PUBLIC DISCLOSURE

June 23, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Comerica Bank
RSSD # 60143
1717 Main Street
Dallas, Texas 75201

Federal Reserve Bank of Dallas
2200 North Pearl Street
Dallas, Texas 75201

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING: Comerica Bank is rated Outstanding.

The following table indicates the Community Reinvestment Act (CRA) performance level of Comerica Bank (Comerica or bank) with respect to the Lending, Investment, and Service tests.

Comerica Bank Performance Test Ratings			
Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Non-Compliance			

* The Lending Test is weighed more heavily than the Investment and Service tests when arriving at an overall rating.

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors supporting the institution's rating are noted below.

Lending Test

- Lending activity reflects good responsiveness to the credit needs of the assessment areas (AAs), including low-income individuals, low-income areas, and very small businesses.
- A substantial majority of loans are made in Comerica's AAs.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels, including low- and moderate-income (LMI) individuals, and businesses of different sizes is good.
- Comerica is a leader in making community development (CD) loans.
- The bank makes use of innovative and/or flexible lending practices in serving the AAs' needs.

Investment Test

- Comerica has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors, and is often in a leadership position.
- The bank makes significant use of innovative and/or complex investments to support CD initiatives.
- The bank exhibits excellent responsiveness to credit and CD needs.

Service Test

- Delivery systems are accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services that do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- Comerica is a leader in providing CD services.

INSTITUTION

DESCRIPTION OF THE INSTITUTION

Comerica, a financial institution headquartered in Dallas, Texas, has the following characteristics.

- The bank is a wholly owned subsidiary of Comerica Incorporated, also headquartered in Dallas, Texas.
- As of March 31, 2025, the bank reported total assets of approximately $77.7 billion and gross loans of $49.7 billion. Since the prior evaluation, Comerica's total assets and gross loans decreased by 14.5 percent and 10.5 percent, respectively.
- As noted in Table 2, Comerica delineates 27 AAs among the states of Arizona, California, Florida, Michigan, and Texas. The delineation of the AAs has had minor changes since the prior evaluation.
- The bank operates 379 branches and 461 deposit-taking automated teller machines (ATMs) throughout its AAs.
- Since the previous CRA performance evaluation, Comerica closed 33 branches and opened four branches within its AAs.
- Comerica offers traditional deposit and loan products to meet the needs of the communities it serves, receiving guidance and feedback on the lending needs and strategies to meet those needs from the Community Development Advisory Council (CDAC), which is comprised of representatives from community interest groups across the bank's footprint.
  - The bank is predominantly a commercial lender, with commercial loans representing 84.1 percent of the bank's loan portfolio as of March 31, 2025.
  - Commercial loans are made for a variety of business purposes, including financing for interim construction of industrial and commercial properties; financing for equipment, inventories, and accounts receivable; and acquisition financing.
  - While residential real estate loans comprise a smaller portion of the total loan portfolio, at 7.8 percent, it is still considered significant.
- Comerica's ability to meet various credit needs of the communities it serves has not been hampered by its capacity to lend, financial condition and size, product offerings, prior performance, known legal impediments, or other factors.

Table 1 below reflects Comerica's loan portfolio mix as of March 31, 2025.

Composition of Loan Portfolio as of March 31, 2025		
Loan Type	**$(000)**	**Percent (%)**
Agricultural	43	0.1
Commercial	41,756	84.1
Consumer	461	0.9
Residential Real Estate	3,874	7.8
Other	3,527	7.1
Gross Loans	**49,661**	**100.0**
Note: Percentages may not total 100.0 percent due to rounding.		

The Federal Reserve Bank of Dallas rated the bank's CRA performance as Outstanding at the previous performance evaluation dated July 17, 2023. Comerica received an Outstanding rating under the Lending Test, an Outstanding rating under the Investment Test, and a High Satisfactory rating under the Service Test.

SCOPE OF THE EVALUATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Institutions* to evaluate Comerica's CRA performance. The evaluation considered relevant performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AAs' demographic and economic characteristics, and credit needs.

This evaluation consists of a review of the bank's mortgage lending data reported in the 2023 and 2024 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers and CRA-reported small business lending data for the same years. In addition, examiners considered Comerica's CD loans, investments, and services extended between July 1, 2023, and March 31, 2025, including prior period CD investments. Given that the bank's volume of small business lending exceeds that of HMDA lending, small business lending carried more weight when assessing Comerica's CRA performance. While CRA-reported small farm lending data is displayed, it was not considered in the assessment of the bank's CRA performance given that agricultural lending represents less than 1.0 percent of Comerica's total loan portfolio. Lastly, the volume of small farm loans as well as HMDA-related lending activity classified as Multifamily, Other Purpose Closed/Exempt, and Purpose Not Applicable would not have allowed for a meaningful analysis. Therefore, small farm lending was not considered when evaluating Comerica's CRA performance, and the aforementioned HMDA products were considered as a whole.

Full-scope reviews were conducted for eight of Comerica's 27 delineated AAs. Factors to determine which AAs would receive full-scope reviews include, but are not limited to, the level of the bank's lending, investment, and service activities as well as the availability of opportunities in the AAs; comments received from community groups and the public regarding the institution's CRA performance; population density; number of other institutions located in the AAs; and the length of time since the most recent full-scope review.

Table 2 depicts the scope of the review for each AA. Additional descriptions of the AAs can be found in the applicable AA sections of this report.

Table 2

Assessment Area Name	Scope of Review Received
Michigan	
Ann Arbor MSA	Limited-Scope
Battle Creek MSA	Limited-Scope
Fenton MSA	Limited-Scope
Grand Rapids Metropolitan	Full-Scope
Jackson MSA	Limited-Scope
Kalamazoo-Portage MSA	Limited-Scope
Lansing-East Lansing MSA	Limited-Scope
Lenawee County Nonmetropolitan	Limited-Scope
Midland MSA	Limited-Scope
Muskegon MSA	Limited-Scope
Southeast Michigan Metropolitan	Full-Scope

Table 2 (continued)

Assessment Area Name	Scope of Review Received
Texas	
Austin Metropolitan	Limited-Scope
Bank of the Hills Nonmetropolitan	Limited-Scope
Dallas-Fort Worth Metropolitan	Full-Scope
Houston Metropolitan	Full-Scope
San Antonio Metropolitan	Limited-Scope
California	
Greater Los Angeles MSA	Full-Scope
Inland Empire MSA	Limited-Scope
Salinas MSA	Limited-Scope
San Diego MSA	Limited-Scope
San Francisco Bay Metropolitan	Full-Scope
San Jose Metropolitan	Limited-Scope
Santa Cruz MSA	Limited-Scope
Ventura County MSA	Limited-Scope
Florida	
Fort Lauderdale-West Palm Beach Metropolitan	Full-Scope
Naples MSA	Limited-Scope
Arizona	
Phoenix Metropolitan AA	Full-Scope

The evaluation of the bank's record of lending in the individual AAs includes the use of and comparison to demographic characteristics. The primary sources for the demographic information are the 2016-2020 U.S. Census Bureau's American Community Survey (ACS) data, 2020 U.S. Census data as well as Dun & Bradstreet (D&B) data for 2023 and 2024. Demographic characteristics of a particular AA are useful in analyzing the bank's record of lending as they provide a means of estimating loan demand and identifying lending opportunities. To understand small businesses, examiners rely on D&B data, which consists of self-reported data of revenue size and geographical location by business entities. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers, as the information is used to understand the bank's performance context. Lastly, examiners interviewed two community leaders serving each of the AAs receiving full-scope review to expand on Comerica's performance context and to understand the credit needs of such areas. Community contacts included representatives of community-based organizations, municipalities, and quasi-governmental agencies.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's overall Lending Test performance is Outstanding. While the ratings for Michigan and Texas are consistent with the overall rating, the state ratings for Arizona, California, and Florida are High Satisfactory. Greater weight was given to Comerica's performance in the states of Michigan and Texas, as the bank's operations in these states represent 71.8 percent of total branches, 76.3 percent of total deposits, and 68.5 percent of the loans reviewed.

Lending Activity

Comerica's overall lending levels reflect good responsiveness to the credit needs of the delineated AAs, taking into consideration relevant performance context, such as the bank's resources and business strategy. In alignment with its business focus, Comerica extended more small business loans than HMDA loans during the review period. Therefore, small business lending generally carried more weight when assessing the bank's overall CRA performance.

While the number of loans and dollar amount saw a significant decrease from the prior evaluation, several factors must be considered. First, the overall asset size of the bank decreased by $13.2 billion (14.5 percent) since the prior evaluation. In addition, Comerica's significant engagement in the Small Business Administration's (SBA's) Payment Protection Program (PPP) increased its commercial lending at the prior evaluation by $13.8 billion. Given that the SBA's PPP ceased in May 2021, the bank no longer had the opportunity to originate loans through this program. Lastly, the overall economy has experienced rising interest rates during the review period, which has impacted loan demand as well as affordability. Despite these limiting factors, Comerica demonstrated targeted responsiveness to the credit needs of its delineated AAs, employing flexible lending practices in its AAs, such as the National Faith Home Buyers Program, the Micro Business Lending Program, and government-insured loan programs. Comerica's Micro Business Lending Program offers secured business lines of credit and term loans in smaller dollar amounts. This well-established program, which is offered throughout the bank's footprint, uses flexible lending practices to better serve the credit needs of small businesses. Comerica also offers a variety of government-insured loan programs to help meet the credit needs of LMI borrowers and small businesses. During the review period, the bank extended Veteran Administration (VA) and Federal Housing Administration (FHA) loans in Michigan, Texas, Florida, and Arizona as well as loans insured through the SBA throughout its AAs.

Table 3 summarizes Comerica's lending activity from January 1, 2023 through December 31, 2024.

Table 3

Summary of Lending Activity January 1, 2023 through December 31, 2024				
Loan Type	**#**	**%**	**$(000)**	**%**
Home Purchase	709	3.4	327,118	6.1
Refinance	2,476	11.8	420,128	7.8
Home Improvement	2,770	13.2	734,549	13.7
Multifamily	27	0.1	275,142	5.1
Other Purpose LOC	1,638	7.8	320,129	6.0
Other Purpose Closed/Exempt	96	0.5	68,158	1.3
Purpose Not Applicable	0	0.0	0	0.0
Total HMDA	**7,716**	**36.9**	**2,145,224**	**40.1**
Total Small Business	**13,194**	**63.0**	**3,199,451**	**59.8**
Total Small Farm	**44**	**0.2**	**10,533**	**0.1**
TOTAL LOANS	**20,954**	**100**	**5,355,208**	**100**
Note: Discrepancies are possible in dollar amount totals due to rounding.				

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank's AAs. As illustrated in Table 4, a substantial majority of Comerica's total loans, by number and dollar volume, were originated inside the delineated AAs across all loan products.

Table 4

Lending Inside and Outside the Assessment Areas								
Loan Types	**Inside**				**Outside**			
	#	**%**	**$(000)**	**%**	**#**	**%**	**$(000)**	**%**
Home Purchase	635	89.6	269,210	82.3	74	10.4	57,908	17.7
Refinance	2,322	93.8	394,673	93.9	154	6.2	25,455	6.1
Home Improvement	2,645	95.5	666,247	90.7	125	4.5	68,302	9.3
Multifamily	19	70.4	168,850	61.4	8	29.6	106,292	38.6
Other Purpose LOC	1,522	92.9	279,075	87.2	116	7.1	41,054	12.8
Other Purpose Closed/Exempt	82	85.4	51,511	75.6	14	14.6	16,647	24.4
Purpose Not Applicable	0	0.0	0	0.0	0	0.0	0	0.0
Total HMDA	**7,225**	**93.6**	**1,829,566**	**85.3**	**491**	**6.4**	**315,658**	**14.7**
Total Small Business	**11,551**	**87.5**	**2,758,308**	**86.2**	**1,643**	**12.5**	**441,143**	**13.8**
Total Small Farm	**28**	**63.6**	**6,797**	**64.5**	**16**	**36.4**	**3,736**	**35.5**
TOTAL LOANS	**18,804**	**89.7**	**4,594,671**	**85.8**	**2,150**	**10.3**	**760,537**	**14.2**

The remaining loan distribution analyses discussed in this performance evaluation consider only those loans originated within the bank's AAs. A detailed discussion of the facts and data supporting the overall conclusions for the geographic and borrower distribution and CD lending are presented in the Conclusions with Respect to Performance Criteria section for each AA.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution and dispersion of lending within the AAs by income level of census tract in light of performance context, such as strategic focus, lending opportunities, and geographic characteristics. Comerica's overall geographic distribution of loans reflects excellent penetration throughout the AAs.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. Comerica's distribution of lending to borrowers reflects good penetration among individuals of different income levels, including LMI, and businesses of different revenue sizes.

Comerica partners with several programs and organizations like the SBA to provide guaranteed loan programs to help small businesses obtain financing even when they have little collateral and may not meet conventional lending standards. The purpose of the SBA loans is to provide access to capital to help small businesses grow, which is why Comerica is an SBA preferred lender. To serve individuals in a similar way, Comerica offers government guaranteed loans, such as FHA and VA loans, which offer unique benefits, such as minimal downpayment requirements, and serve homebuyers with varying needs and financial situations.

Community Development Lending

Comerica is a leader in making CD loans. As noted in Table 5, the bank originated 805 CD loans for a variety of purposes, totaling $3.7 billion. Since the previous evaluation, the number of CD loan originations decreased by 40.2 percent. The review period of the prior evaluation, which was nine months longer, included 230 PPP loans and reflected a difference in total assets of $13.2 billion. The dollar amount remained substantially similar, slightly increasing by 0.2 percent, when considering the shorter length of the review period. The increase in the dollar amount of CD lending, despite a shortened review period, demonstrates Comerica's excellent responsiveness to the CD and credit needs of its AAs, particularly low-income individuals and very small businesses. Additionally, Comerica strategically extended a substantial volume (83.9 percent) of its CD lending on loans with the primary purpose of economic development, which reflects favorably on the bank, as it aligns with its strategic focus on commercial lending. Specific details regarding CD lending can be found in the Conclusions with Respect to Performance Tests section for each AA.

Table 5 summarizes the bank's CD lending activity during the review period.

Table 5

Community Development Lending		
Purpose	**#**	**$(000)**
Affordable Housing	57	354,724
Community Services	64	114,372
Economic Development	676	3,238,110
Revitalize and Stabilize	8	37,516
Total	**805**	**3,744,722**

INVESTMENT TEST

Comerica's overall Investment Test rating is Outstanding. The state ratings for California, Michigan, and Texas are consistent with the overall rating, while the state ratings for Florida and Arizona are High Satisfactory.

Overall, Comerica is often in a leadership position given its excellent level of CD investments, grants, and donations. The bank makes significant use of innovative and/or complex investments and exhibits excellent responsiveness to the credit and CD needs of its AAs. A substantial volume of the investments focuses on affordable housing, which reflects favorably on Comerica's responsiveness to the CD needs of the communities served, as community contacts consistently identified it as a significant need. Further, in alignment with the bank's strategic focus on affordable housing, a significant volume of Comerica's CD investments were eligible for low-income housing tax credit (LIHTC), funding housing projects that meet certain rent affordability requirements in the bank's AAs. Additionally, the bank has several investments that foster economic development, noting a 56.0 percent increase in dollar volume since the prior evaluation.

Since the prior evaluation, Comerica has increased the total dollar amount of combined donations and investments by $41.1 million, or 6.1 percent. This increase is especially notable given the current review period is nine months shorter than that of the previous evaluation, further demonstrating Comerica's strong commitment to meeting the needs of their AAs through intentional donations and investments.

In addition to the investments made within the delineated AAs, Comerica has 28 qualified CD investments in the broader statewide regions, totaling $16.5 million. The bank invested in multiple minority-owned-depository institutions during the review period as well as made several investments into different loan funds to help entrepreneurs build their small businesses by providing access to capital. As Comerica is sufficiently responsive to the CD needs of its AAs, the qualified activity in the broader statewide areas reflects favorably its overall responsiveness to CD needs.

Table 6 illustrates the bank's overall level of CD investments. Specific details regarding investments, grants, and donations can be found in the Conclusions with Respect to Performance Tests section for each AA.

Table 6

Investments, Grants, and Donations All Assessment Areas								
Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	348	427,337	34	175,225	51	567	433	603,129
Community Services	0	0	0	0	848	7,932	848	7,932
Economic Development	36	19,862	42	76,538	156	2,289	234	98,689
Revitalization and Stabilization	0	0	0	0	15	123	15	123
Total	**384**	**447,199**	**76**	**251,763**	**1,070**	**10,911**	**1,530**	**709,873**

1 Book value of investment
2 Original market value of investment
Note: Discrepancies in total amounts are possible due to rounding.

SERVICE TEST

Comerica's overall Service Test rating is High Satisfactory. The state ratings for Texas, California, Florida, and Arizona are consistent with the overall rating, while the state rating for Michigan is Outstanding.

Retail Services

Comerica's branches and alternate delivery systems, such as drive-through facilities and online and mobile banking, are accessible to various geographies and individuals of different income levels in each AA. Although the overall distribution of Comerica's branches and full-service ATMs generally favors upper-income census tracts, branches are distributed among geographies of all income levels throughout the delineated AAs. The percentage of Comerica's branches and full-service ATMs in LMI geographies is similar to the percentage of businesses, households, and census tracts throughout their designated AAs. Comerica operates 379 branches and 461 full-service ATMs throughout its AAs, of which 90 branches, or 23.7 percent, are located in LMI census tracts.

Comerica's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI areas and/or LMI individuals. Since the previous evaluation, the bank closed 33 branches given the rapid increase in customer use and adoption of digital channels and fewer transactions being processed at banking centers. The majority of those branches (60.1 percent) was located in middle- or upper-income census tracts, limiting the impact to LMI geographies. Additionally, the bank's products, services, and business hours of operations do not vary in a way that inconveniences the delineated AAs, particularly in LMI geographies or to LMI individuals. Since the previous evaluation, Comerica has consistent operating hours across every branch, opening at 9:00 am and closing at 5:00 pm Monday through Friday, with several locations opening on Saturdays as well. The bank standardized its operating hours to better serve its communities.

Table 7 illustrates the distribution of banking offices and full-service ATMs by income level of geography as well as numbers of branch openings/closings during the review period.

Table 7

Branch and Full-Service ATM Locations All Assessment Areas								
Tract Income	**Census Tracts**		**% of Households**	**% of Businesses**	**Branches**		**Full-Service ATMs**	
	#	**%**			**#**	**%**	**#**	**%**
Low	1,126	7.7	6.6	4.8	19	5.0	27	5.9
Moderate	3,744	25.6	24.7	20.3	71	18.7	99	21.5
Middle	4,604	31.5	33.1	30.9	122	32.2	143	31.0
Upper	4,729	32.3	34.6	42.4	156	41.2	171	37.1
Unknown	420	2.9	1.1	1.7	11	2.9	21	4.6
Total	**14,623**	**100.0**	**100.0**	**100.0**	**379**	**100.0**	**461**	**100.0**

Changes in Branch Locations						
Tract Income	**Low**	**Moderate**	**Middle**	**Upper**	**Unknown**	**Total**
Openings (#)	0	1	2	1	0	4
Closings (#)	1	12	7	12	1	33
Net Change	**(1)**	**(11)**	**(5)**	**(11)**	**(1)**	**(29)**

Note: Percentages may not total 100.0 percent due to rounding.

Community Development Services

Comerica is is a leader in providing CD services. The state ratings for Michigan, Texas, and California are consistent with the overall rating, while the bank provides a relatively high level of CD services in Florida and Arizona.

As illustrated in Table 8, Bank representatives provided 5,098 services, totaling 19,277 hours, to numerous local grassroots and well-known organizations that provide varying community services to LMI individuals and families in the delineated AAs. Considering the shorter review period compared to the prior evaluation, examiners evaluated the number of services and hours provided on a monthly basis and found Comerica increased the number of services and hours served by 4.0 percent and 23.3 percent, respectively.

Below are two noteworthy initiatives that illustrate Comerica's leadership in providing CD services.

- Volunteerism is a critical component of the bank's mission, encouraging employees to devote time and expertise in extending services that meet the CD needs of the delineated AAs. In addition, Comerica's senior officers are required to complete at least three hours of CRA-qualified services as a component of their annual performance review. This strategic commitment reflects favorably on the bank's responsiveness to meet the critical CD needs of its AAs.
- Comerica BusinessHQ, a collaborative space established in the Dallas-Fort Worth Metropolitan AA in early 2023, has the expressed mission of serving small businesses in the underserved South Dallas region. This unique community resource supports the Dallas small business ecosystem by providing no-cost coworking spaces, incubation

fellowships, and technical assistance. Since its inception, BusinessHQ has served over 4,387 members. This commitment to community service, despite it not fitting within established definitions of qualified CD activity, reflects very favorably on the bank's responsiveness and creativity to meet the needs of its AAs.

Table 8

Community Development Services All Assessment Areas		
Purpose	**#**	**Hours**
Affordable Housing	0	0
Community Services	5,098	19,277
Economic Development	0	0
Revitalize and Stabilize	0	0
Total	**5,098**	**19,277**

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) established the Consumer Financial Protection Bureau (CFPB). In general, the Dodd-Frank Act gives the CFPB, among other things, primary supervisory authority over insured depository institutions with total assets of more than $10 billion when assessing compliance with the requirements of Federal consumer financial laws. The Federal Reserve System retains authority to enforce compliance with the CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation, the Federal Reserve Bank of Dallas did not cite violations involving illegal discrimination or other illegal credit practices that adversely affected the evaluation of the bank's CRA performance. As of the date of this evaluation, the Federal Reserve Bank of Dallas is unaware of any violations of the Equal Credit Opportunity Act or Regulation B, or any unfair, deceptive, or abusive acts or practices identified by the CFPB.

STATE OF MICHIGAN

CRA RATING FOR MICHIGAN: Outstanding

The Lending Test is rated Outstanding.
The Investment Test is rated Outstanding.
The Service Test is rated Outstanding.

Major factors supporting the institution's rating are noted below.

Lending Test

- Lending activity reflects good responsiveness and record of serving the AAs' credit needs, including low-income individuals, low-income areas, and very small businesses.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels, including LMI individuals, and businesses of different sizes is good.
- Comerica is a leader in making CD loans.
- The bank makes use of innovative and/or flexible lending practices in serving the AAs' needs.

Investment Test

- Comerica has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors, and is often in a leadership position.
- The bank makes significant use of innovative and/or complex investments to support CD initiatives.
- Comerica exhibits excellent responsiveness to credit and CD needs.

Service Test

- Delivery systems are readily accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.
- Comerica is a leader in providing CD services.

SCOPE OF THE EVALUATION

The scope of the review for the state of Michigan is consistent with the overall scope for the institution, including evaluations under the Lending, Investment, and Service tests. The period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

Two of the 11 AAs in the state of Michigan were reviewed using full-scope procedures.

- Southeast Michigan Metropolitan AA
- Grand Rapids Metropolitan AA

The remaining nine AAs received limited-scope reviews.

- Ann Arbor Metropolitan Statistical Area (MSA) AA
- Battle Creek MSA AA
- Fenton MSA AA

- Jackson MSA AA
- Kalamazoo-Portage MSA AA
- Lansing-East Lansing MSA AA
- Midland MSA AA
- Muskegon MSA AA
- Lenawee County Nonmetropolitan AA

AAs were selected for full-scope reviews based on the strategic importance of the AA, considering volume of lending, number of branches, and percentage of total deposits, as well as the length of time since the AA received a full-scope review. Approximately 79.4 percent of Comerica's lending activity (by number of loans), 93.2 percent of the deposits, and 79.1 percent of the branches within the state of Michigan were evaluated through the full-scope reviews. The bank's performance in the Southeast Michigan Metropolitan AA was given greater consideration as it is Comerica's largest AA in any state. Moreover, this AA has 74.7 percent of the bank' total branches in Michigan as well as approximately 30.9 percent of Comerica's lending activity and 56.9 percent of total deposits.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN MICHIGAN

The bank delineates 11 of its 27 AAs and operates 158 of its 379 branches in the state of Michigan. As of June 30, 2024, Comerica had $38.9 billion in deposits in the state, representing 62.0 percent of total deposits. According to the FDIC Summary of Deposits as of June 30, 2024, the bank had a deposit market share of 12.5 percent and ranked second out of 103 FDIC-insured financial institutions across the state.

Of the 7,225 HMDA-reportable loans and 11,551 small business loans originated and purchased by Comerica during the review period, 2,818 HMDA-reportable loans (39.0 percent) and 5,085 small business loans (44.0 percent) were extended in Michigan's AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's Lending Test performance in the state of Michigan is Outstanding. Lending performance conclusions in the Southeast Michigan Metropolitan AA are consistent with the overall state rating, while the bank's performance in the Grand Rapids Metropolitan AA is considered good. Comerica's performance in the AAs receiving limited-scope reviews is generally below that of the overall Outstanding rating for the state; however, this does not indicate poor performance, just not outstanding.

Lending Activity

Comerica's lending activities in the state of Michigan reflect good responsiveness to the credit needs of its AAs. The bank makes use of innovative and/or flexible lending programs through its participation in numerous industry-recognized, government-guaranteed programs, including 28 FHA/VA loans, 181 SBA loans, and 1,719 small business micro loans in the state of Michigan.

As outlined in Table 9, this evaluation considered 7,917 loans, totaling $1.7 billion. The loan products and origination volumes are consistent with the credit needs of Michigan's AAs. The number of small business and HMDA loans extended by the bank was compared against the number of loans made by aggregate lenders during the review period.

Table 9

Summary of Lending Activity January 1, 2023 through December 31, 2024 Michigan Assessment Areas				
Loan Type	**#**	**%**	**$(000)**	**%**
Home Purchase	227	2.8	55,507	3.3
Refinance	1,271	16.1	208,041	12.5
Home Improvement	721	9.1	74,261	4.5
Multifamily	2	0.0	500	0.0
Other Purpose LOC	560	7.1	66,032	4.0
Other Purpose Closed/Exempt	37	0.5	7,694	0.5
Purpose Not Applicable	0	0.0	0	0,0
Total HMDA-Related	**2,818**	**35.6**	**412,035**	**24.8**
Total Small Business	**5,085**	**64.2**	**1,246,456**	**75.1**
Total Small Farm	**14**	**0.2**	**2,259**	**0.1**
TOTAL LOANS	**7,917**	**100.0**	**1,660,750**	**100.0**
Note: Discrepancies in dollar amount totals are possible due to rounding				

A detailed discussion of the facts and data supporting the overall conclusions regarding Comerica's Lending Test is presented in the Conclusions with Respect to Performance Criteria section for each AA.

Geographic Distribution of Loans

The overall geographic distribution of lending reflects excellent penetration throughout the bank's AAs in Michigan. This performance is consistent across Comerica's Southeast Michigan Metropolitan and Grand Rapids Metropolitan AAs.

Lending to Borrowers of Different Income Levels and Businesses of Different Revenue Sizes

Comerica's overall lending reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. This performance is consistent with the bank's Southeast Michigan Metropolitan and Grand Rapids Metropolitan AAs.

Community Development Lending

Comerica is a leader in making CD loans in the state of Michigan, originating 404 CD loans, totaling $1.8 billion, which comprises 50.2 percent of its overall CD loan volume by number and 49.2 percent by dollar amount. The level of CD lending in the Southeast Michigan Metropolitan and Grand Rapids Metropolitan AAs is excellent.

CD lending levels in Michigan have decreased since the prior evaluation; however, two factors must be considered. First, Comerica was heavily involved in the SBA's PPP, which ceased in 2021; as such, these loans rolled off the bank's portfolio as they were paid off. Second, the review period of this evaluation is nine months shorter than the review period of the prior evaluation. Examiners accounted for the difference in the length of the review period by determining the number and dollar amount of CD loans on a monthly basis. Looking at Comerica's monthly lending rates, the number of CD loans since the prior evaluation is consistent while the dollar amount increased by 18.2 percent.

As noted in Table 10, Comerica originated CD loans for a variety of purposes, with a special emphasis on economic development loans supporting small businesses. This aligns with the bank's strategic focus and demonstrates intentional efforts to serve the AAs in impactful ways, leveraging its expertise.

Table 10

Community Development Lending Michigan Assessment Areas		
Purpose	**#**	**$(000)**
Affordable Housing	16	101,183
Community Services	40	50,334
Economic Development	347	1,677,771
Revitalization and Stabilization	1	13,616
Total	**404**	**1,842,904**

INVESTMENT TEST

Comerica's Investment Test in the state of Michigan is Outstanding. The Investment Test conclusions in the Southeast Michigan Metropolitan and Grand Rapids Metropolitan AAs are considered excellent and consistent with the overall state rating. Greater weight was given to the Southeast Michigan Metropolitan AA, as the majority of the bank's CD investments and donations in the state of Michigan occurred in that AA. The bank's performance in the AAs that received limited-scope reviews is generally consistent with the performance in the state of Michigan.

Comerica has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors, and is often in a leadership position. The bank's significant use of innovative and/or complex investments exhibits excellent responsiveness to the credit and CD needs of its AAs. As illustrated in Table 11, the bank made a total of 587 CD donations and investments in the Michigan AAs, totaling $256.7 million. Since the previous evaluation, Comerica increased the total dollar amount of combined donations and investments by $17.6 million, which is especially notable given the shorter review period of the current evaluation and contracted asset size. In addition, Comerica made three qualified CD investments in the broader statewide region, totaling $4.3 million, all of which provided small businesses in the state of Michigan access to capital. Specific details regarding CD-qualified investments and donations within the bank's Michigan AAs can be found in the Conclusions with Respect to Performance Tests section for each AA.

Table 11

Investments, Grants, and Donations Michigan Assessment Areas								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	**$(000)**	**#**	**$(000)**	**#**	**$(000)**	**#**	**$(000)**
Affordable Housing	107	167,482	11	61,300	29	226	147	229,008
Community Services	0	0	0	0	396	2,747	396	2,747
Economic Development	5	1,738	9	22,755	27	448	41	24,941
Revitalization and Stabilization	0	0	0	0	3	15	3	15
Total	**112**	**169,220**	**20**	**84,055**	**455**	**3,436**	**587**	**256,711**

[1] Book value of investment
[2] Original market value of investment
Note: Discrepancies in dollar amount totals are possible due to rounding

SERVICE TEST

Comerica's performance under the Service Test in the state of Michigan is Outstanding. While the Service Test conclusions in the Southeast Michigan Metropolitan AA are excellent, the Grand Rapids Metropolitan AA's conclusions are good. The Southeast Michigan Metropolitan AA received the greatest weight as 74.7 percent of branches, and 77.0 percent of CD services of the state of Michigan are held in this AA. Generally, Comerica's performance in the AAs that received limited-scope reviews is consistent with the performance in the state of Michigan.

Retail Services

Branch locations, drive-through facilities, and alternative delivery systems, such as online and mobile banking, are readily accessible to various geographies and individuals of different income levels in the delineated AAs. Of Comerica's 158 branches and 235 full-service ATMs in the state of Michigan, 36 branches and 71 ATMs are located in LMI tracts, which aligns with the distribution of census tracts, households, and businesses. Refer to Table 12 below for the distribution of branches and full-service ATMs in the state of Michigan by income level of geography.

