the accessibility of delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income families. RNA closed one moderate-income branch and sold an upper-income branch to another bank. While RNA closed one branch in a moderate-income tract, the bank continues to operate four branches in moderate-income tracts.

Branch Hours and Services

Branch lobby hours are 9AM-5PM Monday-Thursday and 9AM-6PM Friday for seven branches and 10AM-3PM Monday-Friday for one middle-income branch. Drive-up/walk-up hours are offered at only one location, in a moderate-income geography. Business hours and services are reasonable and do not vary in a way that would inconvenience any portion of the bank's assessment area or any group of individuals.

El Centro MSA*Distribution of Branches*

RNA's distribution of branches is excellent. RNA operates five branch offices each with a full service onsite ATM and three offsite ATMs in middle- and upper-income geographies. The proportion of branches in moderate-income census tracts is excellent with the proportion of branches in moderate-income census tracts comparable to the percentage of the population in moderate-income tracts. There are no low-income census tracts in the AA.

Record of Opening and Closing Branches

RNA's record of opening and closing branches has generally not adversely affected the accessibility of delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income families. While RNA closed one branch in a moderate-income tract, the bank continues to operate two branches in moderate-income tracts and branch distribution remains excellent.

Branch Hours and Services

Branch lobby hours are 9AM-5PM Monday-Thursday and 9AM-6PM Friday for three branches and 10AM-7PM Monday-Friday for two branches. Drive-up/walk-up hours are offered at three branches, including both moderate-income geographies. Business hours and services are reasonable and do not vary in a way that would inconvenience any portion of the bank's assessment area or any group of individuals.

Bakersfield MSA*Distribution of Branches*

RNA's distribution of branches is good. RNA operates five branch offices each with a full service onsite ATM. The bank also operates two offsite ATMs in a moderate- and upper-income geography. The bank does not operate any branches in low-income tracts. As of the 2010 Census, less than four percent of the population resides in low-income tracts. For context, however, the 2015 5-Year American Community Survey updated the demographic data as of 2017 and now reflects that nearly ten percent of the AA's population resides in low-income tracts. The proportion of branches in moderate-income census tracts is excellent with the proportion of AA branches exceeding the percentage of the population in moderate-income tracts.

Record of Opening and Closing Branches

The bank did not open or close any branches in the AA.

Branch Hours and Services

Branch lobby hours are Monday-Thursday 9AM-5PM and Friday 9AM-6PM. Drive-up/walk-up hours are offered at only one location in an upper-income geography. Business hours and services are reasonable and do not vary in a way that would inconvenience any portion of the bank's assessment area or any group of individuals.

Community Development Services

A community development (CD) service is defined by the CRA regulation as a financial-related service targeted to low- and moderate-income individuals or other activities that serve to promote economic development for small businesses and small farms.

RNA provides a relatively high level of CD services that benefit organizations within the assessment areas during the evaluation period. Officers and employees of RNA are involved in numerous community development organizations that provide affordable housing, small business assistance, economic development, and community services for low- and moderate-income individuals and geographies. This includes 2,045 community development service hours to various organizations throughout the full scope AAs and 2,269 services hours in the limited scope AAs. Examples of CD services provided by the bank during the evaluation period are detailed below by full scope AA. The list is not all inclusive.

San Luis Obispo-Paso Robles-Arroyo Grande MSA

RNA's provides a relatively high level of CD services. During the evaluation period, RNA donated 521 service hours to five organizations in the community for economic development, affordable housing, and targeted services for low- and moderate-income individuals. Examples of community development services provided by the bank during the evaluation period are detailed below.

- A staff member served on the Board of Economic Vitality Corporation (EVC). EVC's mission is to promote economic vitality of San Luis Obispo County through job creation and investment in the community as well as promoting start-up businesses, growing existing businesses, and attracting new businesses.
- A staff member served on the Board of Habitat for Humanity for San Luis Obispo as well as a committee member. The organization develops self-help affordable housing for low- and moderate-income individuals.

Salinas MSA

RNA's provides an adequate level of CD services. During the evaluation period, RNA donated 166 service hours to one organization in the community for economic development. Two current and one former staff members serve on the loan committee of the California Coastal Rural Development Corporation (CCRDC). CCRDC provides financing to small farmers and businesses throughout California who lack access to capital and technical assistance. Its mission is to enable these clients to grow, thrive, and prosper to promote economic development within under-served communities. RNA staff serving the Salinas MSA and the Santa Maria-Santa Barbara MSA dedicate time to this organization representing the needs of their respective territories.

Santa Maria-Santa Barbara MSA

RNA's provides a relatively high level of CD services. During the evaluation period, RNA donated 225 service hours to ten organizations in the community for economic development, affordable housing, and services targeted to low- and moderate-income individuals. Examples of community development services provided by the bank during the evaluation period are detailed below. The list is not all inclusive.

- One staff member serves on the Board of California Coastal Rural Development Corporation. RNA staff serving the Salinas MSA and the Santa Maria-Santa Barbara MSA dedicate time to this organization representing the needs of their respective territories. RNA staff provided 66 hours of service to this organization for the benefit of this AA.
- One staff member serves on the loan committee of Housing Trust Fund of Santa Barbara County (HTF). HTF's mission is to expand affordable housing opportunities for low- and moderate-income residents in Santa Barbara County. HTF finances affordable rental and homeownership housing for low- and moderate-income individuals. This organization also provides financing for middle-income individuals due to the high cost of housing in the AA.
- Two staff members serve at the Foodbank of Santa Barbara County. The foodbank strives to end hunger among children, working-class families, and seniors and promote healthy eating through teaching people how to grow their own food and encouraging donation of their produce.

Oxnard-Thousand Oaks-Ventura MSA

RNA's provides an adequate level of CD services. During the evaluation period, RNA donated 181 service hours to eight organizations in the community for affordable housing and services targeted to low- and moderate-income individuals. Examples of community development services provided by the bank during the evaluation period are detailed below. The list is not all inclusive.

- One staff member serves on the Board of Ventura County Community Development Corporation (VCCDC). VCCDC's mission is to assist with self-sufficiency by empowering individuals and families to build wealth through education and homeownership with a primary focus on serving low- to moderate-income clients.
- A former staff member serves on the Board of Boys & Girls Clubs of Greater Oxnard and Port Hueneme. This chapter of the Boys & Girls Clubs offers programs targeted to low-income youth, including initiatives to reduce dropouts and programs to provide assistance with identifying a career path and job-readiness instruction.

Riverside-San Bernardino-Ontario MSA

RNA's provides a relatively high level of CD services. During the evaluation period, RNA donated 274 service hours to six organizations in the community for economic development, affordable housing and services targeted to low- and moderate-income individuals. Several examples of community

development services provided by the bank during the evaluation period are detailed below. The list is not all inclusive.

- One staff member serves on the Board of the Coachella Valley Economic Partnership (CVEP). CVEP's mission is to build a diversified, year-round economy by promoting regional job growth in local companies and through business attraction; and by developing a well-trained and educated workforce.
- One staff member serves on the Board of Pueblo Unido Community Development Corporation (Pueblo). Pueblo's mission is to respond to the needs and concerns of under-represented rural communities of the Eastern Coachella Valley through engaging and fostering collaborative efforts among residents and other stakeholders to find viable solutions, leverage critical resources, and bring new opportunities to improve the quality of life for its residents.

El Centro MSA

RNA's is a leader in providing CD services. During the evaluation period, RNA donated 580 service hours to seven organizations in the community for economic development and services targeted to low- and moderate-income individuals. In addition, bank employees donated 94 hours providing financial education through various seminars and workshops throughout the area. Examples of community development services provided by the bank during the evaluation period are detailed below. The list is not all inclusive.

- One staff member served on the El Centro Police Activity League (PAL). PAL offers programs to increase the physical activity of young people, while decreasing their risk-taking behaviors by providing opportunities for youth from low-income families to play on well-equipped, organized sports leagues. PAL also offers other programs, such as computer labs to assist youth.
- One staff member serves as the President of the Board of the Imperial Valley Food Bank. The Food Bank is a 501(c)(3) non-profit organization that provides food to local families in need. The Food Bank estimates that it currently serves over 20,000 Imperial County residents per month.
- One staff member serves on the Board of ACCION Serving Southern California. ACCION is a micro lender dedicated to connecting entrepreneurs with the accessible financing and resources it takes to create or grow healthy businesses.

Bakersfield MSA

RNA's provides an adequate level of CD services. During the evaluation period, RNA donated 99 service hours to four organizations in the community for economic development and services targeted to low- and moderate-income individuals. Examples of community development services provided by the bank during the evaluation period are detailed below. The list is not all inclusive.

- One staff member is member of the Board and treasurer of the Mid-State Development Corporation. The mission of Mid-State Development Corp. is to stimulate economic development and create (or retain) jobs in the region by helping small- and medium-size businesses obtain financing.
- One staff member serves on the Executive Board of the Bakersfield Women’s Business Conference. The goal of the Bakersfield Women’s Business Conference is to provide information, skills development, and encouragement for women at a crossroads; seeking higher education, first time employment, making a career change or looking to advance their careers.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Service Test in the Merced MSA, Modesto MSA, Visalia-Porterville MSA, Yuba City MSA, and non-MSA AAs is consistent with the bank’s overall high satisfactory performance under the Service Test. In the Chico MSA, Fresno MSA, Hanford-Corcoran MSA, Napa MSA, Placer and Sacramento Counties AA, San Jose-Sunnyvale-Santa Clara MSA, Santa Cruz-Watsonville MSA, Santa Rosa MSA, and Stockton-Lodi MSA, the bank’s performance is weaker than the bank’s overall performance. The AAs with weaker performance do not negatively impact the overall service test rating. The AAs with weaker performance are primarily due to limited number of branches within each AA, but the bank demonstrated adequate performance. Refer to Table 15 in appendix C for the facts and data that support these conclusions.

Appendix B: Market Profiles for Full-Scope Areas

Bakersfield MSA

Demographic Information for Full Scope Area: Bakersfield MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	151	3.97	31.13	31.13	31.13	2.65
Population by Geography	839,631	3.38	32.56	28.83	33.16	2.08
Owner-Occupied Housing by Geography	152,284	2.00	23.16	30.78	44.06	0.00
Business by Geography	37,502	3.80	20.58	29.97	45.64	0.01
Farms by Geography	1,636	1.16	28.79	29.58	40.46	0.00
Family Distribution by Income Level	185,559	23.03	17.18	17.96	41.83	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	74,613	6.14	46.41	28.79	18.67	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		51,311 53,300 18%		Median Housing Value Unemployment Rate (2010 US Census)	212,638 4.78%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

RNA designated the whole Bakersfield MSA as its assessment area. This AA consists of Kern County. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

The U.S. Census Bureau (Census Bureau) estimates the population in Kern County to be 884,788 people in 2016. The population of the AA grew by 5.4 percent since the 2010 Census. The distribution of families by income level was 23.0 percent low-income, 17.2 percent moderate-income, 18.0 percent middle-income, and 41.8 percent upper-income.

Competition

RNA offers commercial, agriculture, and consumer loan and deposit products and services. Competition in the AA is moderate. There are 20 FDIC insured depository institutions with branch operations in the AA according to the FDIC's June 30, 2017 Deposit Market Share Report. With five branches in the AA, RNA's deposits totaled \$426.5 million, or 4.9 percent of the market as of June 30, 2017. The bank ranks seventh in deposits out of 20 depository institutions. The top three depository institutions, Wells Fargo Bank, N.A., Bank of America N.A., and JPMorgan Chase Bank, N.A., account for 58.0 percent of total deposits in the AA.

