



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

May 28, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Riverview Community Bank
Charter Number 704347

900 Washington Street, Suite 900
Vancouver, WA 98660

Office of the Comptroller of the Currency

101 Stewart Street, Suite 1010
Seattle, WA 98101

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

Overall CRA Rating.....	3
Description of Institution.....	5
Scope of the Evaluation.....	6
Discriminatory or Other Illegal Credit Practices Review.....	9
Multistate Metropolitan Statistical Area Rating.....	10
Portland-Vancouver AA.....	10
State Rating.....	18
State of Oregon.....	18
State of Washington.....	25
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory.

The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on a combination of the Portland-Vancouver assessment area (AA) within the Portland-Vancouver-Hillsboro, OR-WA Multi-State Metropolitan Statistical Area (MMSA), Oregon (OR), and Washington (WA) ratings. Performance in the Portland-Vancouver AA is weighted most heavily because it represents the bank's primary trade area with 79 percent of branch locations, 87 percent of total deposit volume as of June 30, 2018, 88 percent of commercial loans originated or purchased, and 78 percent of mortgage loans originated during the evaluation period. The Washington rating area was given more weight than the Oregon rating area based on the greater level of lending and deposit activity.
- The Community Development (CD) Test rating is based on a combination of the Portland-Vancouver AA, Oregon, and Washington ratings. Performance in the CD Test was weighted in the same manner as the Lending Test.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit (LTD) ratio is more than reasonable. The average LTD ratio was 81.2 percent for the 14 quarters ending March 31, 2019, which represents the entire period since the previous CRA performance evaluation. This meets the standard for outstanding performance.

Riverview's LTD ratio is more than reasonable given the demographics, lending opportunities, economic conditions, and credit needs of its AAs. We compared Riverview's average LTD ratio with five similarly situated commercial banks, which were chosen because their sizes and footprints are similar to Riverview's profile. These banks had a lower average LTD ratio at 75.1 percent. Riverview's highest quarterly LTD ratio of 93.0 percent exceeded the highest quarterly LTD ratio of 87.4 percent for any of the five peer banks. The minimum LTD ratio during the review period of 76.3 percent for Riverview significantly exceeded the lowest minimum LTD ratio of 62.5 percent among comparable institutions. The increasing trend evident in the bank's LTD ratio during this span also demonstrated more than reasonable responsiveness to serving the credit needs of the AAs.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs.

Riverview originated and purchased 93 percent of its total loans inside the bank's combined AAs during the evaluation period. By dollar amount, 89.5 percent of loans benefited businesses and individuals inside the bank's combined AAs. This analysis is performed at the bank, rather than the AA level. Performance by number of loans was similar for both business and mortgage lending. By dollar amount, 95 percent of mortgage lending was within the AA while the percentage was slightly lower in our

commercial sample at 82.1 percent. Overall, this meets the standard for excellent performance.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2016	144	96.6	5	3.4	149	59,250	97.9	1,256	2.1	60,506
2017-2018	197	90.4	21	9.6	218	85,976	93.1	6,344	6.9	92,320
Subtotal	341	92.9	26	7.1	367	145,226	95.0	7,600	5.0	152,826
Business Loan Sample										
2016	75	93.8	5	6.3	80	36,449	73.9	12,841	26.1	49,290
2017-2018	76	95.0	4	5.0	80	57,405	88.2	7,687	11.8	65,092
Subtotal	151	94.4	9	5.6	160	93,854	82.1	20,528	17.9	114,382
Total	466	93.0	35	7.0	501	239,080	89.5	28,128	10.5	267,208

Description of Institution

Riverview Community Bank (Riverview, or bank) is a federally chartered savings bank headquartered in Vancouver, WA. The bank was founded in 1923 as Riverview Savings Association and has been headquartered in Clark County, WA since its inception. The bank is wholly owned by Riverview Bancorp, Inc, a one-bank savings and loan holding company. There are no affiliate banks. The bank owns two subsidiaries: Riverview Trust Company (RTC) and Riverview Services, Inc (Riverview Services). RTC offers a standard suite of asset management products such as trustee services, investment management, and custodial safe-keeping. Riverview Services acts as a trustee on deeds of trust for the bank's mortgage loans. Neither subsidiary had an impact on this evaluation since they do not conduct lending or engage in community development activities.

Riverview is a multistate bank offering a variety of financial services such as loan and deposit products to consumers and businesses via its retail branches. While Riverview has served the communities of Clark County for nearly a century, in the past twenty years the bank has expanded into the metro Portland, OR market, as well as outlying rural areas extending eastward through the Columbia Gorge. Riverview currently operates 18 branches in Washington and Oregon, 20 ATMs, and three lending centers. There are 13 branches in Washington, including seven in Vancouver and additional locations in Battle Ground, Camas, Goldendale, Stevenson, Washougal, and White Salmon. The five Oregon branches include two in Portland, and one each in Aumsville, Gresham, and Tualatin. In addition to the branch network, Riverview offers complementary delivery channels including internet banking, a mobile app, remote deposit capture, and phone support.

For purposes of the Community Reinvestment Act (CRA), the bank operates within three rating areas and four AAs. The rating areas include the Portland-Vancouver-Hillsboro MMSA, state of Oregon, and state of Washington. The four designated AAs include the Portland-Vancouver AA within the Portland-Vancouver-Hillsboro MMSA; the WA non-MSA AA, which consists of Klickitat County; the Longview AA, which overlays the Longview, WA MSA; and the Marion County AA within the Salem, OR MSA. There are 15 branches and 17 ATMs located in the Portland-Vancouver AA; there are two branches and

two ATMs located in the Non-MSA AA; and there is one branch and one ATM located in the Marion AA. Prior to closure, there was one branch and one ATM in the Longview AA. The Marion AA is the sole AA for the state of Oregon rating area. The State of Washington rating area consists of the Klickitat and Longview AAs. The Portland-Vancouver AA is assessed separately as a MMSA.

Since the previous CRA examination, there have been several changes to the branch network. On February 17, 2017, Riverview purchased virtually all of the loans (\$115.3 million) and deposits (\$130.8 million) of MBank. In addition, branches in Gresham, OR; Portland, OR; and Tigard, OR, were sold to Riverview. The Tigard branch immediately transitioned to a new location in Tualatin, OR. The MBank Gresham branch was immediately merged into an existing Riverview branch in Gresham. The Portland branch location remains unchanged. These changes in branch locations resulted in an expansion of the Portland-Vancouver AA to include portions of Washington County, OR, within the Portland-Vancouver-Hillsboro MSA.

On January 25, 2018, the bank agreed to sell all deposits held at the Longview, WA branch to Twin City Bancorp, Inc., which is the holding company for Twin City Bank. The sale of \$3.2 million in deposits was completed on September 28, 2018. Simultaneously, Riverview closed its Longview branch, removed the onsite automated teller machine (ATM), and eliminated the Longview AA. This performance evaluation includes the Longview AA because it was operating for the majority of our three-year review period.

There were no other changes in branch locations during the evaluation period. Each branch offers similar products and services such as ATMs, safe deposit boxes, night depositories, and notaries. Weekday hours of operation begin at 9:00 am and typically end at 5:00 pm or 6:00 pm. Most locations feature drive-up facilities. Ten of the eighteen branches offer Saturday hours from 10:00 am to 1:00 pm. All other branches are closed on Saturdays. All branches feature one ATM, with the exception of the Vancouver Main branch which has two ATMs. There is one ATM that is not located at a branch, as the bank's operations center in Vancouver, WA, features a deposit-taking ATM.

As of December 31, 2018, Riverview reported total assets of \$1.15 billion, and tier one capital of \$125.1 million. The primary business focus is commercial lending directed towards small businesses and home mortgages for consumers. Riverview also offers various other loan products including consumer loans. The bank does not originate agricultural production loans; however, Riverview does purchase government guaranteed agricultural loans on the secondary market. The bank continues to enhance its products and services to help meet the diverse needs of the Pacific Northwest communities it serves. Business loans, which include commercial real estate, multifamily, commercial and industrial, and construction and land development loans, comprise 79.5 percent of the total loan portfolio. Commercial real estate (CRE) is the predominant product line at 54.4 percent of the loan portfolio. As of year-end 2018, net loans represent 71.7 percent of total assets, and 90.3 percent of total deposits. The following table reflects details about the loan portfolio:

Table 1 - Riverview Community Bank
Loan Portfolio Composition as of December 31, 2018

Loan Type	Amount (\$000)	% of Loan Portfolio
Consumer	9,676	1.1
Construction and Development	104,974	12.1
Farmland/Agriculture	48,117	5.5
Residential Mortgages (senior and junior liens)	104,330	12.0
Residential Construction	18,321	2.1
Commercial and Industrial	57,844	6.7
Commercial Real Estate/Multifamily	527,630	60.7
Other	16,066	1.8

*Source: December 31, 2018 Call Report. Due to rounding, totals may not equal 100.0
Residential construction loans may be considered as mortgages or business loans depending on HMDA status.*

There are currently no legal, financial, or other impediments that prevent Riverview from meeting the credit needs of its communities. The bank was rated ‘Satisfactory’ at the most recent CRA performance evaluation, dated May 31, 2016. Please refer to the CRA public file for more information about the bank.