Table 12

Branch and Full-Service ATM Locations Michigan Assessment Areas								
Tract Income	**Census Tracts**		**% of Households**	**% of Businesses**	**Branches**		**Full-Service ATMs**	
	#	**%**			**#**	**%**	**#**	**%**
Low	184	8.7	7.0	6.0	9	5.7	17	7.2
Moderate	491	23.2	22.4	20.5	27	17.1	54	23.0
Middle	715	33.8	37.5	35.0	52	32.9	71	30.2
Upper	605	28.6	31.9	36.3	64	40.5	79	33.6
Unknown	119	5.6	1.2	2.2	6	3.8	14	6.0
Total	**2,114**	**100.0**	**100.0**	**100.0**	**158**	**100.0**	**235**	**100.0**

Changes in Branch Locations						
Tract Income	**Low**	**Moderate**	**Middle**	**Upper**	**Unknown**	**Total**
Openings (#)	0	0	0	0	0	0
Closings (#)	0	10	6	2	1	19
Net Change	**0**	**(10)**	**(6)**	**(2)**	**(1)**	**(19)**

Note: Percentages may not total 100.0 percent due to rounding.

Comerica's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Despite closing ten branches in LMI areas throughout the state, Comerica still serves these areas through its large presence of branches and ATMs as well as alternative delivery systems. Banking services and hours of operations do not vary in a way that inconveniences the AAs, particularly in LMI geographies or to LMI individuals. Moreover, Comerica's operations and product and service offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Banking Services section of this evaluation.

Community Development Services

Comerica is a leader in providing CD services in the state of Michigan. Provision of CD services in the bank's Southeast Michigan Metropolitan AA and Grand Rapids Metropolitan AA is consistent with the overall state rating. During the review period, bank representatives provided 2,473 CD services, totaling 8,767 hours, within Michigan's AAs. The bank's directors, officers, and personnel are involved with numerous organizations that extend CD services to LMI individuals and/or geographies. Taking into consideration the shorter length of the review period when compared to the prior evaluation, Comerica increased its efforts in extending CD services, particularly the number of hours provided. The monthly average of CD services extended during the review period increased 1.3 percent by number and 11.5 percent by monthly hours served. This demonstrates Comerica's strong commitment to providing CD services to its AAs. The bank's significant efforts to promote CD are noted through board participation, financial literacy, and entrepreneurship training. Details of the bank's explicit CD services can be found in the respective Conclusions with Respect to Performance Tests section for each AA.

Table 13

Community Development Services Michigan Assessment Areas		
Purpose	**#**	**Hours**
Affordable Housing	0	0
Community Services	2,473	8,767
Economic Development	0	0
Revitalize and Stabilize	0	0
Total	**2,473**	**8,767**

SOUTHEAST MICHIGAN METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SOUTHEAST MICHIGAN METROPOLITAN ASSESSMENT AREA

- The bank's Southeast Michigan Metropolitan AA consists of Livingston, Macomb, Oakland, and Wayne counties in Michigan. These counties represent a portion of the Detroit-Warren-Dearborn MSA in Michigan, which is comprised of the Detroit-Dearborn-Livonia Metropolitan Division (MD) that consists of Wayne County and the Warren-Troy-Farmington Hills MD. See Appendix A for an AA map and Appendix B for additional demographic data.
- Since the previous evaluation, Comerica is no longer taking Lapeer County as part of the AA. While the branches in this AA have been closed since 2010, a standalone ATM remained until January 2024. Therefore, Lapeer County is no longer included in the AA in 2024.
- The AA is comprised of 1,281 census tracts, of which 9.4 percent are designated as low-income, 25.0 percent as moderate-income, 29.2 percent as middle-income, 30.0 percent as upper-income, and 6.5 percent are of unknown-income.
- Comerica operates 118 full-service branches in the AA, including eight in low-income, 20 in moderate-income, 35 in middle-income, 50 in upper-income, and five in unknown-income census tracts.
- According to the FDIC Deposit Market Share Report as of June 30, 2024, the bank had an 18.3 percent market share, ranking second out of 39 FDIC-insured depository institutions operating in the AA.
- In 2024, the bank ranked 26th out of 595 HMDA reporters in the AA, with 905 HMDA originations and purchases, and 12th out of 167 CRA reporters, with 1,857 CRA small business loans.
- Community contacts indicated affordable housing, economic development, particularly creating and retaining jobs, and financial education to individuals and small businesses as prevalent needs in the AA.

Table 14

Population Change Assessment Area: Southeast Michigan Metropolitan			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Southeast Michigan Metropolitan	4,047,752	4,143,039	2.4
Livingston County, MI	184,591	193,866	5.0
Macomb County, MI	854,689	881,217	3.1
Oakland County, MI	1,229,503	1,274,395	3.7
Detroit-Dearborn-Livonia, MI MD	1,778,969	1,793,561	0.8
Warren-Troy-Farmington Hills, MI MD*	2,517,447	2,598,480	3.2
Michigan	9,900,571	10,077,331	1.8

* *Given that the Warren-Troy-Farmington Hills, MI MD is comprised solely of Wayne County, MI, the data for the county is not noted separately.*
Source: 2020 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey

- As shown in Table 14, the AA population increased at a comparable rate to the statewide increase between 2015 and 2020.
- The Detroit-Warren-Dearborn MSA represents a significant portion of Michigan's population, making it the 14th largest MSA in the United States according to the U.S.

Census Bureau. Wayne County, which comprises the Warren-Troy-Farmington Hills, MI MD, is the most populated county in the AA.

- Approximately 32.2 percent of the AA population resides in LMI census tracts, and 38.3 percent of families in this AA are considered LMI.

Table 15

Median Family Income Change Assessment Area: Southeast Michigan Metropolitan			
Area	**2015 Median Family Income ($)**	**2020 Median Family Income ($)**	**Percent Change**
Southeast Michigan Metropolitan	73,721	81,276	10.2
Livingston County, MI	93,625	100,663	7.5
Macomb County, MI	74,060	80,371	8.5
Oakland County, MI	95,290	106,060	11.3
Detroit-Dearborn-Livonia, MI MD	57,615	63,896	10.9
Warren-Troy-Farmington Hills, MI MD*	83,843	92,419	10.2
Michigan	68,010	75,470	11.0

** Given that the Warren-Troy-Farmington Hills, MI MD is comprised solely of Wayne County, MI, the data for the county is not noted separately.*
Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- As shown in Table 15, the 2020 median family income (MFI) in the AA exceeds that of the state and grew at a comparable rate between 2015 and 2020. However, notable disparities exist between the AA counties, with Oakland County having the highest MFI and Livingston County noting the smallest percent increase.
- Wayne County, which comprises the Warren-Troy-Farmington Hills, MI MD and is the most populated county in the AA, has the lowest MFI in the AA, at $63,896, despite experiencing a moderate increase of 10.9 percent between 2015 and 2020. Moreover, it is the only county with an MFI lower than the statewide figure.
- Oakland County, the second most populated county in the AA, has the highest MFI, which is 65.9 percent higher than the MFI in Wayne County. This highlights the income disparity between the various counties in the AA.
- According to FFIEC Census data, 9.9 percent of AA families live below the poverty level, which is comparable to the statewide percentage of 9.2.
- A community contact noted that the city of Detroit, located in the Detroit-Dearborn Livonia MD, has a high concentration of people who earn a very low median wage. Additionally, inflation has had an adverse impact on people, especially lower income individuals and families. Moreover, the community contact stated that the area is heavily involved in manufacturing, which is significantly affected by tariffs, resulting in tightening economic conditions.

Table 16

Housing Cost Burden Assessment Area: Southeast Michigan Metropolitan						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Southeast Michigan Metropolitan	76.3	38.4	43.2	63.3	29.0	19.0
Livingston County, MI	75.4	21.7	38.9	60.7	26.4	16.2
Macomb County, MI	81.0	39.5	43.4	66.7	32.7	19.5
Oakland County, MI	78.7	49.7	38.6	69.3	35.9	17.4
Detroit-Dearborn-Livonia, MI MD	74.2	33.0	46.0	59.5	23.6	20.4
Warren-Troy-Farmington Hills, MI MD*	79.1	42.5	40.7	66.3	31.8	18.0
Michigan	75.3	35.6	42.9	62.1	27.2	17.5

** Given that the Warren-Troy-Farmington Hills, MI MD is comprised solely of Wayne County, MI, the data for the county is not noted separately.*
Cost burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

- Housing within the AA for low-income renters is a substantially greater burden than the burden on homeowners at any other level.
- Overall, the housing cost burden for homeowners and renters in the AA is comparable albeit slightly above the housing cost burden for homeowners and renters statewide.
- The 2024 AA housing affordability ratio[1], at 34.8 percent, is slightly below the 36.4 statewide ratio, which indicates the AA housing is less affordable than housing in the state of Michigan.
- The median age of AA housing stock is 60 years old, with older homes located in LMI geographies and newer homes in middle- and upper-income census tracts. An aging housing stock is likely to impact credit needs, as homeowners may need funds to repair, update, and improve homes.
- The median value of housing in the AA is $180,401; however, homes in middle- and upper-income census tracts are valued significantly higher than those in LMI census tracts. The median value of housing in low-income census tracts is $50,493 while the median home value upper-income census tracts is $271,383.
- A community contact indicated that affordable housing is a prevalent need in the AA.

Table 17

Unemployment Rates Assessment Area: Southeast Michigan Metropolitan					
Area	2019	2020	2021	2022	2023
Southeast Michigan Metropolitan	4.2	11.5	6.1	3.8	3.6
Livingston County, MI	3.2	8.6	4.1	2.9	2.7
Macomb County, MI	4.2	11.8	5.8	3.7	3.5
Oakland County, MI	3.3	9.1	4.6	3.0	2.9
Detroit-Dearborn-Livonia, MI MD	5.0	13.6	7.7	4.7	4.3
Warren-Troy-Farmington Hills, MI MD*	3.7	10.2	5.1	3.3	3.2
Michigan	4.1	10.0	5.7	4.1	3.9

** Given that the Warren-Troy-Farmington Hills, MI MD is comprised solely of Wayne County, MI, the data for the county is not noted separately.*
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

[1] The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

- Unemployment rates in the AA are comparable to the statewide rates between 2019 and 2023.
- Unemployment rates more than doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off employees due to statewide stay-at-home and social distancing orders and expectations. Notably, Wayne County, the AA's most populated county, experienced the highest unemployment rate. Since 2022, unemployment rates have stabilized and returned to pre-pandemic levels.
- Major employment industries within the AA include healthcare and social assistance, manufacturing, and retail trade.
- Ford Motor Company, Stellantis, General Motors, Corewell Health, and Henry Ford Health System are the major AA employers.

Table 18 details selected characteristics of the AA.

Table 18

2024 Southeast MI Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	120	9.4	66,015	6.5	23,871	36.2	218,080	21.5
Moderate	320	25.0	231,171	22.8	39,009	16.9	170,439	16.8
Middle	374	29.2	331,717	32.7	23,397	7.1	201,055	19.8
Upper	384	30.0	380,227	37.5	12,019	3.2	425,622	41.9
Unknown	83	6.5	6,066	0.6	2,470	40.7	0	0.0
Total AA	**1,281**	**100.0**	**1,015,196**	**100.0**	**100,766**	**9.9**	**1,015,196**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	164,526	49,092	4.4	29.8	79,751	48.5	35,683	21.7
Moderate	468,843	229,688	20.5	49.0	173,058	36.9	66,097	14.1
Middle	567,180	380,349	34.0	67.1	150,020	26.5	36,811	6.5
Upper	579,941	453,744	40.6	78.2	95,993	16.6	30,204	5.2
Unknown	21,262	5,399	0.5	25.4	9,598	45.1	6,265	29.5
Total AA	**1,801,752**	**1,118,272**	**100.0**	**62.1**	**508,420**	**28.2**	**175,060**	**9.7**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	12,837	6.7	11,579	6.6	1,182	7.9	76	5.4
Moderate	41,597	21.8	38,161	21.9	3,193	21.4	243	17.4
Middle	57,983	30.4	53,404	30.6	4,161	27.9	418	29.9
Upper	74,014	38.8	67,881	39.0	5,514	36.9	619	44.2
Unknown	4,164	2.2	3,232	1.9	889	6.0	43	3.1
Total AA	**190,595**	**100.0**	**174,257**	**100.0**	**14,939**	**100.0**	**1,399**	**100.0**
Percentage of Total Businesses:				**91.4**		**7.8**		**0.7**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	36	3.7	35	3.7	1	3.4	0	0.0
Moderate	139	14.4	136	14.5	3	10.3	0	0.0
Middle	393	40.6	383	40.8	10	34.5	0	0.0
Upper	392	40.5	378	40.3	14	48.3	0	0.0
Unknown	8	0.8	7	0.7	1	3.4	0	0.0
Total AA	**968**	**100.0**	**939**	**100.0**	**29**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.0**		**3.0**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Comerica's lending performance in the Southeast Michigan Metropolitan AA is excellent. The bank's small business lending carried more weight, as this product comprised the largest volume of lending in the AA. The volume of Multifamily, Other Purpose Closed/Exempt, and Purpose Not Applicable loans originated during the review period would not have allowed for a meaningful analysis of Comerica's home mortgage lending performance; therefore, a separate evaluation for these products was not conducted. Additionally, Comerica removed its standalone, full-service ATM from Lapeer County in January 2024, and no longer considers this county as part of the AA. Therefore, the analysis performed for 2023 includes Lapeer County while it is not considered in the analysis completed for 2024. Because of this change in the AA delineation, separate lending tables are provided for each year.

Lending Activity

The bank's lending activity in the Southeast Michigan Metropolitan AA reflects good responsiveness to the AA's credit needs. Comerica makes extensive use of innovative and/or flexible lending practices to serve the AA's communities through its participation in industry-recognized, government-guaranteed programs: 13 FHA/VA loans, 151 SBA loans, and 1,427 small business micro loans, for a combined total of $288.0 million. Additionally, Comerica partnered with the National Faith HomeBuyers Program to provide flexible lending and downpayment assistance for first-time home buyers in the area. Given that a community contact noted affordable housing as a need in the AA, the bank's active engagement in these programs demonstrates Comerica's record of meeting the credit needs of low-income individuals.

Comerica extended 2,054 home mortgage and 3,758 small business loans between January 1, 2023, and December 31, 2024. The loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

Geographic Distribution of Loans

Comerica's geographic distribution of loans reflects excellent penetration throughout the AA. Small business lending, which carried more weight given the bank's strategic focus and increased lending activity, reflects excellent penetration throughout the AA, while residential real estate lending reflects good penetration. The distribution of the bank's lending in middle- and upper-income geographies did not affect the conclusions reached about Comerica's performance in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA loans reflects good penetration throughout the AA. As illustrated in Tables 19 and 20, the bank's distribution of HMDA-reportable loans among LMI census tracts is comparable to the performance of aggregate HMDA reporters and to demographic data for both 2023 and 2024. As indicated in table 19A, Comerica originated more HMDA loans to refinance homes than any other type. However, special consideration was given to home improvement loans and other purpose lines of credit, which collectively account for 48.8 percent of HMDA lending, as these loans are more likely to address credit needs of borrowers owning older homes in the AA. Given the advancing age of the housing stock, especially in LMI geographies, these loans are likely to be especially impactful in meeting AA credit needs in LMI census tracts. The bank's lending patterns further reflect awareness of the AA credit needs and efforts to address those needs.

Home Purchase Lending

The geographic distribution of home purchase lending is good. The 2023 distribution of home purchase loans among low-income census tracts is comparable to aggregate lending and the demographic figures. In 2024, the bank's lending among low-income census tracts is significantly above the performance of aggregate lenders as well as the demographic figure. The bank's distribution among moderate-income census tracts exceeds both the aggregate lenders and the demographic figure in 2023, but it is comparable to both data sets in 2024.

Home Refinance Lending

The geographic distribution of home refinance lending is adequate. Overall, Comerica's refinance lending is comparable to aggregate HMDA reporters by number of loans and dollar amount, as well as the demographic figure for both 2023 and 2024 among LMI tracts.

Home Improvement Lending

The geographic distribution of home improvement lending is good. The bank's distribution of home improvement loans among low-income census tracts exceeds aggregate HMDA lenders by number in both 2023 and 2024. While Comerica exceeds the demographic figure in 2023, its performance is comparable to the demographic figure in 2024. Similarly, Comerica exceeds aggregate HMDA lenders in moderate-income census tracts in 2023 and 2024. While the bank's lending is below the demographic figure in 2023, it exceeds the percentage of owner-occupied units in moderate-income geographies in 2024. As previously mentioned, home improvement loans are considered especially responsive to credit needs given the advancing age of housing stock in the AA. Moreover, the median home age in LMI census tracts is generally older than that of homes in middle- and upper-income census tracts, and therefore LMI areas are more likely to benefit from home improvement loans.

Other Purpose Lines of Credit Lending

The geographic distribution of other purpose lines of credit lending is good. The bank's distribution among low-income census tracts exceeds aggregate lending in both 2023 and 2024. While the bank's performance is comparable to the demographic figure in 2024, it was below the percentage of owner-occupied units in 2023. Among moderate-income census tracts, the bank's lending is comparable to aggregate lenders in 2023 and 2024. While neither the bank nor the aggregate lenders met the demographic figure during the review period, aggregate lending serves as a better proxy for loan demand and can be more indicative of market conditions and needs in the AA. By this standard, Comerica generally originates more other purpose lines of credit in LMI areas than competitors. Moreover, other purpose lines of credit offer high flexibility to borrowers and may be used to meet a myriad of credit needs, including home improvements. In this way, these loans are also considered to be especially responsive to credit needs in LMI census tracts.

Table 19A

Distribution of 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Southeast MI Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	6	7.9	4.3	1,474	7.7	2.1	4.4
Moderate	13	17.1	22.0	2,160	11.3	14.0	20.5
Middle	23	30.3	35.4	4,838	25.3	32.1	34.0
Upper	34	44.7	37.8	10,633	55.7	51.5	40.6
Unknown	0	0.0	0.5	0	0.0	0.3	0.5
Total	76	100.0	100.0	19,105	100.0	100.0	100.0
Refinance Loans							
Low	7	1.9	3.5	407	0.6	2.0	4.4
Moderate	49	13.2	18.5	5,230	7.8	12.5	20.5
Middle	117	31.5	35.0	16,591	24.7	31.0	34.0
Upper	199	53.5	42.6	44,948	66.9	54.2	40.6
Unknown	0	0.0	0.4	0	0.0	0.2	0.5
Total	372	100.0	100.0	67,176	100.0	100.0	100.0
Home Improvement Loans							
Low	8	3.3	2.5	473	1.9	1.8	4.4
Moderate	52	21.7	15.9	2,939	11.9	11.0	20.5
Middle	77	32.1	35.0	7,441	30.2	30.8	34.0
Upper	103	42.9	46.5	13,782	55.9	56.3	40.6
Unknown	0	0.0	0.1	0	0.0	0.1	0.5
Total	240	100.0	100.0	24,635	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	11.9	0	0.0	1.8	14.2
Moderate	0	0.0	29.6	0	0.0	18.1	27.4
Middle	0	0.0	32.7	0	0.0	49.3	31.5
Upper	1	100.0	23.3	400	100.0	25.3	24.3
Unknown	0	0.0	2.5	0	0.0	5.5	2.6
Total	1	100.0	100.0	400	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	28	3.1	3.7	2,630	1.9	2.0	4.4
Moderate	154	17.0	20.0	14,019	10.1	13.7	20.5
Middle	281	31.0	35.4	35,283	25.5	32.4	34.0
Upper	442	48.8	40.5	86,453	62.5	51.4	40.6
Unknown	0	0.0	0.4	0	0.0	0.5	0.5
Total	905	100.0	100.0	138,385	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 19B

Distribution of 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Southeast MI Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	6	3.0	1.5	193	0.8	0.8	4.4
Moderate	37	18.3	14.7	3,439	13.9	9.6	20.5
Middle	57	28.2	34.4	5,814	23.4	27.9	34.0
Upper	102	50.5	49.1	15,356	61.9	61.5	40.6
Unknown	0	0.0	0.2	0	0.0	0.1	0.5
Total	202	100.0	100.0	24,802	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	7.1	3.1	83	3.7	2.3	4.4
Moderate	3	21.4	18.4	251	11.1	13.2	20.5
Middle	7	50.0	38.1	599	26.4	31.7	34.0
Upper	3	21.4	40.2	1,334	58.8	52.5	40.6
Unknown	0	0.0	0.3	0	0.0	0.3	0.5
Total	14	100.0	100.0	2,267	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	7.5	0	0.0	4.1	4.4
Moderate	0	0.0	30.4	0	0.0	22.0	20.5
Middle	0	0.0	36.4	0	0.0	39.5	34.0
Upper	0	0.0	25.7	0	0.0	34.4	40.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.5
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 20A

Distribution of 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: Southeast MI Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	3	3.2	4.3	675	2.8	2.2	4.3
Moderate	27	28.7	22.5	5,847	24.4	15.1	21.4
Middle	29	30.9	35.9	5,031	21.0	32.9	34.2
Upper	35	37.2	36.8	12,455	51.9	49.4	39.6
Unknown	0	0.0	0.5	0	0.0	0.4	0.5
Total	94	100.0	100.0	24,008	100.0	100.0	100.0
Refinance Loans							
Low	8	1.5	3.6	920	1.0	1.9	4.3
Moderate	103	19.2	19.4	11,781	13.2	15.0	21.4
Middle	166	31.0	37.0	22,435	25.1	31.3	34.2
Upper	255	47.6	39.6	54,066	60.4	51.5	39.6
Unknown	4	0.7	0.4	305	0.3	0.3	0.5
Total	536	100.0	100.0	89,507	100.0	100.0	100.0
Home Improvement Loans							
Low	13	4.8	2.5	628	2.0	1.7	4.3
Moderate	44	16.3	15.8	2,395	7.7	10.5	21.4
Middle	82	30.4	35.2	8,354	27.0	30.2	34.2
Upper	129	47.8	46.2	19,424	62.8	57.4	39.6
Unknown	2	0.7	0.3	120	0.4	0.2	0.5
Total	270	100.0	100.0	30,921	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	20.1	0	0.0	14.0	14.2
Moderate	0	0.0	37.7	0	0.0	29.2	27.7
Middle	0	0.0	25.3	0	0.0	35.2	31.3
Upper	1	100.0	12.3	100	100.0	18.4	24.2
Unknown	0	0.0	4.5	0	0.0	3.2	2.6
Total	1	100.0	100.0	100	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	30	2.6	3.8	2,498	1.4	2.6	4.3
Moderate	209	18.2	20.7	24,082	13.5	15.3	21.4
Middle	359	31.2	36.0	44,698	25.0	32.4	34.2
Upper	544	47.3	39.1	107,028	59.9	49.2	39.6
Unknown	7	0.6	0.4	460	0.3	0.5	0.5
Total	1,149	100.0	100.0	178,766	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 20B

Distribution of 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: Southeast MI Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	6	2.5	1.4	275	0.9	0.7	4.3
Moderate	33	13.9	14.8	3,731	12.3	10.2	21.4
Middle	77	32.5	35.7	7,979	26.2	28.9	34.2
Upper	120	50.6	47.9	18,419	60.5	60.1	39.6
Unknown	1	0.4	0.2	35	0.1	0.1	0.5
Total	237	100.0	100.0	30,439	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	3.4	0	0.0	2.9	4.3
Moderate	2	18.2	20.0	328	8.7	14.4	21.4
Middle	5	45.5	36.4	899	23.7	31.0	34.2
Upper	4	36.4	39.8	2,564	67.6	51.3	39.6
Unknown	0	0.0	0.3	0	0.0	0.4	0.5
Total	11	100.0	100.0	3,791	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	4.5	0	0.0	2.1	4.3
Moderate	0	0.0	25.7	0	0.0	16.3	21.4
Middle	0	0.0	31.9	0	0.0	25.4	34.2
Upper	0	0.0	37.6	0	0.0	56.1	39.6
Unknown	0	0.0	0.2	0	0.0	0.1	0.5
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the AA. Comerica's small business lending performance within LMI census tracts exceeds that of aggregate lenders in number of loans as well as dollar amount in 2023 and 2024. Additionally, the bank's performance slightly exceeds the percentage of businesses located in LMI census tracts for both years. Comerica's performance reflects the effectiveness of efforts, such as CDAC to understand the needs of small businesses in LMI areas, develop relationships, and meet their credit needs.

Table 21

Distribution of 2024 Small Business Lending by Income Level of Geography Assessment Area: Southeast MI Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	168	9.0	5.2	43,129	9.6	6.3	6.7
Moderate	421	22.7	19.6	101,572	22.6	19.1	21.8
Middle	508	27.4	29.7	117,582	26.1	29.6	30.4
Upper	652	35.1	43.3	154,709	34.4	41.0	38.8
Unknown	108	5.8	2.0	33,120	7.4	3.9	2.2
Total	1,857	100.0	100.0	450,112	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 22

Distribution of 2023 Small Business Lending by Income Level of Geography Assessment Area: Southeast MI Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	188	9.9	5.4	52,079	11.3	6.4	6.7
Moderate	444	23.4	19.9	102,352	22.2	19.4	22.1
Middle	517	27.2	30.5	113,731	24.7	29.5	30.7
Upper	662	34.8	41.9	161,924	35.1	40.8	38.2
Unknown	90	4.7	2.0	31,042	6.7	3.8	2.3
Total	1,901	100.0	100.0	461,128	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Comerica's distribution of lending to borrowers reflects a good penetration among individuals of different income levels, including LMI, and businesses of different revenue sizes. The distribution of the bank's lending to middle- and upper-income borrowers did not affect the conclusions reached about Comerica's performance to LMI borrowers.

Residential Real Estate (HMDA) Lending

The distribution of HMDA lending by borrower income in the AA is excellent. LMI borrowers face numerous challenges to secure mortgage loans, including higher loan payments resulting from increased interest rates, shortage of affordable housing stock in the AA, and meeting downpayment requirements. Comerica's performance demonstrates successful implementation of strategic partnerships, such as the National Faith HomeBuyers Program, to overcome challenges facing LMI borrowers and better meet their credit needs.

When analyzing total HMDA-reportable loans, Comerica's lending to low-income borrowers in 2023 and 2024 fell below the demographic figure. However, the bank's performance is still considered excellent as the bank's lending to low-income borrowers exceeded that of aggregate HMDA reporters for both years. Among moderate-income borrowers, Comerica's performance exceeds that of aggregate HMDA reporters as well as the demographic figure for both 2023 and 2024, once again demonstrating the success of strategic partnerships to meet credit needs of moderate-income borrowers.

Table 23A

Distribution of 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Southeast MI Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	11	14.5	9.4	1,253	6.6	4.3	21.5
Moderate	18	23.7	22.1	2,723	14.3	14.5	16.8
Middle	12	15.8	22.2	2,623	13.7	19.9	19.8
Upper	30	39.5	31.6	10,800	56.5	46.8	41.9
Unknown	5	6.6	14.7	1,706	8.9	14.5	0.0
Total	76	100.0	100.0	19,105	100.0	100.0	100.0
Refinance Loans							
Low	54	14.5	11.0	4,207	6.3	5.6	21.5
Moderate	84	22.6	19.4	9,632	14.3	13.3	16.8
Middle	81	21.8	21.0	11,422	17.0	18.2	19.8
Upper	143	38.4	31.8	39,754	59.2	43.5	41.9
Unknown	10	2.7	16.8	2,161	3.2	19.4	0.0
Total	372	100.0	100.0	67,176	100.0	100.0	100.0
Home Improvement Loans							
Low	26	10.8	9.7	950	3.9	5.6	21.5
Moderate	64	26.7	19.9	4,438	18.0	13.7	16.8
Middle	49	20.4	25.7	4,265	17.3	20.8	19.8
Upper	89	37.1	42.2	13,864	56.3	56.9	41.9
Unknown	12	5.0	2.5	1,118	4.5	3.0	0.0
Total	240	100.0	100.0	24,635	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	119	13.2	9.9	7,934	5.7	4.7	21.5
Moderate	211	23.3	21.0	19,836	14.4	14.2	16.8
Middle	190	21.0	22.6	23,323	16.9	19.5	19.8
Upper	346	38.3	33.4	81,146	58.8	46.7	41.9
Unknown	38	4.2	13.1	5,746	4.2	14.9	0.0
Total	904	100.0	100.0	137,985	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table 23B

Distribution of 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Southeast MI Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	19	9.4	9.2	776	3.1	4.7	21.5
Moderate	42	20.8	19.5	2,766	11.2	12.6	16.8
Middle	47	23.3	25.1	4,521	18.2	20.0	19.8
Upper	83	41.1	42.0	15,978	64.4	59.3	41.9
Unknown	11	5.4	4.2	761	3.1	3.4	0.0
Total	202	100.0	100.0	24,802	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	9	64.3	11.7	748	33.0	7.2	21.5
Moderate	3	21.4	23.6	277	12.2	16.1	16.8
Middle	1	7.1	26.6	492	21.7	20.9	19.8
Upper	1	7.1	34.2	750	33.1	49.0	41.9
Unknown	0	0.0	3.8	0	0.0	6.8	0.0
Total	14	100.0	100.0	2,267	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	21.5
Moderate	0	0.0	1.9	0	0.0	2.1	16.8
Middle	0	0.0	0.0	0	0.0	0.0	19.8
Upper	0	0.0	0.9	0	0.0	4.5	41.9
Unknown	0	0.0	97.2	0	0.0	93.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 24A

Distribution of 2023 Home Mortgage Lending by Borrower Income Level Assessment Area: Southeast MI Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	11	11.7	10.5	1,000	4.2	5.1	21.6
Moderate	16	17.0	22.3	2,931	12.2	15.8	17.0
Middle	19	20.2	22.2	4,207	17.5	20.8	19.9
Upper	37	39.4	30.3	12,952	53.9	45.0	41.6
Unknown	11	11.7	14.7	2,918	12.2	13.3	0.0
Total	94	100.0	100.0	24,008	100.0	100.0	100.0
Refinance Loans							
Low	109	20.3	13.7	9,763	10.9	7.2	21.6
Moderate	149	27.8	22.0	17,871	20.0	14.8	17.0
Middle	105	19.6	22.6	14,423	16.1	17.9	19.9
Upper	156	29.1	30.4	45,597	50.9	34.4	41.6
Unknown	17	3.2	11.3	1,853	2.1	25.7	0.0
Total	536	100.0	100.0	89,507	100.0	100.0	100.0
Home Improvement Loans							
Low	55	20.4	10.5	3,122	10.1	6.2	21.6
Moderate	55	20.4	20.8	3,689	11.9	14.0	17.0
Middle	56	20.7	25.0	4,463	14.4	21.0	19.9
Upper	93	34.4	41.5	16,444	53.2	56.3	41.6
Unknown	11	4.1	2.1	3,203	10.4	2.5	0.0
Total	270	100.0	100.0	30,921	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	202	17.6	11.1	15,466	8.7	5.6	21.6
Moderate	267	23.3	21.9	29,697	16.6	15.5	17.0
Middle	236	20.6	22.8	27,504	15.4	20.2	19.9
Upper	388	33.8	32.2	96,377	53.9	43.8	41.6
Unknown	55	4.8	12.0	9,622	5.4	15.0	0.0
Total	1,148	100.0	100.0	178,666	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table 24B

Distribution of 2023 Home Mortgage Lending by Borrower Income Level Assessment Area: Southeast MI Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	25	10.5	9.3	1,469	4.8	5.4	21.6
Moderate	43	18.1	19.7	3,852	12.7	13.7	17.0
Middle	56	23.6	24.8	4,411	14.5	20.1	19.9
Upper	97	40.9	42.0	19,059	62.6	57.5	41.6
Unknown	16	6.8	4.1	1,648	5.4	3.3	0.0
Total	237	100.0	100.0	30,439	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	2	18.2	12.0	112	3.0	7.7	21.6
Moderate	4	36.4	23.3	1,354	35.7	16.9	17.0
Middle	0	0.0	26.9	0	0.0	21.8	19.9
Upper	5	45.5	34.0	2,325	61.3	47.4	41.6
Unknown	0	0.0	3.8	0	0.0	6.2	0.0
Total	11	100.0	100.0	3,791	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.0	0	0.0	0.5	21.6
Moderate	0	0.0	0.5	0	0.0	0.2	17.0
Middle	0	0.0	0.2	0	0.0	0.0	19.9
Upper	0	0.0	0.0	0	0.0	0.0	41.6
Unknown	0	0.0	98.3	0	0.0	99.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

Comerica's distribution of small business loans by revenue size of business is adequate. In 2023 and 2024, the bank's distribution of loans to businesses with revenues of $1 million or less is comparable to the performance of aggregate lenders but below the demographic figure. Given that the demographic figure is not presumed to be representative of loan demand, the bank's performance in comparison to aggregate lenders carried more weight. Moreover, the bank extended a majority of its small business loans in amounts less than $100,000, which aligns with the loan amounts start-up and small businesses typically need. A local contact noted that small businesses need access to capital, especially start-up businesses.