Competition for mortgage lending is high. There are 451 HMDA-reporting mortgage lenders in 2016. No lender has more than a 9.0 percent market share. The top five competitors include Wells Fargo Bank,

N.A., Quicken Loans, PennyMac Loan Services, Freedom Mortgage Corporation, and US Bank, N.A. sharing 25.2 percent of the market for HMDA reportable loans. RNA ranks 87th with a market share of 0.2 percent of all HMDA lending in 2016.

Competition is also high for small business lending. There are 81 small business lenders reporting CRA data in 2015. The top three competitors include American Express, Citibank, N.A., and Wells Fargo Bank, N.A. sharing 52.1 percent of the market of reported small business loans. RNA ranks 16th with a market share of 0.7 percent of all reported small business loans in granted in 2015. There are 20 small farm lenders reporting CRA data in 2015. The top three competitors include Wells Fargo, N.A., Bank of America N.A., and Chase Bank USA, NA sharing 62.4 percent of the market of reported small farm loans. RNA ranks fourth with a market share of 5.2 percent of all reported small farm loans granted in 2015.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment in the Bakersfield MSA remained stable during the evaluation period but remains higher than the 2016 national annual average of 4.9 percent. BLS data indicates the average annual unemployment was 10.4 percent in 2014, 10.2 percent in 2015, and 10.3 percent in 2016. The largest industries in the AA include government, education and health services, retail, and professional/business services. The top five employers are Edward's Airforce Base, China Lake Naval Weapons Center, Grimmway Farms, WM. Bolthouse Farms, and Dignity Health.

The percentage of households in the AA living below the poverty level is high, representing 18.0 percent, according to the 2010 U.S. Census (Census). Significant portions of households in LMI geographies live below the poverty level, comprising 40.1 percent of households in low-income geographies and 28.6 percent in moderate-income geographies. The 2010 U.S. Census data indicates that 35.1 percent of the census tracts in the AA are LMI.

Housing

Opportunities for residential mortgage lending in low-income geographies are limited due to a low number of housing units (10,084) in those geographies compared to total housing units of 278,239. Higher poverty levels and higher level of rental units somewhat limit residential mortgage lending opportunities in moderate-income geographies.

Housing in the Bakersfield MSA is generally affordable. The Census Bureau's 5-Year (2012-2016) American Community Survey (ACS) estimated an affordability ratio of 3.5 for the AA, which was less than the State ratio of 6.4, and comparable to the national ratio of 3.3. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership in the AA is slightly above the state but below the national averages. The ACS indicated home ownership in the AA was 56.9 percent, compared to California at 54.1 percent and the U.S. at 63.6 percent.

The median home value in low- and moderate-income tracts in the AA equaled \$96,426 and \$164,616, respectively. Those median home prices are moderate compared to the FFIEC updated median family income (MFI) for 2016. Low- and moderate-income families earned, at most, 50 and 80 percent of MFI, or approximately \$26,700 and \$42,600, respectively.

The 2010 Census reports 54.7 percent of the total housing units in the AA as owner-occupied, with renter-occupied units at 34.4 percent, and vacant units at 10.9 percent. Owner-occupied housing in LMI geographies in the AA represents 25.2 percent of the total owner-occupied housing units. LMI geographies in the AA have higher levels of rentals than middle- and upper-income geographies, with rental units accounting for 58.6 percent of the housing units in low-income geographies and 46.6 percent of the housing units in moderate-income geographies.

Community Contacts

Two community contacts indicated a need for affordable housing, small business financing, and financial literacy. Challenges facing the community include lack of financial literacy education for low- and moderate-income individuals; investors buying residential properties, thereby further limiting homeownership opportunities for low- and moderate-income individuals; and lack of bank engagement for small business financing in rural portions of the community. The contacts stated that banks have lots of opportunities to lend, invest, and provide services in the community. Banks can support:

- Tax credit project;
- Micro-lending programs; and
- Offering no-cost micro-savings account to help low- and moderate-income individuals build wealth.

EI Centro MSA

Demographic Information for Full Scope Area: EI Centro MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	0.00	38.71	38.71	22.58	0.00
Population by Geography	174,528	0.00	31.41	48.42	20.17	0.00
Owner-Occupied Housing by Geography	26,779	0.00	22.37	51.89	25.74	0.00
Business by Geography	5,748	0.00	31.84	45.35	22.81	0.00
Farms by Geography	405	0.00	19.51	40.74	39.75	0.00
Family Distribution by Income Level	38,146	24.44	17.03	16.45	42.09	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	15,817	0.00	43.12	46.13	10.74	0.00
Median Family Income		43,490	Median Housing Value	181,990		
FFIEC Adjusted Median Family Income for 2016		48,400	Unemployment Rate (2010 US Census)	5.66%		
Households Below Poverty Level		21%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

RNA designated the whole EI Centro MSA as its assessment area. This AA consists of Imperial County. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

The U.S. Census Bureau (Census Bureau) estimates the population in Imperial County to be 180,883 people in 2016. The population of the AA grew by 3.6 percent since the 2010 Census. The distribution of families by income level was 24.4 percent low-income, 17.0 percent moderate-income, 16.5 percent middle-income, and 42.1 percent upper-income.

Competition

RNA offers commercial, agriculture, and consumer loan and deposit products and services. Competition in the AA is limited. There are seven FDIC insured depository institutions with branch operations in the AA according to the FDIC's June 30, 2017 Deposit Market Share Report. With five branches in the AA, RNA's deposits totaled \$518.0 million, or 29.3 percent of the market as of June 30, 2017. The bank ranks first in deposits out of the seven depository institutions. Wells Fargo Bank, N.A., Bank of America N.A., JPMorgan Chase Bank, N.A., MUFG Union Bank, NA, Community Valley Bank, and First Foundation Bank are the other financial institutions offering deposit services.

Competition for mortgage lending is relatively high. There are 199 HMDA-reporting mortgage lenders in 2016. No lender has more than a 10.0 percent market share. The top five competitors include Wallick and Volk, Inc., Wells Fargo Bank, N.A., Sun Community FCU, Guild Mortgage Company, and US

Bank, N.A. sharing 36.7 percent of the market for HMDA reportable loans. RNA ranks 51st with a market share of 0.3 percent of all HMDA lending in 2016.

Competition is moderate for small business lending. There are 41 small business lenders reporting CRA data in 2015. The top three competitors include American Express, FSB, Citibank, N.A., and Wells Fargo Bank, N.A. sharing 54.4 percent of the market of reported small business loans. RNA ranks ninth with a market share of 2.4 percent of all reported small business loans in granted in 2015. There are 12 small farm lenders reporting CRA data in 2015. RNA is the top small farm lender with 30.8 percent market share of reported small farm loans granted in 2015. Wells Fargo, N.A, John Deere Financial, FSB, and US Bank, NA follow RNA with combined 47.3 percent of the market of reported small farm loans.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment in the El Centro MSA remained stable during the evaluation period but remained much higher than the 2016 national annual average of 4.9 percent. BLS data indicates the average annual unemployment was 24.0 percent in 2014 and 2015 and 23.5 percent in 2016. The largest industries in the AA include government, education and health services, and retail. The top five employers are Imperial Valley College, Maui Harvesting, El Centro Regional Medical Center, Imperial Date Gardens, and Wal-Mart Stores, Inc.

The percentage of households in the AA living below the poverty level is high, representing 21.0 percent, according to the 2010 U.S. Census (Census). A significant portion of households in moderate geographies live below the poverty level, comprising 31.3 percent in moderate-income geographies. The 2010 U.S. Census data indicates that 38.7 percent of the census tracts in the AA are moderate-income and there are no low-income census tracts.

Housing

High vacancy rates overall and high rental levels in moderate-income geographies indicate limited opportunities for residential mortgage lending in AA and less opportunity in moderate-income geographies.

Housing in the El Centro MSA is generally affordable. The Census Bureau's 5-Year (2012-2016) American Community Survey (ACS) estimated an affordability ratio of 3.7 for the AA, which was less than the State ratio of 6.4, and comparable to the national ratio of 3.3. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership in the AA is slightly above the state average but below the national average. The ACS indicated home ownership in the AA was 55.8 percent, compared to California at 54.1 percent and the U.S. at 63.6 percent.

The median home value in moderate-income tracts in the AA equaled \$128,621. This median home prices is moderate compared to the FFIEC updated median family income (MFI) for 2016. Low- and

moderate-income families earned, at most, 50 and 80 percent of MFI, or approximately \$24,200 and \$38,700, respectively.

The 2010 Census reports 48.8 percent of the total housing units in the AA as owner-occupied, with rental units at 37.4 percent, and vacant units at 13.8 percent. Owner-occupied housing in moderate-income geographies in the AA represent 22.4 percent of the total owner-occupied housing units. The majority of housing units in moderate-income geographies in the AA are rental units, with rental units accounting 47.2 percent of the housing units in moderate-income geographies and vacant units representing 19.3 percent of housing units in these geographies.

Community Contacts

One community contact indicated needs for financial education and basic business skills. Challenges facing the community include a relatively low level of residents with high level of education and a lack of emphasis in education for engineering, science, law, and medical careers, which could attract more of these industries to the community. Unemployment is very high and jobs tend to move to central California or northern Mexico/Baja California. There are very few banks operating in the Imperial County, so resources and support offered by banks are limited. The contact indicated that banks are reluctant to operate in the county due to border and international risks and that branch closures have hurt the community. Nevertheless, other issues facing the county cannot be solved by banks and that in general, most of the banks serving the community are reasonably engaged. The contact stated that affordable housing was not a critical need.

Oxnard-Thousand Oaks-Ventura MSA

Demographic Information for Full Scope Area: Oxnard-Thousand Oaks-Ventura MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	174	5.17	26.44	39.66	27.59	1.15
Population by Geography	823,318	5.38	26.09	40.80	27.72	0.01
Owner-Occupied Housing by Geography	175,452	1.92	17.13	43.17	37.79	0.00
Business by Geography	58,158	3.50	18.76	44.39	33.35	0.00
Farms by Geography	1,635	6.12	23.79	45.02	25.08	0.00
Family Distribution by Income Level	195,579	21.43	17.35	20.51	40.71	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	75,845	8.90	35.83	38.52	16.76	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		84,364 88,300 8%	Median Housing Value Unemployment Rate (2010 US Census)	558,324 3.63%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

RNA designated the whole Oxnard-Thousand Oaks-Ventura MSA as its assessment area. This AA consists of Ventura County. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

The U.S. Census Bureau (Census Bureau) estimates the population in Ventura County to be 849,738 people in 2016. The population of the AA grew by 3.2 percent since the 2010 Census. The distribution of families by income level was 21.4 percent low-income, 17.4 percent moderate-income, 20.5 percent middle-income, and 40.7 percent upper-income.

Competition

RNA offers commercial, agriculture, and consumer loan and deposit products and services. Competition in the AA is high. There are 24 FDIC insured depository institutions with branch operations in the AA according to the FDIC's June 30, 2017 Deposit Market Share Report. With ten branches in the AA, RNA's deposits totaled \$833.2 million, or 4.4 percent of the market as of June 30, 2017. The bank ranks sixth in deposits. The top competitors are Wells Fargo Bank, N.A., Bank of America N.A., and JPMorgan Chase Bank, N.A., sharing 65.8 percent of the deposit market share.

Competition for mortgage lending is high. There are 543 HMDA-reporting mortgage lenders in 2016. No lender has more than a 10.0 percent market share. The top five competitors include Wells Fargo Bank, N.A., JPMorgan Chase Bank, NA, Quicken Loans, Bank of America, N.A., and Prospect Mortgage sharing 24.8 percent of the market for HMDA reportable loans. RNA ranks 87th with a market share of 0.2 percent of all HMDA lending in 2016.

