
OCC

LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

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Community Reinvestment Act Performance Evaluation

Baker Boyer National Bank
Charter Number: 3956

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Walla Walla, Washington 99362

Office of the Comptroller of the Currency

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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 Baker Boyer National Bank with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
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 support this rating include:

- An excellent level of borrower distribution of small loans to businesses;
- A high level of CD lending responsive to the needs of the community;
- A good geographic distribution of small loans to businesses in the Walla Walla assessment area;
- An adequate level of investments;
- Banking services that are accessible to geographies and individuals of different income levels in the bank's assessment areas.

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 metropolitan area/assessment area.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

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.

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 household 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 or a block numbering area 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 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, or withdrawn).

Home Mortgage Loans: Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multi-family (five or more families) dwellings, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

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

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 metropolitan area/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every 10 years and used to determine the income level category of geographies. Also, the median income determined annually by the Department of Housing and Urban Development 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 primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate Federal financial supervisory agency.

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.

Multi-family: 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 non farm or non residential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by non farm residential real estate as "small business loans" if the loans are reported on the TFR as non mortgage commercial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the 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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

Baker Boyer National Bank (BBNB) is a wholly owned subsidiary of Baker Boyer Bancorp. The bank was chartered on January 8, 1889 and is headquartered in downtown Walla Walla, Washington. The bank is an interstate bank and operates eight branch offices in two states. BBNB offers a full range of products through its three full service branch offices located in Walla Walla, and its five full service branches located in College Place, Kennewick and Connell, Washington, and Milton Freewater and Weston, Oregon.

As of December 31, 2002, BBNB had total assets of \$386 million and equity capital of \$34 million. The bank merged with its affiliate the Bank of Commerce in Milton Freewater, Oregon on April 1, 2001. Prior to the merger, the Bank of Commerce had been owned by the parent corporation, Baker Boyer Bancorp. As of December 31, 2002, total loans represented 72% of total assets. BBNB's commercial loans totaled \$105 million or 38% of total loans. One to four family residential loans totaled \$93 million or 33% of total loans. Agricultural loans totaled \$56 million or 20% of total loans, and consumer loans totaled \$16 million or 6% of total loans.

The bank's primary focus is on customers with small businesses and farms, and home and consumer loans for individuals. When comparing the bank to its peers, we are referring to all banks doing business in the assessment areas. However, the size of the bank is taken into consideration when making comparisons to peers.

The bank has the second, the fifth, and the fifteenth largest share of its Walla Walla, Umatilla and TriCities assessment area deposits, respectively. The bank is one of only three banks headquartered in Walla Walla. Competition for business and home loans is mainly from commercial bank branches located in the assessment areas.

BBNB's CRA performance was evaluated at this examination using Large Retail Bank CRA Procedures. The bank's CRA performance was rated "Satisfactory" using Small Community Bank Procedures at the CRA examination in July 1999.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance from July 20, 1999 through March 17, 2003. We evaluated BBNB's small business, small farm, and residential mortgage loan originations from January 1, 2000 through December 31, 2002. Community development loans, services, and investments were evaluated during the time period from July 20, 1999 through March 17, 2003. For more information about the scope of this evaluation, please refer to Appendix A.

Data Integrity

We reviewed a sample of HMDA and small business loans made in June 2000 to determine the integrity of the data used in this analysis. The data was corrected for errors found in the small business portfolio. We also verified the accuracy of the bank's investments, services, and community development data. This analysis is based on accurate data.

Selection of Areas for Full-Scope Review

BBNB operates primarily in four assessment areas (AAs) in Washington and Oregon. Two AAs are the two counties in the Richland-Kennewick-Pasco MSA (TriCities); therefore, they will be reviewed as one AA for evaluations purposes. The remaining two AAs represent the counties of Walla Walla (in Washington) and Umatilla (directly south of Walla Walla County) in Oregon. We selected the AAs of Walla Walla County and Umatilla County for full scope review. The TriCities AA was selected for a limited scope review, because of its minimal contribution to the total loans and deposits of the bank. Separate state ratings for Washington and Oregon were not assessed, because the bank's operations do not extend significantly into the state of Oregon and the AA is not a separate state or multi-state MSA. Also, the AA only represents a small percentage of the population and area of Oregon. More weight is given to the bank's performance in the Walla Walla and Umatilla AAs, because they comprise a significant majority of the deposits and assets of the bank.

Ratings

The bank's overall rating is based primarily on its performance in the Walla Walla and Umatilla AAs. These areas account for 96.4% of BBNB's deposits and 89.26% of its loans.

Other

Please refer to Market Profiles in Appendix B for a detailed discussion of credit needs and community contacts.

Fair Lending Review

An analysis of the most recent public comments and consumer complaint information and HMDA, small business, and small farm lending data was performed according to the OCC's risk based fair lending approach. Based on the analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending examination was performed in August 1999. The bank was found to be in satisfactory compliance with fair lending laws. There was no evidence of disparate treatment applied on a prohibited basis, and no substantive violations of fair lending laws were cited.

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 Walla Walla and Umatilla AAs is good.

Lending Activity

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

BBNB's lending reflects excellent responsiveness to the credit needs in its AAs. BBNB originated 1,943 loans totaling \$172 million within its AAs during the evaluation period. The major portion of these loans was small loans to businesses (47% by number and 35% by dollar volume). Small loans to farms comprised 30% of the number and 40% of the dollar volume of loans, while home mortgage loans comprised 22% of the number and 23% of the dollar volume of loans. The distribution reflects the bank's emphasis on commercial and agricultural lending with a secondary emphasis on consumer and home mortgage lending.

Peer lending data for the year 2001 showed BBNB with an overall market share of 32% of the number and 58% of the dollar volume of small loans to businesses in the Walla Walla AA. BBNB had an overall market share of 83% of the number and 86% of the dollar volume of small loans to farms. The market share of deposits in the Walla Walla AA was 31%. The lending market share compares favorably to the deposit market share for all loan categories except for home mortgage lending where the deposit market share was only 6% of the number and dollar volume of loans. This is not a concern because the market for home loans is not a primary focus of the bank and is well served by other banks in the area.