Table 25

Distribution of 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Southeast MI Metropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	765	41.2	52.4	121,785	27.1	32.6	91.4
Over $1 Million	957	51.5		296,893	66.0		7.8
Revenue Unknown	135	7.3		31,434	7.0		0.7
Total	1,857	100.0		450,112	100.0		100.0
By Loan Size							
$100,000 or Less	923	49.7	95.8	63,526	14.1	47.8	
$100,001 - $250,000	391	21.1	2.3	78,037	17.3	13.8	
$250,001 - $1 Million	543	29.2	1.9	308,549	68.5	38.3	
Total	1,857	100.0	100.0	450,112	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	491	64.2		32,324	26.5		
$100,001 - $250,000	160	20.9		31,187	25.6		
$250,001 - $1 Million	114	14.9		58,274	47.8		
Total	765	100.0		121,785	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 26

Distribution of 2023 Small Business Lending by Revenue Size of Businesses Assessment Area: Southeast MI Metropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	698	36.7	52.5	108,451	23.5	32.2	91.7
Over $1 Million	993	52.2		312,137	67.7		7.5
Revenue Unknown	210	11.0		40,540	8.8		0.7
Total	1,901	100.0		461,128	100.0		100.0
By Loan Size							
$100,000 or Less	904	47.6	95.7	58,117	12.6	46.3	
$100,001 - $250,000	438	23.0	2.3	85,882	18.6	13.7	
$250,001 - $1 Million	559	29.4	2.1	317,129	68.8	40.0	
Total	1,901	100.0	100.0	461,128	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	439	62.9		27,023	24.9		
$100,001 - $250,000	158	22.6		29,758	27.4		
$250,001 - $1 Million	101	14.5		51,670	47.6		
Total	698	100.0		108,451	100.0		

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

Comerica is a leader in making CD loans in the Southeast Michigan Metropolitan AA, originating 263 qualifying CD loans during the review period, totaling $1.3 billion. When compared to the previous evaluation, the number and dollar amount of CD loans decreased; however, this quantitative decrease is attributable to the cessation of the SBA's PPP and a shorter review period than the previous evaluation rather than a qualitative decrease. To account for the shorter review period, examiners evaluated the number and dollar amount of CD lending on a monthly basis and noted a similar amount of CD loans originated in the AA and a 30.7 percent increase by dollar amount. This demonstrates that Comerica is highly involved in meeting the CD needs of the AA given its asset size and gross loan contraction of 14.5 percent and 10.5 percent, respectively, since the prior evaluation.

Further, Comerica's CD lending activity demonstrates a thorough understanding of community needs and a strategic application of resources to meet those needs in an impactful manner. The bank extended 230 CD loans to promote economic development by financing small businesses, which represents a significant majority (87.5 percent) of the total CD loans in the AA. These strategic efforts helped retain businesses and provide permanent job creation, retention, or improvement for LMI individuals and LMI geographies. Additionally, the Southeast Michigan Metropolitan AA is historically divested, primarily due to the economic decline in the automotive industry and impacts of the COVID-19 pandemic. Community contacts indicated economic development as a substantial need in the AA. Given this performance context, the bank's CD lending reflects favorably on its efforts to meet the credit and CD needs of the AA.

Notable examples of the bank's CD lending activities include:

- A $105.0 million line of credit to a distributor of plumbing and heating supplies that provides permanent employment to 98 LMI individuals.
- A $21.7 million line of credit to an organization that is building and rehabilitating affordable housing, including a majority in Section 8 housing, in the city of Detroit. Affordable housing within the city of Detroit was also identified as a significant need by a local contact.
- A $4.2 million line of credit to a nonprofit organization committed to the development of economic self-sufficiency for LMI individuals through various programs.

Table 27

Community Development Lending Assessment Area: Southeast Michigan Metropolitan		
Purpose	**#**	**$(000)**
Affordable Housing	8	72,160
Community Services	24	34,190
Economic Development	230	1,227,788
Revitalization and Stabilization	1	13,616
Total	**263**	**1,347,754**
Note: Discrepancies in dollar volume totals are possible due to rounding.		

INVESTMENT TEST

The bank's performance under the Investment Test in the Southeast Michigan Metropolitan AA is excellent. Comerica is often in a leadership position given the excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors. The bank makes significant use of innovative or complex investments to support CD initiatives, including extensive work with community development financial institutions (CDFIs) and unique and creative affordable housing projects. Moreover, Comerica exhibits excellent responsiveness to AA needs, including those highlighted by a local community contact, including the need for affordable housing.

Despite the shorter review period and significant asset size contraction since the prior evaluation, the bank has continued to provide an excellent level of CD investments, increasing the total dollar amount of combined donations and investments by 18.6 percent, or $32.1 million. As illustrated in Table 28, Comerica had 390 qualified investments and donations, totaling $204.4 million, in the AA, including prior period investments that remain on the bank's ledger. Notable examples of investments and donations include:

- A $178.5 million investment in LIHTC-eligible projects to develop and rehabilitate affordable housing projects in the area. This is particularly responsive, as there is an identified need for affordable housing in the area.
- A $100,000 donation to an organization that provides downpayment assistance to LMI individuals in Detroit as well as resources to assist them in becoming successful homeowners. The organization also helps existing homeowners to avoid foreclosure.
- A $7.8 million investment to rehabilitate a business located in a moderate-income geography that employs over 700 LMI individuals.

Table 28

Investment, Grants, and Donations Assessment Area: Southeast Michigan Metropolitan								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	**$(000)**	**#**	**$(000)**	**#**	**$(000)**	**#**	**$(000)**
Affordable Housing	59	130,182	7	51,600	8	143	74	181,925
Community Services	0	0	0	0	290	2,255	290	2,255
Economic Development	1	92	8	19,755	15	366	24	20,212
Revitalization and Stabilization	0	0	0	0	2	11	2	11
Total	**60**	**130,273**	**15**	**71,355**	**315**	**2,774**	**390**	**204,403**

[1] Book value of investment
[2] Original market value of investment
Note: Discrepancies in dollar volume totals are possible due to rounding.

SERVICE TEST

The bank's performance under the Service Test in the Southeast Michigan Metropolitan AA is excellent given Comerica's leadership in providing CD services as well as delivery systems being readily accessible to geographies and individuals of different income levels.

Retail Services

The bank's delivery systems are readily accessible to geographies of different income levels in the AA. The distribution of the bank's 118 branch offices and 179 full-service ATMs as of June 23, 2025, was compared to the distribution of the population and businesses among the tract categories within the AA. While 23.8 percent of branches and 29.6 percent of ATMs are located in LMI geographies, Comerica also offers a host of online and mobile delivery systems to ensure easy access to banking services. Table 29 below summarizes the bank's retail locations in the AA.

Table 29

Branch and Full-Service ATM Locations Assessment Area: Southeast Michigan Metropolitan							
Tract Income	**% of Geographies**	**% of Households**	**% of Businesses**	**Branches**		**Full-Service ATMs**	
				#	**%**	**#**	**%**
Low	9.4	7.0	6.7	8	6.8	15	8.4
Moderate	25.0	24.8	21.8	20	17.0	38	21.2
Middle	29.2	32.6	30.5	35	29.7	49	27.4
Upper	30.0	33.8	38.8	50	42.4	64	35.8
Unknown	6.5	0.9	2.2	5	4.2	13	7.3
Total	**100.0**	**100.0**	**100.0**	**118**	**100.0**	**179**	**100.0**

Note: Percentages may not total 100.0 percent due to rounding.

The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or to LMI individuals. Since the previous evaluation, Comerica closed eight branches in the AA: three in moderate-income, two in middle-income, two in upper-income, and one in an unknown-income census tract. Comerica's large presence in the AA provided for each branch that closed to be sufficiently serviced by another location. Moreover, banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are consistent throughout the AA.

Community Development Services

Comerica is a leader in providing CD services in the AA. As noted on Table 30, Comerica's employees served 6,943 hours, extending 1,905 CD services, to 132 organizations that aid LMI individuals in the AA. When considering the shorter review period at this evaluation, the number of CD services as well as the hours served increased by 10.2 percent and 21.4 percent, respectively. The relative increase in CD services and hours reflects Comerica's strong commitment to serving the CD needs of the AA. Notable services provided by bank employees in the AA include:

- Bank employees dedicated 3,353 hours to providing financial literacy and education to LMI individuals, including students and potential homebuyers. Financial education was identified by local community contacts as a significant need in the area.
- Bank employees committed over 763 hours collectively by serving on the board of directors for various organizations that provide community services, affordable housing, and financial education to LMI children, individuals, and families.
- Bank employees volunteered to support the United Way of Southeastern Michigan by providing 408 hours of technical assistance, including providing strategic planning and fundraising for the organization.

Table 30

Community Development Services Assessment Area: Southeast Michigan Metropolitan		
Purpose	**#**	**Hours**
Affordable Housing	0	0
Community Services	1,905	6,943
Economic Development	0	0
Revitalize and Stabilize	0	0
Total	**1,905**	**6,943**

GRAND RAPIDS METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE GRAND RAPIDS METROPOLITAN ASSESSMENT AREA

- The Grand Rapids Metropolitan AA consists of Kent and Ottawa counties in Michigan. These counties represent a portion of the Grand Rapids-Wyoming-Kentwood MSA, with the exclusion of Ionia and Montcalm counties. See Appendix A for an AA map and Appendix B for additional demographic data.
- Although the bank changed the name of the AA from Grand Rapids-Kentwood to Grand Rapids, its delineation remains unchanged since the previous evaluation[2].
- The AA is comprised of 210 total census tracts, of which 4.8 percent are designated as low-income, 17.1 percent are moderate-income, 50.0 percent are middle-income, 26.2 percent are upper-income, and 1.9 percent are designated as unknown-income.
- Comerica operates seven full-service branches in the AA, including four in middle-income and three in upper-income census tracts.
- According to the FDIC Deposit Market Share Report as of June 30, 2024, the bank had a 2.1 percent market share, ranking 12th out of 25 FDIC-insured depository institutions operating in the AA.
- In 2024, the bank ranked 49th out of 401 HMDA reporters in the AA with 68 HMDA originations and purchases, and 16th out of 101 CRA reporters with 159 CRA small business loans.
- Community contacts indicated affordable housing, access to capital for small businesses, and financial education as AA needs.

Table 31

Population Change Assessment Area: Grand Rapids Metropolitan			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Grand Rapids Metropolitan	895,726	954,174	6.5
Kent County, MI	622,590	657,974	5.7
Ottawa County, MI	273,136	296,200	8.4
Grand Rapids-Wyoming-Kentwood, MI MSA	1,081,941	1,150,015	6.3
Michigan	9,900,571	10,077,331	1.8
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- As noted in Table 31, population trends between 2015 and 2020 reflect more growth in both AA counties compared to the state increase of 1.8 percent.
- Grand Rapids is the second most populated city in Michigan.
- Approximately 20.0 percent of the AA population reside in LMI census tracts, and 35.2 percent of families in the AA are considered LMI.

[2] Beginning January 1, 2025, Comerica no longer includes Ottawa County in the Grand Rapids Metropolitan AA given the closure of its branches in that county as of April 25, 2024.

Table 32

Median Family Income Change Assessment Area: Grand Rapids Metropolitan			
Area	**2015 Median Family Income ($)**	**2020 Median Family Income ($)**	**Percent Change**
Grand Rapids Metropolitan	72,527	81,815	12.8
Kent County, MI	71,334	81,007	13.6
Ottawa County, MI	76,893	86,866	13.0
Grand Rapids-Wyoming-Kentwood, MI MSA	70,461	79,594	13.0
Michigan	68,010	75,470	11.0

Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- The AA's MFI experienced an overall moderate growth of 12.8 percent between 2015 and 2020, which is slightly above the 11.0 percent increase at the state level.
- According to FFIEC Census data, 6.2 percent of families live below the poverty level, which is less than the 9.2 percent state figure.
- A community contact noted that the cost of essentials, such as housing and basic goods, has outpaced the MFI increase.

Table 33

Housing Cost Burden Assessment Area: Grand Rapids Metropolitan						
Area	**Cost Burden - Renters**			**Cost Burden - Owners**		
	Low-Income	**Moderate-Income**	**All Renters**	**Low-Income**	**Moderate-Income**	**All Owners**
Grand Rapids Metropolitan	78.2	36.7	43.4	59.0	24.8	14.5
Kent County, MI	78.8	37.6	43.6	58.5	25.6	14.8
Ottawa County, MI	76.3	33.5	42.4	60.1	23.2	14.0
Grand Rapids-Wyoming-Kentwood, MI MSA	77.3	36.1	42.5	59.0	25.5	14.9
Michigan	75.3	35.6	42.9	62.1	27.2	17.5

Cost burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

- As reflected in Table 33, low-income renters experience a substantially greater housing cost burden than homeowners at any other level, indicating that it is more economical for low-income households to purchase a home than to rent. However, many low-income households face barriers to enter homeownership, such as downpayment requirements and meeting creditworthiness standards.
- The housing affordability ratio[3] in the AA, at 34.4, is slightly below the 35.3 percent statewide ratio, indicating housing is generally less affordable in the AA compared to the state of Michigan.
- A community contact noted that lack of affordable housing is the number one issue for both Ottawa and Kent counties.

[3] The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

Table 34

Unemployment Rates Assessment Area: Grand Rapids Metropolitan					
Area	**2019**	**2020**	**2021**	**2021**	**2023**
Grand Rapids Metropolitan	2.9	7.7	4.4	3.3	3.1
Kent County, MI	2.9	7.9	4.6	3.4	3.2
Ottawa County, MI	2.8	7.1	4.0	3.2	3.0
Grand Rapids-Wyoming-Kentwood, MI MSA	3.0	7.8	4.5	3.4	3.2
Michigan	4.1	10.0	5.7	4.1	3.9
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- As illustrated in Table 34, unemployment rates in the AA between 2019 and 2023 are consistently below the statewide rates.
- Unemployment rates more than doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off employees due to the statewide stay-at-home and social distancing orders. Since 2021, the unemployment rates have stabilized and returned to pre-pandemic levels.
- Major employment industries in the AA include manufacturing, healthcare and social assistance, and administrative and waste services.
- Major employers in the area include Challenge Manufacturing, Corewell Health, Trinity Health Grand Rapids, and Padnos.

The following table detail selected characteristics of the AA.

Table 35

2024 Grand Rapids Metropolitan AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	10	4.8	6,629	2.8	1,707	25.8	41,824	17.6	
Moderate	36	17.1	33,392	14.0	4,832	14.5	41,906	17.6	
Middle	105	50.0	116,083	48.8	6,474	5.6	54,795	23.0	
Upper	55	26.2	78,704	33.1	1,472	1.9	99,440	41.8	
Unknown	4	1.9	3,157	1.3	320	10.1	0	0.0	
Total AA	**210**	**100.0**	**237,965**	**100.0**	**14,805**	**6.2**	**237,965**	**100.0**	
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	12,580	3,809	1.5	30.3	7,823	62.2	948	7.5	
Moderate	60,144	30,770	12.1	51.2	25,171	41.9	4,203	7.0	
Middle	184,447	127,042	50.0	68.9	48,916	26.5	8,489	4.6	
Upper	105,724	89,651	35.3	84.8	11,824	11.2	4,249	4.0	
Unknown	4,768	2,919	1.1	61.2	1,456	30.5	393	8.2	
Total AA	**367,663**	**254,191**	**100.0**	**69.1**	**95,190**	**25.9**	**18,282**	**5.0**	
	Total Businesses by Tract		Businesses by Tract & Revenue Size						
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	705	2.0	629	2.1	74	2.1	2	0.7	
Moderate	6,022	17.5	5,101	16.7	884	25.0	37	13.1	
Middle	15,537	45.1	13,909	45.5	1,504	42.5	124	44.0	
Upper	11,890	34.5	10,722	35.0	1,052	29.8	116	41.1	
Unknown	263	0.8	238	0.8	22	0.6	3	1.1	
Total AA	**34,417**	**100.0**	**30,599**	**100.0**	**3,536**	**100.0**	**282**	**100.0**	
Percentage of Total Businesses:				**88.9**		**10.3**		**0.8**	
	Total Farms by Tract		Farms by Tract & Revenue Size						
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	5	0.7	5	0.8	0	0.0	0	0.0	
Moderate	30	4.5	24	3.8	6	13.3	0	0.0	
Middle	390	57.9	366	58.3	24	53.3	0	0.0	
Upper	245	36.4	230	36.6	15	33.3	0	0.0	
Unknown	3	0.4	3	0.5	0	0.0	0	0.0	
Total AA	**673**	**100.0**	**628**	**100.0**	**45**	**100.0**	**0**	**0.0**	
Percentage of Total Farms:				**93.3**		**6.7**		**0.0**	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Comerica's lending performance in the Grand Rapids Metropolitan AA is good. The bank's small business lending carried more weight as this product comprised the largest volume of lending in the AA. Additionally, a separate evaluation of Home Purchase, Multifamily, Other Purpose Lines of Credit, Other Purpose Closed/Exempt, and Purpose Not Applicable was not performed, as the volume of originations would not have allowed for a meaningful analysis.

Lending Activity

The bank's lending activity in the Grand Rapids Metropolitan AA reflects good responsiveness to AA credit needs. Comerica makes use of innovative and/or flexible lending practices to serve the AA communities through its participation in numerous industry-recognized, government-guaranteed programs, including FHA, VA, and SBA loans. During the review period, Comerica supported small businesses by originating nine SBA loans and 44 small business micro loans for a combined total of $14.6 million. Additionally, Comerica partnered with the National Faith HomeBuyers Program to provide flexible lending and downpayment assistance for first-time home buyers in the area. The bank's active engagement in these programs demonstrates Comerica's record of serving the AA needs, which includes affordable housing and access to capital for small businesses.

Comerica extended 169 home mortgage, and 301 small business loans between January 1, 2023, and December 31, 2024. The loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

Geographic Distribution of Loans

Comerica's geographic distribution of loans reflects excellent penetration throughout the AA, with the performance for small business lending rated as excellent and for HMDA lending as good. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions reached about Comerica's performance in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA-reportable loans reflects good penetration throughout the AA. The bank's distribution of HMDA-reportable loans among low-income census tracts is comparable to aggregate HMDA reporters as well as the demographic figure for both 2023 and 2024. Among moderate-income census tracts, the bank's lending is below aggregate HMDA reporters and the demographic figure for 2023. In 2024, the bank's lending meets the aggregate lending as well as exceeding the demographic figure.

Home Refinance Lending

The geographic distribution of home refinance lending among LMI census tracts is adequate. The bank did not originate any home refinance loans among low-income census tracts during the review period. Considering the number of owner-occupied units located in low-income census tracts is only 1.5 percent, there is very little opportunity to lend in such geographies. Among moderate-income census tracts, Comerica's performance is below aggregate HMDA reporters in

2023 but comparable in 2024. In both 2023 and 2024, the bank is below the percentage of owner-occupied units in moderate-income tracts (the demographic figure).

Home Improvement Lending

The geographic distribution of home improvement lending is good. While the bank did not make any loans among low-income census tracts in 2024, Comerica's lending is significantly above both aggregate HMDA reporters and the demographic figure in 2023. Among moderate-income census tracts, the bank's lending exceeds aggregate HMDA reporters' performance as well as the demographic figure for both 2023 and 2024.

Table 36A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Grand Rapids Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	3.4	0	0.0	1.9	1	16.7	2.6	179	8.7	1.6	1.5
Moderate	1	25.0	16.5	165	20.0	12.1	2	33.3	15.0	567	27.5	10.3	12.1
Middle	2	50.0	48.1	407	49.5	45.2	3	50.0	49.2	1,317	63.8	45.6	50.0
Upper	1	25.0	31.1	251	30.5	39.8	0	0.0	32.5	0	0.0	41.5	35.3
Unknown	0	0.0	0.9	0	0.0	1.0	0	0.0	0.7	0	0.0	0.9	1.1
Total	4	100.0	100.0	823	100.0	100.0	6	100.0	100.0	2,063	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.0	0	0.0	1.3	0	0.0	1.9	0	0.0	1.4	1.5
Moderate	3	6.5	14.3	402	5.2	11.5	3	9.1	12.5	378	9.6	9.6	12.1
Middle	27	58.7	49.9	3,759	48.9	47.0	17	51.5	48.8	1,874	47.4	45.4	50.0
Upper	16	34.8	33.0	3,532	45.9	39.6	13	39.4	35.8	1,699	43.0	42.3	35.3
Unknown	0	0.0	0.7	0	0.0	0.6	0	0.0	1.0	0	0.0	1.3	1.1
Total	46	100.0	100.0	7,693	100.0	100.0	33	100.0	100.0	3,951	100.0	100.0	100.0
Home Improvement Loans													
Low	1	3.1	1.5	70	2.7	1.0	0	0.0	1.4	0	0.0	1.2	1.5
Moderate	5	15.6	11.4	309	11.7	8.8	3	14.3	9.8	115	7.3	6.6	12.1
Middle	18	56.3	48.6	1,461	55.5	44.9	13	61.9	50.7	999	63.1	45.4	50.0
Upper	8	25.0	37.7	791	30.1	44.6	5	23.8	37.3	469	29.6	46.0	35.3
Unknown	0	0.0	0.8	0	0.0	0.7	0	0.0	0.8	0	0.0	0.8	1.1
Total	32	100.0	100.0	2,631	100.0	100.0	21	100.0	100.0	1,583	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	9.7	0	0.0	9.6	0	0.0	0.0	0	0.0	0.0	5.5
Moderate	0	0.0	16.7	0	0.0	10.1	0	0.0	23.6	0	0.0	21.1	23.7
Middle	0	0.0	59.7	0	0.0	59.9	0	0.0	58.2	0	0.0	59.2	53.9
Upper	0	0.0	12.5	0	0.0	19.9	0	0.0	14.5	0	0.0	18.6	14.6
Unknown	0	0.0	1.4	0	0.0	0.5	0	0.0	3.6	0	0.0	1.2	2.3
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	1.0	2.7	70	0.5	2.4	1	1.5	2.2	179	2.0	1.5	1.5
Moderate	9	8.9	14.9	876	6.7	11.5	9	13.2	13.3	1,212	13.7	10.3	12.1
Middle	58	57.4	48.6	6,242	47.7	46.5	38	55.9	49.4	4,865	54.8	46.1	50.0
Upper	33	32.7	33.0	5,905	45.1	38.7	20	29.4	34.2	2,618	29.5	41.0	35.3
Unknown	0	0.0	0.9	0	0.0	1.0	0	0.0	0.9	0	0.0	1.1	1.1
Total	101	100.0	100.0	13,093	100.0	100.0	68	100.0	100.0	8,874	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 36B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Grand Rapids Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	1.0	0	0.0	0.5	0	0.0	1.5	0	0.0	0.9	1.5
Moderate	0	0.0	11.1	0	0.0	7.4	0	0.0	10.6	0	0.0	7.2	12.1
Middle	11	61.1	47.4	615	35.2	42.5	4	66.7	49.9	495	52.4	43.1	50.0
Upper	7	38.9	39.3	1,131	64.8	47.6	2	33.3	36.9	450	47.6	47.2	35.3
Unknown	0	0.0	1.2	0	0.0	2.0	0	0.0	1.1	0	0.0	1.6	1.1
Total	18	100.0	100.0	1,746	100.0	100.0	6	100.0	100.0	945	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.2	0	0.0	0.9	0	0.0	2.2	0	0.0	1.8	1.5
Moderate	0	0.0	12.0	0	0.0	7.2	1	50.0	12.4	152	45.8	7.6	12.1
Middle	0	0.0	50.3	0	0.0	41.6	1	50.0	51.5	180	54.2	45.5	50.0
Upper	1	100.0	35.3	200	100.0	48.5	0	0.0	32.2	0	0.0	42.4	35.3
Unknown	0	0.0	1.2	0	0.0	1.8	0	0.0	1.7	0	0.0	2.7	1.1
Total	1	100.0	100.0	200	100.0	100.0	2	100.0	100.0	332	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	15.0	0	0.0	5.1	0	0.0	9.1	0	0.0	8.8	1.5
Moderate	0	0.0	34.6	0	0.0	25.1	0	0.0	31.8	0	0.0	24.4	12.1
Middle	0	0.0	36.2	0	0.0	52.0	0	0.0	36.4	0	0.0	33.1	50.0
Upper	0	0.0	14.2	0	0.0	17.8	0	0.0	18.2	0	0.0	24.4	35.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	4.5	0	0.0	9.2	1.1
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the AA. In 2023, Comerica's small business lending among low-income census tracts is above aggregate CRA reporters and comparable to the demographic figure. In 2024, the bank's lending in low-income geographies is significantly above aggregate CRA reporters and the demographic figure. In 2023, the bank was slightly above aggregate CRA reporters by number of loans and comparable by dollar amount. Among moderate-income census tracts, Comerica's lending significantly exceeds aggregate CRA reporters by number of loans and exceeds aggregate lending by dollar amount in 2023. In 2024, the bank significantly exceeds aggregate CRA reporters in both the number of loans and dollar amount. Additionally, the bank's lending exceeded the total number of small businesses located in moderate-income census tracts in 2023 and significantly exceeded in 2024.

Table 37

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Grand Rapids Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	4	2.8	2.0	760	1.8	2.9	6	3.8	1.7	1,700	3.6	1.8	2.0
Moderate	37	26.1	16.1	11,352	26.4	20.1	47	29.6	14.9	16,099	33.9	19.1	17.5
Middle	51	35.9	43.4	18,038	42.0	43.1	55	34.6	42.9	14,908	31.4	44.1	45.1
Upper	48	33.8	37.6	12,615	29.4	33.3	50	31.4	39.7	14,632	30.8	34.0	34.5
Unknown	2	1.4	0.6	160	0.4	0.6	1	0.6	0.6	100	0.2	0.7	0.8
Total	142	100.0	100.0	42,925	100.0	100.0	159	100.0	100.0	47,439	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of lending to borrowers reflects a good penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's distribution of lending to middle- and upper-income borrowers did not affect conclusions reached about the bank's performance to LMI borrowers.

Residential Real Estate (HMDA) Lending

The distribution of HMDA lending by borrower income in the AA is excellent. The dispersion of HMDA-reportable loans among low-income borrowers is above aggregate lending, while both the bank and aggregate HMDA reporters were below the demographic figure for 2023. In 2024, the bank significantly exceeds aggregate HMDA reporters and the demographic figure for low-income borrowers. Despite the increase in mortgage costs, the bank outperformed aggregate HMDA reporters in both 2023 and 2024, which reflects favorably on the bank's willingness to extend credit to low-income borrowers. Additionally, Comerica's performance among moderate-income borrowers in 2023 is substantially above aggregate HMDA reporters as well as the demographic figure. In 2024, the bank mirrored aggregate lending while exceeding the demographic figure.

Table 38A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Grand Rapids Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	25.0	6.7	155	18.8	3.2	0	0.0	5.9	0	0.0	2.6	17.6
Moderate	0	0.0	22.3	0	0.0	15.7	1	16.7	22.1	224	10.9	14.8	17.6
Middle	1	25.0	23.2	251	30.5	21.3	2	33.3	21.9	470	22.8	19.3	23.0
Upper	2	50.0	32.3	417	50.7	45.8	2	33.3	35.8	728	35.3	48.9	41.8
Unknown	0	0.0	15.5	0	0.0	14.0	1	16.7	14.3	641	31.1	14.4	0.0
Total	4	100.0	100.0	823	100.0	100.0	6	100.0	100.0	2,063	100.0	100.0	100.0
Refinance Loans													
Low	2	4.3	12.8	255	3.3	7.6	12	36.4	9.7	1,138	28.8	5.1	17.6
Moderate	17	37.0	24.7	2,410	31.3	20.3	11	33.3	21.9	1,384	35.0	16.2	17.6
Middle	10	21.7	24.4	1,240	16.1	22.1	4	12.1	24.0	469	11.9	20.4	23.0
Upper	13	28.3	30.9	2,822	36.7	41.3	5	15.2	31.8	910	23.0	40.5	41.8
Unknown	4	8.7	7.1	966	12.6	8.6	1	3.0	12.6	50	1.3	17.8	0.0
Total	46	100.0	100.0	7,693	100.0	100.0	33	100.0	100.0	3,951	100.0	100.0	100.0
Home Improvement Loans													
Low	5	15.6	9.2	265	10.1	5.7	8	38.1	8.5	381	24.1	4.4	17.6
Moderate	14	43.8	22.1	1,024	38.9	15.4	2	9.5	22.0	162	10.2	15.9	17.6
Middle	4	12.5	27.7	448	17.0	24.8	3	14.3	26.4	131	8.3	21.9	23.0
Upper	8	25.0	38.7	783	29.8	51.1	8	38.1	41.0	909	57.4	55.3	41.8
Unknown	1	3.1	2.3	111	4.2	3.0	0	0.0	2.0	0	0.0	2.6	0.0
Total	32	100.0	100.0	2,631	100.0	100.0	21	100.0	100.0	1,583	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	11	10.9	8.6	757	5.8	4.2	21	30.9	7.7	1,619	18.2	3.4	17.6
Moderate	35	34.7	22.6	3,865	29.5	16.4	15	22.1	22.2	1,950	22.0	15.2	17.6
Middle	17	16.8	24.4	2,252	17.2	21.6	13	19.1	23.3	1,383	15.6	19.7	23.0
Upper	32	31.7	33.2	5,069	38.7	45.7	17	25.0	35.6	3,231	36.4	47.5	41.8
Unknown	6	5.9	11.1	1,150	8.8	12.3	2	2.9	11.2	691	7.8	14.1	0.0
Total	101	100.0	100.0	13,093	100.0	100.0	68	100.0	100.0	8,874	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table 38B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Grand Rapids Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	3	16.7	9.1	82	4.7	5.3	1	16.7	9.6	100	10.6	4.7	17.6
Moderate	3	16.7	22.8	231	13.2	15.6	0	0.0	22.4	0	0.0	13.8	17.6
Middle	2	11.1	26.1	313	17.9	20.2	3	50.0	24.2	161	17.0	19.6	23.0
Upper	9	50.0	38.2	1,047	60.0	54.9	2	33.3	40.1	684	72.4	57.5	41.8
Unknown	1	5.6	3.9	73	4.2	4.0	0	0.0	3.7	0	0.0	4.4	0.0
Total	18	100.0	100.0	1,746	100.0	100.0	6	100.0	100.0	945	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	12.8	0	0.0	7.0	0	0.0	10.6	0	0.0	5.7	17.6
Moderate	1	100.0	22.2	200	100.0	14.9	1	50.0	25.9	180	54.2	16.8	17.6
Middle	0	0.0	29.8	0	0.0	20.7	1	50.0	24.8	152	45.8	19.2	23.0
Upper	0	0.0	32.9	0	0.0	50.6	0	0.0	36.2	0	0.0	55.7	41.8
Unknown	0	0.0	2.4	0	0.0	6.8	0	0.0	2.5	0	0.0	2.6	0.0
Total	1	100.0	100.0	200	100.0	100.0	2	100.0	100.0	332	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.6
Moderate	0	0.0	0.8	0	0.0	0.7	0	0.0	0.0	0	0.0	0.0	17.6
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	23.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	41.8
Unknown	0	0.0	99.2	0	0.0	99.3	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

Comerica's borrower distribution of small business loans by revenue size of businesses is adequate. The distribution of 2023 and 2024 loan originations to businesses with revenues of $1 million or less is below the performance of aggregate CRA reporters. While both the bank and the aggregate CRA reporters were significantly below the 88.9 percent of businesses within the AA that reported revenues of $1 million or less, the demographic figure is not presumed to be representative of loan demand. While the bank is significantly below aggregate CRA reporters, the majority of loans extended during the review period were in amounts less than $250,000. A local community contact noted that businesses in the area are in need of access to capital, specifically in amounts of $300,000 or less.