Competition is high for small business lending. There are 80 small business lenders reporting CRA data in 2015. The top three competitors include American Express, FSB, Wells Fargo Bank, N.A. and Bank of America N.A., sharing 57.0 percent of the market of reported small business loans. RNA ranks 18th with a market share of 0.5 percent of all reported small business loans in granted in 2015. There are 17 small farm lenders reporting CRA data in 2015. The top four competitors include Wells Fargo, N.A., Bank of America, N.A., John Deere Financial, F.S.B., and US Bank, N.A., sharing 69.1 percent of the market of reported small farm loans. RNA ranks sixth with 5.0 percent market share of reported small farm loans granted in 2015.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment in the Oxnard MSA improved during the evaluation period and is slightly higher than the 2016 national annual average of 4.9 percent. BLS data indicates the average annual unemployment was 6.6 percent in 2014, 5.6 percent in 2015, and 5.2 percent in 2016. The largest industries in the AA include government, education and health services, retail trade, leisure and hospitality services, and professional/business services. The top five employers are Ventura Naval Bank, Amgen Inc., Bank of America, WellPoint Health Networks Inc., and Ventura County Health Care Agency.

The percentage of households in the AA living below the poverty level is relatively low, representing 8.0 percent according to the 2010 U.S. Census (Census). A moderately high portion of households in LMI geographies lives below the poverty level, comprising 28.5 percent in low-income geographies and 13.0 percent in moderate-income geographies. The 2010 U.S. Census data indicates that 31.6 percent of the census tracts in the AA are LMI.

Housing

Opportunities for residential mortgage lending in low-income geographies are limited due to high housing values and low rate of owner-occupied housing and high housing values and relatively high level of rental units somewhat limit lending opportunities in moderate-income geographies

Housing in the Oxnard MSA is expensive. The Census Bureau's 5-Year (2012-2016) American Community Survey (ACS) estimated an affordability ratio of 6.1 for the AA, which was comparable to the State's ratio of 6.4, and nearly twice the national ratio of 3.3. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership in the AA is higher than the state average and comparable to the national average. The ACS indicated home ownership in the AA was 63.4 percent, compared to California at 54.1 percent and the U.S. at 63.6 percent.

High median housing prices compared to median family incomes impede home ownership in LMI geographies in the AA. The median home value in low- and moderate-income tracts in the AA equaled \$335,587 and \$427,051, respectively. Those median home prices are high compared to the FFIEC updated median family income (MFI) for 2016. Low- and moderate-income families earned, at most, 50 and 80 percent of MFI, or approximately \$44,200 and \$70,600, respectively. Given the high property

values, the ability to accumulate a down payment for a tradition mortgage in this AA impedes home-ownership opportunities for LMI borrowers.

The 2010 Census reports 62.8 percent of the total housing units in the AA as owner-occupied, with renter-occupied units at 31.8 percent, and vacant units at 5.4 percent. Owner-occupied housing in LMI geographies in the AA represent only 19.1 percent of the total owner-occupied housing units. The number of housing units in low-income geographies represent only 4.3 percent of total housing units and the majority (67.1 percent) of those units are rentals. In moderate-income geographies, owner-occupied units account for 46.0 percent of housing units and rental units account for 46.1 percent.

Community Contacts

One community contact indicated a need to provide a concerted effort to reach women-owned and particularly, Latina-owned businesses. These business owners tend to be debt adverse and harder to reach. Banks have opportunities to better serve these businesses and help them to thrive and expand by making a concerted outreach effort.

Riverside-San Bernardino-Ontario MSA

Demographic Information for Full Scope Area: Riverside-San Bernardino MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	822	5.72	28.22	35.89	29.56	0.61
Population by Geography	4,224,851	5.71	26.45	35.43	32.09	0.32
Owner-Occupied Housing by Geography	855,253	2.87	21.60	36.29	39.24	0.00
Business by Geography	210,799	4.47	24.09	34.17	37.20	0.06
Farms by Geography	4,563	3.94	22.75	35.72	37.58	0.00
Family Distribution by Income Level	949,542	21.83	17.53	19.81	40.84	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	373,693	9.87	38.84	34.83	16.46	0.00
Median Family Income		63,176	Median Housing Value	317,566		
FFIEC Adjusted Median Family Income for 2016		61,400	Unemployment Rate (2010 US Census)	5.03%		
Households Below Poverty Level		12%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

RNA designated the whole Riverside-San Bernardino-Ontario MSA as its assessment area. This AA consists of counties of Riverside and San Bernardino. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

The U.S. Census Bureau (Census Bureau) estimates the population in Riverside County to be 2.4 million people in 2016. The population of the Riverside County grew by 9.0 percent since the 2010 Census. The Census Bureau estimates the population in San Bernardino County to be 2.1 million people in 2016, reflecting a growth of 5.2 percent since the 2010 Census. The distribution of families by income level in the AA was 21.8 percent low-income, 17.5 percent moderate-income, 19.8 percent middle-income, and 40.8 percent upper-income.

Competition

RNA offers commercial, agriculture, and consumer loan and deposit products and services. Competition in the AA is high. There are 44 FDIC insured depository institutions with branch operations in the AA according to the FDIC's June 30, 2017 Deposit Market Share Report. With eight branches in the AA, RNA's deposits totaled \$483.8 million, or 1.0 percent of the market as of June 30, 2017. The bank ranks 17th in deposits. The top competitors are Bank of America N.A., Wells Fargo Bank, N.A., and JPMorgan Chase Bank, N.A., sharing 58.3 percent of the deposit market share.

Competition for mortgage lending is very high. There are 814 HMDA-reporting mortgage lenders in 2016. No lender has more than 9.0 percent market share. The top five competitors include Wells Fargo Bank, N.A., PennyMac Loan Services, LLC, Quicken Loans, Broker Solutions, Inc., and Freedom

Mortgage Corp. sharing 21.7 percent of the market for HMDA reportable loans. RNA ranks 334th with a market share of 0.01 percent of all HMDA lending in 2016.

Competition is high for small business lending. There are 140 small business lenders reporting CRA data in 2015. The top four competitors include American Express, FSB, Citibank, .N.A., Wells Fargo Bank, N.A., and Bank of America N.A., sharing 60.6 percent of the market of reported small business loans. RNA ranks 37th with a market share of 0.1 percent of all reported small business loans in granted in 2015. There are 20 small farm lenders reporting CRA data in 2015. The top three competitors include Wells Fargo, N.A, Bank of America, N.A., and US Bank, N.A., sharing 68.6 percent of the market of reported small farm loans. RNA ranks sixth with 2.9 percent market share of reported small farm loans granted in 2015.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment in the Riverside MSA improved during the evaluation period and is higher than the 2016 national annual average of 4.9 percent. BLS data indicated the average annual unemployment was 8.1 percent in 2014, 6.6 percent in 2015, and 5.9 percent in 2016. The largest industries in the AA include government, education and health services, retail trade, leisure and hospitality services, and professional/business services. The top five employers are Stater Brothers Markets, Arrowhead Regional Medical Center, U.S. Marine Corps. Air Ground Combat Center, Fort Irwin, and Wal-Mart Stores, Inc.

The percentage of households in the AA living below the poverty level is 12.0 percent, according to the 2010 U.S. Census (Census). A high portion of households in LMI geographies lives below the poverty level, comprising 32.4 percent in low-income geographies and 18.3 percent in moderate-income geographies. The 2010 U.S. Census data indicates that 33.9 percent of the census tracts in the AA are low- or moderate-income.

Housing

Opportunities for residential mortgage lending in low-income geographies are limited due to high housing values and low rate of owner-occupied housing and high housing values and relatively high level of rental units somewhat limit lending opportunities in moderate-income geographies.

Housing in the Riverside MSA is expensive. The Census Bureau's 5-Year (2012-2016) American Community Survey (ACS) estimated an affordability ratio of 4.8 and 4.7 for Riverside County and San Bernardino County, respectively, which was below the State ratio of 6.4, and higher than the national ratio of 3.3. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership in the AA is higher than the state average and comparable to the national average. The ACS indicates home ownership in the AA was 64.5 percent in Riverside County and 59.1 percent in San Bernardino County, compared to California at 54.1 percent and the U.S. at 63.6 percent.

Median housing prices compared to median family incomes may impede home ownership in LMI geographies in the AA. The median home value in low- and moderate-income tracts in the AA equaled \$174,888 and \$228,041, respectively. Those median home prices are high compared to the FFIEC updated median family income (MFI) for 2016. Low- and moderate-income families earned at most 50 and 80 percent of MFI, or approximately \$30,700 and \$49,100, respectively. Given the relatively high property values, the ability to accumulate a down payment for a traditional mortgage in this AA impedes home-ownership opportunities for low-income individuals and certain moderate-income individuals.

The 2010 Census reports 58.0 percent of the total housing units in the AA as owner-occupied, with rental units at 27.7 percent, and vacant units at 14.3 percent. Owner-occupied housing in LMI geographies in the AA represent 24.5 percent of the total owner-occupied housing units. The number of housing units in low-income geographies represent only 5.3 percent of total housing units and the majority (54.1 percent) of those units are rentals. In moderate-income geographies, owner-occupied units account for 47.2 percent of housing units and rental units account for 37.8 percent.

Community Contacts

Two community contacts indicated needs for affordable housing, small business financing and financial education, and higher wage jobs. Challenge facing the community includes a relatively low level of residents with high level education. There is a need for highly skilled employees in the community, but local employers compete with employers in Los Angeles County for local highly skilled residents. Affordable housing is declining as the improving local economy has pushed rents and housing prices up and there is a lack of new multifamily development. The contacts identified opportunities for banks as:

- Participation in multibank micro-lending consortiums to increase business financing while spreading the risk, particularly to offer second-chance opportunities to small businesses;
- Small business financial education and counseling to prepare small business owners to apply for financing or expand to address any perceptions that banks aren't engaged in small business lending;
- Lines of credit and low-interest construction loans; and
- Provision of financial literacy and financial support for organizations that provide social services.

Salinas MSA

Demographic Information for Full Scope Area: Salinas MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	93	4.30	22.58	37.63	32.26	3.23
Population by Geography	415,057	5.97	26.06	38.13	27.01	2.83
Owner-Occupied Housing by Geography	66,731	1.79	16.11	37.70	44.41	0.00
Business by Geography	23,454	1.37	18.93	38.73	40.35	0.61
Farms by Geography	1,079	0.56	15.94	42.45	40.69	0.37
Family Distribution by Income Level	89,606	21.84	16.71	19.49	41.97	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	34,537	9.89	35.04	38.69	16.39	0.00
Median Family Income		63,372	Median Housing Value	563,038		
FFIEC Adjusted Median Family Income for 2016		63,500	Unemployment Rate (2010 US Census)	4.82%		
Households Below Poverty Level		12%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

RNA designated the whole Salinas MSA as its assessment area. This AA consists of Monterey County. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

The U.S. Census Bureau (Census Bureau) estimates the population in Monterey County to be 435,232 people in 2016. The population of the AA grew by 4.9 percent since the 2010 Census. The distribution of families by income level was 21.8 percent low-income, 16.7 percent moderate-income, 19.5 percent middle-income, and 42.0 percent upper-income.

Competition

RNA offers commercial, agriculture, and consumer loan and deposit products and services. Competition in the AA is high. There are 13 FDIC insured depository institutions with branch operations in the AA according to the FDIC's June 30, 2017 Deposit Market Share Report. With nine branches in the AA, RNA's deposits totaled \$1.2 billion, or 13.7 percent of the market as of June 30, 2017. The bank ranks fourth in deposits. The top competitors are Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A., and Bank of America N.A., sharing 62.0 percent of the deposit market share.

Competition for mortgage lending is high. There are 428 HMDA-reporting mortgage lenders in 2016. The top five competitors include Wells Fargo Bank, N.A., JPMorgan Chase Bank, NA, Quicken Loans, Finance of America Mortgage, and Bank of America, N.A., sharing 32.4 percent of the market for HMDA reportable loans. RNA ranks 35th with a market share of 0.5 percent of all HMDA lending in 2016.