2001 peer lending data in the Umatilla AA showed BBNB with an overall market share of 25% of the number and 20% of the dollar volume of small loans to farms and 10% of the number and 12 % of the dollar volume of small loans to businesses compared to the 15.5% of deposit market share. Again the bank compares favorably in all categories except for home mortgages where the number and dollar volume are only 2% and 1% respectively.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is good in the Walla Walla AA and excellent in the Umatilla AA and is based primarily on the distribution of small loans to businesses.

Home Mortgage Loans

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

To assess the bank's geographic distribution of loans by income level of the geography, we calculated the number of bank loans in low-, moderate-, middle- and upper-income geographies as a percentage of all loans originated during this review period. We then compare the percentage of bank loans originated in the low- and moderate-income geographies to the percentage of owner occupied houses in the low- and moderate-income income geographies. We make these comparisons to determine whether the bank's loans are in proportion to the potential market of home mortgage credit represented by the percentage of owner occupied homes in each income category of geography. We then compare the percentage of bank loans originated in low- and moderate-income geographies to the percentage of loans made in low- and moderate-income geographies by all the banks originating loans in the AA. We make this comparison to determine the level of credit demand and whether the bank's lending is at least in proportion to the market.

Additionally, we compared the bank's overall market share for each type of loan (small business and HMDA) to the bank's market share for each type of loan in the four geographic income categories. This is an indicator of the bank's commitment to lend in low- and moderate-income geographies.

To determine specific needs not being met by the market, we rely on community contact data, which is mentioned when appropriate.

Walla Walla AA

Home Purchase

BBNB's home purchase lending to the Walla Walla AA low-income geography is good. BBNB's home purchase lending to the Walla Walla AA moderate-income geographies is excellent.

The Walla Walla AA is the only AA with a low-income census tract. The percentage of the bank's loans to low-income geographies is slightly less than the percentage of owner occupied units. However, the bank's percentage of loans is higher than the percentage of all banks lending in the low-income geographies for 2001. In 2000, it was lower, but the numbers were statistically insignificant.

Market share data indicates that the bank had a market share in the low-income geography lower than its overall market share. However, the difference in the actual number of loans originated by the bank and the lender with the highest market share were very small and not relevant.

The percentage of the bank's loans to moderate-income geographies is higher than the percentage of owner occupied homes in the geographies. The bank's percentage of loans

exceeded the percentage of loans made by all other banks in 2001 and was almost equal to the percentage of loans made by all banks in the moderate-income geography in 2000.

The bank's market share in moderate-income geographies exceeded its overall market share in 2001 and was almost equal to its overall market share in 2000. The difference in actual number of loans made in 2000 and 2001 was very small.

Home Improvement

Home improvement lending in the Walla Walla AA low-income geographies is good. Home improvement lending to moderate-income geographies is good.

BBNB's percentage of home improvement loans in the low-income geography is slightly less than the percentage of owner occupied units. However, the bank's percentage of loans is higher than the percentage of loans to the low-income geography made by all other banks in the AA in 2001. The percentage made by other banks in 2000 was statistically irrelevant because of the low number of loans. The bank's market share in the low-income geography far exceeded the overall market share. BBNB was only one of five lenders making home improvement loans in the geography in 2000 and 2001.

BBNB's percentage of loans in moderate-income geographies is slightly less than the percentage of owner occupied homes in those geographies. However, the bank's percentage was higher than the percentage of other banks in 2001. It was lower in 2000, but the bank had the number one market share of loans in the moderate-income geography. Market share in the moderate-income geography exceeded market share overall for 2001. It was less than overall market share in 2000, but again, the bank was the number one lender to moderate-income geographies in that year.

Refinance

Home refinance lending in the Walla Walla AA low-income geography is excellent. Home refinance lending in moderate-income-geographies is excellent.

BBNB's percentage of refinance loans to the low-income geography is slightly less than the percentage of owner occupied units in the geography. However, the bank's percentage was higher than the percentage of all banks. Market share in the low-income census tract exceeded its overall market share.

BBNB's percentage of refinance loans to moderate-income geographies is greater than the percentage of owner occupied units in moderate-income geographies. This percentage was higher than the percentage of all other banks in the AA. Market share was greater than overall market share for both 2000 and 2001.

Multi-family

BBNB's distribution of multi-family loans is adequate. The bank originated three multi-family loans, all located within middle-income geographies. 2000 and 2001 peer data indicates that a total of only five loans were made in the AA in 2000 and 2001, and only one was in a low-income census tract. Multi-family lending is not a significant part of the bank's business

strategy. Also, they are seeing to the affordable housing needs through their community development loans to affordable housing advocacy organization. Please see the discussion under the “Community Development Lending” section.

Umatilla AA

Home Purchase

BBNB’s home purchase lending to moderate-income geographies in the Umatilla AA is excellent.

BBNB’s percentage of home purchase loans in moderate-income census tracts is significantly greater than the percentage of owner occupied homes in moderate-income census tracts. The bank’s percentage of loans in moderate-income census tracts also significantly exceeded the percentage of all banks in the AA. Market share in moderate-income census tracts exceeded the overall market share in both 2000 and 2001.

Home Improvement

BBNB’s home improvement lending in the Umatilla AA moderate-income census tracts is excellent.

The percentage of the bank’s home improvement loans in moderate-income census tracts is significantly greater than the percentage of owner occupied homes in the moderate-income census tracts. The bank’s percentage of home improvement loans in moderate-income census tracts is also greater than the percentage of loans in moderate-income tracts made by all other banks in the AA in 2000 and 2001. Market share in moderate-income census tracts is greater than overall market share.

Refinance Loans

BBNB’s refinance lending in the Umatilla AA moderate-income census tracts is excellent.

The bank’s percentage of loans in the moderate-income census tracts is higher than the percentage of owner occupied units in the moderate-income census tracts. The bank’s percentage is also higher than the percentage of all other banks lending in the AA. Market share for both 2000 and 2001 is greater than the bank’s overall market share in the AA.