Table 39

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Grand Rapids Metropolitan													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	28	19.7	51.6	3,289	7.7	23.1	41	25.8	52.2	7,851	16.5	31.3	88.9
Over $1 Million	102	71.8		36,899	86.0		109	68.6		37,965	80.0		10.3
Revenue Unknown	12	8.5		2,737	6.4		9	5.7		1,623	3.4		0.8
Total	142	100.0		42,925	100.0		159	100.0		47,439	100.0		100.0
By Loan Size													
$100,000 or Less	65	45.8	90.0	3,988	9.3	26.7	74	46.5	90.4	4,537	9.6	27.1	
$100,001 - $250,000	25	17.6	4.5	5,083	11.8	15.0	24	15.1	4.3	4,620	9.7	14.8	
$250,001 - $1 Million	52	36.6	5.6	33,854	78.9	58.3	61	38.4	5.3	38,282	80.7	58.1	
Total	142	100.0	100.0	42,925	100.0	100.0	159	100.0	100.0	47,439	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	22	78.6		1,291	39.3		27	65.9		1,602	20.4		
$100,001 - $250,000	3	10.7		690	21.0		5	12.2		1,025	13.1		
$250,001 - $1 Million	3	10.7		1,308	39.8		9	22.0		5,224	66.5		
Total	28	100.0		3,289	100.0		41	100.0		7,851	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

Comerica is a leader in making CD loans in the Grand Rapids Metropolitan AA. As noted in Table 40, the bank originated a total of 42 qualifying CD loans, totaling $168.7 million, during the review period. Despite the reduction of its physical footprint in the AA and a shorter review period, Comerica extended a similar number and dollar amount of CD loans as in the prior evaluation. This level of performance demonstrates the bank's continued commitment to serving the AA's CD needs.

Comerica originated 90.5 percent of its CD loans in the AA to promote economic development by financing small businesses. These strategic efforts helped retain businesses and provide permanent job creation, retention, or improvement for LMI individuals and LMI geographies. Moreover, the bank extended two CD loans to support affordable housing efforts in the AA. Community contacts indicated economic development and affordable housing as substantial needs in the AA. Given this performance context, Comerica's CD lending reflects favorably on its efforts to meet the CD needs of the AA.

Notable examples of the bank's CD lending activities include:

- A $20.0 million line of credit to a metal stamp manufacturer that provides permanent job opportunities for 226 LMI individuals;

- A $25.0 million line of credit to a steel manufacturing company that provides permanent jobs for 165 LMI individuals; and
- A $12.1 million toward LIHTC projects to renovate multifamily apartment complexes to provide affordable housing. Affordable housing is an identified need by local community contacts.

Table 40

Community Development Lending Assessment Area: Grand Rapids Metropolitan		
Purpose	**#**	**$(000)**
Affordable Housing	2	12,123
Community Services	2	300
Economic Development	38	156,229
Revitalization and Stabilization	0	0
Total	**42**	**168,652**
Note: Discrepancies in dollar volume totals are possible due to rounding.		

INVESTMENT TEST

Comerica's performance under the Investment Test in the Grand Rapids Metropolitan AA is excellent. The bank has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors. In addition, Comerica is often in a leadership position given its occasional use of innovative or complex investments to support CD initiatives. As illustrated in Table 41, the bank exhibits excellent responsiveness to the AA needs given its continued efforts in affordable housing as this was an identified need by a local community contact. Specifically, Comerica made 13 LIHTC-eligible investments for the construction or preservation of affordable housing projects.

Comerica has continued to provide an excellent level of CD investments compared to the prior evaluation. Despite the shorter review period of this evaluation when compared to the prior evaluation, the bank increased the total number and dollar amount of qualified donations and investments. Examiners compared the number of combined investments and donations as well as the dollar amount on a monthly basis and found that Comerica increased its efforts by 33.8 percent and 14.1 percent, respectively.

Table 41

Investment, Grants, and Donations Assessment Area: Grand Rapids Metropolitan								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	**$(000)**	**#**	**$(000)**	**#**	**$(000)**	**#**	**$(000)**
Affordable Housing	13	11,467	1	1,800	5	18	19	13,285
Community Services	0	0	0	0	31	118	31	118
Economic Development	0	0	0	0	8	51	8	51
Revitalization and Stabilization	0	0	0	0	1	5	1	5
Total	**13**	**11,467**	**1**	**1,800**	**45**	**192**	**59**	**13,459**
[1] Book value of investment [2] Original market value of investment *Note: Discrepancies in dollar volume totals are possible due to rounding.*								

SERVICE TEST

The bank's Service Test performance is good primarily due to Comerica's leadership in providing CD services as well as delivery systems being reasonably accessible to geographies and individuals of different income levels in the Grand Rapids Metropolitan AA.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its AA. As noted in Table 42, Comerica only operates two full-service ATMs in moderate-income census tracts. The distribution of the bank's seven branches and 12 full-service ATMs as of June 23, 2025, is comparable to the distribution of households and businesses in the AA.

Table 42

Branch and Full-Service ATM Locations
Assessment Area: Grand Rapids Metropolitan

Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	4.8	3.3	2.0	0	0.0	0	0.0
Moderate	17.1	16.0	17.2	0	0.0	2	16.7
Middle	50.0	50.4	45.4	4	57.1	7	58.3
Upper	26.2	29.0	34.6	3	42.9	3	25.0
Unknown	1.9	1.3	0.8	0	0.0	0	0.0
Total	**100.0**	**100.0**	**100.0**	**7**	**100.0**	**12**	**100.0**

Note: Percentages may not total 100.0 percent due to rounding.

While Comerica did not open any branches in the AA during the review period, it closed four branches. One branch closed was located in a moderate-income census tract, and the remaining three branches were located in middle-income census tracts. Although the bank does not have any remaining branches located within an LMI geography, four of the seven branches are located in close proximity to LMI tracts that can reasonably serve the area. The bank's record of opening or closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or individuals. Banking services and hours offered are consistent throughout the AA and therefore do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals.

Community Development Services

Comerica is a leader in providing CD services in the AA. As indicated in Table 43, bank employees served 16 organizations, extending 147 services for a total of 477 hours, to aid LMI individuals in the AA. Comerica maintained a comparable number of CD services and hours despite a shorter review period and reduced presence in the AA since the prior evaluation. A significant portion of the CD services extended in the AA was to provide financial education to LMI students and families as well as small business owners. These services are particularly notable as a local community contact indicated financial education as a significant need.

Notable services performed by bank employees in the AA include:

- Over 190 collective hours of serving on the board of directors for various organizations that provide community services, affordable housing, and financial education to LMI individuals and families.
- Approximately 182 hours of financial education through financial literacy and personal finance education to LMI students and technical assistance to small business owners.

Table 43

Community Development Services Assessment Area: Grand Rapids Metropolitan		
Purpose	**#**	**Hours**
Affordable Housing	0	0
Community Services	147	477
Economic Development	0	0
Revitalize and Stabilize	0	0
Total	**147**	**477**

METROPOLITAN ASSESSMENT AREAS
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE MICHIGAN METROPOLITAN ASSESSMENT AREAS

Ann Arbor MSA Assessment Area

- The Ann Arbor MSA AA is comprised of the entirety of Washtenaw County, which is coterminous with the Ann Arbor MSA in Michigan.
- As of June 23, 2025, Comerica operated eight branches in the AA, representing 2.1 percent of total branches.
- As of June 30, 2024, the bank had $847.3 million in deposits in this AA, representing a market share of 7.1 percent and 1.4 percent of the bank's total deposits.
- In 2024, 318 institutions originated or purchased 6,956 HMDA-reportable loans in the AA. The bank ranked 26th, with 67 home mortgage originations representing 1.0 percent of total reportable loans in the AA.
- The bank ranked 12th among 84 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 8,948 CRA-reportable loans made in the AA, the bank originated 123, or 1.4 percent.
- According to ACS data, the AA consists of 107 census tracts, including 13 low-, 13 moderate-, 40 middle-, 30 upper-, and 11 unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 372,258, representing 3.7 percent of the state's population.
- The AA includes 81,292 families, of which 20.8 percent are low-, 17.7 percent are moderate-, 21.4 percent are middle-, and 40.1 percent are upper-income. Approximately 6.3 percent of AA families live below the poverty level.

Battle Creek MSA Assessment Area

- The Battle Creek MSA AA is comprised of the entirety of Calhoun County, which is coterminous with the Battle Creek MSA in Michigan.
- As of June 23, 2025, Comerica operated two branches in the AA, representing 0.5 percent of total branches.
- As of June 30, 2024, the bank had $218.9 million in deposits in this AA, representing a market share of 15.7 percent and 0.3 percent of the bank's total deposits.
- In 2024, 204 institutions originated or purchased 3,094 HMDA-reportable loans in the AA. The bank ranked 32nd with 16 home mortgage originations representing 0.5 percent of total reportable loans in the AA.
- The bank ranked 8th among 63 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 1,411 CRA-reportable loans made in the AA, the bank originated 42, or 3.0 percent.
- According to ACS data, the AA consists of 40 census tracts, including three low-, 13 moderate-, 15 middle-, and nine upper-income tracts.
- The total population of the AA based on 2020 ACS data was 134,310, representing 1.3 percent of the state's population.
- The AA includes 33,314 families, of which 21.9 percent are low-, 17.2 percent are moderate-, 19.8 percent are middle-, and 41.2 percent are upper-income. Approximately 11.7 percent of AA families live below the poverty level.

Fenton MSA Assessment Area

- The Fenton MSA AA is comprised of the entirety of Genesee County, which is coterminous with the Flint MSA in Michigan.
- As of June 23, 2025, Comerica operated one branch in the AA, representing 0.3 percent of total branches.
- As of June 30, 2024, the bank had $61.4 million in deposits in this AA, representing a market share of 1.1 percent and 0.1 percent of the bank's total deposits.
- In 2024, 278 institutions originated or purchased 9,336 HMDA-reportable loans in the AA. The bank ranked 66th with nine home mortgage originations representing 0.1 percent of total reportable loans in the AA.
- The bank ranked 20th among 81 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 5,444 CRA-reportable loans made in the AA, the bank originated 19, or 0.3 percent.
- According to ACS data, the AA consists of 134 census tracts, including 16 low-, 33 moderate-, 41 middle-, 39 upper-, and five unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 406,211, representing 4.0 percent of the state's population.
- The AA includes 108,430 families, of which 21.3 percent are low-, 17.5 percent are moderate-, 20.8 percent are middle-, and 40.5 percent are upper-income. Approximately 13.0 percent of AA families live below the poverty level.

Jackson MSA Assessment Area

- The Jackson MSA AA is comprised of the entirety of Jackson County, which is coterminous with the Jackson MSA in Michigan.
- As of June 23, 2025, Comerica operated six branches in the AA, representing 1.6 percent of total branches.
- As of June 30, 2024, the bank had $472.8 million in deposits in this AA, representing a market share of 20.0 percent and 0.8 percent of the bank's total deposits.
- In 2024, 237 institutions originated or purchased 3,759 HMDA-reportable loans in the AA. The bank ranked 16th with 65 home mortgage originations representing 1.7 percent of total reportable loans in the AA.
- The bank ranked 6th among 64 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 1,914 CRA-reportable loans made in the AA, the bank originated 113, or 5.9 percent.
- According to ACS data, the AA consists of 46 census tracts, including three low-, 14 moderate-, 15 middle-, 12 upper-, and two unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 160,366, representing 1.6 percent of the state's population.
- The AA includes 39,908 families, of which 18.7 percent are low-, 19.0 percent are moderate-, 21.0 percent are middle-, and 41.3 percent are upper-income. Approximately 8.6 percent of AA families live below the poverty level.

Kalamazoo-Portage MSA Assessment Area

- The Kalamazoo-Portage AA is comprised of the entirety of Kalamazoo County, which is coterminous with the Kalamazoo-Portage MSA in Michigan.
- As of June 23, 2025, Comerica operated five branches in the AA, representing 1.3 percent of total branches.
- As of June 30, 2024, the bank had $246.0 million in deposits in this AA, representing a market share of 5.5 percent and 0.4 percent of the bank's total deposits.

- In 2024, 259 institutions originated or purchased 6,286 HMDA-reportable loans in the AA. The bank ranked 36th with 28 home mortgage originations representing 0.4 percent of total reportable loans in the AA.
- The bank ranked 11th among 70 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 4,042 CRA-reportable loans made in the AA, the bank originated 59, or 1.5 percent.
- According to ACS data, the AA consists of 68 census tracts, including six low-, 17 moderate-, 23 middle-, 21 upper-, and one unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 261,670, representing 2.6 percent of the state's population.
- The AA includes 62,664 families, of which 21.5 percent are low-, 18.3 percent are moderate-, 19.7 percent are middle-, and 40.5 percent are upper-income. Approximately 8.3 percent of AA families live below the poverty level.

Lansing-East Lansing MSA Assessment Area

- The Lansing-East Lansing MSA[4] AA is comprised of the entirety of Clinton, Eaton, and Ingham counties, which makes up the Lansing-East Lansing, Michigan MSA.
- As of June 23, 2025, Comerica operated five branches in the AA, representing 1.3 percent of total branches.
- As of June 30, 2024, the bank had $411.5 million in deposits in this AA, representing a market share of 3.5 percent and 0.7 percent of the bank's total deposits.
- In 2024, 314 institutions originated or purchased 9,536 HMDA-reportable loans in the AA. The bank ranked 36th with 46 home mortgage originations representing 0.5 percent of total reportable loans in the AA.
- The bank ranked 17th among 94 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 7,197 CRA-reportable loans made in the AA, the bank originated 61, or 0.8 percent.
- According to ACS data, the AA consists of 136 census tracts, including seven low-, 28 moderate-, 57 middle-, 32 upper-, and 12 unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 473,203, representing 4.7 percent of the state's population.
- The AA includes 111,157 families, of which 20.3 percent are low-, 17.2 percent are moderate-, 21.9 percent are middle-, and 40.6 percent are upper-income. Approximately 7.9 percent of AA families live below the poverty line.

Midland MSA Assessment Area

- The Midland MSA AA is comprised of the entirety of Midland County, which is coterminous with the Midland MSA in Michigan.
- As of June 23, 2025, Comerica operated one branch in the AA, representing 0.3 percent of total branches.
- As of June 30, 2024, the bank had $111.4 million in deposits in this AA, representing a market share of 9.8 percent and 0.2 percent of the bank's total deposits.
- In 2024, 164 institutions originated or purchased 1,832 HMDA-reportable loans in the AA. The bank ranked 30th with six home mortgage originations representing 0.3 percent of total reportable loans in the AA.

[4] Comerica does not include Shiawassee County as part of their AA. In 2024 the Office of Management and Budget (OMB) updated the Lansing-East Lansing MI MSA to no longer include Shiawassee County. Therefore, as of 2024, Comerica is taking the entire MSA as their AA.

- The bank ranked 15th among 49 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 1,221 CRA-reportable loans made in the AA, the bank originated nine, or 0.7 percent.
- According to ACS data, the AA consists of 21 census tracts, including one low-, four moderate-, 12 middle-, and four upper-income tracts.
- The total population of the AA based on 2020 ACS data was 83,494, representing 0.8 percent of the state's population.
- The AA includes 23,057 families, of which 19.8 percent are low-, 18.1 percent are moderate-, 22.0 percent are middle-, and 40.0 percent are upper-income. Approximately 7.2 percent of AA families live below the poverty level.

Muskegon MSA Assessment Area

- The Muskegon MSA AA is comprised of the entirety of Muskegon County, which is coterminous with the Muskegon-Norton Shores MSA in Michigan.
- As of June 23, 2025, Comerica operated four branches in the AA, representing 1.1 percent of total branches.
- As of June 30, 2024, the bank had $229.5 million in deposits in this AA, representing a market share of 10.9 percent and 0.4 percent of the bank's total deposits.
- In 2024, 233 institutions originated or purchased 4,714 HMDA-reportable loans in the AA. The bank ranked 31st with 25 home mortgage originations representing 0.5 percent of total reportable loans in the AA.
- The bank ranked 11th among 64 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 2,029 CRA-reportable loans made in the AA, the bank originated 44, or 2.2 percent.
- According to ACS data, the AA consists of 46 census tracts, including five low-, eight moderate-, 21 middle-, 11 upper-, and one unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 175,824, representing 1.7 percent of the state's population.
- The AA includes 44,390 families, of which 20.4 percent are low-, 18.7 percent are moderate-, 21.2 percent are middle-, and 39.8 percent are upper-income. Approximately 10.3 percent of AA families live below the poverty level.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Additional information regarding detailed demographic information and the HMDA- and CRA-reportable lending for the limited scope AAs can be found in Appendix C. Table 44, below, details the performance conclusions of the metropolitan AAs receiving a limited-scope review.

Table 44

Assessment Area	Lending Test	Investment Test	Service Test
Ann Arbor MSA	Below	Consistent	Below
Battle Creek MSA	Below	Below	Consistent
Fenton MSA	Below	Consistent	Consistent
Jackson MSA	Consistent	Consistent	Consistent
Kalamazoo-Portage MSA	Below	Consistent	Consistent
Lansing-East Lansing MSA	Below	Consistent	Consistent
Midland MSA	Below	Below	Below
Muskegon MSA	Below	Consistent	Below

While Comerica's lending in the limited-scope AAs is generally below that of the overall state of Michigan, its investment and service performance are generally consistent. Comerica's performance in the limited-scope AAs did not impact the bank's overall performance ratings.

NONMETROPOLITAN ASSESSMENT AREA
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE MICHIGAN NONMETROPOLITAN ASSESSMENT AREA

Lenawee County Nonmetropolitan AA

- The Lenawee Nonmetropolitan AA is comprised of the entirety of Lenawee County.
- As of June 23, 2025, the bank operated one branch, representing 0.3 percent of Comerica's total branches.
- As of June 30, 2024, Comerica held $43.8 million in deposits, representing a market share of 3.0 percent and 0.1 percent of the bank's total deposits.
- In 2024, 192 institutions originated or purchased 2,256 HMDA-reportable loans in the AA. The bank ranked 28th with 10 home mortgage originations representing 0.4 percent of total reportable loans in the AA.
- The bank ranked 17th among 65 institutions originating or purchasing CRA-reportable loans made in the AA in 2024. Of the 1,404 CRA-reportable loans made in the AA, the bank originated 11, or 0.8 percent.
- The bank ranked 17th among 65 institutions originating or purchasing CRA-reportable loans made in the AA in 2024. Of the 1,404 CRA-reportable loans made in the AA, the bank originated 11, or 0.8 percent.
- The AA is comprised of 25 census tracts, including five moderate-, 12 middle-, and eight upper-income tracts.
- Based upon 2020 ACS data, the AA population was 99,423, which reflects a 0.5 percent increase from the 2015 ACS data.
- The AA includes 25,851 families, 14.8 percent are low-, 18.4 percent moderate-, 21.3 percent middle-, and 45.4 percent are upper-income.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Additional information regarding detailed demographic information and the HMDA- and CRA-reportable lending for the nonmetropolitan limited-scope AA can be found in Appendix D.

Table 45, below, details the performance conclusions of the nonmetropolitan AA receiving a limited-scope review.

Table 45

Assessment Area	Lending Test	Investment Test	Service Test
Lenawee County Nonmetropolitan	Below	Below	Below

While Comerica's Lending, Investment, and Service Test performance in the Lenawee County Nonmetropolitan AA is below the overall performance in the state of Michigan, it does not impact the assessed rating. Comerica's performance in the limited-scope AA did not impact the bank's overall performance ratings.

STATE OF TEXAS

CRA RATING FOR TEXAS: Outstanding

The Lending Test is rated Outstanding.
The Investment Test is rated Outstanding.
The Service Test is rated High Satisfactory.

Major factors supporting the institution's rating include:

Lending Test

- Lending activity reflects good responsiveness and record of serving the AAs' credit needs, including low-income individuals, low-income areas, and very small businesses.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels, including LMI individuals, and businesses of different sizes is good.
- Comerica is a leader in making CD loans.
- The bank makes use of innovative and/or flexible lending practices in serving AAs' needs.

Investment Test

- Comerica has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors and is often in a leadership position.
- The bank makes significant use of innovative and/or complex investments to support community development initiatives.
- Comerica exhibits excellent responsiveness to credit and CD needs.

Service Test

- Delivery systems are reasonably accessible to individuals of different income levels throughout the AAs.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.
- Comerica is a leader in providing CD services.

SCOPE OF THE EVALUATION

The scope of the review for the state of Texas is consistent with the overall scope for the institution, including evaluations under the Lending, Investment, and Service tests. The period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

Two of the five AAs in the state of Texas were reviewed using full-scope procedures.

- Dallas-Fort Worth Metropolitan AA
- Houston Metropolitan AA

The remaining three AAs received limited-scope reviews.

- Austin Metropolitan AA
- Bank of the Hills Nonmetropolitan AA
- San Antonio Metropolitan AA

Examiners based their selection of AAs for full-scope reviews on the strategic importance of the AA, considering volume of lending, number of branches, percentage of total deposits, and the length of time since the AA received a full-scope review. Approximately 87.1 percent of lending activity (by number of loans), 89.6 percent of the deposits, and 94.0 percent of branches within the state of Texas were evaluated through full-scope reviews. The bank's performance in the Dallas-Fort Worth Metropolitan AA was given greater weight, as it represents the majority of Comerica's activity within the state of Texas and is a strategic focus of the institution.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN TEXAS

The bank delineates five of its 27 AAs and operates 114 of its 379 branches in the state of Texas. As of June 30, 2024, Comerica had $9.0 billion in deposits in the state, representing 14.1 percent of total deposits. According to the FDIC Summary of Deposits as of June 30, 2024, Comerica had a deposit market share of 0.6 percent and ranked 19th out of 475 FDIC-insured financial institutions across the state.

Of the 7,225 HMDA-reportable loans and 11,551 small business loans originated and purchased by Comerica during the review period, 1,494 (20.7 percent) of HMDA-reportable loans and 3,473 (30.1 percent) of small business loans were extended in the Texas AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Comerica's Lending Test in the state of Texas is rated Outstanding. Lending performance in the Dallas-Fort Worth Metropolitan and Houston Metropolitan AAs is consistent with the overall state rating. In addition, the bank's performance in the AAs receiving limited-scope reviews supports the rating for the state.

Lending Activity

Comerica's lending activities in the state of Texas reflect good responsiveness to the credit needs of its AAs. The bank makes use of innovative and/or flexible lending programs through its participation in numerous industry-recognized, government-guaranteed programs, including two FHA/VA loans, 207 SBA loans, and 1,153 small business micro loans in the state of Texas.

As outlined in Table 46, this evaluation considered 9,938 loans, totaling $2.4 billion. The loan products and origination volumes are consistent with the credit needs of the Texas' AAs. Examiners compared the number of small business and HMDA-reportable mortgage loans extended by Comerica to the number of loans made by aggregate lenders during the review period.

Table 46

Summary of Lending Activity – January 1, 2023 through December 31, 2024 Texas Assessment Areas				
Loan Type	**#**	**%**	**$(000)**	**%**
Home Purchase	103	2.1	63,461	5.3
Refinancing	580	11.7	148,548	12.5
Home Improvement	380	7.6	51,523	4.3
Multifamily	7	0.1	48,376	4.1
Other Purpose LOC	416	8.4	66,297	5.6
Other Purpose Closed/Exempt	8	0.2	4,861	0.4
Purpose Not Applicable	0	0.0	0	0,0
Total HMDA-Related	**1,494**	**30.1**	**383,066**	**32.3**
Total Small Business	**3,473**	**69.9**	**804,031**	**67.7**
Total Small Farm	**2**	**0.0**	**68**	**0.0**
TOTAL LOANS	**4,969**	**100.0**	**1,187,165**	**100.0**
Note: Discrepancies in dollar amount totals are possible due to rounding				

A detailed discussion of the facts and data supporting the overall conclusions regarding Comerica's Lending Test is presented in the Conclusions with Respect to Performance Criteria section for each AA.

Geographic Distribution of Loans

The overall geographic distribution of lending reflects excellent penetration throughout the Texas' AAs. This performance is consistent across Comerica's Dallas-Fort Worth Metropolitan and Houston Metropolitan AAs.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's overall lending reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. This performance is consistent with both the Dallas-Fort Worth Metropolitan AA and the Houston Metropolitan AA.

Community Development Lending

Comerica is a leader in making CD loans in the state of Texas. As reflected in Table 47, the bank originated 189 CD loans for a total of $697.8 million, which comprises 23.5 percent and 18.6 percent of the bank-wide CD loan volume by number and dollar amount, respectively. The level of CD lending in the Dallas-Fort Worth Metropolitan and Houston Metropolitan AAs is excellent.

CD lending levels in the state of Texas decreased since the prior evaluation; however, two factors impacting lending levels must be considered. First, Comerica was heavily involved in the SBA's PPP through May 2021; as such, these loans have rolled off the portfolio as they were paid off. Second, this review period is nine months shorter than the prior evaluation's review period. Adjusting for those factors, Comerica's CD lending in Texas remained consistent with the prior evaluation. It is noteworthy that this level of CD lending demonstrates the bank's commitment and efforts to meet CD needs given the contraction of Comerica's total assets by 14.5 percent and gross loans by 10.5 percent since the prior evaluation.

CD loans originated by the bank during the review period were extended for a variety of purposes, as noted in Table 47. While Comerica originated loans in every CD area, it placed special emphasis on economic development loans that support small businesses, which aligns with the bank's strategic focus and demonstrates intentional efforts to serve its AAs in ways that reflect lenders' expertise.

Table 47

Community Development Lending Texas Assessment Areas		
Purpose	**#**	**$(000)**
Affordable Housing	7	74,587
Community Services	11	12,538
Economic Development	165	586,896
Revitalization and Stabilization	6	23,750
Total	**189**	**697,771**
Note: Discrepancies in dollar amount totals are possible due to rounding		

INVESTMENT TEST

Comerica's Investment Test in the state of Texas is rated Outstanding. The Investment Test conclusions in the Dallas-Fort Worth Metropolitan and Houston Metropolitan AAs are excellent and consistent with the overall state rating. Greater weight was given to the Dallas-Fort Worth Metropolitan AA, as the majority of the bank's CD investments and donations in the state of Texas occurred in that AA. The bank's performance in the AAs that received limited-scope reviews is consistent with the performance in the state of Texas.

Comerica is often in a leadership position, as it has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors. The bank's significant use of innovative and/or complex investments exhibits excellent responsiveness to the credit and CD needs of its AAs. As illustrated in Table 48, the bank made a total of 342 CD qualified donations and investments in their Texas AAs, totaling $167.8 million. Comerica invested $23.4 million (66.0 percent) more during this review period compared to the prior evaluation's review period. This is especially notable considering the 14.5 percent contraction in total assets since the prior evaluation as well as the shorter review period.

The majority of the investments and donations targeted specific AAs; however, Comerica made four qualified CD investments in the broader statewide region, totaling $5.3 million. The bank invested in a LIHTC project to further affordable housing efforts in the state, another investment to a Small Business Investment Company, and two equity investments to provide small businesses in Texas access to capital. Specific details regarding CD-qualified investments and donations within the Texas' AAs can be found in the Conclusions with Respect to Performance Tests section for each AA.

Table 48

Investments, Grants, and Donations Texas Assessment Areas								
Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	51	92,078	10	59,680	7	144	68	151,903
Community Services	0	0	0	0	190	2,066	190	2,066
Economic Development	16	10,093	1	3,000	57	674	74	13,767
Revitalization and Stabilization	0	0	0	0	10	72	10	72
Total	**67**	**102,171**	**11**	**62,680**	**264**	**2,956**	**342**	**167,807**

1 Book value of investment
2 Original market value of investment
Note: Discrepancies in dollar amount totals are possible due to rounding

SERVICE TEST

Comerica's performance under the Service Test in the state of Texas is High Satisfactory. The Service Test conclusions in the Dallas-Fort Worth Metropolitan and Houston Metropolitan AAs are considered good and consistent with the overall state rating. Generally, Comerica's performance in the AAs that received limited-scope reviews is consistent with the performance in the state of Texas. Details of the bank's explicit retail and CD services can be found in the Conclusions with Respect to Performance Tests section for each AA.

Retail Services

Branch locations, drive-through facilities, and alternative delivery systems, such as online and mobile banking, are reasonably accessible to geographies and individuals of different income levels in the bank's AAs. Of Comerica's 114 full-service branches and 113 full-service ATMs in the state of Texas, 33 branches and 33 ATMs are in LMI tracts, which aligns reasonably with the distribution of census tracts, households, and businesses. Refer to Table 49 for the distribution of Texas branches and full-service ATMs by income level of geography.

Table 49

Branch and Full-Service ATM Locations Texas Assessment Areas								
Tract Income	Census Tracts		% of Households	% of Businesses	Branches		Full-Service ATMs	
	#	%			#	%	#	%
Low	415	10.5	9.1	6.4	9	7.9	9	8.0
Moderate	1,037	26.2	25.1	20.6	24	21.1	24	21.2
Middle	1,111	28.1	30.0	28.6	32	28.1	33	29.2
Upper	1,301	32.9	34.7	43.4	46	40.4	44	38.9
Unknown	93	2.4	1.2	1.2	3	2.6	3	2.7
Total	3,957	**100.0**	**100.0**	**100.0**	**114**	**100.0**	**113**	**100.0**

Changes in Branch Locations						
Tract Income	**Low**	**Moderate**	**Middle**	**Upper**	**Unknown**	**Total**
Openings (#)	0	1	2	1	0	4
Closings (#)	0	2	0	3	0	5
Net Change	**0**	**(1)**	**2**	**(2)**	**0**	**(1)**

Note: Discrepancies in percentage totals possible due to rounding.

Comerica's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. Moreover, Comerica's operations and product and service offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Banking Services section of this evaluation.