Competition is high for small business lending. There are 64 small business lenders reporting CRA data in 2015. The top three competitors include American Express, FSB, Wells Fargo Bank, N.A. and Citibank, N.A., sharing 57.7 percent of the market of reported small business loans. RNA ranks 12th with a market share of 1.3 percent of all reported small business loans in granted in 2015. There are 16 small farm lenders reporting CRA data in 2015. RNA ranks third with 14.0 percent market share of small farm loans granted in 2015. The other top competitors include Wells Fargo, N.A, Bank of America, N.A., and US Bank, N.A., sharing 66.5 percent of the market of reported small farm loans.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment in the Salinas MSA improved during the evaluation period and is comparable to the 2016 national annual average of 4.9 percent. BLS data indicated the average annual unemployment was 9.0 percent in 2014, 8.1 percent in 2015, and 7.6 percent in 2016. The largest industries in the AA include agriculture, government, leisure and hospitality services, education and health services, and retail trade. The top five employers are Tanimura & Antle, Inc., Fresh Express, Fresh Food, Escamilla & Sons, Inc., Salinas Valley Memorial Healthcare System, and D'Arrigo Brothers Co. of California.

The percentage of households in the AA living below the poverty level is 12.0 percent, according to the 2010 U.S. Census (Census). A moderately high portion of households in LMI geographies lives below the poverty level, comprising 33.6 percent in low-income geographies and 16.6 percent in moderate-income geographies. The 2010 U.S. Census data indicates that 26.9 percent of the census tracts in the AA are LMI.

Housing

Opportunities for residential mortgage lending in low-income geographies are limited due to high housing values and low rate of owner-occupied housing and high housing values and relatively high level of rental units somewhat limit lending opportunities in moderate-income geographies. Housing units in LMI geographies represent 31.5 percent of the total number of housing units in the AA.

Housing in the Salinas MSA is expensive. The Census Bureau's 5-Year (2012-2016) American Community Survey (ACS) estimated an affordability ratio of 6.5 for the AA, which was comparable to the State ratio of 6.4, and nearly twice the national ratio of 3.3. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership in the AA is lower than the state and national averages. The ACS indicated home ownership in the AA was 49.7 percent, compared to California at 54.1 percent and the U.S. at 63.6 percent.

High median housing prices compared to median family incomes impede home ownership in LMI geographies in the AA. The median home value in low- and moderate-income tracts in the AA equaled \$325,291 and \$357,972, respectively. Those median home prices are high compared to the FFIEC updated median family income (MFI) for 2016. Low- and moderate-income families earned, at most, 50 and 80 percent of MFI, or approximately \$31,800 and \$50,800, respectively. Given the high property

values, the ability to accumulate a down payment for a traditional mortgage in this AA impedes home-ownership opportunities for LMI borrowers.

The 2010 Census reports 48.1 percent of the total housing units in the AA as owner-occupied, with renter-occupied units at 41.9 percent, and vacant units at 10.0 percent. Owner-occupied housing in LMI geographies in the AA represent only 17.9 percent of the total owner-occupied housing units. The number of housing units in low-income geographies represent 3.9 percent of total housing units and the majority (71.0 percent) of those units are rentals. In moderate-income geographies, owner-occupied units account for 35.9 percent of housing units and rental units account for 55.7 percent.

Community Contacts

Three community contacts indicated that affordable housing and participation in SBA lending programs are needs of the community. Many low- and moderate-income workers commute long distances to local-area jobs due to lack of affordable housing locally. The contacts stated there are lots of opportunities to lend or invest in the community, including SBA-guarantee lending, financing start-up business and business expansion, and business loans between \$350,000 and \$2.0 million.

San Luis Obispo-Paso Robles-Arroyo Grande MSA

Demographic Information for Full Scope Area: San Luis Obispo-Paso Robles-Arroyo Grande MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	53	1.89	7.55	62.26	24.53	3.77
Population by Geography	269,637	0.48	8.16	63.95	24.62	2.80
Owner-Occupied Housing by Geography	62,880	0.30	5.63	66.30	27.78	0.00
Business by Geography	23,263	1.97	10.63	60.31	27.03	0.06
Farms by Geography	1,180	0.34	5.42	65.17	29.07	0.00
Family Distribution by Income Level	64,250	19.80	18.20	21.60	40.40	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	24,417	0.78	14.56	67.32	17.28	0.05
Median Family Income		72,054	Median Housing Value	542,686		
FFIEC Adjusted Median Family Income for 2016		76,400	Unemployment Rate (2010 US Census)	3.58%		
Households Below Poverty Level		13%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

RNA designated the whole San Luis Obispo-Paso Robles-Arroyo Grande MSA as its assessment area. This AA consists of San Luis Obispo County. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

The U.S. Census Bureau (Census Bureau) estimates the population in San Luis Obispo County to be 282,887 people in 2016. The population of the AA grew by 4.9 percent since the 2010 Census. The distribution of families by income level was 19.8 percent low-income, 18.2 percent moderate-income, 21.6 percent middle-income, and 40.4 percent upper-income.

Competition

RNA offers commercial, agriculture, and consumer loan and deposit products and services. Competition in the AA is high. There are 13 FDIC insured depository institutions with branch operations in the AA according to the FDIC's June 30, 2017 Deposit Market Share Report. With 14 branches in the AA, RNA's deposits totaled \$1.4 billion, or 22.4 percent of the market as of June 30, 2017. RNA is the top financial institution by deposits. The other top competitors are Premier Pacific Bank, Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A., and Bank of America N.A., sharing 62.6 percent of the deposit market share.

Competition for mortgage lending is high. There are 400 HMDA-reporting mortgage lenders in 2016. The top five competitors include Wells Fargo Bank, N.A., JPMorgan Chase Bank, NA, OPES Advisors, Inc., Quicken Loans, and Coastal Fundings, sharing 28.3 percent of the market for HMDA reportable loans. RNA ranks 12th with a market share of 1.9 percent of all HMDA lending in 2016.

Competition is high for small business lending. There are 59 small business lenders reporting CRA data in 2015. The top three competitors include American Express, FSB, Wells Fargo Bank, N.A. and Citibank, N.A., sharing 54.9 percent of the market of reported small business loans. RNA ranks 11th with a market share of 1.5 percent of all reported small business loans in granted in 2015. There are 14 small farm lenders reporting CRA data in 2015. RNA ranks fourth with 13.1 percent market share of small farm loans granted in 2015. The top three competitors include Wells Fargo, N.A, Bank of America, N.A., and Umpqua Bank, sharing 56.3 percent of the market of reported small farm loans.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment in the San Luis Obispo MSA modestly improved during the evaluation period and was slightly lower to the 2016 national annual average of 4.9 percent. BLS data indicated the average annual unemployment was 5.6 percent in 2014, 4.7 percent in 2015, and 4.3 percent in 2016. The largest industries in the AA include government, leisure and hospitality services, education and health services, and retail trade. The top five employers are Cal Poly San Luis Obispo, Atascadero State Hospital, Pacific Gas & Electric, California Men's Colony, and Tenet Healthcare Corp.

The percentage of households in the AA living below the poverty level is 13.0 percent, according to the 2010 U.S. Census (Census). A moderately high portion of households in LMI geographies live below the poverty level, comprising 32.6 percent in low-income geographies and 16.2 percent in moderate-income geographies. The 2010 U.S. Census data indicates that 33.7 percent of the census tracts in the AA are LMI.

Housing

Opportunities for residential mortgage lending in LMI geographies are limited due to high housing values and low rate of owner-occupied housing. Housing units in LMI geographies represent 9.4 percent of the total number of housing units in the AA.

Housing in the San Luis Obispo MSA is expensive. The Census Bureau's 5-Year (2012-2016) American Community Survey (ACS) estimated an affordability ratio of 7.4 for the AA, which was higher than the State ratio of 6.4, and more than twice the national ratio of 3.3. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership in the AA is higher than the state average but lower than the national average. The ACS indicated home ownership in the AA was 59.0 percent, compared to California at 54.1 percent and the U.S. at 63.6 percent.

High median housing prices compared to median family incomes impede home ownership in LMI geographies in the AA. The median home value in low- and moderate-income tracts in the AA equaled \$384,000 and \$354,915, respectively. Those median home prices are high compared to the FFIEC updated median family income (MFI) for 2016. Low- and moderate-income families earned, at most, 50 and 80 percent of MFI, or approximately \$38,200 and \$61,100, respectively. Given the high property

values, the ability to accumulate a down payment for a tradition mortgage in this AA impedes home-ownership opportunities for LMI borrowers.

The 2010 Census reports 54.1 percent of the total housing units in the AA as owner-occupied, with renter-occupied units at 34.0 percent, and vacant units at 11.9 percent. Owner-occupied housing in LMI geographies in the AA represent only 5.9 percent of the total owner-occupied housing units. The number of housing units in low-income geographies represent 0.1 percent of total housing units and there is a high level of vacancies (38.0 percent) in those units. Housing units in moderate-income geographies represent 8.1 percent of total AA housing units and owner-occupied units account for 37.5 percent of those housing units and rental units account for 55.0 percent.

Community Contacts

Two community contacts indicated that affordable housing and small business financing and education are needs of the community. Challenges facing local low- and moderate-income residents are the lack of affordable housing and having to compete with university students for minimum wage jobs. The lack of higher wage jobs further limits home ownership opportunities for low- and moderate-income individuals. Small business needs include loans up to \$500,000 and small business education for business owners to prepare them for applying for business financing. Opportunities include:

- Financing for the construction or development of affordable housing for low- and moderate-income individuals;
- Financial support for foodbanks and organizations providing social services for the homeless and individuals in recovery;
- Small business financing; and
- Small business financial education.

Santa Maria-Santa Barbara MSA

Demographic Information for Full Scope Area: Santa Maria-Santa Barbara MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	89	8.99	24.72	28.09	35.96	2.25
Population by Geography	423,895	10.48	25.09	31.38	33.04	0.00
Owner-Occupied Housing by Geography	76,757	2.85	15.09	34.95	47.11	0.00
Business by Geography	29,576	13.25	21.69	26.66	37.90	0.50
Farms by Geography	1,181	6.18	16.60	23.88	53.09	0.25
Family Distribution by Income Level	91,108	21.72	17.79	18.61	41.88	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	35,996	16.25	32.75	29.57	21.43	0.00
Median Family Income		69,190	Median Housing Value	603,239		
FFIEC Adjusted Median Family Income for 2016		77,100	Unemployment Rate (2010 US Census)	3.69%		
Households Below Poverty Level		12%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

RNA designated the whole Santa Maria-Santa Barbara MSA as its assessment area. This AA consists of Santa Barbara County. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

The U.S. Census Bureau (Census Bureau) estimates the population in Santa Barbara County to be 446,170 people in 2016. The population of the AA grew by 5.2 percent since the 2010 Census. The distribution of families by income level was 21.7 percent low-income, 17.8 percent moderate-income, 18.6 percent middle-income, and 41.9 percent upper-income.

Competition

RNA offers commercial, agriculture, and consumer loan and deposit products and services. Competition in the AA is high. There are 19 FDIC insured depository institutions with branch operations in the AA according to the FDIC's June 30, 2017 Deposit Market Share Report. With 14 branches in the AA, RNA's deposits totaled \$1.2 billion, or 9.7 percent of the market as of June 30, 2017. The bank ranks fifth in deposits. The top competitors are Wells Fargo Bank, N.A., MUFG Union Bank, NA, Bank of America N.A., and JPMorgan Chase Bank, N.A., sharing 58.5 percent of the deposit market share.