Multi-family

Neither BBNB nor any other institution originated multi-family loans in the Umatilla AA during the evaluation period.

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.

To assess the bank's geographic distribution of loans, we calculated the number of bank loans in low-, moderate-, middle- and upper-income geographies as a percentage of all loans originated during this review period. We then compared this to the percentage of businesses located in the low-, moderate-, middle- and upper-income geographies. This provides some indication of the available lending opportunities within BBNB's AA. We also compared the bank's lending in those geographies to the percentage of loans made by other banks within BBNB's AA. This comparison tells us how well the bank did compared to peer. Additionally, we compared the bank's overall market share to the bank's market share in the four geographic income categories. This is an indicator of the bank's commitment to lend in low- and moderate-income geographies.

Walla Walla AA

Geographic distribution of small loans to businesses is good.

In 2000 and 2001, the bank was the number one lender of small loans to business in the low-income geography. During the assessment period, the percentage of the bank's lending in the only low-income tract in its AAs exceeded the percentage of the number of businesses. The bank's percentage exceeded the percentage of its peers in both 2001 and 2000. BBNB's market share in the low-income geography exceeds its overall market share. This indicates a strong commitment to lending in the low-income geography.

The bank was also the number one lender of small loans to businesses in the moderate-income geographies in 2000 and 2001. During the assessment period, the percentage of the bank's loans in moderate-income geographies was less than the percentage of businesses located in those AA geographies. However, the bank's percentage of loans in moderate-income geographies exceeded the percentage of its peers in both 2000 and 2001. The bank's market share in moderate-income geographies is almost equal to its overall market share.

Umatilla County AA

Geographic distribution of small loans to businesses is excellent.

There are no low-income geographies in the Umatilla County AA. The bank was also the number one lender of small loans to businesses in the moderate-income geographies in 2000 and 2001. During the assessment period, the percentage of the bank's loans in moderate-income geographies exceeded the percentage of businesses located in those geographies. Also, the bank's percentage of loans in moderate-income geographies exceeded the percentage of its peers in both 2000 and 2001. The bank's market share in moderate-income geographies was well above its market share overall in Umatilla County. This is an indication of BBNB's focus on the needs of businesses in moderate-income geographies.

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.

We assess the bank's geographic distribution of small loans to farms using the same method we used for businesses.

Walla Walla County AA

Geographic distribution of small loans to farms is good.

The bank was the only lender of small loans to farms in the low-income census tract in both 2000 and 2001. BBNB was also the number one ranked lender of small loans to farms in the moderate-income geographies in 2000 and 2001. Comparison to peer and discussion of market data is irrelevant because of the small number of loans made by other banks. The low levels of lending are not a concern, because of the small number of farms in these census tracts.

Umatilla County AA

Geographic distribution of small loans to farms is excellent.

There are no low-income geographies in the Umatilla County AA.

For the assessment period, the percentage of the bank's loans in moderate-income geographies exceeded the percentage of farms located in those geographies. BBNB exceeded the percentage of its peers in both 2000 and 2001. The bank was also the number one ranked lender of small loans to farms in 2000 and 2001. The bank's market share in moderate-income geographies was well above its market share overall in Umatilla County. This is an indication of BBNB's focus on the needs of farms in moderate-income geographies.

Lending Gap Analysis

There were several geographies throughout the AA where the bank made no loans. The geographies were random and did not reflect any bias or intent against low- or moderate-income geographies or specific minority populations.

Inside/Outside Ratio

BBNB maintains a high concentration of lending in its AAs. 100% of the number and dollar volume of HMDA and small loans to businesses and farms were made within the bank's AAs.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of loans in the Walla Walla AA is excellent and in the Umatilla AA is good, based primarily on the distribution of small loans to businesses.

Home Mortgage Loans

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

In reviewing the distribution of loans by income of the borrowers, we compare the percentage of the bank's loans to low- and moderate-income applicants to the percentage of families in the AA that are low- or moderate-income. We then compare the bank's percentage of loans to low- and moderate-income families to the lending of all banks to low and moderate-income families in the AA.

We also compare the market share of the bank's loans to low- and moderate-income families to the bank's market share of loans to all families. If the bank's market share is higher than its overall market share then it is presumed that the bank is putting increased emphasis on its lending to low- and moderate-income families.

Walla Walla AA

Home Purchase

Home purchase lending to low-income applicants is considered adequate. Home purchase lending to moderate-income families is poor.

The bank's loans to low-income applicants are below the percentage of low-income families in the AA. However, a large percentage of low-income families are below the poverty level and represent a level of population unsuitable for traditional credit products. Also, in 2000 the percentage of loans made by all banks to low-income borrowers was below the percentage of families and below the percentage of loans made by the bank. Peer comparison in 2001 was statistically irrelevant.

The bank's loans to moderate-income families are below the percentage of moderate-income families in the AA. Also, the percentage of bank loans to moderate-income families is below the percentage of loans made by all banks to moderate-income families in 2000 and 2001.

The 2001 peer market data indicates that the bank holds 9% of the market share overall, but for low- and moderate-income families their market share is 5% and 3%, respectively. In 2000, the peer market data indicates that the bank holds 9% of the overall market share, but 14% and 6% of market share to low- and moderate-income families, respectively. The market share information varies from year to year, although in both years the bank was one of the top five lenders making loans to low income borrowers in the AA. The bank was consistently below its overall market share for moderate-income borrowers.

Home Improvement

Home improvement lending to low-income applicants in the AA is good. Home improvement lending to moderate-income applicants is excellent.

The bank's percentage of loans to low-income families is below the percentage of low-income families in the AA. However, the bank was the number one lender of home improvement loans in AA. Comparison of peer data is statistically irrelevant as there were only eight total applications in the AA.

The bank's percentage of home improvement loans to moderate-income families is below the percentage of moderate-income families in the AA. However, the bank's percentage of loans

is higher than the percentage of loans made by all banks to moderate-income families in the AA in 2000, and significantly higher in 2001. Market share was also higher than overall market share in both 2000 and 2001.