Community Development Services

Comerica is a leader in providing CD services in the state of Texas. Provision of CD services in the bank's Dallas-Fort Worth Metropolitan and Houston Metropolitan AAs is consistent with the overall state rating. During the review period, bank representatives provided 1,272 services, totaling 4,883 hours, within its Texas AAs. The bank's directors, officers, and personnel are involved with numerous organizations that extend CD services to LMI individuals and/or geographies. Due to the nine-month difference in review period, examiners broke down activity and hours served per month and found that Comerica increased the number of hours served per month during the current review period by 24.2 percent. This indicates Comerica's strong commitment to providing CD services remains. The bank's significant efforts to promote CD are noted through board participation, financial literacy, and entrepreneurship training.

Table 50

Community Development Services Texas Assessment Areas		
Purpose	**#**	**Hours**
Affordable Housing	0	0
Community Services	1,272	4,883
Economic Development	0	0
Revitalize and Stabilize	0	0
Total	**1,272**	**4,883**

DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA

- The Dallas-Fort Worth Metropolitan AA consists of the entirety of Collin, Dallas, Denton, Ellis, Rockwall, and Tarrant counties in Texas. These counties make up a portion of the Dallas-Fort Worth-Arlington, TX MSA that includes five other counties. See Appendix A for an AA map and Appendix B for additional demographic data.
- There have been no changes to the delineation of the AA since the previous evaluation.
- The AA is comprised of 1,572 total census tracts, of which 9.5 percent are designated as low-income, 26.0 percent are moderate-income, 28.9 percent are middle-income, 34.0 percent are upper-income, and 1.5 percent are designated as unknown-income.
- The bank operates 56 full-service branches in the AA, including six located in low-income, nine in moderate-income, 21 in middle-income, and 20 in upper-income census tracts.
- According to the FDIC Deposit Market Share Report as of June 30, 2024, the bank held 0.8 percent of the deposit market share, ranking 15th out of 163 FDIC-insured depository institutions operating in the AA.
- In 2024, the bank ranked 89th out of 952 HMDA reporters in the AA originating or purchasing 325 HMDA-reportable loans, and 22nd out of 306 CRA reporters with 707 CRA small business loans.
- Community contacts indicated a need for loans to small and start-up businesses, as well as financial education among entrepreneurs and potential home buyers. Additionally, a significant need for affordable housing was noted.

Table 51

Population Change Assessment Area: Dallas-Fort Worth Metropolitan			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Dallas-Fort Worth Metropolitan	6,236,189	6,995,340	12.2
Collin County, TX	862,215	1,064,465	23.5
Dallas County, TX	2,485,003	2,613,539	5.2
Denton County, TX	731,851	906,422	23.9
Ellis County, TX	157,058	192,455	22.5
Rockwall County, TX	85,536	107,819	26.1
Tarrant County, TX	1,914,526	2,110,640	10.2
Dallas-Plano-Irving, TX MD	4,519,004	5,129,966	13.5
Fort Worth-Arlington-Grapevine, TX MD	2,252,637	2,507,421	11.3
Texas	26,538,614	29,145,505	9.8

Source: 2020 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey

- Population trends between 2015 and 2020 reflect significant growth throughout the AA. The population growth in the AA exceeded the statewide growth rates of 9.8 percent. In most AA counties, growth more than doubled the state growth rate; however, growth in Dallas and Tarrant counties is notably lower than others in the AA. These counties are centrally located in Dallas and Fort Worth and contain the core of the respective metropolitan areas. The growth patterns indicate residents find the suburban portions of the MSA to be more desirable locations for individuals and families to reside.

- A local community leader attributed the rapid growth in the area to a thriving economy with ample high paying jobs from multiple businesses moving to the area.
- Despite these opportunities, approximately 34.1 percent of the AA population reside in LMI census tracts, and 39.2 percent of families in this AA are considered LMI.

Table 52

Median Family Income Change Assessment Area: Dallas-Fort Worth Metropolitan			
Area	**2015 Median Family Income ($)**	**2020 Median Family Income ($)**	**Percent Change**
Dallas-Fort Worth Metropolitan	77,599	86,033	10.9
Collin County, TX	110,174	118,341	7.4
Dallas County, TX	61,072	69,689	14.1
Denton County, TX	99,628	111,436	11.9
Ellis County, TX	78,280	89,870	14.8
Rockwall County, TX	104,958	113,658	8.3
Tarrant County, TX	76,367	82,856	8.5
Dallas-Plano-Irving, TX MD	77,736	88,315	13.6
Fort Worth-Arlington-Grapevine, TX MD	75,758	82,649	9.1
Texas	68,523	76,073	11.0

Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- As shown in the table above, MFI in the AA exceeds that of the state and grew at a comparable rate as the state's MFI. However, notable disparities exist between the various AA counties.
- Dallas County, the largest county in the AA, experienced moderate growth (14.1 percent) in MFI between 2015 to 2020. However, it has lowest MFI in the AA at $69,689 and is the only AA county with an MFI lower than the statewide MFI.
- Collin county has the highest MFI in the AA, exceeding Dallas county's MFI by approximately 41.1 percent. This highlights the income disparity between various geographies in the AA.
- According to FFIEC Census data, 8.2 percent of AA families live below the poverty line. Dallas County has the highest rate of families living below the poverty line at 11.4 percent, which slightly exceeds the statewide rate at 10.9 percent.
- Despite increases in MFI, a local contact reported that inflation is causing families to continue facing financial difficulties. Another contact noted that LMI individuals are more likely to use predatory lenders or cash agencies that charge significant fees because they are more accessible than traditional banking centers. The contact suggested that banking centers located in LMI areas provide an economically sound alternative and benefit the AA.

Table 53

Housing Cost Burden Assessment Area: Dallas-Fort Worth Metropolitan						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Dallas-Fort Worth Metropolitan	83.4	53.5	43.8	65.5	37.8	20.6
Collin County, TX	85.2	68.1	40.2	71.2	50.5	19.8
Dallas County, TX	81.6	46.6	43.7	63.7	32.8	23.2
Denton County, TX	88.4	58.5	42.7	70.7	50.0	19.0
Ellis County, TX	78.1	48.7	42.1	59.3	32.0	18.0
Rockwall County, TX	78.1	59.3	39.9	72.6	43.7	17.3
Tarrant County, TX	84.9	56.8	46.2	65.2	35.8	19.4
Dallas-Plano-Irving, TX MD	82.7	51.6	43.0	65.1	38.0	21.1
Fort Worth-Arlington-Grapevine, TX MD	83.7	55.1	45.4	61.9	34.6	18.9
Texas	79.4	49.8	43.5	59.0	32.7	19.4

Cost burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

- Housing within the AA for low-income renters is a substantially greater burden than the burden on homeowners at any other level.
- Overall, the cost burden for homeowners and renters in the AA is slightly above the housing cost burden for homeowners and renters statewide.
- The 2024 housing affordability ratio[5] in the AA, at 30.3 percent, is below the statewide ratio of 34.1 percent. This indicates AA housing is less affordable than statewide housing.
- A community contact reported a shortage of affordable housing in the AA, noting that housing affordability is a significant issue impacting LMI households. The contact further noted that gentrification coupled with the growing population has reduced the affordable housing stock. The increasing interest rate environment, and resulting higher mortgage payments, poses additional challenges for LMI families to purchase a home. Moreover, the contact noted that a significant portion of the AA population is unbanked or underbanked. This lack of banking relationship results in challenges establishing credit history and further complicating the home buying process.

[5] The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

Table 54

Unemployment Rates Assessment Area: Dallas-Fort Worth Metropolitan					
Area	**2019**	**2020**	**2021**	**2022**	**2023**
Dallas-Fort Worth Metropolitan	3.3	7.2	5.1	3.6	3.7
Collin County, TX	3.1	6.3	4.4	3.2	3.5
Dallas County, TX	3.5	7.8	5.6	3.8	3.8
Denton County, TX	3.0	6.4	4.4	3.3	3.5
Ellis County, TX	3.1	6.0	4.5	3.5	3.7
Rockwall County, TX	3.1	5.9	4.4	3.4	3.6
Tarrant County, TX	3.3	7.4	5.3	3.7	3.7
Dallas-Plano-Irving, TX MD	3.3	7.0	5.0	3.5	3.7
Fort Worth-Arlington-Grapevine, TX MD	3.3	7.2	5.2	3.6	3.7
Texas	3.5	7.7	5.6	3.9	3.9
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- Unemployment rates for the AA and its counties between 2019 and 2023 are comparable to the statewide rate.
- Unemployment rates more than doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off employees due to the statewide stay-at-home and social distancing orders and expectations. Notably the AA's two largest counties, Dallas and Tarrant, had the highest unemployment rates during the COVID-19 pandemic in 2020. Despite the increase in unemployment rates, community contacts stated the COVID-19 pandemic's impacts to the AA have not been long lasting, and wholistically speaking, the AA and its economy have recovered. Since 2022, the unemployment rates have stabilized and returned to rates similar to pre-pandemic levels.
- Major employment industries within the AA include healthcare and social assistance, retail trade, and accommodation and food services.
- Major employers in the AA represent diverse segments of the economy, including manufacturing (Lockheed Martin Corporation and Texas Instruments Incorporated), healthcare (Baylor Scott & White Health, Medical City Healthcare, Parkland Hospital, Texas Health Resources, and UT Southwestern Medical Center), and trade and transportation (Amazon, American Airlines, Southwest Airlines, UPS, and Wal-Mart).

The following table detail selected characteristics of the AA.

Table 55

2024 Dallas-Fort Worth Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	150	9.5	133,215	8.0	34,671	26.0	364,225	22.0
Moderate	409	26.0	393,808	23.8	54,122	13.7	285,539	17.2
Middle	454	28.9	503,984	30.4	29,654	5.9	318,348	19.2
Upper	535	34.0	618,103	37.3	16,723	2.7	689,234	41.6
Unknown	24	1.5	8,236	0.5	1,272	15.4	0	0.0
Total AA	**1,572**	**100.0**	**1,657,346**	**100.0**	**136,442**	**8.2**	**1,657,346**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	249,345	62,642	4.4	25.1	159,061	63.8	27,642	11.1
Moderate	650,771	276,691	19.6	42.5	320,530	49.3	53,550	8.2
Middle	793,625	447,020	31.7	56.3	295,959	37.3	50,646	6.4
Upper	884,505	618,809	43.9	70.0	215,382	24.4	50,314	5.7
Unknown	23,757	5,212	0.4	21.9	15,068	63.4	3,477	14.6
Total AA	**2,602,003**	**1,410,374**	**100.0**	**54.2**	**1,006,000**	**38.7**	**185,629**	**7.1**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	18,973	5.5	17,434	5.4	1,412	6.5	127	3.2
Moderate	68,728	19.9	63,095	19.7	5,093	23.5	540	13.4
Middle	107,015	30.9	99,227	31.0	6,773	31.2	1,015	25.3
Upper	148,618	42.9	138,238	43.1	8,072	37.2	2,308	57.5
Unknown	2,873	0.8	2,521	0.8	325	1.5	27	0.7
Total AA	**346,207**	**100.0**	**320,515**	**100.0**	**21,675**	**100.0**	**4,017**	**100.0**
Percentage of Total Businesses:				**92.6**		**6.3**		**1.2**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	68	2.5	67	2.5	1	3.2	0	0.0
Moderate	349	12.9	343	12.8	6	19.4	0	0.0
Middle	938	34.5	927	34.6	10	32.3	1	33.3
Upper	1,343	49.5	1,327	49.5	14	45.2	2	66.7
Unknown	17	0.6	17	0.6	0	0.0	0	0.0
Total AA	**2,715**	**100.0**	**2,681**	**100.0**	**31**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**98.7**		**1.1**		**0.1**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Comerica's lending performance in the Dallas-Fort Worth Metropolitan AA is excellent. The bank's small business lending generally carried more weight as this product comprised the largest volume of lending in the AA. During the review period, the volume of Multifamily, Other Purpose Closed/Exempt, and Purpose Not Applicable loan originations would not have allowed for a meaningful analysis. Therefore, a separate evaluation for these products was not conducted.

Lending Activity

The bank's lending activity in the Dallas-Fort Worth Metropolitan AA reflects good responsiveness to AA credit needs. Comerica makes use of innovative and/or flexible lending practices to serve the AA communities through its participation in numerous industry-recognized, government-guaranteed programs. During the review period, Comerica supported small businesses by originating 80 SBA loans and 450 small business micro loans for a combined total of 130.4 million. Additionally, Comerica partnered with the National Faith HomeBuyers Program to provide flexible lending and downpayment assistance for first-time home buyers in the area. As previously discussed, affordable housing needed in the AA and the bank's active engagement in these programs demonstrates Comerica's record of serving the credit needs of low-income individuals.

Comerica extended 718 home mortgage and 1,505 small business loans between January 1, 2023, and December 31, 2024. The loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects excellent penetration throughout the AA. Comerica's lending in middle- and upper-income geographies did not affect conclusions reached about the bank's lending in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA-reportable loans reflects excellent penetration throughout the AA. The bank's distribution of HMDA-reportable loans among LMI census tracts exceeds the performance of aggregate HMDA reporters and is comparable to demographic data for both 2023 and 2024.

Home Purchase Lending

The geographic distribution of home purchase lending is excellent. The distribution of 2023 home purchase loans among low-income census tracts is comparable to aggregate lending and the demographic figure. In 2024, the bank's lending among low-income census tracts exceeded the aggregate lenders as well as the demographic figure (owner-occupied housing units in low- or moderate-income census tracts, respectively). Among moderate-income census tracts, the bank's lending substantially exceeded aggregate lenders in both 2023 and 2024, while also exceeding the demographic figure. This performance indicates concentrated efforts to lend in LMI census tracts and successful results of the efforts.

Home Refinance Lending

The geographic distribution of home refinance lending is good. Overall, Comerica's home refinance lending is comparable to both aggregate HMDA reporters and the demographic, indicating the bank has made reasonable efforts to meet the home refinancing credit needs of the AA, particularly in LMI census tracts. The distribution of lending among low-income census tracts is slightly above that of aggregate lending in 2023, and comparable to aggregate lending in 2024. In both 2023 and 2024, the bank's lending is comparable to the demographic figure. Among moderate-income census tracts, the bank's lending is comparable to aggregate lending in 2023, and is above aggregate lending in 2024, while being comparable to the demographic figure in both years.

Home Improvement Lending

The geographic distribution of home improvement lending is excellent. The bank's performance indicates concentrated efforts to originate home improvement loans in LMI census tracts and successful results of the efforts. The bank's distribution of home improvement loans among low-income census exceeds the performance of aggregate HMDA reporters in 2023, while substantially exceeding the performance of aggregate HMDA reporters in 2024. In both 2023 and 2024 the bank's lending exceeded the demographic figure for the AA. Among moderate-income census tracts, the bank's distribution of home improvement lending again exceeded the performance of aggregate HMDA reporters in 2023 and substantially exceeded aggregate HMDA reporter's lending in 2024. Comerica's home improvement lending exceeded the demographic figure in 2024, was comparable to the demographic in 2023.

Other Purpose Lines of Credit Lending

The geographic distribution of other purpose lines of credit lending is excellent. The bank's distribution of other purpose lines of credit lending among low-income census tracts exceeds the performance of aggregate HMDA reporters in 2023, and mirrors aggregate lenders in 2024. Comerica's other purpose lines of credit lending was comparable to the demographic figure in both years. Among moderate-income census tracts, the bank substantially exceeded aggregate HMDA reporter's lending in 2023, and exceeded aggregate lending in 2024, while both years were comparable to the demographic figure.

Table 56A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Dallas-Fort Worth Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	3.4	3.7	564	2.4	2.2	1	5.6	3.5	140	1.2	2.1	4.4
Moderate	7	24.1	14.0	2,846	12.3	9.7	6	33.3	14.3	1,023	8.5	10.0	19.6
Middle	4	13.8	36.1	1,154	5.0	31.5	2	11.1	37.8	269	2.2	32.9	31.7
Upper	17	58.6	45.9	18,610	80.3	56.3	9	50.0	43.8	10,568	88.1	54.4	43.9
Unknown	0	0.0	0.3	0	0.0	0.4	0	0.0	0.5	0	0.0	0.6	0.4
Total	29	100.0	100.0	23,174	100.0	100.0	18	100.0	100.0	12,000	100.0	100.0	100.0
Refinance Loans													
Low	6	4.1	3.9	519	1.5	2.2	4	2.9	3.5	888	2.1	2.0	4.4
Moderate	18	12.4	17.3	2,490	7.0	11.9	22	16.1	14.8	3,375	8.1	9.5	19.6
Middle	42	29.0	33.7	8,119	22.8	26.8	33	24.1	33.5	5,711	13.7	27.6	31.7
Upper	79	54.5	44.7	24,550	68.8	58.8	78	56.9	47.8	31,824	76.1	60.5	43.9
Unknown	0	0.0	0.3	0	0.0	0.3	0	0.0	0.4	0	0.0	0.4	0.4
Total	145	100.0	100.0	35,678	100.0	100.0	137	100.0	100.0	41,798	100.0	100.0	100.0
Home Improvement Loans													
Low	5	4.8	2.0	483	2.9	1.7	7	8.0	2.2	496	4.7	1.5	4.4
Moderate	16	15.2	10.2	1,922	11.4	7.5	23	26.1	11.6	1,771	16.8	8.1	19.6
Middle	24	22.9	26.4	3,079	18.3	19.5	26	29.5	27.9	3,041	28.9	21.8	31.7
Upper	60	57.1	60.7	11,354	67.4	70.6	32	36.4	57.7	5,220	49.6	67.9	43.9
Unknown	0	0.0	0.6	0	0.0	0.7	0	0.0	0.5	0	0.0	0.8	0.4
Total	105	100.0	100.0	16,838	100.0	100.0	88	100.0	100.0	10,528	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	23.7	0	0.0	13.8	0	0.0	18.0	0	0.0	7.4	17.4
Moderate	3	60.0	28.0	10,100	23.3	18.0	2	100.0	33.6	5,063	100.0	26.6	29.2
Middle	1	20.0	25.8	2,145	5.0	29.4	0	0.0	25.4	0	0.0	29.6	28.2
Upper	1	20.0	20.4	31,068	71.7	31.6	0	0.0	20.9	0	0.0	34.5	23.1
Unknown	0	0.0	2.1	0	0.0	7.2	0	0.0	2.1	0	0.0	2.0	2.1
Total	5	100.0	100.0	43,313	100.0	100.0	2	100.0	100.0	5,063	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	16	4.1	3.6	1,959	1.4	3.3	13	4.0	3.4	1,569	1.9	2.6	4.4
Moderate	65	16.5	14.3	20,351	14.5	10.6	63	19.4	14.3	12,402	15.0	11.6	19.6
Middle	97	24.7	35.1	18,267	13.0	30.5	83	25.5	36.4	12,108	14.6	31.5	31.7
Upper	215	54.7	46.6	99,838	71.1	54.6	166	51.1	45.3	56,584	68.5	53.5	43.9
Unknown	0	0.0	0.3	0	0.0	1.0	0	0.0	0.5	0	0.0	0.7	0.4
Total	393	100.0	100.0	140,415	100.0	100.0	325	100.0	100.0	82,663	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 56B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Dallas-Fort Worth Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	4	3.7	1.2	393	2.1	0.6	1	1.3	1.3	45	0.3	0.7	4.4
Moderate	21	19.6	8.1	2,993	16.3	4.9	9	11.5	8.9	1,095	8.4	5.8	19.6
Middle	25	23.4	25.8	3,681	20.0	17.0	21	26.9	27.1	2,987	22.8	17.5	31.7
Upper	57	53.3	64.4	11,338	61.6	76.9	47	60.3	62.4	8,972	68.5	75.6	43.9
Unknown	0	0.0	0.5	0	0.0	0.5	0	0.0	0.3	0	0.0	0.5	0.4
Total	107	100.0	100.0	18,405	100.0	100.0	78	100.0	100.0	13,099	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.7	0	0.0	1.7	0	0.0	3.1	0	0.0	2.2	4.4
Moderate	0	0.0	14.3	0	0.0	10.1	1	50.0	15.4	75	42.9	11.0	19.6
Middle	1	50.0	30.3	89	3.0	20.1	1	50.0	31.3	100	57.1	22.1	31.7
Upper	1	50.0	52.2	2,918	97.0	67.6	0	0.0	49.9	0	0.0	64.4	43.9
Unknown	0	0.0	0.5	0	0.0	0.6	0	0.0	0.4	0	0.0	0.3	0.4
Total	2	100.0	100.0	3,007	100.0	100.0	2	100.0	100.0	175	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	7.0	0	0.0	5.3	0	0.0	7.9	0	0.0	5.8	4.4
Moderate	0	0.0	29.4	0	0.0	21.5	0	0.0	26.2	0	0.0	17.6	19.6
Middle	0	0.0	41.5	0	0.0	39.6	0	0.0	41.9	0	0.0	36.5	31.7
Upper	0	0.0	22.1	0	0.0	33.5	0	0.0	23.8	0	0.0	38.6	43.9
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.3	0	0.0	1.6	0.4
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the AA. The bank's performance indicates significant efforts to meet and exceed the credit needs of small businesses operating in LMI census tracts. Comerica's small business lending among low-income census tracts more than doubles aggregate CRA-reporters as well as exceeding the number of total businesses (the demographic figure) in both 2023 and 2024. Among moderate-income census tracts, Comerica's lending exceeds aggregate CRA-reporters as well as the demographic figure for both 2023 and 2024.

Table 57

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Dallas-Fort Worth Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	80	10.0	4.4	18,111	9.0	4.3	70	9.9	4.0	16,592	8.9	4.1	5.5
Moderate	214	26.8	17.5	52,989	26.4	18.2	186	26.3	17.0	44,707	24.0	17.8	19.9
Middle	234	29.3	28.4	59,406	29.6	28.1	189	26.7	28.0	53,110	28.6	27.6	30.9
Upper	261	32.7	48.5	67,445	33.6	48.2	251	35.5	49.9	67,591	36.4	49.2	42.9
Unknown	9	1.1	0.9	2,613	1.3	1.2	11	1.6	0.9	3,910	2.1	1.1	0.8
Total	798	100.0	100.0	200,564	100.0	100.0	707	100.0	100.0	185,910	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of lending to borrowers reflects a good penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's lending to middle- and upper-income borrowers did not affect conclusions reached about the bank's lending to LMI borrowers.

Residential Real Estate (HMDA) Lending

The distribution of HMDA lending by borrower income in the AA is excellent when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA reporters with loan originations or purchases in the AA. As previously indicated, there are numerous challenges facing LMI borrowers, including the higher payments resulting from increased interest rates and shortage of affordable housing stock in the AA. Notwithstanding these challenges, the bank significantly outperformed aggregate HMDA reporters in both 2023 and 2024. While Comerica's performance falls below the demographic (percentage of AA families classified as low-income), it reflects favorably on the bank's efforts to meet the credit needs of low-income borrowers given the performance context.

Among moderate-income borrowers, Comerica's performance exceeded that of aggregate HMDA reporters in 2023 and is comparable to aggregate HMDA reporters in 2024. The bank's performance again fell short of the of the demographic, which more likely reflects economic challenges in the AA, rather than lack of effort to reach moderate-income borrowers. Such challenges include lack of affordable housing stock and increased housing payments due to rising interest rates. In addition, the unbanked and underbanked population limit Comerica's and other HMDA reporters' ability to meet the demographic.

Table 58A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Dallas-Fort Worth Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.6	0	0.0	0.7	2	11.1	2.0	214	1.8	1.0	22.0
Moderate	2	6.9	11.4	435	1.9	7.1	2	11.1	11.8	137	1.1	7.4	17.2
Middle	5	17.2	19.8	1,660	7.2	16.0	2	11.1	19.0	227	1.9	15.6	19.2
Upper	15	51.7	40.8	12,646	54.6	51.7	12	66.7	38.3	11,422	95.2	48.5	41.6
Unknown	7	24.1	26.3	8,433	36.4	24.5	0	0.0	28.8	0	0.0	27.5	0.0
Total	29	100.0	100.0	23,174	100.0	100.0	18	100.0	100.0	12,000	100.0	100.0	100.0
Refinance Loans													
Low	13	9.0	8.4	1,341	3.8	4.2	23	16.8	7.2	2,358	5.6	3.0	22.0
Moderate	27	18.6	16.9	4,147	11.6	10.0	15	10.9	12.9	1,776	4.2	6.8	17.2
Middle	24	16.6	20.1	4,469	12.5	15.2	23	16.8	16.7	3,851	9.2	11.6	19.2
Upper	78	53.8	39.6	25,195	70.6	51.2	67	48.9	39.5	30,298	72.5	49.8	41.6
Unknown	3	2.1	15.0	526	1.5	19.5	9	6.6	23.7	3,515	8.4	28.7	0.0
Total	145	100.0	100.0	35,678	100.0	100.0	137	100.0	100.0	41,798	100.0	100.0	100.0
Home Improvement Loans													
Low	16	15.2	4.4	1,101	6.5	2.5	23	26.1	5.8	1,403	13.3	3.0	22.0
Moderate	14	13.3	10.4	1,334	7.9	6.1	11	12.5	12.1	810	7.7	7.5	17.2
Middle	16	15.2	18.6	2,087	12.4	12.4	20	22.7	18.0	2,235	21.2	11.9	19.2
Upper	54	51.4	63.9	11,679	69.4	73.5	30	34.1	58.2	5,555	52.8	67.6	41.6
Unknown	5	4.8	2.8	637	3.8	5.4	4	4.5	5.9	525	5.0	10.0	0.0
Total	105	100.0	100.0	16,838	100.0	100.0	88	100.0	100.0	10,528	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	39	10.1	2.8	3,339	3.4	1.1	55	17.0	3.2	4,314	5.6	1.4	22.0
Moderate	59	15.2	12.0	8,517	8.8	7.3	39	12.1	12.0	3,550	4.6	7.4	17.2
Middle	73	18.8	19.7	12,042	12.4	15.8	57	17.6	18.6	7,592	9.8	14.9	19.2
Upper	200	51.5	41.9	63,343	65.2	52.2	157	48.6	39.6	57,804	74.5	49.2	41.6
Unknown	17	4.4	23.6	9,861	10.2	23.6	15	4.6	26.5	4,340	5.6	27.2	0.0
Total	388	100.0	100.0	97,102	100.0	100.0	323	100.0	100.0	77,600	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table 58B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Dallas-Fort Worth Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	10	9.3	5.9	897	4.9	3.7	6	7.7	5.0	264	2.0	2.8	22.0
Moderate	16	15.0	10.2	2,601	14.1	5.4	10	12.8	11.0	727	5.6	5.8	17.2
Middle	27	25.2	20.0	3,737	20.3	11.5	12	15.4	19.7	1,279	9.8	11.6	19.2
Upper	52	48.6	62.0	10,905	59.3	75.4	48	61.5	57.7	10,529	80.4	72.2	41.6
Unknown	2	1.9	2.0	265	1.4	4.0	2	2.6	6.6	300	2.3	7.7	0.0
Total	107	100.0	100.0	18,405	100.0	100.0	78	100.0	100.0	13,099	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	6.0	0	0.0	2.9	1	50.0	8.9	75	42.9	5.1	22.0
Moderate	0	0.0	15.1	0	0.0	8.6	1	50.0	16.0	100	57.1	10.5	17.2
Middle	1	50.0	20.2	89	3.0	11.7	0	0.0	20.6	0	0.0	13.2	19.2
Upper	1	50.0	49.5	2,918	97.0	60.4	0	0.0	45.7	0	0.0	58.2	41.6
Unknown	0	0.0	9.3	0	0.0	16.5	0	0.0	8.7	0	0.0	13.1	0.0
Total	2	100.0	100.0	3,007	100.0	100.0	2	100.0	100.0	175	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.1	0	0.0	0.6	0	0.0	0.5	0	0.0	0.4	22.0
Moderate	0	0.0	0.8	0	0.0	0.6	0	0.0	1.0	0	0.0	1.3	17.2
Middle	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	19.2
Upper	0	0.0	0.1	0	0.0	0.6	0	0.0	1.7	0	0.0	14.6	41.6
Unknown	0	0.0	97.8	0	0.0	98.0	0	0.0	96.4	0	0.0	83.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

Comerica's distribution of small business loans by revenue size of businesses is adequate. The distribution of 2023 and 2024 loan originations to businesses with revenues of $1 million or less is below the performance of aggregate lenders when considering the number of loans as well as the dollar amount. Both the bank and the aggregate lenders were significantly below the 92.6 percent of businesses within the AA that reported revenues of $1 million or less, however, the demographic figure is not presumed to be representative of loan demand. While the bank was significantly below aggregate lenders, the majority of the loans extended during the review period were in amounts less than $250,000. A local contact noted that there is a significant need for small business loans, especially for start-up businesses. Comerica originated 472 loans to start-up businesses in the Dallas-Fort Worth Metropolitan AA during the review period. Start-up businesses as well as small businesses typically require smaller dollar loans.

Table 59

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Dallas-Fort Worth Metropolitan													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	251	31.5	52.7	37,847	18.9	33.6	220	31.1	52.0	34,040	18.3	33.9	92.6
Over $1 Million	441	55.3		141,471	70.5		410	58.0		133,144	71.6		6.3
Revenue Unknown	106	13.3		21,246	10.6		77	10.9		18,726	10.1		1.2
Total	798	100.0		200,564	100.0		707	100.0		185,910	100.0		100.0
By Loan Size													
$100,000 or Less	354	44.4	94.9	23,365	11.6	43.9	305	43.1	94.8	20,822	11.2	44.3	
$100,001 - $250,000	194	24.3	2.8	38,906	19.4	15.3	171	24.2	2.9	34,696	18.7	15.3	
$250,001 - $1 Million	250	31.3	2.3	138,293	69.0	40.8	231	32.7	2.3	130,392	70.1	40.4	
Total	798	100.0	100.0	200,564	100.0	100.0	707	100.0	100.0	185,910	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	169	67.3		9,939	26.3		150	68.2		9,763	28.7		
$100,001 - $250,000	40	15.9		7,521	19.9		38	17.3		7,403	21.7		
$250,001 - $1 Million	42	16.7		20,387	53.9		32	14.5		16,874	49.6		
Total	251	100.0		37,847	100.0		220	100.0		34,040	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

Comerica is a leader in making CD loans in the AA. During the review period, the bank originated a total of 104 qualifying CD loans, totaling $391.7 million. When compared to the previous evaluation, the number and dollar amount of CD loans decreased; however, this quantitative decrease is attributable to the cessation of the SBA's PPP, shorter review period than the previous evaluation, and 14.5 percent contraction of the bank's total assets. The bank's CD lending efforts in the AA in number of loans and dollar amount are comparable to the prior evaluation after removing the SBA's PPP lending and considering the shorter review period. This demonstrates Comerica's continued commitment to serve the community through CD lending. Comerica is highly involved in CD activity in the Dallas-Fort Worth Metropolitan AA and originated several loans which are considered highly impactful to the AA's needs.

Some notable examples of the bank's CD lending activities include:

- A $15 million dollar loan to fund a multifamily housing complex for LMI individuals in the AA. Given the shortage of affordable housing units in the AA and comments from community leaders highlighting this need, this loan is considered highly impactful to the AA and demonstrates Comerica's commitment to meeting housing needs of residents.
- Numerous lines of credit to support ongoing operations of manufacturers (e.g., fixtures, medical devices) that are employing LMI individuals and promoting economic development in LMI geographies.