Competition for mortgage lending is high. There are 412 HMDA-reporting mortgage lenders in 2016. The top five competitors include Wells Fargo Bank, N.A., JPMorgan Chase Bank, NA, Guild Mortgage Company, Quicken Loans, and Caliber Home Loans, sharing 29.0 percent of the market for HMDA reportable loans. RNA ranks 29th with a market share of 0.9 percent of all HMDA lending in 2016.

Competition is high for small business lending. There are 70 small business lenders reporting CRA data in 2015. The top three competitors include American Express, FSB, Wells Fargo Bank, N.A. and Chase Bank USA, NA, sharing 53.8 percent of the market of reported small business loans. RNA ranks 13th with a market share of 1.0 percent of all reported small business loans in granted in 2015. There are 19 small farm lenders reporting CRA data in 2015. RNA ranks second with 18.1 percent market share of small farm loans granted in 2015. The other top competitors include Wells Fargo, N.A, Bank of America, N.A., and US Bank, N.A., sharing 46.6 percent of the market of reported small farm loans.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment in the Santa Maria MSA modestly improved during the evaluation period and was comparable to the 2016 national annual average of 4.9 percent. BLS data indicated the average annual unemployment was 6.1 percent in 2014, 5.3 percent in 2015, and 5.0 percent in 2016. The largest industries in the AA include government, leisure and hospitality services, education and health services, professional/business services, and retail trade. The top five employers are University of California, Santa Barbara, Santa Barbara Cottage Hospital, Dignity Health Central Coast, Santa Barbara City College, and Marian Medical Center.

The percentage of households in the AA living below the poverty level is 12.0 percent, according to the 2010 U.S. Census (Census). A moderately high portion of households in LMI geographies lives below the poverty level, comprising 32.1 percent in low-income geographies and 14.8 percent in moderate-income geographies. The 2010 U.S. Census data indicates that 33.7 percent of the census tracts in the AA are LMI.

Housing

Opportunities for residential mortgage lending in low-income geographies are limited due to high housing values and low rate of owner-occupied housing and high housing values and relatively high level of rental units somewhat limit lending opportunities in moderate-income geographies. Housing units in LMI geographies represent 31.5 percent of the total number of housing units in the AA.

Housing in the Santa Maria MSA is expensive. The Census Bureau's 5-Year (2012-2016) American Community Survey (ACS) estimated an affordability ratio of 7.4 for the AA, which was higher than the State ratio of 6.4, and more than twice the national ratio of 3.3. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership in the AA is lower than the state and national averages. The ACS indicated home ownership in the AA was 52.0 percent, compared to California at 54.1 percent and the U.S. at 63.6 percent.

High median housing prices compared to median family incomes impede home ownership in LMI geographies in the AA. The median home value in low- and moderate-income tracts in the AA equaled \$306,124 and \$448,932, respectively. Those median home prices are high compared to the FFIEC updated median family income (MFI) for 2016. Low- and moderate-income families earned, at most, 50 and 80 percent of MFI, or approximately \$38,600 and \$61,700, respectively. Given the high property

values, the ability to accumulate a down payment for a traditional mortgage in this AA impedes home-ownership opportunities for LMI borrowers.

The 2010 Census reports 50.4 percent of the total housing units in the AA as owner-occupied, with renter-occupied units at 42.7 percent, and vacant units at 6.9 percent. Owner-occupied housing in LMI geographies in the AA represent only 17.9 percent of the total owner-occupied housing units. The number of housing units in low-income geographies represent 8.4 percent of total housing units and the majority (76.8 percent) of those units are rentals. In moderate-income geographies, owner-occupied units account for 33.0 percent of housing units and rental units account for 59.7 percent.

Community Contact

Two community contacts indicated needs for affordable housing, economic development, community facility development, and small business outreach. The contacts identified opportunities for bank as:

- Affordable housing development/construction;
- Community facility developing, including shelters and foodbanks;
- Financial support of economic development organizations; and
- Outreach to women-owned and, particularly, Latina-owned businesses to better serve these businesses and help them to thrive and expand.

Appendix C: Tables of Performance Data

Content of Standardized 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 loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms** - 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 market share information based on the most recent aggregate market data available. Because 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 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original

investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME												
Geography: CALIFORNIA												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Bakersfield MSA	8.51	178	48,144	343	84,253	30	8,608	3	28,242	554	169,247	4.11
El Centro MSA	4.08	42	8,127	146	31,838	76	22,696	2	18,178	266	80,839	4.99
Oxnard MSA	8.86	173	82,842	355	63,381	39	12,939	10	37,601	577	196,763	8.03
Riverside-San Bernardino MS	5.02	111	47,875	189	39,363	23	5,379	4	23,420	327	116,037	4.66
Salinas MSA	8.68	201	101,133	305	66,152	55	18,184	4	42,582	565	228,051	11.80
San Luis Obispo MSA	17.84	702	303,790	387	86,904	70	12,172	3	23,514	1,162	426,380	13.90
Santa Maria MSA	11.73	351	157,276	316	59,468	92	22,109	5	20,992	764	259,845	11.49
Limited Review:												
CA Non-MSA AA	1.98	55	16,274	46	5,597	25	7,410	3	11,072	129	40,353	1.47
Chico MSA	4.65	139	38,787	140	12,911	23	3,941	1	1,700	303	57,339	3.04
Fresno MSA	3.47	88	32,685	62	12,562	73	23,230	3	16,000	226	84,477	2.24
Hanford-Corcoran MSA	1.21	22	31,871	26	5,078	30	8,508	1	4,300	79	49,757	0.88
Merced MSA	2.29	76	35,262	54	6,958	17	3,886	2	11,763	149	57,869	2.23
Modesto MSA	2.01	65	44,313	38	11,575	28	7,668	0	0	131	63,556	1.34
Napa MSA	2.10	52	43,053	74	10,472	11	3,250	0	0	137	56,775	2.03
Placer-Sacramento Counties	2.98	160	83,729	24	6,886	7	1,115	3	12,454	194	104,184	20.66
San Jose MSA	2.55	53	28,231	89	15,879	21	3,813	3	13,562	166	61,485	1.42
Santa Cruz-Watsonville MSA	1.12	24	20,927	44	9,738	4	850	1	2,510	73	34,025	0.98
Santa Rosa MSA	1.70	54	42,114	48	10,608	8	2,065	1	2,768	111	57,555	0.61
Stockton-Lodi MSA	1.64	44	33,456	36	7,288	27	8,194	0	0	107	48,938	0.70
Visalia-Porterville MSA	4.25	48	43,925	142	25,119	86	24,892	1	1,200	277	95,136	2.03
Yuba City MSA	3.30	43	30,830	57	9,965	111	28,413	4	19,986	215	89,194	1.40
Statewide/Regional								3	6,000	3	6,000	

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE														Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Bakersfield MSA	70	8.42	2.00	0.00	23.16	11.43	30.78	17.14	44.06	71.43	0.83	16.82	26.50	55.84							
El Centro MSA	10	1.20	0.00	0.00	22.37	10.00	51.89	40.00	25.74	50.00	0.00	16.73	46.05	37.22							
Oxnard MSA	40	4.81	1.92	5.00	17.13	22.50	43.17	47.50	37.79	25.00	2.16	16.62	45.83	35.39							
Riverside-San Bernardino MS	36	4.33	2.87	5.56	21.60	25.00	36.29	30.56	39.24	38.89	2.79	18.90	38.95	39.36							
Salinas MSA	50	6.02	1.79	2.00	16.11	14.00	37.70	44.00	44.41	40.00	1.37	17.85	43.07	37.71							
San Luis Obispo MSA	194	23.35	0.30	0.00	5.63	3.61	66.30	62.37	27.78	34.02	0.46	8.73	65.48	25.32							
Santa Maria MSA	93	11.19	2.85	1.08	15.09	25.81	34.95	30.11	47.11	43.01	4.30	20.99	38.35	36.36							
Limited Review:																					
CA Non-MSA AA	17	2.05	0.00	0.00	12.15	17.65	57.76	58.82	30.10	23.53	0.00	11.21	46.18	42.61							
Chico MSA	38	4.57	0.28	0.00	14.47	7.89	56.01	52.63	29.24	39.47	0.65	15.21	52.52	31.61							
Fresno MSA	30	3.61	4.95	0.00	20.81	13.33	27.75	36.67	46.49	50.00	3.56	15.85	26.84	53.74							
Hanford-Corcoran MSA	8	0.96	0.00	0.00	27.94	0.00	25.61	25.00	46.45	75.00	0.00	17.34	27.47	55.19							
Merced MSA	24	2.89	1.17	0.00	23.76	0.00	40.43	20.83	34.64	79.17	0.82	22.34	32.35	44.49							
Modesto MSA	27	3.25	1.15	0.00	14.56	0.00	44.38	48.15	39.91	51.85	1.37	12.18	47.52	38.93							
Napa MSA	15	1.81	0.00	0.00	22.42	26.67	45.50	40.00	32.09	33.33	0.00	23.16	46.74	30.10							
Placer-Sacramento Counties	100	12.03	4.39	0.00	19.83	8.00	39.35	62.00	36.43	30.00	5.08	19.36	38.52	37.03							
San Jose MSA	10	1.20	4.35	10.00	18.70	10.00	39.49	40.00	37.45	40.00	6.28	23.73	42.91	27.09							
Santa Cruz-Watsonville MSA	9	1.08	0.47	0.00	22.33	11.11	36.59	44.44	40.62	44.44	0.39	22.37	36.82	40.41							
Santa Rosa MSA	20	2.41	0.09	0.00	16.64	5.00	58.49	65.00	24.78	30.00	0.29	20.03	60.44	19.24							
Stockton-Lodi MSA	11	1.32	2.21	0.00	20.81	9.09	32.98	9.09	44.00	81.82	1.98	17.53	31.73	48.76							
Visalia-Porterville MSA	18	2.17	0.73	0.00	22.50	5.56	34.56	27.78	42.21	66.67	0.15	13.41	28.09	58.35							
Yuba City MSA	11	1.32	1.36	0.00	19.05	0.00	36.03	45.45	43.56	54.55	0.89	17.27	37.00	44.84							

* Based on 2016 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT														Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016											
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*																
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp													
Full Review:																											
Bakersfield MSA	17	4.75	2.00	0.00	23.16	17.65	30.78	17.65	44.06	64.71	0.30	10.19	21.51	68.00													
El Centro MSA	2	0.56	0.00	0.00	22.37	0.00	51.89	0.00	25.74	100.00	0.00	15.25	55.08	29.66													
Oxnard MSA	10	2.79	1.92	0.00	17.13	20.00	43.17	50.00	37.79	30.00	1.87	15.26	43.77	39.09													
Riverside-San Bernardino M	20	5.59	2.87	5.00	21.60	40.00	36.29	30.00	39.24	25.00	1.66	14.44	36.51	47.39													
Salinas MSA	47	13.13	1.79	0.00	16.11	10.64	37.70	53.19	44.41	36.17	1.00	13.20	42.00	43.80													
San Luis Obispo MSA	96	26.82	0.30	0.00	5.63	3.13	66.30	64.58	27.78	32.29	0.27	5.63	70.91	23.19													
Santa Maria MSA	56	15.64	2.85	0.00	15.09	41.07	34.95	28.57	47.11	30.36	3.58	15.85	36.23	44.34													
Limited Review:																											
CA Non-MSA AA	12	3.35	0.00	0.00	12.15	25.00	57.76	50.00	30.10	25.00	0.00	9.91	54.65	35.44													
Chico MSA	19	5.31	0.28	0.00	14.47	5.26	56.01	52.63	29.24	42.11	0.00	14.64	54.21	31.15													
Fresno MSA	12	3.35	4.95	0.00	20.81	16.67	27.75	41.67	46.49	41.67	2.37	12.58	22.34	62.71													
Hanford-Corcoran MSA	2	0.56	0.00	0.00	27.94	0.00	25.61	50.00	46.45	50.00	0.00	10.70	21.39	67.91													
Merced MSA	12	3.35	1.17	0.00	23.76	25.00	40.43	41.67	34.64	33.33	0.23	17.14	32.16	50.47													
Modesto MSA	7	1.96	1.15	0.00	14.56	0.00	44.38	28.57	39.91	71.43	1.10	9.84	43.97	45.08													
Napa MSA	6	1.68	0.00	0.00	22.42	16.67	45.50	16.67	32.09	66.67	0.00	21.68	40.75	37.57													
Placer Sacramento Counties	16	4.47	4.39	0.00	19.83	12.50	39.35	56.25	36.43	31.25	3.48	16.85	38.22	41.45													
San Jose MSA	8	2.23	4.35	0.00	18.70	25.00	39.49	62.50	37.45	12.50	4.26	17.56	40.43	37.74													
Santa Cruz MSA	3	0.84	0.47	0.00	22.33	33.33	36.59	66.67	40.62	0.00	0.37	19.22	39.55	40.86													
Santa Rosa MSA	2	0.56	0.09	0.00	16.64	50.00	58.49	0.00	24.78	50.00	0.10	15.86	61.03	23.02													
Stockton-Lodi MSA	4	1.12	2.21	0.00	20.81	25.00	32.98	25.00	44.00	50.00	2.07	12.29	32.27	53.37													
Visalia-Porterville MSA	3	0.84	0.73	0.00	22.50	33.33	34.56	0.00	42.21	66.67	0.56	12.52	30.47	56.45													
Yuba City MSA	4	1.12	1.36	0.00	19.05	0.00	36.03	50.00	43.56	50.00	0.00	12.97	35.98	51.05													