Refinance

Refinance lending to low-income applicants is good. Refinance lending to moderate-income applicants is good.

The bank's percentage of refinance loans to low-income applicants is below the percentage of low-income families in the AA. As mentioned previously, low lending percentages are mitigated by the high poverty level among these individuals. Also, the bank's percentage of loans was higher than the percentage of loans made by other banks to low-income applicants in 2000 and 2001.

The bank's market share of loans to low-income borrowers exceeds its overall market share in both 2000 and 2001.

The bank's percentage of refinance loans to moderate-income applicants is below the percentage of moderate-income families in the AA. However, the bank's percentage of loans is above the percentage of loans made by all banks to moderate-income families in the AA.

The bank's market share of loans to moderate-income borrowers is well above their overall market share in both 2000 and 2001.

Umatilla AA

Home Purchase

Home purchase lending to low-income applicants is adequate. Home purchase lending to moderate-income applicants is excellent.

BBNB's percentage of home purchase loans to low-income applicants is below the percentage of low-income families in the AA. However, market data indicates all banks lending in the AA only originated 2% and 1% of loans to low-income applicants in 2000 and 2001, respectively.

The bank's lending to moderate-income individuals is slightly above the demographics of the AA. BBNB's percentage of loans to moderate-income applicants is higher than the percentage of loans originated by all other banks to moderate-income borrowers in the AA.

BBNB's market share of loans to moderate-income borrowers is greater than its market share of loans to all applicants in both 2000 and 2001.

Home Improvement

Home improvement lending to low-income applicants is excellent. Home improvement lending to moderate-income applicants is excellent

BBNB's percentage of loans to low-income applicants is less than the percentage of low-income families in the AA. However, in 2000 and 2001, all banks only originated 4% and 2% of loans to low-income applicants in the AA. The bank surpassed this level and had a market share significantly exceeding its overall market share.

BBNB's percentage of loans to moderate-income applicants is larger than the percentage of moderate-income families in the AA. The bank's percentage of loans was also higher than the percentage of all other banks lending in the AA in both 2000 and 2001. Market share to moderate-income applicants exceeded market share to all applicants in both 2000 and 2001.

Refinance

BBNB's refinance lending to low-income applicants is good. BBNB's refinance lending to moderate-income applicants is good.

BBNB's percentage of loans to low-income applicants is less than the percentage of low-income families in the AA. As mentioned previously, a large percentage of low-income families are below the poverty level and represent a level of population unsuitable for traditional credit products. Also, the bank's percentage of loans to low-income applicants is higher than the percentage of combined banks in the AA in 2000 and 2001. Market share to low-income borrowers is higher than the overall market share.

BBNB's percentage of loans to moderate-income applicants is also less than the percentage of moderate-income families. However, the bank's percentage of loans to moderate-income families is higher than the percentage of all banks in the AA. Market share to moderate-income borrowers was higher than overall market share in 2001. Market share in 2000 was almost equal to the overall 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.

Walla Walla County AA

Distribution of small loans to business with gross annual revenues of less than \$1 million is excellent.

For the assessment period, BBNB's percentage of loans in the AA to businesses with gross annual revenues of less than \$1 million is greater than the percentage of businesses with gross annual revenues of less than \$1 million. The bank exceeded the percentage of its peers in both 2000 and 2001. For the assessment period, 65% of the bank's loans were for less than \$100,000. The bank's peers made 91% of their loans for less than \$100,000 in 2000 and 96% for less than \$100,000 in 2001. Peer comparison in this category includes several credit card issuers that only make loans in smaller amounts. The bank's market share of loans to businesses with gross annual revenues less than \$1 million is greater than its overall market share to all businesses indicating responsiveness to the needs of small businesses.

Umatilla County AA

Distribution of small loans to business with gross annual revenues of less than \$1 million is excellent.

For the assessment period, BBNB's percentage of loans in the AA to businesses with gross annual revenues of less than \$1 million is less than the percentage of businesses with gross annual revenues of less than \$1 million. The bank exceeded the percentage of its peers in both 2000 and 2001. For the assessment period, 88% of the bank's loans were for less than \$100,000. The bank's peers made 94% of their loans for less than \$100,000 in 2000 and 90% for less than \$100,000 in 2001. Peer comparison in this category includes several credit card issuers that only make loans in smaller amounts. The bank's market share of loans to businesses with gross annual revenues less than \$1 million is greater than its overall market share to all businesses.

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 businesses.

Walla Walla County AA

Distribution of small loans to farms with gross annual revenues of less than \$1 million is good.

For the assessment period, BBNB's percentage of loans in the AA to farms with gross annual revenues of less than \$1 million is greater than the percentage of farms with gross annual revenues of less than \$1 million. The bank exceeded its peers in 2000 and 2001. For the assessment period, 55% of the bank's loans were for less than \$100,000. The bank's peers made 58% of their loans for less than \$100,000 in 2000 and 72% for less than \$100,000 in 2001. The bank's market share of loans to farms with gross annual revenues less than \$1 million is greater than its overall market share to all farms indicating responsiveness to the needs of small farms.

Umatilla County AA

Distribution of small loans to farms with gross annual revenues of less than \$1 million is good.

For the assessment period, BBNB's percentage of loans in the AA to farms with gross annual revenues of less than \$1 million exceeds the percentage of farms with gross annual revenues of less than \$1 million by 13%. The bank's peers' lending to farms with gross annual revenues of less than \$1 million for 2000 exceeded the percentage of farms with that revenue level by 4% and again by 4% for 2001. For the assessment period, 72% of the bank's loans were for less than \$100,000. The bank's peers made 69% of their loans for less than \$100,000 in 2000 and 65% for less than \$100,000 in 2001. The bank's market share of loans to farms with gross annual revenues less than \$1 million is greater than its overall market share to all farms by 2%.

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 multi-family 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.

Walla Walla AA

One loan for \$2.6 million was made by the bank to renovate, restore, and expand a historic hotel located in a moderate-tract in downtown Walla Walla. When opened, the facility provided new jobs for LMI individuals. BBNB is the lead bank that assisted in generating a total of \$8.6 million for the project. The bank engaged other lending institutions to fund the \$6 million balance, because of legal lending limits,.