- Comerica opened 'BusinessHQ' in May 2023, which is a collaborative space established in Dallas-Fort Worth that supports small businesses in the underserved south Dallas region. Comerica provides business owners with no-cost coworking space, tailored assistance, and resources to meet their specific needs.

Table 60

Community Development Lending Assessment Area: Dallas-Fort Worth Metropolitan		
Purpose	**#**	**$(000)**
Affordable Housing	3	31,814
Community Services	2	1,350
Economic Development	99	359,495
Revitalization and Stabilization	0	0
Total	**104**	**391,659**
Note: Discrepancies in dollar volume totals are possible due to rounding.		

INVESTMENT TEST

Comerica's performance under the Investment Test in the Dallas-Fort Worth Metropolitan AA is excellent. The bank has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors and is often in a leadership position. Comerica makes significant use of innovative and/or complex investments to support CD initiatives, including significant work with CDFIs and unique and creative affordable housing projects. Comerica exhibits excellent responsiveness to AA needs, which is highlighted by the bank's continued efforts in affordable housing as this has been an identified need by multiple community contacts. Additionally, housing cost burden data from the U.S. Department of Housing and Urban Development (HUD) demonstrated a significant need for affordable housing.

The bank has continued to provide an excellent level of CD investments compared to the prior evaluation. Despite the shorter review period of this evaluation, the bank increased the dollar amount of total donations and investments by $40.9 million (59.8 percent) since the prior evaluation. Table 61 illustrates the breakdown of Comerica's CD investments, grants, and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the current review period, and CD donations made since the previous evaluation. Examples of notable investments and donations include:

- Twenty-four investments, totaling $102.8 million, in LIHTC-eligible funds for the construction or preservation of rent-restricted units for LMI individuals in the AA. This investment is particularly responsive given the significant need for affordable housing in the AA.
- A $500,000 dollar donation to a local nonprofit organization to support a program aiming to improve education, income, and health among LMI residents in the AA.

Table 61

Investment, Grants, and Donations Assessment Area: Dallas-Fort Worth Metropolitan								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	**$(000)**	**#**	**$(000)**	**#**	**$(000)**	**#**	**$(000)**
Affordable Housing	16	48,564	8	54,280	4	95	28	102,940
Community Services	0	0	0	0	103	1,555	103	1,555
Economic Development	5	4,433	0	0	47	489	47	4,922
Revitalization and Stabilization	0	0	0	0	2	15	2	15
Total	**21**	**52,997**	**8**	**54,280**	**151**	**2,154**	**180**	**109,432**

[1] Book value of investment
[2] Original market value of investment
Note: Discrepancies in dollar volume totals are possible due to rounding.

SERVICE TEST

The bank's performance under the Service Test in the Dallas-Fort Worth Metropolitan AA is good primarily due to Comerica's leadership in providing CD services as well as delivery systems being reasonably accessible to geographies and individuals of different income levels.

Retail Services

The bank's delivery systems are reasonably accessible to geographies of different income levels in the Dallas-Fort Worth Metropolitan AA. The distribution of the bank's 56 branch offices and 57 full-service ATMs as of June 23, 2025, was compared to the distribution of the population and businesses among the tract categories within the AA. The table below summarizes the bank's retail locations in the Dallas-Fort Worth Metropolitan AA.

Table 62

Branch and Full-Service ATM Locations Assessment Area: Dallas-Fort Worth Metropolitan							
Tract Income	**% of Geographies**	**% of Households**	**% of Businesses**	**Branches**		**Full-Service ATMs**	
				#	**%**	**#**	**%**
Low	9.5	9.2	5.5	6	10.7	6	10.5
Moderate	26.0	24.7	19.8	9	16.1	9	15.8
Middle	28.9	30.7	30.9	21	37.5	22	38.6
Upper	34.0	34.5	43.0	20	35.7	20	35.1
Unknown	1.5	0.8	0.8	0	0.0	0	0.0
Total	**100.0**	**100.0**	**100.0**	**56**	**100.0**	**57**	**100.0**

Note: Percentages may not total 100.0 percent due to rounding.

The bank opened two branches in middle-income census tracts and closed one branch in an upper-income census tract in the AA. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Moreover, banking services and hours of operations do not vary in a way that inconveniences parts of the AA, particularly in LMI geographies and/or LMI individuals. The level of branch services and hours offered are consistent throughout the AA.

Community Development Services

Comerica is a leader in providing CD services in the AA. Comerica's employees served in various capacities, with 56 different organizations offering 656 CD services that aid LMI individuals for a total of 2,842 hours. Since the prior evaluation, the number of services decreased; however, the number of hours increased when considering the length of review period. Because the prior evaluation's review period was nine months, examiners compared how many service hours Comerica employees contributed per month to draw an accurate conclusion. Examiners determined Comerica provided a comparable number of CD services, while showing an increase in service hours of 11.1 percent.

Examples of CD services in the AA include:

- Comerica employees dedicated 1,379 hours with various organizations to provide financial literacy and education to various individuals, including students and potential homebuyers.
- Additionally, employees dedicated 281 hours to specifically educate small business owners. This service is particularly notable, as this was identified by a community contact as a significant need in the AA.
- Comerica employees provided technical assistance, totaling 546 hours, to various organizations by sitting on boards of directors or otherwise dedicating their financial expertise to provide a wide range of services benefiting LMI individuals in the area.
- Over 1,600 business owners have received services through the Business HQ center Comerica operates in Dallas.

Table 63

Community Development Services Assessment Area: Dallas-Fort Worth Metropolitan		
Purpose	**#**	**Hours**
Affordable Housing	0	0
Community Services	656	2,842
Economic Development	0	0
Revitalize and Stabilize	0	0
Total	**656**	**2,842**

HOUSTON METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE HOUSTON METROPOLITAN ASSESSMENT AREA

- The bank's Houston Metropolitan AA consists of the entirety of Brazoria, Fort Bend, Galveston, Harris, and Montgomery counties in Texas. These counties make up a portion of the Houston-Pasadena-The Woodlands, TX MSA. See Appendix A for an AA map and Appendix B for additional demographic data.
- There have been no changes to the delineation of the AA since the previous evaluation.
- The AA is comprised of 1,562 total census tracts, of which 13.0 percent are designated as low-income, 24.9 percent are moderate-income, 26.0 percent are middle-income, 33.0 percent are upper-income, and 3.1 percent are designated as unknown-income.
- The bank operates 41 full-service branches in the AA, including three located in low-income, nine in moderate-income, six in middle-income, 21 in upper-income, and three in unknown-income census tracts.
- According to the FDIC Deposit Market Share Report as of June 30, 2024, the bank held 1.0 percent of the deposit market share, ranking 13th out of 101 FDIC-insured depository institutions operating in the AA.
- In 2024, the bank ranked 84th out of 922 HMDA reporters in the AA originating or purchasing 313 HMDA-reportable loans, and 24th out of 270 CRA reporters with 683 CRA small business loans.
- Community contacts noted a consistent need for access to capital for small businesses and entrepreneurs. Community contacts also noted there is also a need for affordable housing as the housing market is very constrained.

Table 64

Population Change Assessment Area: Houston Metropolitan			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Houston Metropolitan	6,157,183	6,897,080	12.0
Brazoria County, TX	331,741	372,031	12.1
Fort Bend County, TX	658,331	822,779	25.0
Galveston County, TX	308,163	350,682	13.8
Harris County, TX	4,356,362	4,731,145	8.6
Montgomery County, TX	502,586	620,443	23.5
Houston-Pasadena-The Woodlands, TX MSA	6,373,676	7,149,642	12.2
Texas	26,538,614	29,145,505	9.8

Source: 2020 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey

- Population trends between 2015 and 2020 reflect modest growth. The AA population increased faster than the statewide increase of 9.8 percent.
- Suburban areas, such as Fort Bend and Montgomery counties saw the largest percentage increase. On the other hand, Harris County, the largest and most urban county in the AA, saw the greatest increase by number of residents.
- Approximately 33.8 percent of the AA population reside in LMI census tracts, and 39.8 percent of families in this AA are considered LMI.

Table 65

Median Family Income Change Assessment Area: Houston Metropolitan			
Area	**2015 Median Family Income ($)**	**2020 Median Family Income ($)**	**Percent Change**
Houston Metropolitan	75,604	81,367	7.6
Brazoria County, TX	89,293	96,168	7.7
Fort Bend County, TX	108,399	109,870	1.4
Galveston County, TX	84,895	94,795	11.7
Harris County, TX	67,969	73,274	7.8
Montgomery County, TX	88,680	99,511	12.2
Houston-Pasadena-The Woodlands, TX MSA	75,322	81,128	7.7
Texas	68,523	76,073	11.0

Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- As shown in the table above, the AA's MFI increased at a lower rate than that of the state of Texas' MFI between 2015 and 2020. While each county in the AA experienced growth, the AA's largest county, Harris County, still has an MFI that is less than the overall state.
- According to 2020 FFIEC data, 10.6 percent of AA families live below the poverty level, which is slightly below the statewide figure at 10.9 percent. However, 12.7 percent of families in Harris County live below the poverty level, which is where 69.0 percent of the population resides.
- A community contact noted that inflation has had an overall negative impact on the economy, particularly on LMI individuals who were already struggling to afford basic necessities.

Table 66

Housing Cost Burden Assessment Area: Houston Metropolitan						
Area	**Cost Burden - Renters**			**Cost Burden - Owners**		
	Low-Income	**Moderate-Income**	**All Renters**	**Low-Income**	**Moderate-Income**	**All Owners**
Houston Metropolitan	81.9	51.8	45.3	62.1	37.8	19.9
Brazoria County, TX	80.0	37.0	40.3	50.6	30.0	17.4
Fort Bend County, TX	76.4	70.0	43.5	75.0	50.6	21.1
Galveston County, TX	81.9	50.1	43.6	59.1	34.4	17.8
Harris County, TX	82.6	50.7	46.3	62.6	37.2	20.5
Montgomery County, TX	77.8	60.6	38.3	55.8	34.6	17.4
Houston-Pasadena-The Woodlands, TX MSA	81.7	51.4	45.2	61.6	37.3	19.9
Texas	79.4	49.8	43.5	59.0	32.7	19.4

Cost burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

- The cost of housing presents a significantly greater burden on low-income renters than on homeowners at any other level. This indicates that it is more economical for low-income borrowers to purchase a home rather than rent. However, other factors, such as downpayment requirements and the high cost of homeowners and flood insurance, can act as a barrier to entry into homeownership for many low-income families.

- Overall, housing is less affordable for renters in the AA than renters in other parts of the state, as indicated by the housing cost burden ratio. For homeowners in the AA, the housing cost burden is comparable to that of the state of Texas.
- The housing affordability ratio[6] in the AA is 33.1, which is slightly below the statewide affordability ratio of 34.1 percent, indicating housing is generally less affordable in the AA compared to the state of Texas.

Table 67

Unemployment Rates Assessment Area: Houston Metropolitan					
Area	**2019**	**2020**	**2021**	**2022**	**2023**
Houston Metropolitan	3.8	8.7	6.3	4.2	4.2
Brazoria County, TX	4.2	8.6	6.8	4.6	4.4
Fort Bend County, TX	3.5	7.6	5.9	4.0	4.0
Galveston County, TX	4.1	8.8	6.6	4.4	4.3
Harris County, TX	3.9	9.0	6.4	4.3	4.3
Montgomery County, TX	3.4	7.5	5.7	4.0	3.9
Houston-Pasadena-The Woodlands, TX MSA	3.8	8.7	6.3	4.3	4.2
Texas	3.5	7.7	5.6	3.9	3.9
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- The unemployment rate in the AA is consistently comparable to the statewide unemployment rate.
- Unemployment rates doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off employees due to the statewide stay-at-home and social distancing orders. In 2021, the AA and statewide unemployment rates began to decrease and have since stabilized.
- Major employment industries within the AA include healthcare and social assistance, accommodation and food services, retail trade, and professional and technical services. Major employers in the area include H-E-B, Houston Methodist, Memorial Hermann Health System, and Walmart.

The following table details selected characteristics of the AA.

[6] The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

Table 68

2024 Houston Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	203	13.0	157,980	9.6	51,744	32.8	384,519	23.3
Moderate	389	24.9	379,159	23.0	62,098	16.4	272,478	16.5
Middle	406	26.0	470,866	28.5	36,518	7.8	292,962	17.7
Upper	515	33.0	623,736	37.8	20,880	3.3	700,900	42.5
Unknown	49	3.1	19,118	1.2	4,477	23.4	0	0.0
Total AA	**1,562**	**100.0**	**1,650,859**	**100.0**	**175,717**	**10.6**	**1,650,859**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	279,129	65,519	4.6	23.5	178,456	63.9	35,154	12.6
Moderate	610,132	274,400	19.4	45.0	277,729	45.5	58,003	9.5
Middle	713,236	425,063	30.1	59.6	227,080	31.8	61,093	8.6
Upper	917,034	635,813	45.0	69.3	214,045	23.3	67,176	7.3
Unknown	48,212	12,289	0.9	25.5	28,761	59.7	7,162	14.9
Total AA	**2,567,743**	**1,413,084**	**100.0**	**55.0**	**926,071**	**36.1**	**228,588**	**8.9**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	25,429	8.3	23,026	8.2	2,247	10.6	156	4.5
Moderate	63,256	20.6	57,650	20.4	5,152	24.4	454	13.1
Middle	80,303	26.2	74,643	26.4	4,929	23.4	731	21.2
Upper	133,113	43.4	122,740	43.5	8,319	39.4	2,054	59.5
Unknown	4,665	1.5	4,147	1.5	460	2.2	58	1.7
Total AA	**306,766**	**100.0**	**282,206**	**100.0**	**21,107**	**100.0**	**3,453**	**100.0**
Percentage of Total Businesses:				**92.0**		**6.9**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	63	3.0	62	3.0	1	2.4	0	0.0
Moderate	278	13.2	263	12.8	14	34.1	1	25.0
Middle	658	31.3	644	31.3	11	26.8	3	75.0
Upper	1,083	51.4	1,068	51.8	15	36.6	0	0.0
Unknown	23	1.1	23	1.1	0	0.0	0	0.0
Total AA	**2,105**	**100.0**	**2,060**	**100.0**	**41**	**100.0**	**4**	**100.0**
Percentage of Total Farms:				**97.9**		**1.9**		**0.2**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Comerica's lending performance in the Houston Metropolitan AA is excellent. The bank's small business lending generally carried more weight as this product comprised the largest volume of lending in the AA. Additionally, a separate evaluation of Multifamily, Other Purpose Closed/Exempt, and Purpose Not Applicable loans was not performed as the individual volume of originations during the review period would not have allowed for a meaningful analysis.

Lending Activity

The bank's lending activity in the Houston Metropolitan AA reflects good responsiveness to AA credit needs. Comerica makes extensive use of innovative and/or flexible lending practices through its participation in numerous industry-recognized, government-guaranteed programs. During the review period, Comerica originated 99 SBA loans and 606 small business micro loans for a combined total of $146.4 million. Additionally, Comerica partnered with the National Faith HomeBuyers Program to provide flexible lending and downpayment assistance for first-time home buyers in the area. The bank's level of lending to these programs demonstrates Comerica's excellent record of serving the credit needs of low-income individuals and very small businesses.

Comerica extended 629 home mortgage loans and 1,475 small business loans between January 1, 2023, and December 31, 2024. The loan products and origination volumes are consistent with the credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects excellent penetration throughout the AA. Comerica's lending in middle- and upper-income geographies did not affect conclusions reached about the bank's lending in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA-reportable loans reflects excellent penetration throughout the AA. Although there were minor variations, the bank's performance generally exceeded that of aggregate HMDA reporters and was comparable to, and occasionally above the percentage of owner-occupied units in the respective census tracts. An additional analysis of material HMDA products is provided below.

Home Purchase Lending

The geographic distribution of home purchase lending is excellent. While the bank did not originate any loans in a low-income census tract in 2023, the bank's performance more than doubled that of aggregate HMDA reporters, as well as the demographic figure in 2024. This is notable, as only 4.5 percent of owner-occupied units are located in low-income census tracts, limiting opportunities for banks to lend. Among moderate-income census tracts the bank's performance exceeded that of both aggregate lenders and the demographic in both 2023 and 2024. Home purchase lending represents a relatively small portion of total HMDA lending and in this space, the bank competes with a myriad of banks, credit unions, and mortgage brokers. Given the fierce competition and the fact that the bank consistently outperformed aggregate HMDA reporters, the bank's performance is considered excellent.

Home Refinance Lending

The geographic distribution of home refinancing lending is good. Comerica's distribution of home refinance loans within low-income census tracts is slightly above that of aggregate HMDA reporters and comparable to the demographic figure for both 2023 and 2024. Among moderate-income census tracts, the bank's performance fell below that of aggregate HMDA reporters and the demographic figure in 2023. In 2024, however, Comerica's home refinance lending again outperformed aggregate HMDA reporters, and was comparable to the demographic figure.

Home Improvement Lending

The geographic distribution of home improvement lending is good. The bank's home improvement lending exceeded the performance of aggregate HMDA-reporters in both low- and moderate-income census tracts for both 2023 and 2024. The bank's lending was below the demographic in 2023 and comparable to the demographic figure in 2024. Aggregate data generally serves as a better proxy for loan demand.

Other Purpose Lines of Credit Lending

The geographic distribution of other purpose lines of credit is excellent. The bank's other purpose lines of credit lending within low-income census tracts exceeds the performance of aggregate HMDA-reporters in 2023 and is comparable to aggregate in 2024. Comerica's other purpose lines of credit performance within moderate-income census tracts exceeds aggregate HMDA reporters in both 2023 and 2024. While the distribution of lending among LMI census tracts is generally comparable to the demographic figure, aggregate data serves as a better proxy for loan demand than the demographic figure.

Table 69A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Houston Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	3.5	0	0.0	2.5	3	12.5	3.4	683	5.7	2.6	4.6
Moderate	4	22.2	15.3	1,776	18.4	11.3	6	25.0	16.6	1,162	9.7	12.4	19.4
Middle	7	38.9	33.6	1,102	11.4	29.0	1	4.2	33.2	806	6.7	28.9	30.1
Upper	7	38.9	46.6	6,757	70.1	56.2	14	58.3	45.9	9,375	78.0	55.1	45.0
Unknown	0	0.0	1.0	0	0.0	0.9	0	0.0	1.0	0	0.0	1.0	0.9
Total	18	100.0	100.0	9,635	100.0	100.0	24	100.0	100.0	12,026	100.0	100.0	100.0
Refinance Loans													
Low	7	5.3	4.5	1,285	4.5	3.4	5	4.1	3.9	873	3.3	3.0	4.6
Moderate	20	15.3	18.7	2,935	10.3	13.4	23	19.0	17.1	3,617	13.6	12.5	19.4
Middle	45	34.4	32.6	6,753	23.7	27.4	35	28.9	31.0	6,097	22.9	26.2	30.1
Upper	58	44.3	43.4	16,968	59.7	55.1	58	47.9	47.0	15,999	60.2	57.2	45.0
Unknown	1	0.8	0.8	500	1.8	0.7	0	0.0	1.0	0	0.0	1.1	0.9
Total	131	100.0	100.0	28,441	100.0	100.0	121	100.0	100.0	26,586	100.0	100.0	100.0
Home Improvement Loans													
Low	2	3.2	2.4	120	1.5	2.3	3	4.2	2.4	181	2.3	2.4	4.6
Moderate	9	14.5	11.4	625	8.0	9.3	15	21.1	12.1	1,459	18.4	9.3	19.4
Middle	15	24.2	26.1	1,403	18.0	22.2	19	26.8	24.8	1,728	21.8	21.0	30.1
Upper	35	56.5	59.4	5,190	66.5	65.6	33	46.5	60.0	4,552	57.4	66.4	45.0
Unknown	1	1.6	0.7	467	6.0	0.5	1	1.4	0.7	11	0.1	0.8	0.9
Total	62	100.0	100.0	7,805	100.0	100.0	71	100.0	100.0	7,931	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	17.7	0	0.0	13.8	0	0.0	21.4	0	0.0	14.4	21.8
Moderate	0	0.0	29.3	0	0.0	24.5	0	0.0	31.1	0	0.0	29.6	27.0
Middle	0	0.0	21.1	0	0.0	22.0	0	0.0	22.5	0	0.0	20.7	21.6
Upper	0	0.0	28.6	0	0.0	35.9	0	0.0	22.5	0	0.0	32.5	25.4
Unknown	0	0.0	3.4	0	0.0	3.8	0	0.0	2.5	0	0.0	2.8	4.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	15	4.7	3.5	1,995	3.2	3.3	12	3.8	3.5	1,857	3.1	3.4	4.6
Moderate	49	15.5	15.5	7,567	12.0	12.2	63	20.1	16.4	7,938	13.3	13.5	19.4
Middle	88	27.8	33.1	12,242	19.3	28.2	84	26.8	32.4	11,587	19.4	27.8	30.1
Upper	160	50.6	46.9	40,464	63.9	55.1	153	48.9	46.8	38,398	64.2	54.2	45.0
Unknown	4	1.3	1.0	1,019	1.6	1.2	1	0.3	1.0	11	0.0	1.2	0.9
Total	316	100.0	100.0	63,287	100.0	100.0	313	100.0	100.0	59,791	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 69B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Houston Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	5	4.9	1.7	386	2.4	1.1	1	1.0	1.8	120	0.9	1.0	4.6
Moderate	16	15.7	6.8	2,231	14.1	3.9	18	18.8	9.2	1,560	11.9	5.8	19.4
Middle	21	20.6	24.7	2,984	18.8	18.6	29	30.2	21.8	2,956	22.6	14.9	30.1
Upper	58	56.9	65.9	10,214	64.4	75.6	48	50.0	66.4	8,472	64.6	77.5	45.0
Unknown	2	2.0	0.9	52	0.3	0.8	0	0.0	0.8	0	0.0	0.9	0.9
Total	102	100.0	100.0	15,867	100.0	100.0	96	100.0	100.0	13,108	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	33.3	3.2	204	13.3	3.3	0	0.0	2.8	0	0.0	3.1	4.6
Moderate	0	0.0	14.6	0	0.0	12.3	1	100.0	14.4	140	100.0	12.1	19.4
Middle	0	0.0	30.7	0	0.0	25.4	0	0.0	31.6	0	0.0	25.2	30.1
Upper	2	66.7	50.5	1,335	86.7	57.4	0	0.0	50.4	0	0.0	58.7	45.0
Unknown	0	0.0	0.9	0	0.0	1.6	0	0.0	0.9	0	0.0	0.9	0.9
Total	3	100.0	100.0	1,539	100.0	100.0	1	100.0	100.0	140	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.3	0	0.0	1.8	0	0.0	3.9	0	0.0	1.8	4.6
Moderate	0	0.0	23.8	0	0.0	13.3	0	0.0	23.5	0	0.0	13.3	19.4
Middle	0	0.0	39.9	0	0.0	29.5	0	0.0	38.5	0	0.0	22.0	30.1
Upper	0	0.0	31.8	0	0.0	36.4	0	0.0	33.2	0	0.0	62.2	45.0
Unknown	0	0.0	1.2	0	0.0	19.0	0	0.0	0.8	0	0.0	0.6	0.9
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the AA. Comerica's small business lending performance within low-income census tracts exceeds that of aggregate CRA-reporters, as well as the percentage of businesses located in such tracts (demographic) in both 2023 and 2024. Further, among moderate-income census tracts, Comerica's lending is substantially above aggregate lenders and above the demographic figure for both 2023 and 2024.

Table 70

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Houston Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	88	11.1	7.5	18,563	11.7	8.8	75	11.0	6.5	17,137	11.1	7.8	8.3
Moderate	226	28.5	17.7	54,274	34.2	19.9	216	31.6	17.6	60,067	38.9	20.2	20.6
Middle	192	24.2	25.2	36,827	23.2	23.7	147	21.5	24.8	31,667	20.5	23.6	26.2
Upper	271	34.2	47.8	46,852	29.5	45.7	236	34.6	49.3	43,464	28.2	46.7	43.4
Unknown	15	1.9	1.5	2,393	1.5	1.7	9	1.3	1.4	1,914	1.2	1.6	1.5
Total	792	100.0	100.0	158,909	100.0	100.0	683	100.0	100.0	154,249	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of loans reflects good penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's distribution of the lending to middle- and upper-income borrowers did not affect conclusions reached about the bank's lending to LMI borrowers.

Residential Real Estate (HMDA) Lending

Comerica's HMDA-reportable lending by borrower income in the AA is excellent when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA reporters with loan originations or purchases in the AA. The dispersion of the bank's HMDA-reportable loans among low-income borrowers exceeds the 2023 and 2024 performance of aggregate HMDA reporters but is below the percentage of AA families classified as low-income families (demographic). While the bank's performance fell below the demographic, other factors must be considered to fully assess performance. Low-income borrowers may struggle to demonstrate an ability to repay a mortgage in the AA, given the high cost of housing and increasing interest rates. Furthermore, Comerica competes in a market with other banks, mortgage brokers, and credit unions, all of which strive to meet the credit needs of qualified low-income borrowers. Despite these challenges, the bank outperformed aggregate HMDA reporters in both 2023 and 2024, demonstrating a commitment to meet credit needs of low-income borrowers.

Additionally, in 2023, the bank's performance among moderate-income borrowers is substantially above aggregate lenders and is above aggregate lenders in 2024. The bank's lending exceeds the percentage of AA families classified as moderate-income for both years of the review period.

Table 71A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Houston Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	11.1	1.9	263	2.7	0.8	2	8.3	2.0	297	2.5	0.9	23.3
Moderate	5	27.8	12.6	797	8.3	8.1	2	8.3	12.4	304	2.5	8.0	16.5
Middle	1	5.6	19.5	85	0.9	15.9	4	16.7	19.3	1,592	13.2	15.6	17.7
Upper	9	50.0	39.8	8,210	85.2	50.9	16	66.7	38.3	9,833	81.8	49.1	42.5
Unknown	1	5.6	26.2	280	2.9	24.3	0	0.0	28.0	0	0.0	26.4	0.0
Total	18	100.0	100.0	9,635	100.0	100.0	24	100.0	100.0	12,026	100.0	100.0	100.0
Refinance Loans													
Low	25	19.1	6.8	2,383	8.4	3.7	3	2.5	6.1	256	1.0	3.0	23.3
Moderate	35	26.7	15.3	5,625	19.8	9.7	20	16.5	12.5	2,272	8.5	7.1	16.5
Middle	24	18.3	19.5	5,234	18.4	14.8	28	23.1	16.3	4,539	17.1	11.2	17.7
Upper	45	34.4	42.7	14,489	50.9	54.4	65	53.7	39.2	18,203	68.5	47.2	42.5
Unknown	2	1.5	15.6	710	2.5	17.5	5	4.1	25.9	1,316	4.9	31.5	0.0
Total	131	100.0	100.0	28,441	100.0	100.0	121	100.0	100.0	26,586	100.0	100.0	100.0
Home Improvement Loans													
Low	6	9.7	4.6	300	3.8	2.9	10	14.1	5.1	602	7.6	2.8	23.3
Moderate	14	22.6	11.2	977	12.5	7.4	14	19.7	11.9	815	10.3	7.4	16.5
Middle	14	22.6	17.7	1,775	22.7	13.0	17	23.9	16.3	1,645	20.7	11.7	17.7
Upper	27	43.5	64.2	4,603	59.0	72.1	29	40.8	62.2	4,805	60.6	70.5	42.5
Unknown	1	1.6	2.2	150	1.9	4.6	1	1.4	4.4	64	0.8	7.6	0.0
Total	62	100.0	100.0	7,805	100.0	100.0	71	100.0	100.0	7,931	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	39	12.3	2.6	3,513	5.6	1.1	26	8.3	2.8	1,730	2.9	1.2	23.3
Moderate	72	22.8	12.8	9,286	14.7	8.2	57	18.2	12.3	5,284	8.8	7.9	16.5
Middle	68	21.5	19.3	11,684	18.5	15.6	68	21.7	18.7	9,850	16.5	15.0	17.7
Upper	129	40.8	41.3	37,138	58.7	51.6	156	49.8	39.7	41,547	69.5	49.3	42.5
Unknown	8	2.5	24.0	1,666	2.6	23.4	6	1.9	26.5	1,380	2.3	26.6	0.0
Total	316	100.0	100.0	63,287	100.0	100.0	313	100.0	100.0	59,791	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table 71B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Houston Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	6	5.9	6.6	567	3.6	4.0	11	11.5	4.1	575	4.4	2.5	23.3
Moderate	17	16.7	8.8	1,787	11.3	5.5	20	20.8	8.6	1,753	13.4	5.0	16.5
Middle	28	27.5	15.5	3,355	21.1	9.2	19	19.8	16.2	2,074	15.8	9.9	17.7
Upper	47	46.1	67.1	9,632	60.7	79.4	46	47.9	62.9	8,706	66.4	75.6	42.5
Unknown	4	3.9	2.0	526	3.3	2.0	0	0.0	8.2	0	0.0	7.1	0.0
Total	102	100.0	100.0	15,867	100.0	100.0	96	100.0	100.0	13,108	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	5.6	0	0.0	3.6	0	0.0	7.2	0	0.0	4.3	23.3
Moderate	1	33.3	14.8	100	6.5	10.4	1	100.0	14.9	140	100.0	10.3	16.5
Middle	1	33.3	21.6	1,235	80.2	14.9	0	0.0	21.1	0	0.0	15.4	17.7
Upper	1	33.3	51.8	204	13.3	60.0	0	0.0	49.3	0	0.0	55.8	42.5
Unknown	0	0.0	6.2	0	0.0	11.0	0	0.0	7.5	0	0.0	14.2	0.0
Total	3	100.0	100.0	1,539	100.0	100.0	1	100.0	100.0	140	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.7	0	0.0	0.9	0	0.0	0.8	0	0.0	0.3	23.3
Moderate	0	0.0	1.9	0	0.0	1.3	0	0.0	0.6	0	0.0	0.4	16.5
Middle	0	0.0	0.4	0	0.0	0.4	0	0.0	0.6	0	0.0	0.3	17.7
Upper	0	0.0	0.2	0	0.0	0.2	0	0.0	0.6	0	0.0	2.2	42.5
Unknown	0	0.0	95.7	0	0.0	97.2	0	0.0	97.3	0	0.0	96.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

Considering the bank's performance when compared to aggregate CRA-reporters, the distribution of small business loans by revenue size of businesses is adequate. The distribution of 2023 and 2024 loan originations to businesses with revenues of $1 million or less is below the performance of aggregate lenders when considering the number of loans as well as dollar amount. While both the bank and aggregate lenders were significantly below the 92.0 percent of businesses within the AA that reported revenues of $1 million or less, the demographic figure is not presumed to be representative of loan demand. Moreover, the bank originated a majority of loans in amounts less than $100,000, which is reflective of the bank's willingness to lend to small businesses, as they often require smaller dollar loans. This is particularly noteworthy, as a community contact noted a need in the area for small dollar lending, specifically loans under $350,000.