* Based on 2016 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE														Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*								
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
Bakersfield MSA	86	5.94	2.00	1.16	23.16	12.79	30.78	22.09	44.06	63.95	0.45	12.03	25.02	62.49					
El Centro MSA	29	2.00	0.00	0.00	22.37	10.34	51.89	51.72	25.74	37.93	0.00	7.92	56.22	35.86					
Oxnard MSA	123	8.49	1.92	3.25	17.13	18.70	43.17	47.97	37.79	30.08	1.79	14.35	44.51	39.35					
Riverside-San Bernardino M	45	3.11	2.87	11.11	21.60	24.44	36.29	20.00	39.24	44.44	1.57	13.54	34.75	50.14					
Salinas MSA	97	6.69	1.79	0.00	16.11	9.28	37.70	37.11	44.41	53.61	1.03	12.42	41.24	45.30					
San Luis Obispo MSA	409	28.23	0.30	0.98	5.63	3.91	66.30	63.81	27.78	31.30	0.54	5.75	69.23	24.47					
Santa Maria MSA	201	13.87	2.85	2.99	15.09	22.89	34.95	32.34	47.11	41.79	2.80	15.85	33.90	47.44					
Limited Review:																			
CA Non-MSA AA	26	1.79	0.00	0.00	12.15	26.92	57.76	42.31	30.10	30.77	0.00	9.36	46.48	44.16					
Chico MSA	82	5.66	0.28	0.00	14.47	14.63	56.01	41.46	29.24	43.90	0.45	12.78	49.34	37.43					
Fresno MSA	45	3.11	4.95	0.00	20.81	20.00	27.75	24.44	46.49	55.56	2.12	12.84	23.22	61.81					
Hanford-Corcoran MSA	11	0.76	0.00	0.00	27.94	0.00	25.61	54.55	46.45	45.45	0.00	12.31	24.14	63.55					
Merced MSA	40	2.76	1.17	0.00	23.76	10.00	40.43	40.00	34.64	50.00	0.30	17.71	32.66	49.33					
Modesto MSA	30	2.07	1.15	0.00	14.56	6.67	44.38	53.33	39.91	40.00	0.70	9.71	43.90	45.69					
Napa MSA	28	1.93	0.00	0.00	22.42	3.57	45.50	53.57	32.09	42.86	0.00	22.68	43.24	34.08					
Placer Sacramento Counties	43	2.97	4.39	2.33	19.83	9.30	39.35	34.88	36.43	53.49	3.04	14.51	38.04	44.42					
San Jose MSA	32	2.21	4.35	0.00	18.70	28.13	39.49	43.75	37.45	28.13	4.37	20.09	40.89	34.66					
Santa Cruz MSA	9	0.62	0.47	0.00	22.33	33.33	36.59	44.44	40.62	22.22	0.29	20.12	36.79	42.80					
Santa Rosa MSA	32	2.21	0.09	0.00	16.64	12.50	58.49	40.63	24.78	46.88	0.14	17.27	58.61	23.97					
Stockton-Lodi MSA	26	1.79	2.21	11.54	20.81	0.00	32.98	34.62	44.00	53.85	1.08	11.21	30.14	57.58					
Visalia-Porterville MSA	27	1.86	0.73	3.70	22.50	7.41	34.56	33.33	42.21	55.56	0.30	12.25	26.55	60.90					
Yuba City MSA	28	1.93	1.36	0.00	19.05	7.14	36.03	32.14	43.56	60.71	0.68	13.14	34.92	51.26					

* Based on 2016 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Bakersfield MSA	5	11.63	8.38	0.00	37.14	0.00	27.60	80.00	26.88	20.00	4.65	51.16	27.91	16.28
El Centro MSA	1	2.33	0.00	0.00	39.27	100.00	33.71	0.00	27.02	0.00	0.00	50.00	27.78	22.22
Oxnard MSA	0	0.00	7.56	0.00	34.46	0.00	46.44	0.00	11.54	0.00	18.27	46.15	23.08	12.50
Riverside-San Bernardino MSA	10	23.26	11.28	10.00	36.12	10.00	35.44	50.00	17.17	30.00	18.39	44.58	26.70	10.33
Salinas MSA	7	16.28	8.24	42.86	33.38	14.29	40.99	42.86	17.39	0.00	7.69	30.77	47.44	14.10
San Luis Obispo MSA	3	6.98	1.18	0.00	13.55	33.33	63.47	33.33	21.79	33.33	0.00	6.90	89.66	3.45
Santa Maria MSA	1	2.33	19.05	0.00	29.23	100.00	29.08	0.00	22.64	0.00	14.56	35.92	24.27	25.24
Limited Review:														
CA Non-MSA AA	0	0.00	0.00	0.00	33.31	0.00	61.81	0.00	4.89	0.00	0.00	33.33	33.33	33.33
Chico MSA	0	0.00	6.12	0.00	37.46	0.00	39.37	0.00	17.06	0.00	13.33	43.33	16.67	26.67
Fresno MSA	1	2.33	17.36	0.00	32.69	0.00	29.99	100.00	19.96	0.00	21.82	39.09	30.00	9.09
Hanford-Corcoran MSA	1	2.33	0.00	0.00	41.95	0.00	17.35	0.00	40.70	100.00	0.00	52.94	11.76	35.29
Merced MSA	0	0.00	9.31	0.00	59.83	0.00	15.10	0.00	15.76	0.00	14.29	57.14	28.57	0.00
Modesto MSA	1	2.33	6.64	0.00	17.98	100.00	50.02	0.00	25.36	0.00	18.18	24.24	39.39	18.18
Napa MSA	3	6.98	0.00	0.00	46.75	66.67	34.77	33.33	18.48	0.00	0.00	52.63	36.84	10.53
Placer Sacramento Counties	1	2.33	12.40	0.00	36.03	0.00	35.46	100.00	16.11	0.00	13.04	47.83	27.54	11.59
San Jose MSA	3	6.98	10.18	0.00	32.23	66.67	39.62	33.33	17.98	0.00	15.70	35.70	36.71	11.90
Santa Cruz MSA	3	6.98	5.53	33.33	39.40	0.00	43.08	66.67	11.99	0.00	11.63	30.23	53.49	4.65
Santa Rosa MSA	0	0.00	1.80	0.00	38.46	0.00	51.56	0.00	8.17	0.00	4.40	32.97	51.65	10.99
Stockton-Lodi MSA	3	6.98	21.80	0.00	33.80	66.67	28.11	33.33	16.29	0.00	29.41	45.10	21.57	3.92
Visalia-Porterville MSA	0	0.00	4.85	0.00	38.42	0.00	29.16	0.00	27.56	0.00	0.00	35.71	21.43	42.86
Yuba City MSA	0	0.00	3.75	0.00	55.92	0.00	27.65	0.00	12.68	0.00	0.00	61.54	23.08	15.38

* Based on 2016 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi-Family Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*										
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Bakersfield MSA	343	11.78	3.75	3.21	20.18	13.70	29.64	22.45	46.43	60.64	2.86	18.97	26.70	51.47							
El Centro MSA	146	5.01	0.00	0.00	31.43	28.77	46.34	44.52	22.22	26.71	0.00	27.04	48.06	24.90							
Oxnard MSA	355	12.19	3.43	5.92	18.97	30.70	44.21	49.01	33.38	14.37	3.04	17.13	42.72	37.10							
Riverside-San Bernardino	189	6.49	4.39	6.88	24.04	35.98	34.04	29.10	37.45	28.04	3.28	21.74	33.62	41.36							
Salinas MSA	302	10.37	1.43	0.00	19.36	27.48	39.29	47.68	39.35	24.83	1.24	17.94	38.79	42.03							
San Luis Obispo MSA	387	13.29	1.90	1.55	10.83	10.59	60.30	56.59	26.91	31.27	1.35	9.31	60.34	29.00							
Santa Maria MSA	313	10.75	12.99	9.90	21.66	31.63	27.19	30.67	37.67	27.80	11.38	21.38	26.27	40.97							
Limited Review:																					
CA Non-MSA AA	46	1.58	0.00	0.00	13.34	8.70	61.52	60.87	25.10	30.43	0.00	14.76	60.56	24.68							
Chico MSA	140	4.81	0.37	0.00	28.67	28.57	43.56	38.57	27.41	32.86	0.21	20.08	43.22	36.49							
Fresno MSA	62	2.13	9.37	4.84	23.48	43.55	25.83	14.52	41.13	37.10	6.94	21.44	26.30	45.32							
Hanford-Corcoran MSA	26	0.89	0.00	0.00	40.96	38.46	20.57	23.08	38.24	38.46	0.00	32.77	26.09	41.14							
Merced MSA	54	1.85	2.19	3.70	39.89	29.63	28.97	37.04	28.95	29.63	1.16	26.86	40.29	31.69							
Modesto MSA	38	1.30	2.41	13.16	19.23	18.42	44.35	60.53	34.01	7.89	2.33	17.44	44.41	35.81							
Napa MSA	71	2.44	0.00	0.00	30.29	26.76	41.37	54.93	27.40	18.31	0.00	27.63	41.59	30.79							
Placer Sacramento Counties	24	0.82	7.51	8.33	22.08	12.50	37.88	41.67	32.53	37.50	6.66	19.88	37.44	36.02							
San Jose MSA	89	3.06	6.13	14.61	22.46	66.29	34.51	15.73	36.79	3.37	5.34	22.63	36.31	35.73							
Santa Cruz MSA	44	1.51	2.06	18.18	20.77	43.18	44.28	25.00	32.89	13.64	1.29	22.47	42.57	33.66							
Santa Rosa MSA	48	1.65	3.67	18.75	20.31	14.58	52.88	52.08	23.14	14.58	1.99	18.74	52.94	26.32							
Stockton-Lodi MSA	36	1.24	7.67	22.22	21.96	19.44	31.19	30.56	39.18	27.78	4.79	18.51	30.29	46.42							
Visalia-Porterville MSA	142	4.88	1.19	0.00	26.73	36.62	28.34	28.87	43.71	34.51	1.25	26.55	29.80	42.40							
Yuba City MSA	57	1.96	0.87	0.00	34.54	40.35	30.57	15.79	34.01	43.86	0.42	23.54	36.30	39.74							