Scope of the Evaluation

The bank’s CRA performance was evaluated under the Intermediate Small Bank (ISB) criteria. We reviewed home mortgage loans and small loans to businesses for the period beginning January 1, 2016, through December 31, 2018. We reviewed CD loans, investments, and services for the same period.

The Lending Test evaluates the bank’s record of meeting the credit needs of its AAs through its lending activities. The CD Test evaluates the bank’s record of responding to CD needs in its AAs through CD lending, qualified investments, donations, and services. Under the Lending Test, we did not analyze the loan data for any AA where the number of originated or purchased loans was less than 20 loans. Consequently, small loans to businesses were not analyzed in Marion AA or Klickitat AA as there was not a sufficient volume of loans to conduct a meaningful analysis. The bank is required to report mortgage lending data by the Home Mortgage Disclosure Act (HMDA). Mortgage data is provided for all areas based on reported HMDA data. No analysis of mortgage lending was completed for the Marion AA within the state of Oregon, nor for the Klickitat AA as there was not a sufficient volume of loans to perform a meaningful analysis. Our assessment of Longview AA mortgage lending was limited to 2017-2018 lending as 2016 mortgage lending within the AA lacked sufficient volume to support a meaningful analysis.

The U.S. Census Bureau’s American Community Survey (ACS) is used as the source of demographic data on census tract (CT) income levels. Analysis of data related to calendar year 2016 is based on the 2006-2010 ACS. Analysis of data related to calendar years 2017 and 2018 is based on the 2011-2015 ACS. This evaluation segments lending data into separate time periods for 2016 and 2017-2018 due to the ACS data updates, which may result in changes in the designation of low- and moderate-income (LMI) tracts. Changes in tract data may impact the geographic distribution of lending activity. The separate time periods also correspond to the minor change in the Portland-Vancouver AA boundaries in

2017 caused by the addition of tracts in Washington County, OR after the purchase of the MBank branches. Loans originated in 2016 are compared to 2010 ACS data and loans originated in 2017 and 2018 are compared to 2015 ACS data and, therefore, were evaluated separately. Greater emphasis was placed on 2017-2018 lending data since the underlying volume of lending over the two-year period was greater than for 2016.

Prior to this evaluation, we tested the accuracy of Riverview’s publicly filed information on home mortgage loans. The HMDA data we reviewed was collected and reported by the bank over the evaluation period. The testing indicated no substantive inaccuracies in the data for home mortgage loans; therefore, we determined the data is reliable. For CD lending, all loans were individually verified for CRA eligibility. Additionally, a sample of CD investments and services made or rendered during the evaluation period was reviewed to determine their eligibility for consideration. We included in this evaluation all activities found to meet the definition of community development.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The rating methodology is structured such that the Lending Test is weighted equally with the Community Development Test. The bank’s overall rating is a blend of the two state ratings and multistate rating. Our review included a full-scope analysis of all AAs; however, performance in the Portland-Vancouver AA was heavily weighted in our determination of the overall rating. The Portland-Vancouver AA accounts for 87 percent of deposits; approximately 88 percent of business loans originated and purchased; and 79 percent of the branch network during the review period. The following table summarizes total deposits by assessment area, which approximates the weight given to each assessment area in the overall conclusions:

Table 2 - Riverview Community Bank
Deposit Composition by AA as of June 30, 2018

Assessment Area	Amount (\$000)	% of Total Deposits
Portland-Vancouver AA	861,154	86.9
State of Oregon – Marion AA	23,629	2.4
State of Washington – Klickitat AA	101,515	10.2
State of Washington – Longview AA	4,868	0.5

Source: June 30, 2018 FDIC data. Due to rounding, totals may not equal 100.0

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Business lending was emphasized in determining the overall ratings for the Lending Test since business loans are the foremost loan product. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the loan products were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

Multistate Metropolitan Statistical Area Rating

Portland-Vancouver AA

CRA rating for the Portland-Vancouver AA¹: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's evaluation period lending activity in the Portland-Vancouver AA reflects reasonable penetration among business of different sizes and among individuals of different income levels.
- The bank's evaluation period lending activity reflects reasonable dispersion among geographies of different income levels in the Portland-Vancouver AA.
- The bank has demonstrated adequate responsiveness to the community development (CD) needs of the Portland-Vancouver AA.

Description of Institution's Operations in Portland-Vancouver AA

The Portland-Vancouver AA is comprised of portions of the Portland-Vancouver-Hillsboro MSA. The MSA is a large urban MMSA in Southwest WA and Northwest OR with an estimated 2.5 million residents as of 2018². The Columbia River divides the region into separate states. A substantial majority of the population and economic activity is located in Oregon as Portland is the most populous city in Oregon. Riverview operates 15 branches and 17 ATMs in this AA. Of the 15 branches in the AA, 27 percent are in LMI census tracts as one is located a low-income tract, three are in moderate-income tracts, nine are in middle-income tracts, and two are in upper-income tracts. The business focus is lending to small businesses and providing mortgage loans to consumers. Riverview's market penetration is stronger within the smaller Vancouver area market due to the longer history of serving communities in WA than in the Portland market. By dollar, 87 percent of Riverview's deposits and approximately 88 percent of evaluation period business loans were located in this AA.

The designated AA includes the entirety of Clark and Skamania Counties in WA; all of Multnomah County in OR; the North Clackamas Political Subdivision within Clackamas County in OR; and portions of Washington County, OR. This AA represents the bank's core market area and includes the overwhelming majority of bank-wide lending and deposit activities. As of 2017, there are 355 census tracts in the AA with 30.4 percent of the population residing in LMI geographies. The bank's designated AA complies with the CRA and does not arbitrarily exclude low- or moderate-income CTs from the AA.

According to Moody's Analytics, top employers in the MSA include Intel Corp., Providence Health Systems, Oregon Health and Science University, Legacy Health System, and Nike Inc. The economy is healthy and diversified. Key industries include education and health services, professional and business

¹ This rating reflects performance within the MMSA. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

² Based on U.S. Census Bureau estimates

services, and government services, and manufacturing. High-tech, transportation, and manufacturing are key drivers for the economic vitality of the area. As of December 2018, U.S. Bureau of Labor Statistics data estimates the unemployment rate was 3.9 percent as of December 2018, which matches the national unemployment rate.

The 2017 Federal Financial Institutions Examination Council (FFIEC) Median Family Income (MFI) Report indicates an adjusted MFI of \$73,089 for the Portland-Vancouver AA. Data collected in the 2015 ACS estimates, relative to the MFI stated above, 22 percent of the families living in the AA are low-income, 18 percent are moderate-income, 21 percent are middle-income, and 39 percent are upper-income. Nine percent of all households have income levels that fall below the poverty level.

According to the June 30, 2018, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, 34 financial institutions held \$50 billion in deposits in the AA. Competition is strong as there are 487 branches in the AA seeking to capture local deposits. Large national banks such as U.S. Bank N.A., Bank of America N.A., Wells Fargo Bank N.A., J.P. Morgan Chase Bank N.A., and KeyBank N.A. have the largest market shares with an aggregate 77 percent of AA deposits. Regional banks such as Umpqua Bank, Columbia State Bank, and Bank of the West also compete in the AA. Riverview is one of only four locally headquartered community banks that still operates in the AA as industry consolidation has recently reduced the total number of community banks in the area. Riverview ranks 10th out of 34 banks with \$861 million in deposits, or a 1.7 percent market share.

We conducted one community contact interview for the Portland-Vancouver AA in conjunction with this examination. Our contact stated that while unemployment numbers are low, the cost of rental and owner-occupied housing available for sale in the AA is relatively expensive, particularly for LMI residents. First time homeowners are struggling to find affordable homes and the cost of rental housing is high with annual increases that have outpaced wage growth. This indicates a need for affordable housing. Our contact also emphasized the importance of financial literacy as an essential skill. The contact noted that well-educated consumers are more likely to effectively manage money, debt, and credit in support of their financial stability.