Table 72

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Houston Metropolitan													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	348	43.9	53.2	43,606	27.4	34.7	286	41.9	52.8	42,159	27.3	34.5	92.0
Over $1 Million	364	46.0		104,128	65.5		328	48.0		100,630	65.2		6.9
Revenue Unknown	80	10.1		11,175	7.0		69	10.1		11,460	7.4		1.1
Total	792	100.0		158,909	100.0		683	100.0		154,249	100.0		100.0
By Loan Size													
$100,000 or Less	442	55.8	94.8	24,021	15.1	42.8	353	51.7	95.1	23,119	15.0	44.8	
$100,001 - $250,000	160	20.2	2.8	31,289	19.7	15.2	148	21.7	2.7	29,126	18.9	15.0	
$250,001 - $1 Million	190	24.0	2.4	103,599	65.2	42.1	182	26.6	2.2	102,004	66.1	40.2	
Total	792	100.0	100.0	158,909	100.0	100.0	683	100.0	100.0	154,249	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	254	73.0		12,597	28.9		188	65.7		11,965	28.4		
$100,001 - $250,000	52	14.9		9,566	21.9		60	21.0		10,912	25.9		
$250,001 - $1 Million	42	12.1		21,443	49.2		38	13.3		19,282	45.7		
Total	348	100.0		43,606	100.0		286	100.0		42,159	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

Comerica is a leader in making CD loans in the AA. During the review period, the bank originated a total of 61 qualifying CD loans, totaling $209.7 million. While the number of CD loans decreased since the prior evaluation, due to the cessation of the SBA's PPP, and considering the shorter review period, the dollar amount of CD lending in the AA increased by $12.1 million. This demonstrates Comerica's targeted efforts to identify CD opportunities and meet those needs that align with its resources and strategic plans. This increase is noteworthy given the reduced CD review period and the 14.5 percent contraction of the bank's total assets.

Examples of the bank's CD lending activities that were considered responsive to the AA credit needs include:

- Loans exceeding $37.8 million to support affordable housing efforts, including LIHTC projects.
- Lines of credit to support ongoing operations of various small businesses, including a $3.5 million line to support a daycare provider that employs LMI individuals.

Table 73

Community Development Lending Assessment Area: Houston Metropolitan		
Purpose	**#**	**$(000)**
Affordable Housing	3	37,805
Community Services	5	3,900
Economic Development	47	144,272
Revitalization and Stabilization	6	23,750
Total	**61**	**209,727**
Note: Discrepancies in dollar volume totals are possible due to rounding.		

INVESTMENT TEST

The bank's performance under the Investment Test in the AA is excellent. Comerica's has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors and is often in a leadership position. The bank makes significant use of innovative or complex investments to support CD initiatives. Comerica exhibits excellent responsiveness to AA needs, including those highlighted by a local community contact.

As shown in the table below, the bank invested or retained investments, totaling $33.9 million, in affordable housing initiatives. These investments are considered particularly responsive given the shortage of affordable housing options in the AA. In addition to financial investments, Comerica donated approximately $637 thousand to community organizations serving the needs of LMI individuals and geographies. Notable donations include a $40,000 donation to an organization providing financial, entrepreneurial, educational, and leadership training to empower LMI women for the future.

Table 74 illustrates the breakdown of Comerica's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the review period, and CD donations made since the previous evaluation.

Since the prior evaluation, Comerica's investments slightly decreased in dollar volume. However, this decrease does not indicate a downturn in investment performance considering the length of CD review period, which was nine months shorter than the prior evaluation's review period, and the bank's total asset contraction of 14.5 percent. On the contrary, when comparing the number of investments and the dollar amount per month of review, both the number and the dollar amount of investments increased relative to the prior evaluation by 22.4 percent and 23.7 percent, respectively.

Table 74

Investment, Grants, and Donations Assessment Area: Houston Metropolitan								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	**$(000)**	**#**	**$(000)**	**#**	**$(000)**	**#**	**$(000)**
Affordable Housing	20	28,951	1	5,000	3	49	24	34,000
Community Services	0	0	0	0	67	437	67	437
Economic Development	5	1,400	0	0	11	104	16	1,504
Revitalization and Stabilization	0	0	0	0	7	47	7	47
Total	**25**	**30,351**	**1**	**5,000**	**88**	**637**	**114**	**35,988**

[1] Book value of investment
[2] Original market value of investment
Note: Discrepancies in dollar volume totals are possible due to rounding.

SERVICE TEST

The bank's Service Test performance in the Houston Metropolitan AA is good primarily due to Comerica's leadership in providing CD services as well as delivery systems being reasonably accessible to geographies and individuals of different income levels in the Houston Metropolitan AA.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its AA. The distribution of the bank's 41 branch offices and 39 full-service ATMs as of June 23, 2025, was compared to the distribution of the population and businesses among the tract categories within the AA. The table below summarizes the bank's retail locations in the Houston Metropolitan AA.

Table 75

Branch and Full-Service ATM Locations Assessment Area: Houston Metropolitan							
Tract Income	**% of Geographies**	**% of Households**	**% of Businesses**	**Branches**		**Full-Service ATMs**	
				#	**%**	**#**	**%**
Low	13.0	10.4	8.3	3	7.3	3	7.7
Moderate	24.9	23.6	20.6	9	22.9	9	23.1
Middle	26.0	27.9	26.2	6	14.6	6	15.4
Upper	33.0	36.3	43.4	21	51.2	19	48.7
Unknown	3.1	1.8	1.5	2	4.9	2	5.1
Total	**100.0**	**100.0**	**100.0**	**41**	**100.0**	**39**	**100.0**

Note: Percentages may not total 100.0 percent due to rounding.

The bank opened one branch in an upper-income census tract and closed one branch in an upper-income census tract in the AA. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Moreover, banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are consistent throughout the AA.

Community Development Services

Comerica is a leader in providing CD services in the AA. Comerica's employees served in various capacities, for 60 organizations offering CD services that aid LMI individuals for a total of 1,645 hours. When considering the length of review period, which is nine months shorter than the prior review period, the number of CD services as well as the hours served has increased since the prior evaluation. Because the review period was longer at the prior evaluation, examiners compared the monthly average of CD services and hours provided by Comerica employees to more accurately compare performance. Examiners found that CD services increased by 67.7 percent and the number of hours provided increased by 39.4 percent since the prior evaluation.

Examples of CD services in the AA include:

- Employees served with small business programs to provide veterans with financial education to succeed as entrepreneurs.
- Employees served 666 hours with various organizations to provide financial education to LMI individuals, including several programs for educating young people.
- Employees dedicated 176 hours serving various organizations, including an organization that provides basic necessities to families with food insecurity.

Table 76

Community Development Services Assessment Area: Houston Metropolitan		
Purpose	**#**	**Hours**
Affordable Housing	0	0
Community Services	540	1,645
Economic Development	0	0
Revitalize and Stabilize	0	0
Total	**540**	**1,645**

METROPOLITAN ASSESSMENT AREAS
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE TEXAS METROPOLITAN ASSESSMENT AREAS

Austin Metropolitan Assessment Area

- The Austin Metropolitan AA is comprised of the entirety of Travis and Williamson counties. These counties along with Bastrop, Caldwell, and Hays counties make up the Austin-Round Rock-San Marcos, Texas MSA.
- As of June 23, 2025, Comerica operated 10 branches in the AA, representing 2.6 percent of total branches.
- As of June 30, 2024, the bank had $595.9 million in deposits in this AA, representing a market share of 1.0 percent and 1.0 percent of the bank's total deposits.
- In 2024, 701 institutions originated or purchased 48,275 HMDA-reportable loans in the AA. The bank ranked 111th with 50 home mortgage originations representing 0.1 percent of total reportable loans in the AA.
- The bank ranked 25th among 219 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 79,591 CRA-reportable loans made in the AA, the bank originated 140, or 0.2 percent.
- According to ACS data, the AA consists of 425 census tracts, including 27 low-, 100 moderate-, 142 middle-, 140 upper-, and 16 unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 1,899,205, representing 6.5 percent of the state's population.
- The AA includes 416,236 families, of which 20.4 percent are low-, 16.8 percent are moderate-, 20.8 percent are middle-, and 42.0 percent are upper-income. Approximately 6.4 percent of AA families live below the poverty line.

San Antonio Metropolitan Assessment Area

- The San Antonio Metropolitan AA is comprised of the entirety of Bexar and Kendall counties, which represent a portion of the San Antonio-New Braunfels, Texas MSA. The AA excludes the following MSA counties: Atascosa, Bandera, Comal, Guadalupe, Medina, and Wilson.
- As of June 23, 2025, Comerica operated five branches in the AA, representing 1.3 percent of total branches.
- As of June 30, 2024, the bank had $132.0 million in deposits in this AA, representing a market share of 0.1 percent and 0.2 percent of the bank's total deposits.
- In 2024, 597 institutions originated or purchased 50,018 HMDA-reportable loans in the AA. The bank ranked 135th with nine home mortgage originations representing less than 0.1 percent of total reportable loans in the AA.
- The bank ranked 41st among 183 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 46,078 CRA-reportable loans made in the AA, the bank originated 66, or 0.1 percent.
- According to ACS data, the AA consists of 384 census tracts, including 35 low-, 137 moderate-, 103 middle-, 105 upper-, and four unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 2,053,603, representing 7.0 percent of the state's population.
- The AA includes 432,722 families, of which 23.5 percent are low-, 17.7 percent are moderate-, 19.5 percent are middle-, and 39.3 percent are upper-income. Approximately 11.6 percent of AA families live below the poverty line.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Additional information regarding detailed demographic information and the HMDA- and CRA-reportable lending for the metropolitan limited-scope AAs can be found in Appendix C.

Table 77, below, details the performance conclusions of the metropolitan AAs receiving a limited-scope review.

Table 77

Assessment Area	Lending Test	Investment Test	Service Test
Austin Metropolitan	Consistent	Consistent	Consistent
San Antonio Metropolitan	Consistent	Consistent	Consistent

The institution's lending, investment, and service performance in the Austin Metropolitan AA as well as the San Antonio Metropolitan are consistent with the institution's overall lending, investment, and service performance. The bank's performance in the limited-scope AAs did not impact the bank's overall performance.

NONMETROPOLITAN ASSESSMENT AREA
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE TEXAS NONMETROPOLITAN ASSESSMENT AREA

Bank of the Hills Nonmetropolitan AA

- The Bank of the Hills Nonmetropolitan AA is comprised of the entirety of Kerr County in Texas.
- As of June 23, 2025, the bank operated two branches, representing 0.5 percent of Comerica's total branches.
- As of June 30, 2024, Comerica held $196.4 million in deposits, representing a market share of 11.9 percent and 0.3 percent of the bank's total deposits.
- In 2024, 152 institutions originated or purchased 889 HMDA-reportable loans in the AA. The bank ranked 17th with 10 home mortgage originations representing 1.1 percent of total reportable loans in the AA.
- The bank ranked 23rd among 79 institutions originating or purchasing CRA-reportable loans made in the AA in 2024. Of the 1,479 CRA-reportable loans made in the AA, the bank originated five, or 0.3 percent.
- The AA is comprised of 14 census tracts, including two moderate-, six middle- and six upper-income tracts.
- Based upon 2020 ACS data, the AA population was 52,598, which represents 0.1 percent of the state's population.
- The AA includes 14,712 families, 17.6 percent are low-, 17.8 percent moderate-, 19.0 percent middle-, and 45.6 percent are upper-income.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Additional information regarding detailed demographic information and the HMDA- and CRA-reportable lending for the nonmetropolitan limited-scope AA can be found in Appendix D.

Table 78, below, details the performance conclusions of the nonmetropolitan AA receiving a limited-scope review.

Table 78

Assessment Area	Lending Test	Investment Test	Service Test
Bank of the Hills Nonmetropolitan	Below	Consistent	Consistent

The institution's lending performance is generally below Comerica's performance in the state; however, the Investment and Service tests are consistent with the overall performance in the state. The bank's performance in the limited-scope AA did not impact the bank's overall performance.

STATE OF CALIFORNIA

CRA RATING FOR CALIFORNIA: Satisfactory

The Lending Test is rated High Satisfactory.
The Investment Test is rated Outstanding.
The Service Test is rated High Satisfactory.

Major factors supporting the institution's rating include:

Lending Test

- Lending activity reflects good responsiveness and record of serving the AAs' credit needs, including low-income individuals, low-income areas, and very small businesses.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels, including LMI individuals, and businesses of different sizes is adequate.
- Comerica is a leader in making CD loans.
- The bank makes use of innovative and/or flexible lending practices in serving AA's needs.

Investment Test

- Comerica has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors, and is often in a leadership position.
- The bank makes significant use of innovative and/or complex investments to support community development initiatives.
- Comerica exhibits excellent responsiveness to credit and CD needs.

Service Test

- Delivery systems are reasonably accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.
- Comerica is a leader in providing CD services.

SCOPE OF THE EVALUATION

The scope of the review for the state of California is consistent with the overall scope for the institution, including evaluations under the Lending, Investment, and Service tests. The period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

Two of the eight AAs in the state of California were reviewed using full-scope procedures.

- Greater Los Angeles MSA AA
- San Francisco Bay Metropolitan AA

The remaining six AAs received limited-scope reviews.

- Inland Empire MSA AA
- Salinas MSA AA
- San Diego MSA AA

- San Jose Metropolitan AA
- Santa Cruz MSA AA
- Ventura County MSA AA

AAs were selected for full-scope reviews based on the strategic importance of the AA, considering volume of lending, number of branches, and percentage of total deposits, as well as the length of time since the AA received a full-scope review. Approximately 59.0 percent of lending activity (by number of loans), 60.0 percent of the deposits, and 55.7 percent of branches within the state of California were evaluated through the full-scope reviews. In drawing overall conclusions, the bank's performance in the Greater Los Angeles AA was given greater consideration as it represents the majority of Comerica's activity within the state of California.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN CALIFORNIA

The bank delineates eight of its 27 AAs and operates 88 of its 379 branches in the state of California. As of June 30, 2024, Comerica had $14.8 billion in deposits in the state, representing 23.6 percent of total deposits. According to the FDIC Summary of Deposits as of June 30, 2024, the bank had a deposit market share of 0.8 percent and ranked 15th out of 181 FDIC-insured financial institutions across the state.

Of the 7,225 HMDA-reportable loans and 11,551 small business loans originated and purchased by Comerica during the review period, 2,345 HMDA-reportable loans (32.3 percent) and 2,600 small business loans (22.5 percent) were extended in the California AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Comerica's performance under the Lending Test in the state of California is rated High Satisfactory. Lending Test performance in both the Greater Los Angeles Metropolitan and San Francisco Bay Metropolitan AAs is consistent with the overall state rating. In addition, the bank's performance in the AAs receiving limited-scope reviews supports the rating for the state.

Lending Activity

Comerica's lending activities in the state of California reflect good responsiveness to the credit needs of its AAs. The bank makes use of innovative and/or flexible lending programs through its participation in numerous industry-recognized, government-guaranteed programs, including 195 SBA loans and 1,117 small business micro loans in the state of California.

As outlined in Table 79, this evaluation considered 4,957 loans, totaling $1.5 billion. The loan products and origination volumes are consistent with the credit needs of the bank's California AAs. The number of small business and HMDA-reportable loans extended by the bank was compared against the number of loans made by aggregate lenders during the review period.

Table 79

Summary of Lending Activity – January 1, 2023 through December 31, 2024 California Assessment Areas				
Loan Type	**#**	**%**	**$(000)**	**%**
Home Purchase	155	3.1	104,382	7.0
Refinancing	649	13.1	269,096	17.9
Home Improvement	1,051	21.2	242,588	16.2
Multifamily	9	0.2	93,474	6.2
Other Purpose LOC	464	9.4	134,397	9.0
Other Purpose Closed/Exempt	17	0.3	24,648	1.6
Purpose Not Applicable	0	0.0	0	0,0
Total HMDA-Related	**2,345**	**47.3**	**868,585**	**57.9**
Total Small Business	**2,600**	**52.5**	**626,403**	**41.8**
Total Small Farm	**12**	**0.2**	**4,470**	**0.3**
TOTAL LOANS	**4,957**	**100.0**	**1,499,458**	**100.0**
Note: Discrepancies in dollar amount totals are possible due to rounding				

A detailed discussion of the facts and data supporting the overall conclusions regarding Comerica's Lending Test is presented in the Conclusions with Respect to Performance Criteria section for each AA.

Geographic Distribution of Loans

The overall geographic distribution of lending reflects excellent penetration throughout the bank's AAs in California. This performance is consistent across Comerica's Greater Los Angeles Metropolitan AA, while the performance in the San Francisco Bay Metropolitan is good.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's overall lending in California reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. This performance is consistent with the bank's Greater Los Angeles Metropolitan and San Francisco Bay Metropolitan. A detailed discussion of the facts and data supporting the overall conclusions is presented in the Conclusions with Respect to Performance Criteria section for each AA.

Community Development Lending

Comerica is a leader in making CD loans in the state of California. As reflected in Table 80, the bank originated 189 CD loans within the state, totaling approximately $1.1 billion, which comprises 23.5 percent of bank-wide CD loan volume by number and 29.5 percent by dollar amount. The level of CD lending in the Greater Los Angeles Metropolitan AA is excellent, while the performance in the San Francisco Bay Metropolitan AA performance is good.

CD lending levels in California slightly decreased since the prior evaluation; however, two factors impacting lending levels must be considered. First, Comerica was heavily involved in the SBA's PPP, which ceased in 2021; as such, these loans rolled off the portfolio as they were paid off. Second, this review period is nine months shorter than the prior evaluation's review period. Adjusting for those factors, Comerica's CD lending in California was comparable to the prior evaluation; therefore, the bank continues to be a leader in providing a substantial amount of CD lending in the state of California.

CD loans originated by the bank during the review period were extended for a variety of purposes, as noted in Table 80. Comerica originated loans in various CD areas, but with special emphasis on economic development loans supporting small businesses, which aligns with the bank's strategic focus and demonstrates intentional efforts to serve its AAs in ways that reflect lenders' expertise.

Table 80

Community Development Lending California Assessment Areas		
Purpose	**#**	**$(000)**
Affordable Housing	32	178,554
Community Services	13	51,500
Economic Development	144	873,348
Revitalization and Stabilization	0	0
Total	**189**	**1,103,402**
Note: Discrepancies in dollar amount totals are possible due to rounding		

INVESTMENT TEST

Comerica's Investment Test in the state of California is rated Outstanding. The Investment Test conclusions in the Greater Los Angeles MSA and San Francisco Bay Metropolitan AAs are considered excellent and consistent with the overall state rating. Greater weight was given to the Greater Los Angeles MSA AA, as 43.0 percent by number volume and 42.2 percent by dollar amount of the bank's CD investments and donations in the state of California occurred in that AA. The bank's performance in the AAs that received limited-scope reviews is consistent with the performance in the state of California.

Comerica has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors and is often in a leadership position. The bank's significant use of innovative and/or complex investments exhibits excellent responsiveness to the credit and CD needs of its AAs. As illustrated in Table 81, the bank made a total of 416 CD qualified donations and investments in their California AAs, totaling $229.5 million. Due to the nine-month difference in review period, examiners broke down the total amount of combined donations and investments and found that the bank increased the total dollar amount by 38.3 percent when compared to her prior evaluation. Specific details regarding CD-qualified investments and donations within the bank's California AAs can be found in the Conclusions with Respect to Performance Tests section for each AA.

In addition to the investments made within the bank's delineated AAs, the bank also made several investments in the broader statewide or regional area. These investments, totaling over a million, were primarily for LIHTC-eligible projects to support affordable housing efforts in the region.

Table 81

Investments, Grants, and Donations California Assessment Areas								
Community Development Purpose	**Prior Period Investments**[1]		**Current Investments**[2]		**Donations**		**Total**	
	#	**$(000)**	**#**	**$(000)**	**#**	**$(000)**	**#**	**$(000)**
Affordable Housing	153	141,531	10	45,745	13	192	176	187,468
Community Services	0	0	0	0	156	1,774	156	1,774
Economic Development	12	6,809	15	32,499	57	974	84	40,282
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**165**	**148,340**	**25**	**78,244**	**226**	**2,940**	**416**	**229,524**

1 Book value of investment
2 Original market value of investment
Note: Discrepancies in dollar amount totals are possible due to rounding

SERVICE TEST

Comerica's performance under the Service Test in the state of California is High Satisfactory. The bank's performance in the AAs that received limited-scope reviews is generally consistent with the performance in the state of California. Details of the bank's explicit retail and CD services can be found in the Conclusions with Respect to Performance Tests section for each AA.

Retail Services

Branch locations, drive-through facilities, and alternative delivery systems, such as online and mobile banking are reasonably accessible to geographies and individuals of different income levels in the bank's AAs. Of Comerica's 88 full-service branches and 92 full-service ATMs in the state of California, 16 branches and 17 ATMs are located in LMI tracts, which aligns reasonably with the distribution of census tracts, households, and businesses. Refer to Table 82 for the distribution of California branches and full-service ATMs by income level of geography.

Table 82

Branch and Full-Service ATM Locations California Assessment Areas								
Tract Income	**Census Tracts**		**% of Households**	**% of Businesses**	**Branches**		**Full-Service ATMs**	
	#	**%**			**#**	**%**	**#**	**%**
Low	410	6.2	5.3	4.0	1	1.1	1	1.1
Moderate	1,718	25.9	24.4	19.7	15	17.1	16	17.4
Middle	2,185	32.9	33.9	31.8	32	36.4	33	35.9
Upper	2,173	32.7	35.4	42.4	38	43.2	38	41.3
Unknown	158	2.4	1.1	2.1	2	2.3	4	4.3
Total	**6,644**	**100.0**	**100.0**	**100.0**	**88**	**100.0**	**92**	**100.0**

Changes in Branch Locations						
Tract Income	**Low**	**Moderate**	**Middle**	**Upper**	**Unknown**	**Total**
Openings (#)	0	0	0	0	0	0
Closings (#)	1	0	0	3	0	4
Net Change	**(1)**	**0**	**0**	**(3)**	**0**	**(4)**

Note: Discrepancies in percentage totals are possible due to rounding.

Comerica's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. Moreover, Comerica's operations and product and service offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Banking Services section of this evaluation.

Community Development Services

Comerica is a leader in providing CD services in the state of California. Provision of CD services in the bank's Greater Los Angeles MSA AA and San Francisco Bay Metropolitan AAs are consistent with the overall state rating. During the review period, bank representatives provided 884 services, totaling 4,032 hours, within its California AAs. The bank's directors, officers, and personnel are involved with numerous organizations that extend CD services to LMI individuals and/or geographies. Taking into consideration the length of review period compared to the prior evaluation Comerica increased efforts in CD services by 5.3 percent and the number of hours provided by 48.5 percent since the previous evaluation. The bank's significant efforts to promote CD services are noted through board participation, financial literacy, and entrepreneurship training.

Table 83

Community Development Services California Assessment Areas		
Purpose	**#**	**Hours**
Affordable Housing	0	0
Community Services	884	4,032
Economic Development	0	0
Revitalize and Stabilize	0	0
Total	**884**	**4,032**

GREATER LOS ANGELES MSA ASSESSMENT AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE GREATER LOS ANGELES MSA ASSESSMENT AREA

- The Greater Los Angeles MSA AA consists of the entirety of the Los Angeles-Long Beach-Anaheim, MSA in California. See Appendix A for an AA map and Appendix B for additional demographic data.
- There have been no changes to the delineation of the AA since the previous evaluation.
- The AA is comprised of 3,112 census tracts of those 5.7 percent are designated as low-income, 27.5 percent are moderate-income, 29.8 percent are middle-income, 34.4 percent are upper-income, and 2.6 percent are designated as unknown-income.
- The bank operates 33 full-service branches in the AA, including six located in moderate-income, nine in middle-income, 17 in upper-income census tracts, and one in an unknown-income census tract.
- According to the FDIC Deposit Market Share Report as of June 30, 2024, the bank held 1.0 percent of the deposit market share, ranking 18th out of 107 FDIC-insured depository institutions operating in the AA.
- In 2024, the bank ranked 63rd out of 773 HMDA-reporters in the AA, originating or purchasing 468 HMDA-reportable loans, and 40th out of 264 CRA small business-reporters with 551 CRA small business loans.
- Community contacts indicated affordable housing, homelessness, and small business lending and financial education as credit and CD needs in the area.

Table 84

Population Change Assessment Area: Greater Los Angeles MSA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Greater Los Angeles MSA	13,154,457	13,200,998	0.4
Los Angeles County, CA	10,038,388	10,014,009	-0.2
Orange County, CA	3,116,069	3,186,989	2.3
Anaheim-Santa Ana-Irvine, CA MD	3,116,069	3,186,989	2.3
California	38,421,464	39,538,223	2.9

Source: 2020 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey

- The AA saw little population change between 2015 and 2020, despite the overall growth noted in the state, at 2.9 percent.
- The Los Angeles County has the highest population in the state of California, according to the US Census Bureau. However, as noted in Table 84, the population decreased slightly between 2015 and 2020.
- Approximately 33.5 percent of the AA population reside in LMI census tracts, and 40.2 percent of families in the AA are considered LMI.

Table 85

Median Family Income Change Assessment Area: Greater Los Angeles MSA			
Area	**2015 Median Family Income ($)**	**2020 Median Family Income ($)**	**Percent Change**
Greater Los Angeles MSA	74,040	85,544	15.5
Los Angeles County, CA	68,508	80,317	17.2
Orange County, CA	93,965	106,451	13.3
Anaheim-Santa Ana-Irvine, CA MD	93,965	106,451	13.3
California	77,267	89,798	16.2

Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- MFI in the AA was 4.2 percent lower than the state in 2015, and that disparity grew to 4.7 percent in 2020, indicating that MFI in the AA is growing slower than other parts of the state.
- While Los Angeles County had the largest percentage increase from 2015 to 2020, the MFI is still the lowest in the AA and below the state MFI of $89,798.
- According to FFIEC data, 9.6 percent of AA families live below the poverty level, which is above the statewide figure at 8.9 percent.
- A community contact noted that inflation has had a significant impact on residents in the AA, particularly LMI individuals.

Table 86

Housing Cost Burden Assessment Area: Greater Los Angeles MSA						
Area	**Cost Burden - Renters**			**Cost Burden - Owners**		
	Low-Income	**Moderate-Income**	**All Renters**	**Low-Income**	**Moderate-Income**	**All Owners**
Greater Los Angeles MSA	82.1	54.1	52.1	68.0	49.2	32.1
Los Angeles County, CA	81.8	52.2	52.4	68.8	50.0	33.3
Orange County, CA	83.4	61.0	51.0	65.8	46.9	29.0
Anaheim-Santa Ana-Irvine, CA MD	83.4	61.0	51.0	65.8	46.9	29.0
California	81.1	56.6	49.5	67.3	47.9	29.1

Cost burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

- As noted in Table 86, the housing cost burden in the AA is comparable to that of the state; however, housing costs in both the AA and the state are extremely high relative to the majority of the country and has a significant impact on credit needs.
- The median home value in the AA is $641,309, which is significantly higher than median home values in the rest of California, at $538,500.
- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on homeowners at any other level, indicating it is more economical for low-income borrowers to purchase a home rather than rent. However, downpayment requirements can act as a barrier to homeownership for many low-income borrowers, especially given the high prices of homes in the area.

- Low downpayments programs, such as FHA and similar government-sponsored programs, are more beneficial to home buyers, but the high cost of homes may still present challenges in making a downpayment.
- The 2024 housing affordability ratio[7] in the AA at 11.9 percent, is below the statewide ratio of 14.6 percent. This indicates AA housing is less affordable in the Greater Los Angeles MSA AA than statewide housing.
- A community contact noted that high rent costs far outpace stagnant wages, which results in a large portion of the population being cost-burdened for housing. In addition, the contact noted that aggressive investors purchase and flip houses at a rapid pace, further reducing opportunities for LMI homebuyers to penetrate the market.
- The community contact further noted that the homeless population in the AA has grown significantly, resulting in homeless camps growing throughout the region.

Table 87

Unemployment Rates Assessment Area: Greater Los Angeles MSA					
Area	**2019**	**2020**	**2021**	**2022**	**2023**
Greater Los Angeles MSA	4.1	11.5	8.3	4.5	4.7
Los Angeles County, CA	4.5	12.3	9.0	5.0	5.0
Orange County, CA	2.8	8.9	6.0	3.2	3.6
Anaheim-Santa Ana-Irvine, CA MD	2.8	8.9	6.0	3.2	3.6
California	4.1	10.1	7.3	4.3	4.8
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- Unemployment rates for the AA between 2019 and 2023 are generally comparable to the statewide rate and unlikely to have a significant impact on the credit needs of the AA.
- Unemployment rates more than doubled in 2020 due to the COVID-19 pandemic, as many businesses laid off employees due to the statewide stay-at-home and social distancing orders. In 2021, the AA and statewide unemployment rates began to decrease and have since stabilized, although they remain higher than pre-pandemic rates.
- Major employment industries within the AA include healthcare and social assistance, accommodation and food services, retail trade, and professional and technical services.
- Major employers in the area include the Los Angeles County Department of Health Services, Target, Walt Disney Co., and Northrop Gruman Corp.

The following table detail selected characteristics of the AA.

[7] The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

Table 88

2024 Greater Los Angeles MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	178	5.7	142,545	4.8	39,818	27.9	699,400	23.7
Moderate	856	27.5	792,186	26.8	125,169	15.8	486,097	16.5
Middle	926	29.8	905,587	30.7	73,556	8.1	529,772	17.9
Upper	1,071	34.4	1,098,658	37.2	43,367	3.9	1,238,213	41.9
Unknown	81	2.6	14,506	0.5	1,991	13.7	0	0.0
Total AA	**3,112**	**100.0**	**2,953,482**	**100.0**	**283,901**	**9.6**	**2,953,482**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	225,201	29,216	1.4	13.0	183,218	81.4	12,767	5.7
Moderate	1,184,434	364,211	17.1	30.7	758,418	64.0	61,805	5.2
Middle	1,388,988	672,356	31.6	48.4	643,632	46.3	73,000	5.3
Upper	1,803,716	1,056,633	49.6	58.6	613,113	34.0	133,970	7.4
Unknown	58,695	7,284	0.3	12.4	44,424	75.7	6,987	11.9
Total AA	**4,661,034**	**2,129,700**	**100.0**	**45.7**	**2,242,805**	**48.1**	**288,529**	**6.2**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	23,032	3.5	20,915	3.5	2,012	4.2	105	2.7
Moderate	129,825	19.8	118,246	19.6	11,000	22.9	579	15.0
Middle	183,679	28.1	168,345	28.0	14,347	29.9	987	25.6
Upper	302,912	46.3	282,420	46.9	18,407	38.4	2,085	54.0
Unknown	14,662	2.2	12,349	2.1	2,206	4.6	107	2.8
Total AA	**654,110**	**100.0**	**602,275**	**100.0**	**47,972**	**100.0**	**3,863**	**100.0**
Percentage of Total Businesses:				**92.1**		**7.3**		**0.6**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	44	2.1	44	2.2	0	0.0	0	0.0
Moderate	321	15.4	303	15.1	18	25.4	0	0.0
Middle	494	23.7	476	23.6	18	25.4	0	0.0
Upper	1,188	57.0	1,153	57.3	35	49.3	0	0.0
Unknown	37	1.8	37	1.8	0	0.0	0	0.0
Total AA	**2,084**	**100.0**	**2,013**	**100.0**	**71**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.6**		**3.4**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Comerica's lending performance in the Greater Los Angeles MSA AA is good. For this evaluation, the bank's home mortgage and small business lending generally carried equal weight as Comerica extended a similar volume of these products during the review period. Additionally, a separate evaluation of Multifamily, Other Purpose Closed/Exempt, and Purpose Not Applicable loans was not performed, as the volume of originations during the review period would not have allowed for a meaningful analysis.