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2017).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS														Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*								
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
Bakersfield MSA	30	3.50	1.20	0.00	28.93	26.67	29.79	26.67	40.08	46.67	1.10	28.57	30.77	39.56					
El Centro MSA	76	8.88	0.00	0.00	18.77	3.95	40.99	26.32	40.25	69.74	0.00	20.45	35.23	44.32					
Oxnard MSA	39	4.56	5.68	20.51	23.84	20.51	45.77	38.46	24.71	20.51	7.95	21.02	44.32	26.70					
Riverside-San Bernardino	23	2.69	4.11	21.74	22.16	39.13	35.26	17.39	38.47	21.74	5.51	16.53	32.20	45.76					
Salinas MSA	55	6.43	0.63	0.00	15.31	14.55	41.81	60.00	41.81	25.45	0.67	14.77	42.95	41.61					
San Luis Obispo MSA	70	8.18	0.50	0.00	5.73	0.00	64.95	65.71	28.82	34.29	0.59	1.76	65.88	31.76					
Santa Maria MSA	92	10.75	6.23	11.96	15.82	18.48	25.00	23.91	52.70	45.65	11.72	16.41	28.13	43.75					
Limited Review:																			
CA Non-MSA AA	25	2.92	0.00	0.00	16.67	28.00	64.25	72.00	19.09	0.00	0.00	9.88	75.31	14.81					
Chico MSA	23	2.69	0.41	0.00	21.05	8.70	36.55	43.48	41.99	47.83	0.00	21.82	40.00	38.18					
Fresno MSA	73	8.53	5.15	1.37	29.21	19.18	33.78	46.58	31.86	32.88	3.69	30.43	37.08	28.80					
Hanford-Corcoran MSA	30	3.50	0.00	0.00	20.49	0.00	42.94	50.00	36.42	50.00	0.00	8.41	44.86	46.73					
Merced MSA	17	1.99	0.40	0.00	17.13	11.76	52.43	35.29	30.04	52.94	0.00	11.55	65.07	23.38					
Modesto MSA	28	3.27	0.65	10.71	7.68	0.00	51.61	82.14	40.07	7.14	0.71	7.60	55.58	36.10					
Napa MSA	11	1.29	0.00	0.00	15.65	9.09	33.74	63.64	50.24	27.27	0.00	12.82	43.59	43.59					
Placer Sacramento Counties	7	0.82	4.27	0.00	19.58	0.00	43.39	42.86	32.76	57.14	1.85	8.89	48.15	41.11					
San Jose MSA	21	2.45	6.72	0.00	25.91	47.62	35.68	42.86	31.61	9.52	0.74	29.63	38.52	31.11					
Santa Cruz MSA	4	0.47	1.30	0.00	26.06	75.00	40.21	25.00	32.43	0.00	0.00	52.11	22.54	25.35					
Santa Rosa MSA	8	0.93	0.89	0.00	12.15	0.00	56.34	62.50	30.63	37.50	1.40	7.44	58.60	32.56					
Stockton-Lodi MSA	27	3.15	4.30	22.22	12.49	0.00	31.63	18.52	51.57	59.26	7.46	8.55	28.73	55.26					
Visalia-Porterville MSA	86	10.05	2.50	2.33	24.72	36.05	41.78	40.70	31.00	20.93	4.60	25.67	49.64	20.10					
Yuba City MSA	111	12.97	0.34	0.00	7.15	4.50	38.14	27.03	54.37	68.47	0.00	7.18	26.67	66.15					

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2017).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families** *	% BANK Loans****	% Families ¹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Bakersfield MSA	70	8.42	23.03	2.86	17.18	4.29	17.96	7.14	41.83	85.71	3.22	14.50	26.43	55.85
El Centro MSA	10	1.20	24.44	0.00	17.03	10.00	16.45	20.00	42.09	70.00	2.02	12.57	29.32	56.09
Oxnard MSA	40	4.81	21.43	0.00	17.35	17.50	20.51	20.00	40.71	62.50	1.68	10.13	27.76	60.43
Riverside-San Bernardino MS	36	4.33	21.83	0.00	17.53	2.86	19.81	11.43	40.84	85.71	2.09	12.76	27.06	58.09
Salinas MSA	50	6.02	21.84	0.00	16.71	2.00	19.49	14.00	41.97	84.00	0.38	4.78	19.86	74.98
San Luis Obispo MSA	194	23.35	19.80	1.04	18.20	7.25	21.60	11.92	40.40	79.79	1.26	7.53	22.70	68.50
Santa Maria MSA	93	11.19	21.72	1.09	17.79	10.87	18.61	33.70	41.88	54.35	1.55	13.44	26.11	58.90
Limited Review:														
CA Non-MSA AA	17	2.05	20.34	6.25	18.84	6.25	19.30	6.25	41.52	81.25	2.07	15.19	24.30	58.44
Chico MSA	38	4.57	22.10	5.26	17.16	5.26	19.36	13.16	41.38	76.32	3.28	15.46	25.70	55.56
Fresno MSA	30	3.61	24.70	0.00	16.04	0.00	17.13	13.33	42.13	86.67	1.58	11.51	25.03	61.88
Hanford-Corcoran MSA	8	0.96	22.37	0.00	18.52	0.00	18.90	12.50	40.21	87.50	1.42	9.07	26.04	63.46
Merced MSA	24	2.89	24.83	0.00	16.51	8.33	17.16	12.50	41.51	79.17	0.88	8.25	24.53	66.34
Modesto MSA	27	3.25	22.58	0.00	16.69	3.70	19.60	18.52	41.12	77.78	1.34	13.82	31.45	53.39
Napa MSA	15	1.81	21.89	0.00	16.70	6.67	20.35	13.33	41.06	80.00	1.28	6.95	18.37	73.40
Placer Sacramento Cos	100	12.03	22.76	1.00	17.19	8.00	20.11	10.00	39.94	81.00	2.41	15.11	26.55	55.92
San Jose MSA	10	1.20	23.65	0.00	16.34	10.00	19.49	10.00	40.51	80.00	1.26	6.86	20.21	71.68
Santa Cruz MSA	9	1.08	23.85	0.00	16.93	0.00	18.29	0.00	40.92	100.00	0.68	7.23	16.79	75.30
Santa Rosa MSA	20	2.41	20.14	0.00	18.47	0.00	20.77	10.00	40.62	90.00	1.10	6.84	21.06	71.00
Stockton-Lodi MSA	11	1.32	22.05	0.00	17.73	9.09	19.13	18.18	41.09	72.73	1.58	10.13	25.96	62.33
Visalia-Porterville MSA	18	2.17	22.78	0.00	17.63	11.11	17.83	5.56	41.76	83.33	0.77	9.06	22.79	67.38
Yuba City MSA	11	1.32	21.41	0.00	17.29	10.00	20.30	10.00	40.99	80.00	1.69	14.25	32.21	51.85

* Based on 2016 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by BANK.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT														Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*										
	#	% of Total**	% Families***	% BANK Loans****	% Families ²	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp							
Full Review:																					
Bakersfield MSA	17	4.75	23.03	11.76	17.18	0.00	17.96	11.76	41.83	76.47	2.98	7.29	16.54	73.20							
El Centro MSA	2	0.56	24.44	0.00	17.03	0.00	16.45	0.00	42.09	100.00	0.00	14.04	21.93	64.04							
Oxnard MSA	10	2.79	21.43	30.00	17.35	0.00	20.51	40.00	40.71	30.00	5.79	16.54	24.74	52.93							
Riverside-San Bernardino MSA	20	5.59	21.83	5.00	17.53	15.00	19.81	25.00	40.84	55.00	3.37	12.94	22.64	61.05							
Salinas MSA	47	13.13	21.84	2.13	16.71	14.89	19.49	23.40	41.97	59.57	2.45	9.18	21.63	66.73							
San Luis Obispo MSA	96	26.82	19.80	8.33	18.20	13.54	21.60	22.92	40.40	55.21	5.99	11.56	25.85	56.60							
Santa Maria MSA	56	15.64	21.72	5.36	17.79	21.43	18.61	23.21	41.88	50.00	7.05	15.07	22.90	54.99							
Limited Review:																					
CA Non-MSA AA	12	3.35	20.34	8.33	18.84	0.00	19.30	16.67	41.52	75.00	4.44	13.02	24.76	57.78							
Chico MSA	19	5.31	22.10	10.53	17.16	5.26	19.36	15.79	41.38	68.42	3.27	18.30	21.24	57.19							
Fresno MSA	12	3.35	24.70	0.00	16.04	0.00	17.13	8.33	42.13	91.67	1.29	6.91	16.77	75.02							
Hanford-Corcoran MSA	2	0.56	22.37	0.00	18.52	0.00	18.90	50.00	40.21	50.00	1.12	3.35	12.29	83.24							
Merced MSA	12	3.35	24.83	8.33	16.51	0.00	17.16	8.33	41.51	83.33	1.21	10.41	19.85	68.52							
Modesto MSA	7	1.96	22.58	0.00	16.69	0.00	19.60	14.29	41.12	85.71	3.89	13.46	27.30	55.36							
Napa MSA	6	1.68	21.89	0.00	16.70	0.00	20.35	16.67	41.06	83.33	5.71	13.51	25.83	54.95							
Placer Sacramento Cos	16	4.47	22.76	0.00	17.19	6.25	20.11	18.75	39.94	75.00	3.31	14.65	25.40	56.64							
San Jose MSA	8	2.23	23.65	12.50	16.34	0.00	19.49	37.50	40.51	50.00	4.61	12.58	21.41	61.40							
Santa Cruz MSA	3	0.84	23.85	0.00	16.93	0.00	18.29	33.33	40.92	66.67	3.05	9.71	26.29	60.95							
Santa Rosa MSA	2	0.56	20.14	0.00	18.47	0.00	20.77	0.00	40.62	100.00	3.22	11.98	23.36	61.43							
Stockton-Lodi MSA	4	1.12	22.05	0.00	17.73	0.00	19.13	25.00	41.09	75.00	2.94	10.05	23.18	63.83							
Visalia-Porterville MSA	3	0.84	22.78	0.00	17.63	0.00	17.83	0.00	41.76	100.00	1.57	4.31	15.49	78.63							
Yuba City MSA	4	1.12	21.41	0.00	17.29	0.00	20.30	0.00	40.99	100.00	1.83	11.87	29.68	56.62							