The tables below provide summary demographic data for the Portland-Vancouver AA:

Table A – Demographic Information of the Assessment Area

2016 Assessment Area: Portland-Vancouver AA 2010 Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	328	3.7	27.1	45.7	23.2	0.3
Population by Geography	1,409,724	3.5	27.5	47.2	21.8	0.0
Housing Units by Geography	589,619	3.6	27.4	47.4	21.5	0.0
Owner-Occupied Units by Geography	339,459	1.7	22.4	49.2	26.7	0.0
Occupied Rental Units by Geography	211,843	6.5	35.2	44.9	13.4	0.0
Vacant Units by Geography	38,317	5.0	29.0	45.2	20.8	0.0
Businesses by Geography	128,888	5.7	23.7	43.6	26.7	0.2
Farms by Geography	2,716	2.7	19.0	48.0	30.3	0.1
Family Distribution by Income Level	336,244	21.7	18.2	21.4	38.7	0.0
Household Distribution by Income Level	551,302	24.7	16.8	18.9	39.6	0.0
Median Family Income MSA – 38900 Portland-Vancouver-Hillsboro, OR-WA MSA		\$68,924	Median Housing Value			\$304,838
			Median Gross Rent			\$862
			Families Below Poverty Level			9.3%

Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0

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

Table A – Demographic Information of the Assessment Area

2017-2018 Assessment Area: Portland-Vancouver AA 2015 ACS

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	355	2.5	26.8	41.1	28.7	0.8
Population by Geography	1,600,916	2.2	28.2	41.6	27.7	0.2
Housing Units by Geography	661,228	2.2	27.7	41.3	28.5	0.4
Owner-Occupied Units by Geography	368,650	0.9	21.7	44.5	32.8	0.1
Occupied Rental Units by Geography	256,830	4.0	35.9	37.1	22.3	0.7
Vacant Units by Geography	35,748	2.5	30.9	37.5	27.7	1.4
Businesses by Geography	150,428	2.9	23.1	36.4	34.2	3.3
Farms by Geography	3,062	2.3	20.7	42.5	33.3	1.2
Family Distribution by Income Level	382,771	22.0	17.4	20.2	40.5	0.0
Household Distribution by Income Level	625,480	25.1	16.5	17.9	40.5	0.0
Median Family Income MSA – 38900 Portland-Vancouver-Hillsboro, OR-WA MSA		\$73,089	Median Housing Value			\$287,484
			Median Gross Rent			\$1,016
			Families Below Poverty Level			9.6%

Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0

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

Scope of Evaluation in Portland-Vancouver AA

We completed a full-scope review of Riverview's lending and community development activities in the Portland-Vancouver AA as this is the sole AA within the MMSA. Our assessments incorporate the performance context including economic conditions; local competition; the bank's strategic emphasis on the Portland-Vancouver AA; the needs and opportunities for credit; and the needs and opportunities for essential community development services such as affordable housing, economic development that creates middle-income jobs, and financial education.

The weighting of loan products within the AA was consistent with the weights assigned to loan products throughout all of the bank's AAs with great emphasis placed on business loans. Demand for mortgage loans has remained moderate. The prolonged low interest rate environment has adversely impacted the market for refinance transactions as most borrowers with good credit refinanced to lower rates prior to the review period. There are 661,228 housing units in the Portland-Vancouver AA. Above-average population growth continues to result in rising housing costs. The median home value is \$287,484.

Commercial loan demand has been strong during the review period, with a decreasing trend evident as the decade-long economic expansion shows signs of tapering. Moody's Analytics recently rated the Portland-Vancouver-Hillsboro MSA 8th out of 403 MSAs nationally for economic vitality. Based on 2015 demographic data, there were 150,428 businesses operating in the MSA. While business loan demand was strong for our review period, the performance context for Riverview is not without challenges. The bank competes primarily against national or regional banks, which are typically able to offer lower rates due to benefits derived from their larger scale. The bank also competes against local credit unions and nonbank financial institutions such as mortgage companies.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PORTLAND-VANCOUVER AA

LENDING TEST

The bank's performance under the Lending Test in the Portland-Vancouver AA is rated Satisfactory.

Based on a full-scope review, the bank's lending performance in the Portland-Vancouver AA assessment area is reasonable. Riverview exhibits adequate responsiveness to the credit needs of the AA by providing business loans and home mortgages to borrowers of different income levels, including small businesses and LMI individuals. The bank's lending demonstrates a reasonable distribution of loans across geographies, including LMI census tracts.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The geographic distribution of home mortgage loans to CTs of different income levels is reasonable. Overall, lending performance was slightly lower, but reasonably similar to the level of lending indicated by aggregate data. In 2016, Riverview did not originate any home mortgage loans to borrowers located in low-income CTs. The ACS and HMDA peer data for the AA indicates that 1.7 percent of both owner-occupied housing units and aggregate peer mortgage loans occur in low-income CTs. Riverview originated 20.8 percent of bank loans in moderate-income CTs. Census data indicates that 22.4 percent of owner-occupied housing units are in moderate-income CTs in the AA, while 22.6 percent of aggregate peer loans were located in moderate-income CTs.

In 2017-2018, Riverview did not originate any home mortgage loans to borrowers located in low-income CTs. The census data for the AA indicates that 0.9 percent of owner-occupied housing units are located in low-income CTs. The HMDA peer data indicates that 1.1 percent of home mortgage loans within the AA were located in low-income CTs. Riverview originated 19.8 percent of bank loans in moderate-income CTs. Census data indicates that 21.7 percent of owner-occupied housing units are in moderate-income CTs in the AA, while 23.4 percent of aggregate peer loans were located in moderate-income CTs.

Small Loans to Businesses

Refer to Table Q in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

The geographic distribution of business loans is reasonable. In 2016, Riverview originated 5 percent of sampled business loans within low-income CTs. This is in line with the 5.7 percent of total businesses located within low-income CTs, and 3.9 percent of aggregate loans in the AA originated in low-income CTs. For 2016, Riverview originated 10 percent of business loans in moderate-income CTs. This is lower than the census and aggregate peer data, which indicate that 23.7 percent of businesses and 22.1 percent of business loans within the AA are located in moderate-income CTs.

In 2017-2018, Riverview originated 10 percent of small business loans in low-income CTs, which is a favorable distribution relative to the 2.9 percent of businesses located in those tracts. The aggregate peer data indicates 2.8 percent of small business loans in the AA were originated to business in low-income CTs. Riverview originated 30 percent of its business loans in moderate-income CTs. This compares favorably to both the percentage of businesses, which is 23.1 percent of total businesses, and to the aggregate CRA data which totals 22.8 percent.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed Riverview’s home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. The bank’s AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude LMI areas.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The distribution of home mortgage loans to LMI families in the Portland-Vancouver AA is reasonable. The lack of affordable housing reduces opportunities for mortgage lending to LMI borrowers in the AA. This is demonstrated by the considerable gap between demographic data and aggregate lending in the AA. Riverview originated 6.4 percent of mortgage loans to low-income families in 2016. Aggregate HMDA data indicates that 3.1 percent of home mortgage loans within the AA were originated to low-income families in 2016. Census data indicates 21.7 percent of AA families are low-income. The bank originated 8.8 percent of home mortgage loans to moderate-income families in 2016. Aggregate HMDA data indicates that 14.6 percent of home mortgage loans within the AA were originated to moderate-income families in 2016. Census data indicates 18.2 percent of AA families are moderate-income.

In 2017-2018, Riverview originated 3.1 percent of mortgage loans to low-income families within the AA. Aggregate HMDA data indicates that 3.5 percent of home mortgage loans within the AA were originated to low-income families in 2017-2018. Census data indicates 22 percent of AA families are low-income. The bank originated 15.4 percent of home mortgage loans to moderate-income families in 2017-2018. Aggregate HMDA data indicates that 14.8 percent of home mortgage loans within the AA were originated to moderate-income families. Census data indicates 17.4 percent of AA families are moderate-income.

Small Loans to Businesses

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of business loans to businesses with gross annual revenues of \$1 million or less is excellent. In 2016, Riverview originated 55 percent of sampled business loans to small businesses with gross annual revenues of \$1 million or less. This compares favorably to the aggregate CRA data which indicates 41.7 percent of loans within the AA were to small businesses. Census data indicates that 87.2 percent of businesses have gross annual revenues of \$1 million or less.

In 2017-2018, Riverview originated 80 percent of its business loans to small businesses with gross annual revenues of \$1 million or less. This ratio of lending to small businesses compares favorably to the aggregate CRA data which indicates that 52.4 percent of loans within the AA were to small business. Census data indicates that 86.9 percent of businesses have gross annual revenues of \$1 million or less.

Responses to Complaints

There were no complaints related to the bank’s CRA performance within the Portland-Vancouver AA.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the Portland-Vancouver AA is rated Satisfactory.

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the MMSA through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

Number and Amount of Community Development Loans

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Portland-Vancouver AA	46	100%	\$9,966	100%

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank exhibited adequate responsiveness to community development needs in the Portland-Vancouver AA through community development loans. During the evaluation period, the bank originated 46 community development loans totaling \$10 million that benefited the assessment area. Loans were made to organizations offering affordable housing to low- and moderate-income individuals, services for the elderly and persons with disabilities, as well as services for mental health and substance abuse counseling for low-income individuals. Examples of CD lending include:

- Five affordable housing projects totaling \$4.22 million, which provide affordable housing specifically for low- and moderate-income individuals.
- Three loans to health clinics totaling \$3.1 million, providing mental health and substance abuse services for predominantly low- and moderate-income individuals.
- Three loans to centers providing care for the elderly and persons with disabilities totaling \$2.52 million. These services are predominantly for low- and moderate-income individuals.
- Riverview participated in six projects via loan pools that support the development of affordable housing units within the Portland-Vancouver AA. This lending is conducted through the Network for Oregon Affordable Housing (NOAH). In total, the bank advanced \$120 thousand for these six projects.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Portland-Vancouver AA	0	\$0	266	\$461	266	100%	\$461	100%	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.

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investments, including prior period investments that remain outstanding as of the examination date.

The bank exhibited adequate responsiveness to community development needs in the Portland-Vancouver AA through qualified investments. During the evaluation period, the bank donated \$461 thousand to 88 organizations that support low- and moderate-income individuals through programs such as local food banks, educational foundations, financial assistance and counseling services, homeless shelters, as well as mental health and substance abuse services. Examples of investments, primarily consisting of donations, include:

- Donations of \$47,934 to a charitable organization that supports local programs for LMI children.
- Donations of \$28,500 to a scholarship program that assists LMI individuals with college tuition.
- Donations of \$29,029 to a charity that aids the homeless via food banks, housing, and job assistance programs.