The bank has been involved extensively with the Blue Mountain Action Council (BMAC) with lending and service activity. During this evaluation period the bank has originated two loans totaling \$14,000 to fund continued operations of the Council. BMAC is a private, nonprofit, multi-purpose agency, serving residents of Southeastern Washington. BMAC's mission is to meet the basic needs of low-income individuals and families, offer opportunities for individuals and families to achieve greater self-sufficiency; develop and implement strategies to prevent poverty, and leverage community support.

The bank originated three loans totaling \$446,000 that revitalized and/or stabilized moderate-income geographies in Walla Walla County. In addition, the bank originated one loan totaling \$400,000, which supported the infrastructure of an organization providing affordable housing assistance to LMI individuals. Although these meet the definition of community development for CRA reporting purposes, these loans are included in the small business data section of Table 1. We mention these loans here because they are helping to meet the community development needs of the AA.

Umatilla AA

The bank made 12 loans totaling \$724,000 to Horizons Projects, Inc. to fund housing and infrastructure, and provide resources to meet the needs of LMI individuals. Horizons Projects, Inc. is a non-profit organization that provides vocation and residential services and alternative work environments to predominately low-income adults with developmental disabilities. Recently they have expanded into the areas of low-income housing, employment services and youth services. This organization is located in a moderate-income tract in Umatilla County.

The bank originated one loan totaling \$100,000 to Homestead Youth Lodge. Located in Umatilla County, the facility provides an alternative to jail for youthful offenders as well as drug and alcohol counseling. The facility serves many of the area's LMI youth.

The bank originated six loans totaling \$1.46 million to non-profit organizations to provide community service assistance to LMI individuals and geographies. Again, although these

loans meet the definition of community development, for CRA purposes these loans are included in the small business and HMDA data section of Table 1. We mention these loans here because they are helping to meet the community development needs of the AA.

Product Innovation and Flexibility

The bank did not present any innovative or flexible lending products for review.

Conclusions for Areas Receiving Limited-Scope Reviews

TriCities AA

Based on limited scope review, the bank's performance in the TriCities AA is not inconsistent with its overall performance under the lending test.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "Low Satisfactory". Based on full scope reviews, the bank's performance in the Walla Walla, and Umatilla AAs is weak.

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

The bank's limited investments are considered responsive to the needs of the community. The level of investments is very low considering the bank's resources; however, the opportunities for investment other than grants and donations have been limited. Community Development activities available for bank participation have been predominately in the form of loans to community development organizations and in areas in need of revitalization and stabilization. Consequently, the bank has channeled its community development efforts into lending. Please refer to the Community Development Lending section of the lending test for a more complete discussion of the extent of the bank's community development lending. See the "Market Profile of the AAs" section for further discussion of the opportunities for investment.

Investments totaled .058% of Tier One equity capital. Investments amounted to \$19,045 in total with \$13,960 benefiting the Walla Walla County AA, \$1,855 benefiting the Umatilla County AA, and \$3,230 benefiting the Richland-Kennewick MSA AA. The largest amount was \$9,950 in donations to the Downtown Walla Walla Foundation, which is involved in revitalization of the moderate-income downtown Walla Walla tract. Other significant donations were \$3,290 to Friends, a county program to benefit low- and moderate-income children in Walla Walla County and the Richland-Kennewick MSA, \$1,100 to Walla Walla Goodwill, \$1,500 to the Milton Freewater Development Corporation for revitalization of the Milton Freewater downtown in a moderate-income tract. The bank also donated \$1,630 to support various food banks and direct food handouts across all three AAs.

Conclusions for Area Receiving Limited-Scope Reviews

TriCities AA

The bank's performance in the limited scope TriCities AA is not inconsistent with the bank's performance in the full scope areas.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Baker Boyer National Bank's performance under the Service Test is rated "High Satisfactory". Based on a full scope review, the bank's performance in the Walla Walla and Umatilla AAs is good.

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.

BBNB provides services that are accessible to geographies and individuals of different income levels in its AAs. Of the eight total branches located in the AA, four are in the Walla Walla AA, two are in the Umatilla AA and two are in the TriCities AA. In the Walla Walla and Umatilla AAs, 50% are in moderate-income geographies and 50% are in middle-income geographies. This distribution is good and correlates well with the distribution of population throughout the AA.

BBNB opened three branches in its AA during the evaluation period. Two branches were acquired in the Bank of Commerce merger on April 1, 2000. They comprised the moderate and middle-income branches of the Umatilla AA. The third branch was opened in an upper income census tract in the TriCities AA.

Bank services are tailored to the needs of the AAs and do not vary in a way that would inconvenience portions of the AA, particularly low- and moderate-income individuals or geographies. The bank offers the same level of service and convenience at all of its branches.

BBNB has nine deposit-taking ATMs. Seven are located in the Walla Walla AA and are distributed 57% in moderate-income geographies and 43% in middle-income geographies. Four of the seven are located in branches. The remaining three are in facilities not owned by the bank. The other two ATMs are located in the Umatilla AA in a moderate-income geography and in the TriCities AA in a middle-income geography.

BBNB provides alternative delivery systems, such as toll-free Bank-by-Phone, Bank-by-Mail, and Electronic Benefits Transfer. Since the bank provided no data as to the benefit of these alternative delivery systems to low- and moderate-income persons and geographies, we could not give significant weight to these services when drawing CRA performance conclusions.