* Based on 2016 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 20166								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid
Full Review:															
Bakersfield MSA	86	5.94	23.03	0.00	17.18	2.47	17.96	8.64	41.83	88.89	4.03	10.81	19.24	65.91	
El Centro MSA	29	2.00	24.44	6.90	17.03	6.90	16.45	17.24	42.09	68.97	2.89	8.66	18.50	69.95	
Oxnard MSA	123	8.49	21.43	10.08	17.35	15.97	20.51	21.01	40.71	52.94	3.87	13.58	26.64	55.91	
Riverside-San Bernardino MSA	45	3.11	21.83	2.44	17.53	19.51	19.81	19.51	40.84	58.54	3.30	11.56	21.58	63.56	
Salinas MSA	97	6.69	21.84	0.00	16.71	6.25	19.49	15.63	41.97	78.13	2.19	7.80	19.69	70.32	
San Luis Obispo MSA	409	28.23	19.80	2.96	18.20	10.59	21.60	19.70	40.40	66.75	3.40	10.40	24.44	61.77	
Santa Maria MSA	201	13.87	21.72	10.10	17.79	15.15	18.61	18.18	41.88	56.57	4.13	11.97	20.90	62.99	
Limited Review:															
CA Non-MSA AA	26	1.79	20.34	0.00	18.84	12.00	19.30	20.00	41.52	68.00	4.09	13.34	21.49	61.08	
Chico MSA	82	5.66	22.10	2.47	17.16	9.88	19.36	13.58	41.38	74.07	4.66	12.10	20.61	62.63	
Fresno MSA	45	3.11	24.70	0.00	16.04	2.27	17.13	6.82	42.13	90.91	3.11	7.75	17.91	71.23	
Hanford-Corcoran MSA	11	0.76	22.37	0.00	18.52	0.00	18.90	0.00	40.21	100.00	2.46	8.36	16.22	72.96	
Merced MSA	40	2.76	24.83	0.00	16.51	2.70	17.16	8.11	41.51	89.19	2.26	9.30	20.35	68.09	
Modesto MSA	30	2.07	22.58	0.00	16.69	3.57	19.60	10.71	41.12	85.71	4.01	13.79	25.73	56.47	
Napa MSA	28	1.93	21.89	3.85	16.70	3.85	20.35	19.23	41.06	73.08	3.63	10.39	23.41	62.57	
Placer Sacramento Cos	43	2.97	22.76	0.00	17.19	4.88	20.11	9.76	39.94	85.37	3.66	12.99	23.88	59.46	
San Jose MSA	32	2.21	23.65	16.13	16.34	9.68	19.49	16.13	40.51	58.06	2.77	10.26	21.33	65.64	
Santa Cruz MSA	9	0.62	23.85	11.11	16.93	11.11	18.29	11.11	40.92	66.67	3.15	10.54	21.32	64.99	
Santa Rosa MSA	32	2.21	20.14	3.33	18.47	3.33	20.77	10.00	40.62	83.33	2.68	11.17	24.59	61.57	
Stockton-Lodi MSA	26	1.79	22.05	3.85	17.73	3.85	19.13	11.54	41.09	80.77	2.70	9.46	21.79	66.06	
Visalia-Porterville MSA	27	1.86	22.78	4.35	17.63	13.04	17.83	0.00	41.76	82.61	2.38	8.25	15.60	73.77	
Yuba City MSA	28	1.93	21.41	0.00	17.29	12.00	20.30	0.00	40.99	88.00	3.79	13.38	24.92	57.91	

* Based on 2016 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated and purchased by BANK.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: CALIFORNIA A Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Bakersfield MSA	343	11.74	84.57	25.36	41.11	27.99	30.90	13,215	6,773
El Centro MSA	146	5.00	75.96	41.10	55.48	17.12	27.40	2,045	1,031
Oxnard MSA	355	12.15	86.55	48.45	60.00	16.90	23.10	22,007	12,016
Riverside-San Bernardino M	189	6.47	86.05	41.27	54.50	17.46	28.04	80,638	43,851
Salinas MSA	305	10.44	85.51	51.15	60.98	12.46	26.56	7,124	3,905
San Luis Obispo MSA	387	13.25	87.37	49.61	55.81	17.31	26.87	7,618	4,138
Santa Maria MSA	316	10.82	84.67	45.57	57.91	17.72	24.37	9,095	4,769
Limited Review:									
CA Non-MSA AA	46	1.57	85.29	60.87	78.26	6.52	15.22	3,156	1,767
Chico MSA	140	4.79	85.27	65.00	83.57	10.71	5.71	5,706	3,025
Fresno MSA	62	2.12	83.81	50.00	58.06	12.90	29.03	15,087	7,479
Hanford-Corcoran MSA	26	0.89	81.13	26.92	46.15	30.77	23.08	1,453	708
Merced MSA	54	1.85	82.72	66.67	72.22	16.67	11.11	3,516	1,980
Modesto MSA	38	1.30	83.90	15.79	34.21	28.95	36.84	8,853	4,928
Napa MSA	74	2.53	86.21	50.00	60.81	22.97	16.22	4,177	2,219
Placer Sacramento Cos	24	0.82	85.63	33.33	33.33	29.17	37.50	40,625	22,065
San Jose MSA	89	3.05	86.04	33.71	61.80	19.10	19.10	53,710	28,167
Santa Cruz MSA	44	1.51	88.25	43.18	38.64	40.91	20.45	6,743	3,800
Santa Rosa MSA	48	1.64	86.96	27.08	56.25	14.58	29.17	13,276	7,273
Stockton-Lodi MSA	36	1.23	83.38	63.89	61.11	19.44	19.44	11,834	6,607
Visalia-Porterville MSA	142	4.86	81.78	47.89	53.52	26.06	20.42	6,078	3,188
Yuba City MSA	57	1.95	83.99	29.82	56.14	24.56	19.30	2,940	1,427

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2017).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.34% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Bakersfield MSA	30	3.50	88.22	33.33	10.00	36.67	53.33	194	82
El Centro MSA	76	8.88	76.30	47.37	17.11	19.74	63.16	91	26
Oxnard MSA	39	4.56	90.26	41.03	7.69	35.90	56.41	181	72
Riverside-San Bernardino M	23	2.69	93.28	43.48	26.09	34.78	39.13	245	138
Salinas MSA	55	6.43	82.81	16.36	25.45	7.27	67.27	164	57
San Luis Obispo MSA	70	8.18	94.27	65.71	54.29	21.43	24.29	176	99
Santa Maria MSA	92	10.75	89.67	57.61	29.35	30.43	40.22	133	60
Limited Review:									
CA Non-MSA AA	25	2.92	94.87	72.00	16.00	28.00	56.00	88	55
Chico MSA	23	2.69	94.35	82.61	43.48	39.13	17.39	171	103
Fresno MSA	73	8.53	90.05	65.75	10.96	23.29	65.75	697	286
Hanford-Corcoran MSA	30	3.50	88.77	40.00	16.67	30.00	53.33	110	44
Merced MSA	17	1.99	88.45	64.71	29.41	29.41	41.18	360	156
Modesto MSA	28	3.27	90.58	32.14	10.71	50.00	39.29	429	227
Napa MSA	11	1.29	91.44	72.73	9.09	9.09	81.82	125	62
Placer Sacramento Cos	7	0.82	94.35	100.00	57.14	28.57	14.29	274	171
San Jose MSA	21	2.45	93.37	52.38	52.38	23.81	23.81	142	70
Santa Cruz MSA	4	0.47	91.27	25.00	0.00	100.00	0.00	74	38
Santa Rosa MSA	8	0.93	93.25	50.00	25.00	37.50	37.50	225	123
Stockton-Lodi MSA	27	3.15	90.75	44.44	11.11	25.93	62.96	469	233
Visalia-Porterville MSA	86	10.05	86.72	32.56	11.63	36.05	52.33	429	174
Yuba City MSA	111	12.97	91.71	73.87	21.62	37.84	40.54	199	124

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2017).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.40% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: CALIFORNIA									
Evaluation Period: JULY 14, 2014 TO OCTOBER 18, 2017									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Bakersfield MSA	0	0	7	2,125	7	2,125	2.97	0	0
El Centro MSA	1	4,600	6	6,120	7	10,720	15.00	1	515
Oxnard MSA	2	1,000	18	9,081	20	10,081	14.10	1	6,000
Riverside-San Bernardino M	2	5,553	20	1,637	22	7,190	10.06	1	2,454
Salinas MSA	1	50	9	6,550	10	6,600	9.23	0	0
San Luis Obispo MSA	0	0	21	2,720	21	2,720	3.81	2	3,389
Santa Maria MSA	0	0	15	574	15	574	0.80	1	4,000
Limited Review:									
CA Non-MSA AA	0	0	1	802	1	802	1.12	1	0
Chico MSA	1	730	5	444	6	1,174	1.64	1	396
Fresno MSA	1	4,393	8	1,464	9	5,857	8.19	0	0
Hanford-Corcoran MSA	0	0	1	500	1	500	0.70	0	0
Merced MSA	0	0	3	1,215	3	1,215	1.70	1	1,878
Modesto MSA	2	1,792	1	10	3	1,802	2.52	0	0
Napa MSA	0	0	2	11	2	11	0.02	0	0
Placer Sacramento Cos	1	4,000	25	5,070	26	9,070	12.69	0	0
San Jose MSA	0	0	2	4,143	2	4,143	5.80	1	2
Santa Cruz MSA	1	350	3	504	4	854	1.19	0	0
Santa Rosa MSA	0	0	6	3,220	6	3,220	4.514.50	0	0
Stockton-Lodi MSA	0	0	1	5	1	5	0.01	0	0
Visalia-Porterville MSA	0	0	7	100	7	100	0.14	0	0
Yuba City MSA	0	0	3	2,709	3	2,709	3.79	1	539
Regional/Statewide	12	24,150	58	21,671	70	45,821		5	13,335

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: CALIFORNIA																	
Evaluation Period: JULY 14, 2014 TO OCTOBER 18, 2017																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Bakersfield MSA	4.11	5	4.95	0.00	40.00	20.00	40.00	0	0	0	0	0	0	9.68	23.27	31.77	33.00
El Centro MSA	4.99	5	4.95	0.00	40.00	0.00	60.00	0	1	0	- 1	0	0	0.00	41.49	26.37	29.68
Oxnard MSA	8.03	10	9.90	10.00	40.00	40.00	10.00	1	1	0	0	0	0	4.39	29.23	37.71	28.47
Riverside-San Bernardino MSA	4.66	8	7.92	0.00	50.00	25.00	25.00	0	2	0	- 1	0	- 1	5.35	27.64	35.44	31.19
Salinas MSA	11.80	9	8.91	11.11	55.56	11.11	22.22	0	1	0	- 1	0	0	3.09	25.97	35.99	32.12
San Luis Obispo MSA	13.90	14	13.86	0.00	28.57	50.00	21.43	0	2	0	0	- 1	- 1	0.00	13.81	65.77	14.84
Santa Maria MSA	11.49	14	13.86	14.29	42.86	14.29	28.57	1	4	- 1	- 1	- 1	0	12.21	25.77	29.27	32.03
Limited Review:																	
CA Non-MSA AA	1.47	4	3.96	0.00	50.00	25.00	25.00	0	4	0	- 1	- 3	0	0.00	20.83	56.36	20.88
Chico MSA	3.04	5	4.95	0.00	20.00	40.00	40.00	0	1	0	0	- 1	0	3.93	26.18	46.63	23.26
Fresno MSA	2.24	2	1.98	0.00	0.00	50.00	50.00	0	0	0	0	0	0	8.49	33.63	23.18	33.95
Hanford-Corcoran MSA	0.88	1	0.99	0.00	100.00	0.00	0.00	0	0	0	0	0	0	3.14	26.33	26.59	33.44
Merced MSA	2.23	4	3.96	0.00	75.00	0.00	25.00	0	0	0	0	0	0	1.40	30.55	43.24	24.81
Modesto MSA	1.34	4	3.96	0.00	25.00	50.00	25.00	0	0	0	0	0	0	3.84	25.33	38.73	32.10
Napa MSA	2.03	1	0.99	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	21.10	51.70	26.55
Placer Sacramento Cos	20.66	1	0.99	0.00	0.00	100.00	0.00	0	1	0	0	0	- 1	10.25	25.02	33.99	30.62
San Jose MSA	1.42	2	1.98	0.00	50.00	50.00	0.00	0	0	0	0	0	0	9.30	22.26	36.30	31.99
Santa Cruz MSA	0.98	2	1.98	0.00	50.00	50.00	0.00	1	1	0	1	- 1	0	5.58	25.37	40.32	28.74
Santa Rosa MSA	0.61	2	1.98	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	27.05	52.28	20.67
Stockton-Lodi MSA	0.70	2	1.98	0.00	50.00	50.00	0.00	0	2	0	- 1	- 1	0	8.37	22.25	35.03	34.35
Visalia-Porterville MSA	2.03	4	3.96	0.00	50.00	25.00	25.00	0	0	0	0	0	0	2.44	33.58	31.92	31.91
Yuba City MSA	1.40	2	1.98	0.00	50.00	0.00	50.00	0	0	0	0	0	0	3.99	23.59	34.35	38.08