Extent to Which the Bank Provides Community Development Services

The bank exhibited excellent responsiveness to community development needs in the Portland-Vancouver AA through community development services. Riverview's staff contributed 5,667 financial service hours to 77 qualified organizations within the AA. The bank's CD services include technical assistance through voluntary Board and committee memberships, fundraising, and financial and small business education. These organizations serve various needs of the community by providing services such as food banks, health and social services, economic development, counseling, financial education, and affordable housing to LMI individuals and families. Examples of services provided by Riverview staff to qualifying organizations include:

- A total of 715 hours were contributed to a community development organization that assists LMI individuals with job training and placement services in support of economic development.
- Employees donated 239 hours to an organization that supports the well-being and health care needs of elderly and disabled LMI individuals.
- Staff contributed 152 hours to a local non-profit that provides financial education to youth in schools located in LMI census tracts.

State Rating

State of Oregon

CRA rating for the State of Oregon³: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- While the bank's volume of lending within the AA was insufficient to conduct a meaningful analysis of lending to borrowers of different income levels, or to analyze the distribution of loans by income level of the geography, the overall level of lending within the AA did demonstrate reasonable efforts to meet the credit needs of the AA given the performance context.
- When lending data specific to the AA is not available to form the basis for our conclusions, we rely upon bank-wide measures of lending including the LTD ratio and the level of lending inside of all AAs. Riverview's LTD ratio is excellent and the level of lending within its AA is also excellent.
- The bank has demonstrated adequate responsiveness to the community development needs of the Marion AA.

Description of Institution's Operations in Oregon

The Marion AA is comprised of the entirety of Marion County within the Salem, OR MSA. This MSA is a small urban region in Northwest Oregon, which consists of Marion and Polk Counties. Salem is the most populous city within the MSA as it contains a majority of the 323,259 residents in Marion County as of 2018⁴. Because Salem is designated as the capital city of Oregon, it is the epicenter of local economic activity. Riverview operates one branch and one ATM in this AA in the town of Aumsville. Aumsville is a bedroom community in the Willamette Valley located southeast of Salem.

As of 2017, there were 58 census tracts in the AA with 30.2 percent of the population residing in LMI geographies. The Riverview branch is located in a middle-income census tract. The business focus is lending to small businesses and providing mortgage loans to consumers. Opportunities for lending are limited as most of the local business activity occurs in the city of Salem where competing financial institutions are numerous. The Riverview branch also competes with several banks in the nearby town of Stayton. Riverview is the only bank operating in Aumsville. This AA represents a very small portion of overall bank activity. By dollar, 2.4 percent of Riverview's deposits and approximately 1.6 percent of evaluation period commercial loans were located in this AA.

According to Moody's Analytics, top employers in the MSA include Salem Hospital, SuperMedia LLC, Association of Salem Keizer Education Support, Fred Meyer Stores, and Chemeketa Community College. The economy is performing well. Key industries include education and health services,

³ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

⁴ Based on U.S. Census Bureau data.

government services, professional and business services, and leisure and hospitality services. State government and agriculture are key drivers for the economic vitality of the area. As of December 2018, U.S. Bureau of Labor Statistics data estimates the unemployment rate was 4.5 percent, which is higher than the national unemployment rate of 3.9 percent.

The 2017 FFIEC MFI Report indicates an adjusted MFI of \$58,033 for the Marion AA. Data collected in the 2015 ACS estimates, relative to the MFI stated above, 22 percent of the families living in the AA are low-income, 18 percent are moderate-income, 20 percent are middle-income, and 40 percent are upper-income. Fourteen percent of all households have income levels that fall below the poverty level.

According to the June 30, 2018 FDIC Deposit Market Share Report, 15 financial institutions held \$5.3 billion in deposits in the AA. Competition is considerable as there are 70 branches in the AA seeking to capture local deposits. The leading banks in the market are Wells Fargo Bank N.A., U.S. Bank N.A., Columbia State Bank, J.P. Morgan Chase Bank N.A., and Pioneer Trust Bank N.A. with an aggregate 73 percent of AA deposits. Other large national and regional banks also compete in the AA. There are five community banks, including Riverview, that operate in the AA. Riverview ranks 15th out of 15 banks with \$23.6 million in deposits, or a 0.5 percent market share. The location of the branch in a small rural town with limited lending opportunities in the immediate area is an important factor in understanding the credit needs of the AA and the capacity of Riverview to meet the local credit needs.

We conducted one community contact interview for the Marion AA in conjunction with this examination. Our contact indicated there was a need for affordable housing, particularly for LMI individuals. The contact also emphasized the need for local economic revitalization with opportunity zones including the Salem downtown area. Grants and small business loans to support the creation of living wage jobs and new businesses were cited as a primary credit need of the AA.

The tables below provide summary demographic data for the Marion AA:

Table A – Demographic Information of the Assessment Area

2016 Assessment Area: Marion AA 2010 Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	58	0.0	22.4	56.9	20.7	0.0
Population by Geography	315,335	0.0	25.4	55.0	19.6	0.0
Housing Units by Geography	119,630	0.0	23.6	55.1	21.3	0.0
Owner-Occupied Units by Geography	69,943	0.0	14.6	59.3	26.1	0.0
Occupied Rental Units by Geography	42,830	0.0	37.7	47.8	14.5	0.0
Vacant Units by Geography	6,857	0.0	28.3	57.5	14.2	0.0
Businesses by Geography	21,606	0.0	24.4	55.8	19.8	0.0
Farms by Geography	1,466	0.0	10.0	70.9	19.1	0.0
Family Distribution by Income Level	77,101	20.8	19.5	21.0	38.8	0.0
Household Distribution by Income Level	112,773	22.6	17.6	19.4	40.4	0.0
Median Family Income MSA – 41420 Salem, OR MSA	\$56,016	Median Housing Value				\$210,341
		Median Gross Rent				\$742
		Families Below Poverty Level				11.7%

Source: 2010 U.S. Census and 2016 D&B Data. Due to rounding, totals may not equal 100.0

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

Table A – Demographic Information of the Assessment Area

2017-2018 Assessment Area: Marion AA 2015 ACS

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	58	3.4	22.4	46.6	27.6	0.0
Population by Geography	323,259	3.1	27.1	45.4	24.4	0.0
Housing Units by Geography	122,315	3.0	24.9	45.9	26.2	0.0
Owner-Occupied Units by Geography	68,134	1.3	17.2	50.9	30.6	0.0
Occupied Rental Units by Geography	45,862	5.4	35.1	39.1	20.4	0.0
Vacant Units by Geography	8,319	4.0	31.4	42.5	22.1	0.0
Businesses by Geography	22,599	3.2	24.4	40.6	31.8	0.0
Farms by Geography	1,488	1.5	12.2	45.0	41.3	0.0
Family Distribution by Income Level	78,914	22.4	17.9	20.2	39.5	0.0
Household Distribution by Income Level	113,996	23.4	16.8	19.4	40.3	0.0
Median Family Income MSA – 41420 Salem, OR MSA	\$58,033	Median Housing Value				\$191,525
		Median Gross Rent				\$812
		Families Below Poverty Level				14.2%

Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0

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

Scope of Evaluation in Oregon

We completed a full-scope review of Riverview's lending and community development activities in the Marion AA as this is the sole AA within the MMSA. Our assessments incorporate the performance context including economic conditions, local competition, the bank's strategic emphasis on the Portland-Vancouver AA, and the need for essential community development services such as affordable housing, economic development that creates middle-income jobs, and financial education.

Due to the insufficient volume of loan products in any single product line for this AA, a meaningful analysis of lending activity in the State of Oregon was not possible. The bank's footprint in the AA consists of a single branch in a small town, which impacts the potential lending opportunities. We gave substantial consideration to the performance context for the AA as the demand for credit services near the Aumsville branch is limited. In addition, the percentage of overall bank activity occurring in this AA is nominal. Because Riverview does not offer agricultural production loans, this further reduces opportunities for lending in the AA. In the absence of meaningful quantitative data for any single product within this AA, we based our conclusions on bank-wide lending metrics including the LTD ratio and the level of lending inside of all AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OREGON

LENDING TEST

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

Based on a full-scope review, the bank's lending performance in the state of Oregon is reasonable.

Lending within this AA was diversified with no single loan product featuring sufficient volume for a meaningful analysis. When data is not available for a rating area, we rely upon the LTD ratio and the level of lending within all of the bank's AAs as a substitute for AA specific lending test analyses. Our conclusions with regard to those two tests indicate performance is excellent.

We also gave consideration to internal reports on lending data in order to formulate our final conclusion on AA lending. During our review period, the bank originated 25 loans totaling \$30.9 million in credit across all loan products within the AA. While assessing the adequacy of lending, we considered the level of lending in the AA relative to overall bank activity. Deposits in the Marion AA represent 2.4 percent of bank-wide deposits. In comparison, the level of business lending within the AA represents 1.6 percent of bank-wide business lending by dollar volume during the review period. For home mortgage loans, the percentage of home mortgages by dollar volume within the AA represents 1.0 percent of total home mortgage loans originated bank-wide. While these metrics are a bit below the level of deposit activity, they do demonstrate reasonable efforts to meet the credit needs of the AA, particularly when consideration is given to the modest level of lending opportunities available near the Riverview branch in this AA. Based on a combination of the bank-wide lending data and the level of lending in the AA, we determined that Riverview's performance is reflective of adequate efforts to meet the credit needs of the communities served in the state of Oregon.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state. Refer to the conclusions in the “Lending Test” section above, which summarizes our conclusions for this AA.