Community Development Services

BBNB provides an adequate level of community development services for an institution of its size. These services are responsive to the identified need of the AAs, particularly in the areas of affordable housing and small business and neighborhood revitalization. During the evaluation period, members of various levels of management in the bank contributed more

than 200 hours of financial technical assistance to four organizations or programs that support affordable housing, or provide community development services to low- and moderate-income persons within the Walla Walla and Umatilla AA.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): (January 1, 2000 to December 31, 2003) (Investment and Service Tests and CD Loans: (July 19, 1999 to March 17, 2003)	
Financial Institution	Products Reviewed	
Baker Boyer National Bank (BBNB) Walla Walla, Washington	HMDA, Small Loans to Businesses, Small loans to Farms, CD loans, investments and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
<i>No affiliate products were reviewed.</i>		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Walla Walla non-metropolitan Umatilla non-metropolitan TriCities AA MSA #6740	Full Scope Full Scope Limited Scope	

Appendix B: Market Profiles for Full Scope Areas

Table of Contents

Market Profiles for Areas Receiving Full Scope Reviews

Walla Walla Non-metropolitan Area	1
Umatilla Non-metropolitan Area	2

Walla Walla Non-metropolitan Area

Demographic Information for Full Scope Area: Walla Walla County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	10	10.00	10.00	60.00	20.00	0.00
Population by Geography	48,439	5.07	10.56	68.33	16.03	0.00
Owner-Occupied Housing by Geography	10,980	4.13	9.97	69.99	15.90	0.00
Business by Geography	3,059	5.39	16.70	67.08	10.82	0.00
Farms by Geography	386	2.59	5.44	77.72	14.25	0.00
Family Distribution by Income Level	12,030	19.38	16.77	23.68	40.17	0.00
Distribution of Low and Moderate-income Families throughout AA Geographies	4,348	9.71	14.63	67.02	8.65	0.00
Median Family Income		29,671	Median Housing Value		54,841	
HUD Adjusted Median Family Income for 2002		40,200	Unemployment Rate (1990 US Census)		3.41%	
Households Below Poverty Level		15.07%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 US Census and 2002 HUD updated MFI

The Walla Walla AA is comprised of the entire county of Walla Walla located in Southeast Washington. Walla Walla County has a total area of 1,271 square miles and ranks 26th in size among Washington’s 39 counties. Walla Walla County is bounded to the north by Franklin County (along the Snake River), to the west by Benton County (along the Columbia River), and to the east by Columbia County. The county’s southern boundary forms part of the Washington-Oregon border across which is the Umatilla County AA.

Walla Walla County is a regional center of trade and services (especially health care) for residents across Southeast Washington. Agriculture is the dominant force behind the local economy, thus setting the pattern of local economic development. Walla Walla County is the fourth largest wheat producer among Washington counties with nearly 10 percent of the state's

wheat output. The county also has healthy fruit, seed, and vegetable crops. Wine making is fast becoming a significant part of the local economy.

State government employment in the county has largely been driven by the Washington State Penitentiary at Walla Walla. Manufacturing continues to play a strong role in Walla Walla County. Local manufacturing centers on food processing (beef, vegetables, fruit, and dairy products), lumber and paper processing. Other manufacturing includes printing and publishing, and other manufacturing (e.g., irrigation equipment, wood stoves, metal containers, and toys).

Eighty-one percent of the bank's deposits come from this AA. The headquarters as well as three other branches and seven ATMs are located in this AA. Major competitors of the bank are Banner Bank, which is headquartered in Walla Walla, and branches of Washington Mutual Bank, Bank of America, Sterling Savings, and US Bank. One hundred seventy-two lenders made home loans in the AA in 2001. None of the top 10 lenders had more than 10% of the market. In 2001, 34 lenders made small business loans in the AA. Baker Boyer had the largest market share with 32%. No other lender had more than 11% market share, and of the top ten small business lenders only three had branches in the AA.

Unemployment figures and population growth do not inhibit the bank's ability to originate loans or generate deposits in this assessment area. Population levels and job growth have been positive and stable during the evaluation period. Poverty levels have decreased. Competitive factors have the greatest impact on the ability of the bank to originate loans to various segments of the AA population or within certain geographic areas within the AA.

Umatilla Non-metropolitan Area

Demographic Information for Full Scope Area: Umatilla County						
Demographic Characteristics	#	Low % Of #	Moderate % Of #	Middle % Of #	Upper % Of #	NA* % Of #
Geographies (Census Tracts/BNAs)	17	0.00	5.88	82.35	11.76	0.00
Population by Geography	59,249	0.00	10.48	72.34	17.18	0.00
Owner-Occupied Housing by Geography	13,647	0.00	9.72	74.52	15.76	0.00
Business by Geography	4,306	0.00	10.31	80.52	9.17	0.00
Farms by Geography	483	0.00	5.59	76.60	17.81	0.00
Family Distribution by Income Level	15,755	20.28	19.59	23.35	36.78	0.00
Distribution of Low and Moderate-income Families throughout AA Geographies	6,281	0.00	13.96	75.47	10.57	0.00
Median Family Income		27,616	Median Housing Value		48,233	
HUD Adjusted Median Family Income for 2002		38,300	Unemployment Rate (1990		4%	
Households Below Poverty Level		15.89%	US Census)			

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

Source: 1990 US Census and 2002 HUD updated MFI

The Umatilla AA comprises the entire county of Umatilla in Oregon. The county covers 3,231 square miles and is located on the Washington border in Northeast Oregon, at the confluence of the Umatilla and Columbia Rivers. The county is bordered to the north by Walla Walla County in Washington State and to the south by Grant County in Oregon.

Umatilla County traces its beginnings back to 1862 when regional gold rushes and stock raisers first came to the area. The railroad arrived in the county in 1881, and with it came the development of dryland wheat farming. The county has seen the development of a number of large public and private infrastructure projects ranging from hydroelectric and coal-fired power generation facilities to government military systems and facilities. In 1908, Cold Springs Reservoir was constructed east of newly incorporated Hermiston, providing storage for Umatilla River water. The development of the reservoir marked the beginning of irrigated farming on a large scale. In the late 1940s, the Federal government announced the construction of an ammunition storage depot. In 1947, construction began on McNary Dam. Along with the electricity produced by the region's hydroelectric dams came water for irrigation purposes. Umatilla County's top industries are agriculture, food processing, and wood products. The largest employer is Two Rivers Correctional Institution with 500 employees.