Home Mortgage Loans

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

The volume of mortgage loans during the review period was insufficient to conduct a meaningful analysis.

Small Loans to Businesses

Refer to Table Q in the state of Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

The volume of business loans during the review period was insufficient to conduct a meaningful analysis.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed Riverview’s home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. The bank’s AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude LMI areas.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. Refer to the conclusions in the “Lending Test” section above, which summarizes our conclusions for this AA.

Home Mortgage Loans

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

The volume of mortgage loans during the review period was insufficient to conduct a meaningful analysis.

Small Loans to Businesses

Refer to Table R in the state of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The volume of business loans during the review period was insufficient to conduct a meaningful analysis.

Responses to Complaints

There were no complaints related to the bank's CRA performance within Oregon.

COMMUNITY DEVELOPMENT TEST

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

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

Number and Amount of Community Development Loans

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Marion AA	1	100%	\$20	100%

The Community Development Loans Table, shown above, set forth the information and data used to evaluate the bank's level of community development lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Overall, there was a low level of CD lending in the Marion AA, which was supplemented by additional CD lending in the broader statewide region. During the evaluation period, the bank originated one community development loan totaling \$20 thousand that benefited the Marion AA. This loan funded affordable housing, which was identified as an AA need by our community contact.

In addition to the lending activity that benefited the Marion AA, the bank also originated 10 loans totaling \$220 thousand that benefited the broader statewide area. These loans funded affordable housing. Statewide community development lending in Oregon had a positive impact on our conclusions since the bank had demonstrated adequate responsiveness to the community development needs of its AA.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Marion AA	0	\$0	7	\$5	7	100%	\$5	100%	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.

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified community development investments. This table includes all community development investments, including prior period investments that remain outstanding as of the examination date.

During the evaluation period, there was a low level of CD investments as the bank donated \$5 thousand to three qualified organizations operating in the Marion AA. These donations funded necessary community services, such as food banks. In addition, some of the donations funded a reading education program that targets students at an elementary school with a high percentage of LMI students.

Extent to Which the Bank Provides Community Development Services

The bank exhibited excellent responsiveness to community development needs in the Marion AA through community development services. During the evaluation period, bank employees dedicated 435 service hours to three qualified organizations operating in the Marion AA. These organizations include a crisis center, an organization that facilitates economic development by providing coaching services to entrepreneurs, and the organization that facilitates the reading education program described in the "Number and Amount of Qualified Investments" section above.

State Rating

State of Washington

CRA rating for the State of Washington⁵: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's evaluation period lending activity in the Longview AA reflects reasonable penetration among business of different sizes and among individuals of different income levels.
- The bank's evaluation period lending activity reflects reasonable dispersion among geographies of different income levels in the Longview AA.
- The bank has demonstrated adequate overall responsiveness to the community development (CD) needs of its AAs.

Description of Institution's Operations in Washington

The state of Washington rating area is comprised of the Klickitat AA and the Longview AA.

Klickitat AA

The Klickitat AA consists of Klickitat County in South Central Washington. Klickitat County is a large, sparsely populated, rural area that has historically relied upon agriculture to support the local economy. The topography of Klickitat County is a transition zone as the lush forests, cliffs, and volcanoes of the Columbia Gorge and Cascade Mountains to the west fade into the rounded hills and golden-hued grasslands that characterize Central Washington. Goldendale is the most populous town in the county with a 2018 estimated population of 3,497⁶. White Salmon is located on the Columbia River and is the second most populous town in the county with a population of 2,619 as of 2018⁷. There are no other towns or census designated places with populations of more than 1,000 residents in the county. There is no designated MSA within the county.

Riverview operates one branch each in Goldendale and White Salmon. Each branch features an ATM. There are three census tracts in the AA. The Goldendale branch was located in a moderate-income census tract in 2016. In 2017, this tract was designated a middle-income tract. As of 2016, the White Salmon branch was located in a middle-income census tract. In 2017, this census tract was designated upper-income. There are no low-income census tracts in the AA. There was one middle-income tract as of 2016 and no middle-income tracts as of 2017. The business focus is lending to small businesses and providing mortgage loans to consumers. The bank's overall presence in Klickitat County is modest in

⁵ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

⁶ Based on U.S. Census Bureau data.

⁷ Based on U.S. Census Bureau data

proportion to the overall bank. By dollar, 10.2 percent of Riverview's deposits and approximately 0.7 percent of evaluation period business loans were located in this AA. As of 2016, 41 percent of the population resided in LMI geographies. As of 2017, there were no LMI geographies.

According to the Economic Security Department of Washington State, agriculture is the primary industry⁸. Primary agricultural lines of business are vegetables, fruit orchards, and vineyards. Other key sectors are advanced manufacturing, tourism, and drone production. Most newly created jobs are in manufacturing. Employment has historically lagged statewide averages, although this gap has narrowed in recent years. Personal income levels have benefited from the expansion of manufacturing as these jobs offer higher average wages. As of December 2018, U.S. Bureau of Labor Statistics data estimates the local unemployment rate was 6.6 percent, compared to the national unemployment rate of 3.9 percent.

The 2017 Federal Financial Institutions Examination Council Median Family Income Report indicates an adjusted MFI of \$58,513 for the Klickitat AA. Data collected in the 2015 ACS estimates, relative to the MFI stated above, 20 percent of the families living in the AA are low-income, 10 percent are moderate-income, 22 percent are middle-income, and 38 percent are upper-income. Eleven percent of all households have income levels that fall below the poverty level.

According to the June 30, 2018 Federal Deposit Insurance Corporation Deposit Market Share Report, four financial institutions held \$313 million in deposits in the AA. Competition is modest as there are 7 branches in the AA seeking to capture local deposits. The other three banks operating in the AA are regional banks including Umpqua Bank, Columbia State Bank, and First Interstate Bank. The White Salmon market is also subject to competition from banks outside the AA in Hood River, OR, which is easily accessible via the Hood River Bridge. Riverview ranks second out of four banks with \$102 million in deposits, or a 32.4 percent market share.

We conducted one community contact interview for the Klickitat AA in conjunction with this examination. Our contact stated that economic conditions have improved recently and the disparity between the local economy and statewide economic conditions has shrunk. Nonetheless, there is still significant poverty, and the area needs additional middle-income jobs to support families. The cost of rental and owner-occupied housing available for sale in the AA may still be expensive for LMI residents, particularly in the western part of the county. In the central and eastern parts of the county, housing is more affordable, but wages are lower, and the supply of rental and owner-occupied housing is very low. Our contact emphasized the importance of economic development loans for startup companies, small business owners, and housing developments.

Longview AA

The Longview AA is comprised of the entirety of Cowlitz County within the Longview, WA MSA. This MSA is a small urban region in Southwest Washington located to the North of the Portland-Vancouver AA. Longview is the most populous city within the MSA as it contains 36,740 residents as of 2017⁹. Riverview operated one branch and one ATM in this AA in downtown Longview. The branch was closed in September 2018.

⁸ Based on Washington State Employment Security Department data

⁹ Based on U.S. Census Bureau data

As of 2017, there were 24 census tracts in the AA with 23.5 percent of the population residing in LMI geographies. The Riverview branch was located in a low-income census tract. The business focus is lending to small businesses and providing mortgage loans to consumers. Opportunities for lending are moderate; however, competition is significant. This AA represents a very small portion of overall bank activity. By dollar, 0.5 percent of Riverview's deposits and approximately 2.6 percent of evaluation period business loans were located in this AA.

According to Moody's Analytics, top employers in the MSA include Eastman Chemical, Walmart Stores Inc., Longview Regional Medical Center, and Trinity Rail LLC. The local economy has sputtered for decades since the onset of the decline in the timber industry, which served as the economic engine for Longview during much of the 20th century. Recently, economic conditions have improved. Key industries include education and health services, government services, manufacturing, and retail trade. Manufacturing and logistics are key drivers for the economic vitality of the area. The Longview economy is heavily dependent on international trade. As of December 2018, U.S. Bureau of Labor Statistics data estimates the unemployment rate was 6.3 percent, which is higher than the national unemployment rate of 3.9 percent.

The 2017 FFIEC MFI Report indicates an adjusted MFI of \$57,938 for the Longview AA. Data collected in the 2015 ACS estimates, relative to the MFI stated above, 21 percent of the families living in the AA are low-income, 18 percent are moderate-income, 22 percent are middle-income, and 40 percent are upper-income. Thirteen percent of all households have income levels that fall below the poverty level. There are 43,503 housing units in the Longview AA. The median home value is \$175,712.

According to the June 30, 2018, FDIC Deposit Market Share Report, eight financial institutions held \$636 million in deposits in the AA. Competition is moderate as there are 11 branches in the AA seeking to capture local deposits. The leading banks in the market are U.S. Bank N.A., Columbia State Bank, Bank of America N.A., Heritage Bank, and J.P. Morgan Chase Bank N.A. with an aggregate 86 percent of AA deposits. Credit unions also have a significant presence in the area. Only one other community bank continues to operate in the area as the other banks are national or regional banks. Riverview ranked eighth out of eight banks with \$4.9 million in deposits, or a 0.8 percent market share.

We conducted one community contact interview for the Longview AA in conjunction with this examination. Our contact indicated there was a need for affordable housing, particularly for LMI individuals. Income levels have not increased as rapidly as housing values or inflation per our contact. For those individuals with middle-income jobs, the supply of housing is limited, and some residents are moving to Clark County in order to expand their housing options. The contact also emphasized the need for additional living wage jobs and new businesses in Longview and Kelso.

The tables below provide summary demographic data for the Longview AA:

Table A – Demographic Information of the Assessment Area

2016 Assessment Area: Longview AA 2010 Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	12.5	16.7	54.2	16.7	0.0
Population by Geography	102,410	6.4	17.2	58.2	18.2	0.0
Housing Units by Geography	42,842	6.9	18.4	57.9	16.8	0.0
Owner-Occupied Units by Geography	26,529	3.7	11.4	61.4	23.6	0.0
Occupied Rental Units by Geography	12,912	13.5	33.3	48.0	5.1	0.0
Vacant Units by Geography	3,401	6.9	17.2	67.5	8.4	0.0
Businesses by Geography	5,151	10.2	25.1	50.7	14.0	0.0
Farms by Geography	168	9.5	12.5	60.7	17.3	0.0
Family Distribution by Income Level	26,969	20.7	17.8	20.6	40.9	0.0
Household Distribution by Income Level	39,441	23.6	16.2	19.2	41.0	0.0
Median Family Income MSA – 31020 Longview, WA MSA		\$55,002	Median Housing Value			\$192,352
			Median Gross Rent			\$697
			Families Below Poverty Level			11.8%

Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0

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

Table A – Demographic Information of the Assessment Area

2017-2018 Assessment Area: Longview AA 2015 ACS

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	16.7	12.5	50.0	20.8	0.0
Population by Geography	102,338	10.8	12.7	46.8	29.7	0.0
Housing Units by Geography	43,503	10.8	12.6	48.0	28.6	0.0
Owner-Occupied Units by Geography	26,091	4.3	9.0	50.3	36.3	0.0
Occupied Rental Units by Geography	13,672	22.8	19.6	41.5	16.2	0.0
Vacant Units by Geography	3,740	12.5	12.0	55.4	20.1	0.0
Businesses by Geography	5,289	28.9	7.7	40.9	22.4	0.0
Farms by Geography	195	19.5	5.6	46.7	28.2	0.0
Family Distribution by Income Level	26,082	20.6	18.1	21.7	39.6	0.0
Household Distribution by Income Level	39,763	24.7	15.8	17.8	41.8	0.0
Median Family Income MSA – 31020 Longview, WA MSA		\$57,938	Median Housing Value			\$175,712
			Median Gross Rent			\$766
			Families Below Poverty Level			12.5%

Source: 2015 U.S. Census and 2018 D&B Data Due to rounding, totals may not equal 100.0

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

The tables below provide summary demographic data for the Klickitat AA:

Table A – Demographic Information of the Assessment Area

2016 Assessment Area: Klickitat AA 2010 Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	33.3	66.7	0.0	0.0
Population by Geography	20,318	0.0	41.0	59.0	0.0	0.0
Housing Units by Geography	9,612	0.0	41.8	58.2	0.0	0.0
Owner-Occupied Units by Geography	5,874	0.0	43.8	56.2	0.0	0.0
Occupied Rental Units by Geography	2,531	0.0	44.8	55.2	0.0	0.0
Vacant Units by Geography	1,207	0.0	25.6	74.4	0.0	0.0
Businesses by Geography	1,366	0.0	43.6	56.4	0.0	0.0
Farms by Geography	157	0.0	55.4	44.6	0.0	0.0
Family Distribution by Income Level	5,767	27.6	18.8	21.2	32.4	0.0
Household Distribution by Income Level	8,405	27.6	20.3	18.0	34.1	0.0
Median Family Income Non-MSAs – WA		\$54,500	Median Housing Value			\$207,017
			Median Gross Rent			\$661
			Families Below Poverty Level			13.7%

Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0

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

Table A – Demographic Information of the Assessment Area

2017-2018 Assessment Area: Klickitat AA 2015 ACS

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	66.7	33.3	0.0
Population by Geography	20,820	0.0	0.0	62.8	37.2	0.0
Housing Units by Geography	9,894	0.0	0.0	62.7	37.3	0.0
Owner-Occupied Units by Geography	5,395	0.0	0.0	64.3	35.7	0.0
Occupied Rental Units by Geography	2,468	0.0	0.0	63.5	36.5	0.0
Vacant Units by Geography	2,031	0.0	0.0	57.5	42.5	0.0
Businesses by Geography	1,383	0.0	0.0	58.5	41.5	0.0
Farms by Geography	171	0.0	0.0	67.3	32.7	0.0
Family Distribution by Income Level	5,281	20.4	19.9	21.8	37.9	0.0
Household Distribution by Income Level	7,863	20.6	18.4	19.1	41.9	0.0
Median Family Income Non-MSAs – WA		\$58,513	Median Housing Value			\$222,761
			Median Gross Rent			\$834
			Families Below Poverty Level			10.9%

Source: 2015 U.S. Census and 2018 D&B Data Due to rounding, totals may not equal 100.0

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

The tables below provide summary demographic data for the combined state of Washington rating area:

Table A – Demographic Information of the Assessment Area

2016 Assessment Area: Combined Washington AAs 2010 Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	11.1	18.5	55.6	14.8	0.0
Population by Geography	122,728	5.4	21.2	58.3	15.2	0.0
Housing Units by Geography	52,454	5.6	22.7	57.9	13.7	0.0
Owner-Occupied Units by Geography	32,403	3.0	17.2	60.5	19.3	0.0
Occupied Rental Units by Geography	15,443	11.3	35.2	49.2	4.3	0.0
Vacant Units by Geography	4,608	5.1	19.4	69.3	6.2	0.0
Businesses by Geography	6,517	8.0	28.9	51.9	11.1	0.0
Farms by Geography	325	4.9	33.2	52.9	8.9	0.0
Family Distribution by Income Level	32,736	21.9	18.0	20.7	39.4	0.0
Household Distribution by Income Level	47,846	24.3	16.9	19.0	39.8	0.0
Median Family Income – 31020 Longview WA AA		\$55,002	Median Housing Value			\$195,039
Median Family Income – Non-MSA WA AA		\$54,500				
			Median Gross Rent			\$691
			Families Below Poverty Level			12.1%

Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0

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

Table A – Demographic Information of the Assessment Area

2017-2018 Assessment Area: Combined Washington AAs 2015 ACS

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	14.8	11.1	51.9	22.2	0.0
Population by Geography	123,158	9.0	10.6	49.5	31.0	0.0
Housing Units by Geography	53,397	8.8	10.3	50.7	30.2	0.0
Owner-Occupied Units by Geography	31,486	3.6	7.5	52.7	36.2	0.0
Occupied Rental Units by Geography	16,140	19.3	16.6	44.8	19.3	0.0
Vacant Units by Geography	5,771	8.1	7.8	56.2	28.0	0.0
Businesses by Geography	6,672	22.9	6.1	44.6	26.4	0.0
Farms by Geography	366	10.4	3.0	56.3	30.3	0.0
Family Distribution by Income Level	31,363	20.6	18.4	21.7	39.3	0.0
Household Distribution by Income Level	47,626	24.0	16.2	18.0	41.8	0.0
Median Family Income – 31020 Longview WA AA		\$57,938	Median Housing Value			\$184,430
Median Family Income – Non-MSA WA AA		\$58,513				
			Median Gross Rent			\$777
			Families Below Poverty Level			12.2%

Source: 2015 U.S. Census and 2018 D&B Data Due to rounding, totals may not equal 100.0

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

Scope of Evaluation in Washington

We completed full-scope reviews of Riverview's lending and community development activities in the Klickitat AA and Longview AA. Our assessments incorporate the performance context including economic conditions, local competition, the bank's strategic emphasis on the Portland-Vancouver AA, and the need for essential community development services such as affordable housing, economic development that creates middle-income jobs, and funding for small businesses.

The weighting of loan products within the AA was consistent with the weights assigned to loan products throughout all of the bank's AAs with greater emphasis placed on business lending. For business loans, there was an insufficient volume of loans to conduct a meaningful assessment of lending within the Klickitat AA; therefore, our assessment of business lending is based solely on activity in the Longview AA. For 2016, mortgage lending in the State of Washington did not have sufficient volume to support a meaningful analysis. Thus, our conclusions on mortgage lending were based solely on the 2017-2018 HMDA data using combined data for both AAs. Demand for mortgage loans has remained moderate.

Commercial loan demand has been moderate during the review period in Longview. Moody's Analytics recently rated the Longview MSA 288th out of 403 MSAs nationally for economic vitality. Based on 2015 demographic data, there were 5,289 businesses operating in the MSA. While business loan demand was moderate for our review period, local competition is significant. Riverview competes primarily against national or regional banks, as well as credit unions.