15.5% of the bank's deposits come from this AA. Two branches and two ATMs are located in this AA. Major competitors of the bank are Banner Bank, Columbia River Bank, Klamath Federal Bank and branches of Bank of America, US Bank, and Wells Fargo Bank. One hundred eighty-seven lenders made home loans in the AA in 2001. None of the top 10 lenders had more than 12% of the market. In 2001, 34 lenders made small business loans in the AA. Baker Boyer was had the fifth largest market share with 9.6%. The top lender was Columbia bank with 16 percent. Four of the top 10 lenders had branches in the AA.

Unemployment figures and population growth do not inhibit the bank's ability to originate loans or generate deposits in this assessment area. Population levels and job growth have been positive and stable during the evaluation period. Poverty levels have decreased. Competitive factors have the greatest impact on the ability of the bank to originate loans to various segments of the AA population or within certain geographic areas within the AA.

Community Contact Information/AA Needs

As part of our examination, we contacted several state, city and county government agencies and reviewed community contacts made by other regulatory agencies. The community groups and governmental agencies identified the need for affordable housing and micro business loans throughout the AAs and small business and community development loans in the downtown core of Walla Walla.

Opportunities for community development lending and investment are limited. There are a limited number of bonds or other financial instruments available for investment. Also, low-income housing tax credits are not available on the open market.

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: 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/AA. Tables without data are not included in this Performance Evaluation.

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. Refer to Interagency Q&As - .12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/AA column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- 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 Multi-family Loans** - Compares the percentage distribution of the number of multi-family loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multi-family 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 is 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 is 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/AA. 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/AA.

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. When such investments exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/AA column and record the corresponding numbers and amounts in the “Qualified Investments” column.

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.

Institution ID: 10000003956 **BAKER BOYER BANK**

Table 1. Lending Volume

LENDING VOLUME												
Geography: BAKER BOYER NB												
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002												
MA/Assessment Area (2002):	% 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:												
Umatilla County	23.73	88	6,739	188	9,034	172	15,703	13	824	461	32,300	15.50
Walla Walla County	65.62	327	30,738	643	39,996	302	36,072	3	2,597	1,275	109,403	80.86
Limited Review:												
Tri Cities AA	10.65	15	1,955	90	11,512	102	16,686	0	0	207	30,153	3.65

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From January 01, 2000 to December 31, 2002.

*** Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

BANK

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 31, 2002			Geography: BAKER BOYER NB						Evaluation Period: JANUARY 1, 2000 TO DECEMBER						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Umatilla County	29	14.95	0.00	0.00	9.72	27.59	74.52	65.52	15.76	6.90	2.15	0.00	8.99	1.69	0.00
Walla Walla County	155	79.90	4.13	3.23	9.97	10.32	69.99	58.06	15.90	28.39	7.17	3.85	11.67	6.90	7.14
Limited Review:															
Tri Cities AA	10	5.15	0.00	0.00	20.77	20.00	48.06	20.00	31.18	60.00	0.04	0.00	0.11	0.00	0.05

* Based on 2001 Peer Mortgage Data: Western Region 1.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

BANK

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT DECEMBER 31, 2002			Geography: BAKER BOYER NB						Evaluation Period: JANUARY 1, 2000 TO						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Umatilla County	28	32.94	0.00	0.00	9.72	21.43	74.52	75.00	15.76	3.57	9.26	0.00	30.00	8.33	0.00
Walla Walla County	56	65.88	4.13	3.57	9.97	8.93	69.99	64.29	15.90	23.21	28.42	75.00	66.67	15.38	43.75
Limited Review:															
Tri Cities AA	1	1.18	0.00	0.00	20.77	0.00	48.06	0.00	31.18	100.00	0.29	0.00	2.17	0.00	0.00

* Based on 2001 Peer Mortgage Data: Western Region 1.

** 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 Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

BANK

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2002		Geography: BAKER BOYER NB								Evaluation Period: JANUARY 1, 2000 TO					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ*** Units	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Umatilla County	31	20.95	0.00	0.00	9.72	16.13	74.52	83.87	15.76	0.00	2.24	0.00	5.56	2.21	0.00
Walla Walla County	113	76.35	4.13	3.54	9.97	10.62	69.99	63.72	15.90	22.12	6.51	11.63	8.62	5.82	7.50
Limited Review:															
Tri Cities AA	4	2.70	0.00	0.00	20.77	50.00	48.06	0.00	31.18	50.00	0.12	0.00	0.50	0.09	0.05

* Based on 2001 Peer Mortgage Data: Western Region 1.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

BANK

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY 2002			Geography: BAKER BOYER NB						Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31,						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Walla Walla County	3	100.00	9.82	0.00	14.59	0.00	72.56	100.00	3.03	0.00	40.00	0.00	0.00	50.00	0.00
Umatilla County	0	0.00	0.00	0.00	15.92	0.00	66.32	0.00	17.76	0.00	0.00	0.00	0.00	0.00	
Limited Review:															
Tri Cities AA	0	0.00	0.00	0.00	33.35	0.00	42.00	0.00	24.65	0.00	4.17	0.00	0.00	0.00	20.00

* Based on 2001 Peer Mortgage Data: Western Region 1.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

BANK

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2002			Geography: BAKER BOYER NB								Evaluation Period: JANUARY 1, 2000 TO				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Umatilla County	188	20.41	0.00	0.00	10.31	35.64	80.52	58.51	9.17	5.85	6.38	0.00	23.58	4.68	5.67
Walla Walla County	643	69.82	5.39	7.00	16.70	11.82	67.08	59.41	10.82	21.77	24.73	30.36	24.62	25.18	32.52
Limited Review:															
Tri Cities AA	90	9.77	0.00	0.00	25.55	45.56	48.77	31.11	25.59	23.33	1.12	0.00	3.02	0.41	1.04

* Based on 2001 Peer Small Business Data: US&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 (2002).

BANK

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2002			Geography: BAKER BOYER NB						Evaluation Period: JANUARY 1, 2000 TO						
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Umatilla County	172	29.86	0.00	0.00	5.59	15.12	76.60	84.30	17.81	0.58	25.09	0.00	50.00	29.53	1.79
Walla Walla County	302	52.43	2.59	0.66	5.44	1.32	77.72	77.15	14.25	20.86	82.95	100.00	50.00	80.95	100.00
Limited Review:															
Tri Cities AA	102	17.71	0.00	0.00	25.68	79.41	60.06	18.63	14.26	1.96	12.94	0.00	28.26	5.22	0.00

* Based on 2001 Peer Small Business Data: US&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 (2002).