Due to the following reasons, the bank's community development performance in the Klickitat AA was given more consideration than performance in the Longview AA when assigning the overall community development test rating for this state:

- The bank only operated one branch in the Longview AA, and this branch was closed on September 28, 2019. The bank operated two branches in the Klickitat AA throughout the entire review period.
- The Longview AA comprised a small percentage of the bank's deposit base throughout the evaluation period. As of June 30, 2017, which was the midpoint of the CRA evaluation period, 1.4 percent of the bank's deposits were obtained through the Longview AA. In comparison, 10.1 percent of the bank's deposits were obtained through the Klickitat AA. This information was obtained through the FDIC Deposit Market Share Report.
- Competition in the Longview AA is considerable. As of June 30, 2017, Riverview had the smallest market share of all FDIC-insured institutions operating in this AA, at 2.2 percent. This information was obtained through the FDIC Deposit Market Share Report.
- The decision to exit the Longview market impacted the level of community development activity during the latter part of the review period. Once the bank elected to close the Longview branch, the allocation of resources and service hours for community development was directed towards other AAs where the bank continues to operate, which is a reasonable strategy.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON

LENDING TEST

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

Based on a full-scope review, the bank's lending performance in the state of Washington is reasonable. Riverview exhibits adequate responsiveness to the credit needs of the AAs by providing business loans and home mortgages to borrowers of different income levels, including small businesses and LMI individuals. The bank's lending demonstrates a reasonable distribution of loans across geographies, including LMI census tracts.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The geographic distribution of home mortgage loans to CTs of different income levels is reasonable. In 2016, Riverview did not originate a sufficient volume of home mortgage loans to conduct a meaningful analysis.

Riverview's mortgage lending was in line with peer lending for low-income borrowers and slightly lower for moderate-income borrowers. In 2017-2018, Riverview originated 3.4 percent of home mortgage loans to borrowers located in low-income CTs in the combined Washington AAs. The census data indicates that 3.6 percent of owner-occupied housing units are located in low-income CTs. The HMDA peer data indicates that 4.2 percent of home mortgage loans within the AA were located in low-income CTs. Riverview originated 3.4 percent of bank loans in moderate-income CTs. Census data indicates that 7.5 percent of owner-occupied housing units are in moderate-income CTs in the AA, while 8.1 percent of aggregate peer loans were located in moderate-income CTs.

Small Loans to Businesses

Refer to Table Q in the State of Washington section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of business loans in the Longview AA is reasonable. In 2016, Riverview originated 5 percent of sampled business loans within low-income CTs. This is slightly below the metrics of 10.2 percent of total businesses located within low-income CTs, and 8 percent of aggregate loans in the AA originated in low-income CTs. For 2016, Riverview did not originate any business loans

in moderate-income CTs in the AA. The census and aggregate peer data indicate that 25.1 percent of businesses, and 20.5 percent of business loans within the AA are located in moderate-income CTs.

In 2017-2018, Riverview originated 15 percent of small business loans in low-income CTs, while 28.9 percent of businesses are located in those tracts. The aggregate peer data indicates 26.1 percent of small business loans in the AA were originated to business in low-income CTs. Riverview originated 10 percent of its business loans in moderate-income CTs. This is in line with both the percentage of businesses, which is 7.7 percent of total businesses, and the aggregate CRA data which totals 9.4 percent.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed Riverview's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. The bank's AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude LMI areas.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The distribution of home mortgage loans to LMI families in the combined AAs of the state of Washington is reasonable. In 2016, Riverview did not originate a sufficient volume of home mortgage loans to conduct a meaningful analysis.

In 2017-2018, Riverview originated 6.9 percent of mortgage loans to low-income families within the combined AAs. Aggregate HMDA data indicates that 2.5 percent of home mortgage loans within the AA were originated to low-income families in 2017-2018. Census data indicates 20.6 percent of AA families are low-income. The bank originated 17.2 percent of home mortgage loans to moderate-income families in 2017-2018. Aggregate HMDA data indicates that 10.2 percent of home mortgage loans within the AA were originated to moderate-income families. Census data indicates 18.4 percent of AA families are moderate-income.

Small Loans to Businesses

Refer to Table R in the State of Washington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of business loans to businesses with gross annual revenues of \$1 million or less in the Longview AA reflects reasonable penetration among small businesses of different sizes. In 2016, Riverview originated 30 percent of sampled business loans to small businesses with gross annual revenues of \$1 million or less. This performance lags the aggregate CRA data which indicates 35.3

percent of loans within the AA were to small businesses. Census data indicates that 82.4 percent of businesses have gross annual revenues of \$1 million or less.

In 2017-2018, Riverview originated 30 percent of its business loans to small businesses with gross annual revenues of \$1 million or less. This ratio of lending to small businesses is below the aggregate CRA data which indicates that 43.2 percent of loans within the AA were to small business. Census data indicates that 81.7 percent of businesses have gross annual revenues of \$1 million or less.

Responses to Complaints

There were no complaints related to the bank's CRA performance in Washington.

COMMUNITY DEVELOPMENT TEST

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

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

Number and Amount of Community Development Loans

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Klickitat AA	2	100%	\$278	100%
Longview AA	0	0%	\$0	0%

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

During the evaluation period, the level of CD lending activity in Washington is low as the bank originated two community development loans totaling \$278 thousand that benefited the Klickitat AA. Both loans benefited an organization that provides necessary community services, such as food banks, emergency housing, and a youth center. The bank did not originate any community development loans in the Longview AA during the evaluation period.

We also gave positive consideration for CD lending, predominantly conducted through loan consortiums, that serves a broader statewide or regional area that includes the bank's AAs. In addition to the lending activity that benefited the Klickitat AA, the bank also originated 16 loans totaling \$463 thousand that benefited the broader statewide area. Most of these loans funded affordable housing. While these loans do not directly benefit the bank's AAs, participation in these loan consortiums expands the lender's opportunities for CD lending while allowing lenders to pool funds and share credit risk to fund affordable housing projects. Furthermore, participation fosters cooperation between

participating lenders to fund projects outside of a particular lender's AA, which incentivizes other lenders to fund projects within that lender's AA. Notable statewide CD lending activities include:

- Like the NOAH loan consortium, the Washington Community Reinvestment Association (WCRA) provides loans for the development or preservation of affordable housing for low- and moderate-income individuals throughout the state of Washington. The bank advanced \$313 thousand towards 15 affordable housing projects in Washington that were outside of the bank's AAs.
- Riverview also advanced \$150 thousand to Lifeline Connections, a non-profit organization providing mental health and substance abuse services in Washington.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Klickitat AA	0	\$0	15	\$4	15	100%	\$4	100%	0	\$0
Longview AA	0	\$0	0	\$0	0	0%	\$0	0%	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.

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified community development investments. This table includes all community development investments, including prior period investments that remain outstanding as of the examination date.

During the evaluation period, there was a low level of investments as the bank donated \$4 thousand to four qualified organizations operating in the Klickitat AA. These donations funded necessary community services, such as food banks and a youth center. The bank did not make any community development investments in the Longview AA during the evaluation period.

Extent to Which the Bank Provides Community Development Services

The bank exhibited excellent responsiveness to community development needs in the Klickitat AA through community development services. During the evaluation period, bank employees dedicated 928 service hours to 11 qualified organizations operating in the Klickitat AA. These organizations provide and/or facilitate food banks, safe affordable housing, financial education, low-cost legal advice for LMI individuals, and industrial economic development. The bank's community development services are responsive to the AA needs identified by our community contact, including affordable housing and job creation. Bank employees did not perform any community development services in this AA during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/16 to 12/31/18	
Bank Products Reviewed:	Home mortgage, small business Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not applicable	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Portland-Vancouver AA	Full-scope	County of Multnomah in Oregon. Counties of Clark and Skamania in Washington. Partial Counties of Clackamas and Washington in Oregon.
Oregon		
Marion AA	Full-scope	County of Marion
Washington		
Klickitat AA	Full-scope	County of Klickitat
Longview AA	Full-scope	County of Cowlitz

Appendix B: Summary of MMSA and State Ratings

RATINGS Riverview Community Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Riverview Community Bank	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
Portland-Vancouver AA	Satisfactory	Satisfactory	Satisfactory
Oregon	Satisfactory	Satisfactory	Satisfactory
Washington	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

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

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

Portland-Vancouver AA

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Port-Van AA 2010 Census	125	54,075	100.0	73,652	1.7	0.0	1.7	22.4	20.8	22.6	49.2	57.6	50.5	26.7	21.6	25.2	0.0	0.0	0.0
Total	125	54,075	100.0	73,652	1.7	0.0	1.7	22.4	20.8	22.6	49.2	57.6	50.5	26.7	21.6	25.2	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Port-Van AA 2015 ACS	162	78,500	100.0	65,267	0.9	0.0	1.1	21.7	19.8	23.4	44.5	61.1	45.9	32.8	19.1	29.6	0.1	0.0	0.0
Total	162	78,500	100.0	65,267	0.9	0.0	1.1	21.7	19.8	23.4	44.5	61.1	45.9	32.8	19.1	29.6	0.1	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Portland-Vancouver AA