BANK

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 31, 2002		Geography: BAKER BOYER NB						Evaluation Period: JANUARY 1, 2000 TO DECEMBER							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Over all	Low	Mod	Mid	Upp
Full Review:															
Umatilla County	29	14.95	20.28	3.45	19.59	20.69	23.35	13.79	36.78	62.07	2.62	0.00	2.52	1.41	3.35
Walla Walla County	155	79.90	19.38	4.55	16.77	13.64	23.68	20.13	40.17	61.69	8.60	4.76	3.28	6.50	11.47
Limited Review:															
Tri Cities AA	10	5.15	21.30	10.00	16.99	20.00	23.41	10.00	38.30	60.00	0.04	0.00	0.00	0.15	0.00

^{*} Based on 2001 Peer Mortgage Data: Western Region 1.

^{**} As a percentage of loans with borrower income information available. No information was available for 0.52% of loans originated and purchased by BANK.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} 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.

BANK

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT DECEMBER 31, 2002		Geography: BAKER BOYER NB						Evaluation Period: JANUARY 1, 2000 TO							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	Over all	Low	Mod	Mid	Upp
Full Review:															
Umatilla County	28	32.94	20.28	7.14	19.59	25.00	23.35	32.14	36.78	35.71	9.43	25.0 0	19.0 5	19.3 5	3.88
Walla Walla County	56	65.88	19.38	7.27	16.77	10.91	23.68	30.91	40.17	50.91	30.0 0	33.3 3	50.0 0	29.1 7	25.4 9
Limited Review:															
Tri Cities AA	1	1.18	21.30	0.00	16.99	100.00	23.41	0.00	38.30	0.00	0.30	0.00	0.00	0.00	0.52

^{*} Based on 2001 Peer Mortgage Data: Western Region 1.

^{**} As a percentage of loans with borrower income information available. No information was available for 1.18% of loans originated and purchased by BANK.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} 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.

BANK

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2002		Geography: BAKER BOYER NB								Evaluation Period: JANUARY 1, 2000 TO					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Umatilla County	31	20.95	20.28	10.00	19.59	6.67	23.35	33.33	36.78	50.00	2.81	5.56	4.90	2.85	2.40
Walla Walla County	113	76.35	19.38	7.27	16.77	11.82	23.68	27.27	40.17	53.64	8.33	9.76	12.04	5.88	8.64
Limited Review:															
Tri Cities AA	4	2.70	21.30	25.00	16.99	0.00	23.41	50.00	38.30	25.00	0.14	0.00	0.19	0.19	0.12

* Based on 2001 Peer Mortgage Data: Western Region 1.

** As a percentage of loans with borrower income information available. No information was available for 2.70% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

BANK

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2002		Geography: BAKER BOYER NB			Evaluation Period: JANUARY 1, 2000 TO				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% 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:									
Umatilla County	188	20.41	71.48	85.11	88.30	7.98	3.72	6.38	11.25
Walla Walla County	643	69.82	78.98	85.38	85.23	9.02	5.75	24.73	38.26
Limited Review:									
Tri Cities AA	90	9.77	80.83	86.67	65.56	20.00	14.44	1.12	2.70

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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 1.85% of small loans to businesses originated and purchased by the bank.

BANK

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2002		Geography: BAKER BOYER NB				Evaluation Period: JANUARY 1, 2000 TO			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of *** Farms	% 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:									
Umatilla County	172	29.86	84.06	94.77	71.51	20.93	7.56	25.09	27.43
Walla Walla County	302	52.43	85.75	95.36	55.30	32.45	12.25	82.95	88.79
Limited Review:									
Tri Cities AA	102	17.71	81.03	93.14	43.14	38.24	18.63	12.94	17.39

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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 0.52% of small loans to farms originated and purchased by the bank.

BANK

**Table 13. Geographic and Borrower Distribution of Consumer Loans
(Institution's Option)**

Geographic and Borrower Distribution: CONSUMER LOANS																		Geography: BAKER BOYER NB		Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002	
MA/Assessment Area:	Geographic Distribution										Borrower Distribution										
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers				
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds*	% of BANK Loans			
Full Review:																					
Umatilla County	785	32.46	0.00	0.00	10.80	45.10	73.49	51.72	15.71	3.18	24.00	20.61	16.94	27.27	20.00	21.82	39.06	30.30			
Walla Walla County	1,350	55.83	5.38	4.30	11.66	12.74	69.82	64.52	13.14	18.44	24.37	23.67	16.98	14.69	17.28	21.63	41.37	40.00			
Limited Review:																					
Tri Cities AA	283	11.70	0.00	0.00	26.01	47.70	47.70	34.28	26.29	18.02	23.86	0.00	16.33	0.00	19.87	20.00	39.95	80.00			

* Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.
 ** Percentage of Households is based on the 1990 Census Information.

BANK

Table 14. Qualified Investments

QUALIFIED INVESTMENTS 2002		Geography: BAKER BOYER NB				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31,			
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:									
Umatilla County	0	0	5	2	5	2	10.53	0	0
Walla Walla County	0	0	22	14	22	14	73.68	0	0
Limited Review:									
Tri Cities AA	0	0	9	3	9	3	15.79	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

BANK

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 1, 2000 TO DECEMBER 31, 2002								Geography: BAKER BOYER NB				Evaluation Period:					
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:																	
Umatilla County	15.50	2	25	0.00	50.00	50.00	0.00	2	0	0	1	1	0	0.00	10.48	72.34	17.18
Walla Walla County	80.86	4	50	0.00	50.00	50.00	0.00	0	0	0	0	0	0	5.07	10.56	68.33	16.03
Limited Review:																	
Tri Cities AA	3.65	2	25	0.00	50.00	0.00	50.00	1	0	0	0	0	1	0.00	26.82	46.97	26.20