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Port-Van AA 2010 Census	125	54,075	100.0	73,652	21.7	6.4	3.1	18.2	8.8	14.6	21.4	22.4	23.7	38.7	39.2	43.3	0.0	23.2	15.3
Total	125	54,075	100.0	73,652	21.7	6.4	3.1	18.2	8.8	14.6	21.4	22.4	23.7	38.7	39.2	43.3	0.0	23.2	15.3

Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Port-Van AA 2015 ACS	162	78,500	100.0	65,267	22.0	3.1	3.5	17.4	15.4	14.8	20.2	23.5	25.1	40.5	41.4	45.6	0.0	16.7	11.0
Total	162	78,500	100.0	65,267	22.0	3.1	3.5	17.4	15.4	14.8	20.2	23.5	25.1	40.5	41.4	45.6	0.0	16.7	11.0

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Portland-Vancouver AA

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Port-Van AA 2010 Census	20	6,001	100.0	47,759	5.7	5.0	3.9	23.7	10.0	22.1	43.6	30.0	45.1	26.7	55.0	28.7	0.2	0.0	0.1
Total	20	6,001	100.0	47,759	5.7	5.0	3.9	23.7	10.0	22.1	43.6	30.0	45.1	26.7	55.0	28.7	0.2	0.0	0.1
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2017-18	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Port-Van AA 2015 ACS	20	7,991	100.0	39,051	2.9	10.0	2.8	23.1	30.0	22.8	36.4	50.0	37.8	34.2	10.0	34.3	3.3	0.0	2.4
Total	20	7,991	100.0	39,051	2.9	10.0	2.8	23.1	30.0	22.8	36.4	50.0	37.8	34.2	10.0	34.3	3.3	0.0	2.4
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Portland-Vancouver AA

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Port-Van AA 2010 Census	20	6,001	100.0	47,759	87.2	55.0	41.3	4.9	45.0	7.9	0.0
Total	20	6,001	100.0	47,759	87.2	55.0	41.3	4.9	45.0	7.9	0.0
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Port-Van AA 2015 ACS	20	7,991	100.0	39,051	86.9	80.0	52.4	4.9	20.0	8.3	0.0
Total	20	7,991	100.0	39,051	86.9	80.0	52.4	4.9	20.0	8.3	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

State of Oregon

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Marion AA 2010 Census	3	334	100.0	11,737	0.0	0.0	0.0	14.6	0.0	14.0	59.3	100.0	58.9	26.1	0.0	27.1	0.0	0.0	0.0
Total	3	334	100.0	11,737	0.0	0.0	0.0	14.6	0.0	14.0	59.3	100.0	58.9	26.1	0.0	27.1	0.0	0.0	0.0
Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Marion AA 2015 ACS	6	1,117	100.0	11,347	1.3	0.0	1.7	17.2	16.7	18.8	50.9	50.0	50.0	30.6	33.3	29.6	0.0	0.0	0.0
Total	6	1,117	100.0	11,347	1.3	0.0	1.7	17.2	16.7	18.8	50.9	50.0	50.0	30.6	33.3	29.6	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

State of Oregon

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Marion AA 2010 Census	3	334	100.0	11,737	20.8	0.0	2.4	19.5	33.3	13.1	21.0	66.7	22.5	38.8	0.0	42.2	0.0	0.0	19.9
Total	3	334	100.0	11,737	20.8	0.0	2.4	19.5	33.3	13.1	21.0	66.7	22.5	38.8	0.0	42.2	0.0	0.0	19.9
Source: 2010 U.S Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Marion AA 2015 ACS	6	1,117	200.0	11,347	22.4	16.7	2.6	17.9	16.7	13.4	20.2	0.0	25.5	39.5	66.7	43.3	0.0	0.0	15.2	
Total	6	1,117	200.0	11,347	22.4	16.7	2.6	17.9	16.7	13.4	20.2	0.0	25.5	39.5	66.7	43.3	0.0	0.0	15.2	
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																				

State of Oregon

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Marion AA 2010 Census	--	--	--	8,004	0.0	--	0.0	24.4	--	20.3	55.8	--	55.0	19.8	--	24.6	0.0	--	0.0
Total	--	--	--	8,004	0.0	--	0.0	24.4	--	20.3	55.8	--	55.0	19.8	--	24.6	0.0	--	0.0
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Marion AA 2015 ACS	--	--	--	5,196	3.2	--	3.6	24.4	--	22.7	40.6	--	40.1	31.8	--	33.6	0.0	--	0.0
Total	--	--	--	5,196	3.2	--	3.6	24.4	--	22.7	40.6	--	40.1	31.8	--	33.6	0.0	--	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

State of Oregon

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Marion AA 2010 Census	--	--	--	8,004	85.0	--	38.6	4.5	--	10.5	--
Total	--	--	--	8,004	85.0	--	38.6	4.5	--	10.5	--
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Marion AA 2015 ACS	--	--	--	5,196	84.8	--	52.2	4.5	--	10.7	--
Total	--	--	--	5,196	84.8	--	52.2	4.5	--	10.7	--
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

State of Washington

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Klickitat AA 2010 Census	13	2,668	81.3	528	0.0	0.0	0.0	43.8	46.2	36.7	56.2	53.8	63.3	0.0	0.0	0.0	0.0	0.0	0.0
Longview AA 2010 Census	3	2,173	18.8	4,369	3.7	0.0	2.5	11.4	0.0	10.5	61.4	100.0	66.0	23.6	0.0	21.0	0.0	0.0	0.0
Total	16	4,841	100.0	4,897	3.0	0.0	2.2	17.2	37.5	13.3	60.5	62.5	65.7	19.3	0.0	18.8	0.0	0.0	0.0
Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Klickitat AA 2015 ACS	18	3,660	62.1	646	0.0	0.0	0.0	0.0	0.0	0.0	64.3	22.2	58.5	35.7	77.8	41.5	0.0	0.0	0.0
Longview AA 2015 ACS	11	2,700	37.9	4,565	4.3	9.1	4.8	9.0	9.1	9.2	50.3	63.6	52.3	36.3	18.2	33.7	0.0	0.0	0.0
Total	29	6,360	100.0	5,211	3.6	3.4	4.2	7.5	3.4	8.1	52.7	37.9	53.0	36.2	55.2	34.7	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

State of Washington

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Klickitat AA 2010 Census	13	2,668	81.3	528	27.6	0.0	1.3	18.8	23.1	12.5	21.2	46.2	17.4	32.4	23.1	52.7	0.0	7.7	16.1
Longview AA 2010 Census	3	2,173	18.8	4,369	20.7	0.0	4.7	17.8	0.0	16.2	20.6	33.3	22.3	40.9	33.3	35.8	0.0	33.3	21.0
Total	16	4,841	100.0	4,897	21.9	0.0	4.3	18.0	18.8	15.8	20.7	43.8	21.8	39.4	25.0	37.6	0.0	12.5	20.5
Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Klickitat AA 2015 ACS	18	3,660	138.5	646	20.4	11.1	4.6	19.9	16.7	13.0	21.8	5.6	22.6	37.9	66.7	48.3	0.0	0.0	11.5
Longview AA 2015 ACS	11	2,700	68.8	4,565	20.6	0.0	2.2	18.1	18.2	9.8	21.7	36.4	23.3	39.6	45.5	50.1	0.0	0.0	14.7
Total	29	6,360	100.0	5,211	20.6	6.9	2.5	18.4	17.2	10.2	21.7	17.2	23.2	39.3	58.6	49.8	0.0	0.0	14.3
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

State of Washington

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Klickitat AA 2010 Census	--	--	--	448	0.0	--	0.0	43.6	--	42.2	56.4	--	57.8	0.0	--	0.0	0.0	--	0.0
Longview AA 2010 Census	20	8,068	100.0	1,622	10.2	5.0	8.0	25.1	0.0	20.5	50.7	50.0	54.6	14.0	45.0	16.9	0.0	0.0	0.0
Total	20	8,068	100.0	1,622	10.2	5.0	8.0	25.1	0.0	20.5	50.7	50.0	54.6	14.0	45.0	16.9	0.0	0.0	0.0
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Klickitat AA 2015 ACS	--	--	--	280	0.0	--	0.0	0.0	--	0.0	58.5	--	53.2	41.5	--	46.8	0.0	--	0.0	
Longview AA 2015 ACS	20	6,821	100.0	1,135	28.9	15.0	26.1	7.7	10.0	9.4	40.9	65.0	42.6	22.4	10.0	21.9	0.0	0.0	0.0	
Total	20	6,821	100.0	1,415	22.9	15.0	20.9	6.1	10.0	7.6	44.6	65.0	44.7	26.4	10.0	26.9	0.0	0.0	0.0	
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																				

State of Washington

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Klickitat AA 2010 Census	--	--	--	448	83.1	--	49.1	4.2	--	12.7	--
Longview AA 2010 Census	20	8,068	100.0	1,622	82.4	30.0	35.3	5.9	70.0	11.7	0.0
Total	20	8,068	100.0	2,070	82.5	30.0	38.3	5.6	70.0	11.9	0.0
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Klickitat AA 2015 ACS	--	--	--	280	82.9	--	57.1	4.5	--	12.7	--
Longview AA 2015 ACS	20	6,821	100.0	1,135	81.7	30.0	43.2	5.9	70.0	12.4	0.0
Total	20	6,821	100.0	1,415	81.9	30.0	45.9	5.6	70.0	12.5	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											