Lending Activity

The bank's lending activity in the Greater Los Angeles MSA AA reflects good responsiveness to AA credit needs. Comerica makes use of innovative and/or flexible lending practices, including participation in numerous industry-recognized, government-guaranteed programs. During the review period, Comerica supported small businesses by originating 102 SBA loans and 531 small business micro loans for a combined total of $164.7 million. Additionally, Comerica partnered with the National Faith HomeBuyers Program to provide flexible lending and downpayment assistance for first-time home buyers in the area. Given the lack of affordable housing in the AA, the bank's active engagement in these programs demonstrates Comerica's continued record of serving the credit needs of low-income individuals.

Comerica extended 1,018 HMDA-reportable and 1,116 small business loans between January 1, 2023, and December 31, 2024. The loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects excellent penetration throughout the AA. Comerica's lending in middle- and upper-income geographies did not affect conclusions reached about the bank's lending in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA-reportable loans reflects good penetration throughout the AA, as the bank's performance among LMI census tracts is comparable to the performance of aggregate HMDA reporters as well as the number of owner-occupied units in the area for both 2023 and 2024.

Home Purchase Lending

The geographic distribution of home purchase lending is excellent. Among low-income census tracts, the bank's performance slightly exceeded aggregate HMDA reporters as well as the demographic figure for both 2023 and 2024. Among moderate-income census tracts, the bank's performance significantly exceeded that of aggregate HMDA reporters as well as the demographic figure for both 2023 and 2024. While aggregate HMDA reporters originated 17.8 percent of home purchase loans in moderate-income census tracts, Comerica originated 71.4 percent. Furthermore, the bank originated a majority (73.5 percent) of their home purchase loans during the review period among LMI census tracts, which reflects favorably on the banks efforts to meet the credit needs in all parts of their AA.

Home Refinance Lending

The geographic distribution of home refinance lending is adequate. The distribution of home refinance loans among low-income census tracts is comparable to aggregate HMDA reporters as well as the demographic figure in 2023. In 2024, the bank's lending is slightly above that of aggregate lending as well as the demographic figure. Among moderate-income census tracts, the bank's lending is comparable in 2023 and slightly below aggregate lending as well as the demographic figure in 2024.

Home Improvement Lending

The geographic distribution of home improvement lending among LMI census tracts is adequate. While the bank did not originate any home improvement loans among low-income census tracts in 2024, the bank's lending in 2023 mirrors that of aggregate HMDA reporters. Among moderate-income census tracts, the bank's lending was below aggregate HMDA reporters in 2023, and slightly below in 2024. While both the bank and the aggregate HMDA reporters fell below the percentage of owner-occupied units in the area for both 2023 and 2024, aggregate data serves as a better proxy for loan demand.

Other Purpose Lines of Credit Lending

The geographic distribution of other purpose lines of credit lending is good. While the bank's lending among low-income census tracts is limited, it is comparable to the aggregate HMDA reporters, indicating low loan demand. Among moderate-income census tracts, the bank's lending was slightly below aggregate HMDA reporters in 2023 and mirrored aggregate lending in 2024. While both the bank and the aggregate HMDA reporters fell below the demographic figure for both 2023 and 2024, aggregate data serves as a better proxy for loan demand.

Table 89A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Greater Los Angeles MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	2.0	1.7	588	2.9	1.2	1	2.4	1.8	437	1.2	1.3	1.4
Moderate	35	71.4	17.8	16,111	78.2	11.7	23	56.1	18.5	11,102	31.6	12.7	17.1
Middle	2	4.1	30.8	207	1.0	23.8	6	14.6	31.3	2,948	8.4	25.5	31.6
Upper	11	22.4	49.0	3,696	17.9	62.6	11	26.8	47.8	20,593	58.7	59.9	49.6
Unknown	0	0.0	0.7	0	0.0	0.7	0	0.0	0.6	0	0.0	0.6	0.3
Total	49	100.0	100.0	20,602	100.0	100.0	41	100.0	100.0	35,080	100.0	100.0	100.0
Refinance Loans													
Low	1	0.8	1.9	300	0.6	1.0	3	2.1	1.8	854	1.2	1.6	1.4
Moderate	20	16.3	17.3	5,207	10.8	13.6	18	12.5	17.5	6,422	8.9	14.5	17.1
Middle	29	23.6	28.7	7,841	16.3	20.1	36	25.0	32.0	13,048	18.1	24.6	31.6
Upper	73	59.3	51.7	34,772	72.3	64.9	85	59.0	48.4	49,148	68.1	58.9	49.6
Unknown	0	0.0	0.5	0	0.0	0.3	2	1.4	0.4	2,710	3.8	0.5	0.3
Total	123	100.0	100.0	48,120	100.0	100.0	144	100.0	100.0	72,182	100.0	100.0	100.0
Home Improvement Loans													
Low	2	0.8	0.8	136	0.2	0.8	0	0.0	1.2	0	0.0	1.2	1.4
Moderate	23	8.6	13.5	4,849	7.8	10.3	20	11.0	14.8	3,515	7.8	11.2	17.1
Middle	64	24.1	30.5	12,258	19.8	23.5	54	29.8	32.8	11,522	25.4	26.3	31.6
Upper	177	66.5	54.9	44,620	72.1	65.0	107	59.1	50.9	30,306	66.8	60.8	49.6
Unknown	0	0.0	0.3	0	0.0	0.4	0	0.0	0.2	0	0.0	0.4	0.3
Total	266	100.0	100.0	61,863	100.0	100.0	181	100.0	100.0	45,343	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	11.9	0	0.0	9.8	0	0.0	10.6	0	0.0	4.6	8.8
Moderate	1	33.3	36.8	9,580	20.8	24.7	0	0.0	40.2	0	0.0	31.2	30.7
Middle	1	33.3	24.7	10,175	22.1	33.9	0	0.0	25.7	0	0.0	28.3	27.1
Upper	1	33.3	24.3	26,250	57.1	29.2	1	100.0	20.9	1,210	100.0	33.9	30.5
Unknown	0	0.0	2.2	0	0.0	2.4	0	0.0	2.7	0	0.0	2.0	2.9
Total	3	100.0	100.0	46,005	100.0	100.0	1	100.0	100.0	1,210	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	4	0.7	1.8	1,024	0.5	1.8	5	1.1	1.8	1,521	0.8	1.7	1.4
Moderate	87	15.8	17.0	37,994	16.8	13.1	76	16.2	17.6	23,944	12.8	14.8	17.1
Middle	124	22.5	29.7	36,262	16.0	22.7	119	25.4	31.7	31,939	17.1	25.4	31.6
Upper	334	60.7	51.0	150,990	66.6	61.6	266	56.8	48.4	127,117	67.9	57.5	49.6
Unknown	1	0.2	0.6	287	0.1	0.7	2	0.4	0.5	2,710	1.4	0.7	0.3
Total	550	100.0	100.0	226,557	100.0	100.0	468	100.0	100.0	187,231	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 89B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Greater Los Angeles MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	1.0	0	0.0	0.5	1	1.0	1.0	230	0.7	0.6	1.4
Moderate	8	7.5	11.9	2,247	6.6	6.3	13	13.4	13.4	2,686	8.3	9.1	17.1
Middle	28	26.4	28.4	5,781	16.9	17.7	22	22.7	32.5	4,221	13.0	25.0	31.6
Upper	69	65.1	58.4	25,927	75.7	75.1	61	62.9	52.9	25,325	78.0	65.1	49.6
Unknown	1	0.9	0.3	287	0.8	0.3	0	0.0	0.2	0	0.0	0.2	0.3
Total	106	100.0	100.0	34,242	100.0	100.0	97	100.0	100.0	32,462	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.1	0	0.0	0.4	0	0.0	1.1	0	0.0	0.6	1.4
Moderate	0	0.0	13.4	0	0.0	4.4	2	50.0	15.2	219	23.0	6.9	17.1
Middle	0	0.0	28.9	0	0.0	11.3	1	25.0	33.4	200	21.0	17.7	31.6
Upper	3	100.0	56.2	15,725	100.0	83.2	1	25.0	50.1	535	56.1	74.3	49.6
Unknown	0	0.0	0.4	0	0.0	0.6	0	0.0	0.3	0	0.0	0.4	0.3
Total	3	100.0	100.0	15,725	100.0	100.0	4	100.0	100.0	954	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.6	0	0.0	1.7	0	0.0	3.1	0	0.0	2.1	1.4
Moderate	0	0.0	20.3	0	0.0	9.5	0	0.0	22.6	0	0.0	21.2	17.1
Middle	0	0.0	21.9	0	0.0	11.2	0	0.0	28.5	0	0.0	13.8	31.6
Upper	0	0.0	53.4	0	0.0	76.6	0	0.0	45.2	0	0.0	62.1	49.6
Unknown	0	0.0	0.8	0	0.0	1.0	0	0.0	0.5	0	0.0	0.8	0.3
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the AA when compared to demographics and the performance of aggregate lenders. The bank's performance indicates significant efforts to meet and exceed the credit needs of small businesses operating in LMI census tracts. Comerica's small business lending among low-income census tracts exceeds the performance of aggregate CRA-reporters as well as the percentage of businesses located in such tracts in 2023 and 2024. Among moderate-income census tracts, Comerica's performance is comparable to aggregate CRA-reporters as well as the demographic figure in 2023 but exceeds both in 2024.

Table 90

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Greater Los Angeles MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	25	4.4	3.2	5,063	3.9	3.4	32	5.8	3.1	6,883	5.0	3.5	3.5
Moderate	106	18.8	19.6	29,551	23.0	20.2	119	21.6	19.1	31,669	22.8	20.3	19.8
Middle	190	33.6	28.6	47,699	37.1	28.1	182	33.0	28.6	44,135	31.8	28.3	28.1
Upper	222	39.3	46.3	41,427	32.2	44.9	192	34.8	46.9	47,947	34.5	44.6	46.3
Unknown	22	3.9	2.1	4,875	3.8	3.3	26	4.7	2.1	8,365	6.0	3.2	2.2
Total	565	100.0	100.0	128,615	100.0	100.0	551	100.0	100.0	138,999	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of lending to borrowers reflects adequate penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's lending distribution to middle- and upper-income borrowers did not affect conclusions reached about the bank's lending to LMI borrowers.

Residential Real Estate (HMDA) Lending

The distribution of HMDA lending by borrower income in the AA is adequate when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA reporters with loan originations or purchases in the AA. Comerica's dispersion of HMDA-reportable loans among low-income borrowers is slightly below that of aggregate HMDA reporters. Among moderate-income borrowers the bank's lending was slightly above aggregate HMDA reporters in 2023, and comparable to aggregate HMDA reporters in 2024. Both the bank's performance and that of aggregate HMDA reporters are significantly below the demographic figure (percentage of families by family income) for both years, which more likely reflects economic challenges in the AA, rather than lack of effort to reach LMI borrowers. As previously noted, the population of the AA increased by only 0.4 percent between 2015 and 2020. The stagnant population growth has likely reduced demand for home purchase loans, which only represent 8.9 percent of Comerica's HMDA lending during the review period. Moreover, LMI families are more likely to struggle meeting downpayment requirements required by lenders to ensure safe and sound lending practices. The result, as indicated in the table below, is that Comerica did not originate any home purchase loans to LMI borrowers during the review period. Aggregate-HMDA reporters also fell significantly below the demographic, confirming the low demand and/or challenges in originating home purchase loans to LMI borrowers in the AA. Comerica originated more refinance and home improvement loans. Refinance loans accounted for 26.3 percent of Comerica's HMDA lending. But these loans must also be considered in the economic context. During the review period, mortgage interest rates increased steadily. The resulting rate hikes would likely result in refinanced mortgages having a higher interest rate than the refinanced loan. Rate increases are more likely to impact LMI borrowers who have reduced disposable income and, therefore, result in lower loan demand from LMI borrowers. Given this context, Comerica's distribution of HMDA lending is adequate, despite underperforming aggregate HMDA-reporters.

Table 91A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Greater Los Angeles MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.6	0	0.0	1.0	0	0.0	2.7	0	0.0	2.0	23.7
Moderate	0	0.0	2.8	0	0.0	1.0	0	0.0	2.9	0	0.0	1.2	16.5
Middle	17	34.7	10.1	6,336	30.8	5.3	9	22.0	8.9	3,567	10.2	4.6	17.9
Upper	30	61.2	56.1	13,221	64.2	58.8	31	75.6	62.1	31,323	89.3	67.7	41.9
Unknown	2	4.1	29.4	1,045	5.1	33.8	1	2.4	23.4	190	0.5	24.6	0.0
Total	49	100.0	100.0	20,602	100.0	100.0	41	100.0	100.0	35,080	100.0	100.0	100.0
Refinance Loans													
Low	3	2.4	5.5	512	1.1	1.5	4	2.8	5.4	471	0.7	3.8	23.7
Moderate	8	6.5	7.5	1,675	3.5	1.4	6	4.2	7.0	1,381	1.9	3.1	16.5
Middle	16	13.0	13.3	3,312	6.9	3.0	3	2.1	13.6	880	1.2	6.8	17.9
Upper	95	77.2	39.1	40,121	83.4	16.7	130	90.3	53.9	67,140	93.0	57.2	41.9
Unknown	1	0.8	34.6	2,500	5.2	77.5	1	0.7	20.1	2,310	3.2	29.2	0.0
Total	123	100.0	100.0	48,120	100.0	100.0	144	100.0	100.0	72,182	100.0	100.0	100.0
Home Improvement Loans													
Low	2	0.8	3.1	304	0.5	2.2	2	1.1	3.0	204	0.4	2.1	23.7
Moderate	17	6.4	8.6	1,592	2.6	4.6	6	3.3	8.1	586	1.3	4.2	16.5
Middle	29	10.9	18.2	4,292	6.9	11.1	20	11.0	18.2	2,289	5.0	11.4	17.9
Upper	217	81.6	59.6	55,553	89.8	62.5	150	82.9	62.1	41,916	92.4	64.7	41.9
Unknown	1	0.4	10.5	122	0.2	19.6	3	1.7	8.6	348	0.8	17.7	0.0
Total	266	100.0	100.0	61,863	100.0	100.0	181	100.0	100.0	45,343	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	1.3	2.9	952	0.5	1.3	7	1.5	3.6	763	0.4	2.5	23.7
Moderate	28	5.1	5.0	3,771	2.1	1.3	16	3.4	5.3	2,212	1.2	1.9	16.5
Middle	75	13.7	12.2	15,858	8.8	4.5	40	8.6	12.2	8,115	4.4	5.5	17.9
Upper	432	79.0	50.6	152,429	84.4	41.4	399	85.4	59.1	172,083	92.5	64.3	41.9
Unknown	5	0.9	29.3	7,542	4.2	51.6	5	1.1	19.8	2,848	1.5	25.7	0.0
Total	547	100.0	100.0	180,552	100.0	100.0	467	100.0	100.0	186,021	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table 91B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Greater Los Angeles MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	2	1.9	3.1	136	0.4	2.9	0	0.0	3.0	0	0.0	3.6	23.7
Moderate	3	2.8	6.2	504	1.5	2.5	4	4.1	7.3	245	0.8	3.9	16.5
Middle	13	12.3	15.8	1,918	5.6	7.6	6	6.2	16.7	1,048	3.2	9.8	17.9
Upper	87	82.1	56.5	27,809	81.2	56.8	87	89.7	62.2	31,169	96.0	68.3	41.9
Unknown	1	0.9	18.4	3,875	11.3	30.1	0	0.0	10.8	0	0.0	14.5	0.0
Total	106	100.0	100.0	34,242	100.0	100.0	97	100.0	100.0	32,462	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.7	0	0.0	0.9	1	25.0	3.8	88	9.2	2.0	23.7
Moderate	0	0.0	9.1	0	0.0	2.1	0	0.0	10.3	0	0.0	3.3	16.5
Middle	0	0.0	16.6	0	0.0	3.5	2	50.0	19.3	331	34.7	6.1	17.9
Upper	3	100.0	49.7	15,725	100.0	42.5	1	25.0	52.0	535	56.1	57.4	41.9
Unknown	0	0.0	20.9	0	0.0	51.0	0	0.0	14.6	0	0.0	31.2	0.0
Total	3	100.0	100.0	15,725	100.0	100.0	4	100.0	100.0	954	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	23.7
Moderate	0	0.0	0.1	0	0.0	0.0	0	0.0	0.8	0	0.0	0.2	16.5
Middle	0	0.0	0.1	0	0.0	0.0	0	0.0	0.3	0	0.0	0.1	17.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	13.9	0	0.0	22.3	41.9
Unknown	0	0.0	99.8	0	0.0	99.9	0	0.0	85.1	0	0.0	77.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

Comerica's distribution of small business loans by revenue size of businesses is adequate. As previously mentioned, 264 institutions reported CRA small business loans in the AA. Of those, Comerica ranked 40th, indicating solid performance but the bank was not a market leader. Moreover, there are presumably a number of institutions that also originated small business loans but were not required to report them. Given this level of competition and Comerica's position in the market, the distribution of small business loans is adequate despite being below the performance of aggregate CRA-reporters. While 92.2 percent of small businesses within the AA reported revenues of $1 million or less, the demographic figure is not presumed to be representative of loan demand. Although the bank was below aggregate lenders, the majority of the loans extended during the review period were originated in amounts of $250,000 or less. Comerica originated 404 loans to start-up businesses in the Greater Los Angeles MSA AA during the review period. Start-up businesses as well as small businesses typically require smaller dollar loans.

Table 92

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Greater Los Angeles MSA													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	214	37.9	53.9	31,555	24.5	33.2	190	34.5	54.1	28,950	20.8	34.5	92.1
Over $1 Million	277	49.0		85,927	66.8		299	54.3		93,807	67.5		7.3
Revenue Unknown	74	13.1		11,133	8.7		62	11.3		16,242	11.7		0.6
Total	565	100.0		128,615	100.0		551	100.0		138,999	100.0		100.0
By Loan Size													
$100,000 or Less	296	52.4	96.5	20,232	15.7	54.4	281	51.0	96.6	22,434	16.1	56.1	
$100,001 - $250,000	122	21.6	2.0	23,802	18.5	13.7	111	20.1	2.0	21,952	15.8	13.7	
$250,001 - $1 Million	147	26.0	1.4	84,581	65.8	32.0	159	28.9	1.3	94,613	68.1	30.2	
Total	565	100.0	100.0	128,615	100.0	100.0	551	100.0	100.0	138,999	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	144	67.3		9,438	29.9		123	64.7		9,399	32.5		
$100,001 - $250,000	45	21.0		8,608	27.3		46	24.2		9,041	31.2		
$250,001 - $1 Million	25	11.7		13,509	42.8		21	11.1		10,510	36.3		
Total	214	100.0		31,555	100.0		190	100.0		28,950	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

Comerica is a leader in making CD loans in the AA. During the review period, the bank originated a total of 100 qualifying CD loans, totaling $732.9 million. When compared to the previous evaluation, the number and dollar amount of CD loans has decreased; however, this quantitative decrease is attributable to the cessation of the SBA's PPP and a shorter review period than the previous evaluation, rather than a qualitative decrease. Considering the ending of the SBA's PPP and the shorter length of review period compared to the previous evaluation, Comerica's CD lending is consistent with prior performance in the AA. Comerica is highly involved in CD activity and continues to address the CD needs of the AA. As shown in the Table 93, the bank originated $109 million through 21 loans to affordable housing initiatives. Given the extremely high cost of housing and needs noted by community contacts, these loans are considered particularly responsive to credit needs in the AA. As a commercial lender, the majority of Comerica's CD lending went to economic development, supporting small businesses to create and maintain jobs. Some notable examples of the bank's CD lending activities include:

- An $80 million line of credit to a lens manufacturer, providing for the retention and improvement of more than 200 LMI jobs.
- A $17.1 million loan to help fund a multifamily apartment complex providing 179 LIHTC units in an area where affordable housing is an identified need.

Table 93

Community Development Lending Assessment Area: Greater Los Angeles MSA		
Purpose	**#**	**$(000)**
Affordable Housing	21	109,013
Community Services	4	43,000
Economic Development	75	580,899
Revitalization and Stabilization	0	0
Total	**100**	**732,912**
Note: Discrepancies in dollar volume totals are possible due to rounding.		

INVESTMENT TEST

Comerica's performance under the Investment Test in the Greater Los Angeles MSA AA is excellent. The bank has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors and is often in a leadership position given its significant use of innovative or complex investments to support CD initiatives. Comerica exhibits excellent responsiveness to AA needs, which is highlighted by the bank's continued efforts in affordable housing, as this was an identified need in the area by a local community contact.

Comerica provides an excellent level of CD investments in the AA. Despite the shorter review period of this evaluation, the bank increased the total number of donations and investments made in the AA. Notably, Comerica increased the total dollar amount of donations and investments by 22.0 percent, or $17.4 million, when compared to the prior evaluation. Table 94 illustrates the breakdown of Comerica's CD investments, grants, and donations within the AA. These include prior period investments that remain on the bank's ledger, current period investments purchased during the current review period, and CD donations made since the previous evaluation. Examples of notable investment and donation activities made by the bank include:

- An $8 million investment with an organization that provides housing for LMI and homeless individuals. Given the increasing homeless population noted by community contacts, this investment is considered particularly responsive.
- An investment of almost $8 million to fund a housing development, a non-profit community institution, and local small businesses in Little Tokyo to promote economic development in the growing historic area.
- A $50,000 donation to a local non-profit organization that helps people who are economically disadvantaged by providing a host of services, including financial literacy.

Table 94

Investment, Grants, and Donations Assessment Area: Greater Los Angeles MSA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	**$(000)**	**#**	**$(000)**	**#**	**$(000)**	**#**	**$(000)**
Affordable Housing	43	53,878	3	13,820	6	56	52	67,754
Community Services	0	0	0	0	75	855	75	855
Economic Development	7	3,667	11	23,999	34	525	52	28,191
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**50**	**57,544**	**14**	**37,819**	**115**	**1,436**	**179**	**96,800**

1 Book value of investment
2 Original market value of investment
Note: Discrepancies in dollar volume totals are possible due to rounding.

SERVICE TEST

The bank's performance under the Service Test in the Greater Los Angeles MSA AA is good primarily due to Comerica's leadership in providing CD services as well as delivery systems being reasonably accessible to geographies and individuals of different income levels.

Retail Services

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the Greater Los Angeles MSA AA. The distribution of the bank's 33 branch offices and 36 full-service ATMs, as of June 23, 2025, was compared to the distribution of the population and businesses among the income tract categories within the AA. The majority of Comerica's branches in the AA are located in upper-income census tracts. This is reasonable because 46.3 percent of businesses in the AA operate in upper-income census tracts. The bank operates a percentage of its branches in moderate- and middle-income census tracts comparable to households and businesses in those tracts. The bank does not operate any branches or ATMs in low-income census tracts; however, only a small percentage of households and businesses are located in low-income census tracts. The table below summarizes the bank's retail locations in the Greater Los Angeles MSA AA.

Table 95

Branch and Full-Service ATM Locations Assessment Area: Greater Los Angeles MSA							
Tract Income	**% of Geographies**	**% of Households**	**% of Businesses**	**Branches**		**Full-Service ATMs**	
				#	**%**	**#**	**%**
Low	5.7	4.9	3.5	0	0.0	0	0.0
Moderate	27.5	25.7	19.8	6	18.2	6	16.7
Middle	29.8	30.1	28.1	9	27.3	10	27.8
Upper	34.3	38.2	46.3	17	51.5	17	47.2
Unknown	2.6	1.2	2.2	1	3.0	3	8.3
Total	**100.0**	**100.0**	**100.0**	**33**	**100.0**	**36**	**100.0**

Note: Percentages may not total 100.0 percent due to rounding.

Since the prior evaluation, the bank closed two branches in the AA, both of which were in upper-income census tracts. Comerica's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Moreover, banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or LMI individuals. The level of branch services and hours offered are consistent throughout the AA.

Community Development Services

Comerica is a leader in providing CD services in the Greater Los Angeles MSA AA. Comerica's employees dedicated a total of 1,811 hours serving in various capacities across 32 organizations offering CD services that aid LMI individuals. Since the prior evaluation, the number of hours increased when considering the length of review period. Because the review period was nine months longer at the prior evaluation examiners broke down the number of services as well as the hours provided to gain a more accurate comparison. Based on this monthly breakdown Comerica increased the number of hours provided on a monthly basis by 18.7 percent when compared to the prior evaluation.

Examples of CD services in the AA include:

- Comerica employees dedicated over a thousand hours to providing financial education to individuals in the AA. A community contact also identified financial education as a significant need in the area, demonstrating Comerica's understanding of and willingness to address AA needs.
- Comerica employees provided 427 hours of technical assistance to various non-profit organizations by serving on their boards of directors. These organizations of various organizations provide a wide range of services benefiting LMI individuals and families in the area.

Table 96

Community Development Services Assessment Area: Greater Los Angeles MSA		
Purpose	**#**	**Hours**
Affordable Housing	0	0
Community Services	444	1,811
Economic Development	0	0
Revitalize and Stabilize	0	0
Total	**444**	**1,811**

SAN FRANCISCO BAY METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SAN FRANCISCO BAY METROPOLITAN ASSESSMENT AREA

- The bank's San Francisco Bay Metropolitan AA consists of Alameda, Contra Costa, San Francisco, and San Mateo counties in California. These counties represent part of the San Francisco-Oakland-Berkeley, CA MSA, with Marin County excluded from the AA. See Appendix A for an AA map and Appendix B for additional demographic data.
- There have been no changes to the delineation of the AA since the previous evaluation.
- The AA is comprised of 1,039 total census tracts, of which 8.8 percent are designated as low-income, 23.1 percent are moderate-income, 31.8 percent are middle-income, 32.4 percent are upper-income, and 3.9 percent are designated as unknown-income.
- The bank operates 16 full-service branches in the AA, including three located in moderate-income, five in middle-income, seven in upper-income census tracts, and one in an unknow-income census tract.
- According to the FDIC Deposit Market Share Report as of June 30, 2024, the bank held a 0.4 percent of the deposit market share, ranking 14th out of 66 FDIC-insured depository institutions operating in the AA.
- In 2024, the bank ranked 67th out of 604 HMDA reporters in the AA originating or purchasing 159 HMDA reportable loans, and 36th out of 187 CRA reporters with 209 CRA-reportable small business loans.
- Community contacts indicated affordable housing, access to capital for small businesses, as well as financial education for small businesses, as needs in the area.

Table 97

Population Change Assessment Area: San Francisco Bay Metropolitan			
Area	**2015 Population**	**2020 Population**	**Percent Change**
San Francisco Bay Metropolitan	4,270,545	4,486,687	5.1
Alameda County, CA	1,584,983	1,682,353	6.1
Contra Costa County, CA	1,096,068	1,165,927	6.4
San Francisco County, CA	840,763	873,965	3.9
San Mateo County, CA	748,731	764,442	2.1
San Francisco-San Mateo-Redwood City, CA MD	1,589,494	1,638,407	3.1
California	38,421,464	39,538,223	2.9
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- Population trends between 2015 and 2020 reflect growth at a higher rate in each AA county compared to the state increase at 2.9 percent. The AA's two largest counties, Alameda County and Contra Costa County, had the highest rate increase.
- Approximately 32.5 percent of the AA population reside in LMI census tracts, and 39.9 percent of families in the AA are considered LMI.

Table 98

Median Family Income Change Assessment Area: San Francisco Bay Metropolitan			
Area	**2015 Median Family Income ($)**	**2020 Median Family Income ($)**	**Percent Change**
San Francisco Bay Metropolitan	105,889	129,130	21.9
Alameda County, CA	100,875	125,834	24.7
Contra Costa County, CA	104,695	119,567	14.2
San Francisco County, CA	105,254	138,207	31.3
San Mateo County, CA	119,880	148,138	23.6
San Francisco-San Mateo-Redwood City, CA MD	113,346	143,526	26.6
California	77,267	89,798	16.2

Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- As shown in the table above, MFI in the AA grew significantly (21.9 percent) from 2015 to 2020, which is higher than the 16.2 percent increase at the state level.
- According to FFIEC Census data, 5.4 percent of AA families live below the poverty level, which is less than the overall state at 8.9 percent.
- A community contact noted that inflation in recent years and the rising cost of goods have had an adverse impact on everyone in the community.

Table 99

Housing Cost Burden Assessment Area: San Francisco Bay Metropolitan						
Area	**Cost Burden - Renters**			**Cost Burden - Owners**		
	Low-Income	**Moderate-Income**	**All Renters**	**Low-Income**	**Moderate-Income**	**All Owners**
San Francisco Bay Metropolitan	76.3	53.8	42.0	65.7	44.6	27.3
Alameda County, CA	79.5	56.8	44.4	67.0	48.1	26.6
Contra Costa County, CA	80.2	61.5	49.2	67.7	47.0	28.0
San Francisco County, CA	66.8	41.7	33.7	60.9	36.1	27.4
San Mateo County, CA	82.9	56.1	44.6	65.2	43.4	27.5
San Francisco-San Mateo-Redwood City, CA MD	71.8	47.6	37.3	63.1	40.0	27.5
California	81.1	56.6	49.5	67.3	47.9	29.1

Cost burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

- The median housing value in the AA is $875,338, and in San Francisco and San Mateo counties, the median housing value is over $1 million.
- Housing affordability within the AA for low-income renters is a greater burden than the burden on homeowners at any other level. This indicates that it is more economical for low-income borrowers to purchase a home rather than rent. However, downpayment and income verification requirements can act as a barrier to entry into homeownership, especially for many low-income borrowers.
- Overall, housing affordability at every level is comparable to that of the state.
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- Overall, housing affordability at every level is comparable to that of the state.
- The housing affordability ratio[8] in the AA is 12.6, which is below the statewide affordability ratio of 14.6, indicating housing is generally less affordable in the AA compared to the state of California.
- The median age of housing stock in the AA is 59 years old, and 61 years old in LMI census tracts. Older houses are more likely to have higher maintenance, repair, and general upkeep costs.
- A community contact confirmed that affordable housing is a consistent need in the area.

Table 100

Unemployment Rates Assessment Area: San Francisco Bay Metropolitan					
Area	**2019**	**2020**	**2021**	**2022**	**2023**
San Francisco Bay Metropolitan	2.7	8.3	5.6	3.1	3.7
Alameda County, CA	3.0	8.9	6.1	3.4	4.1
Contra Costa County, CA	3.1	9.0	6.4	3.6	4.1
San Francisco County, CA	2.2	7.9	5.1	2.6	3.3
San Mateo County, CA	2.1	6.9	4.6	2.5	3.0
San Francisco-San Mateo-Redwood City, CA MD	2.2	7.5	4.9	2.5	3.2
California	4.1	10.1	7.3	4.3	4.8
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- The unemployment rate in the AA is generally lower than the rest of California, meaning that jobs are plentiful in the AA.
- The unemployment rate in the AA tripled in 2020 due to the COVID-19 pandemic, as many businesses laid off employees due to the social distancing and stay-at-home orders. Even so, AA unemployment remained below that of the state. In 2021, the unemployment rate began to decline but as of 2023, it has not yet reached pre-pandemic levels.
- Major employment industries within the AA include professional and technical services, healthcare and social assistance, and accommodation and food services.
- Major employers in the area include Kaiser Permanente, Salesforce, and Uber.

The following table detail selected characteristics of the AA.

[8] The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

Table 101

2024 San Francisco Bay Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	91	8.8	72,932	7.1	13,583	18.6	240,172	23.5
Moderate	240	23.1	229,789	22.5	17,895	7.8	167,475	16.4
Middle	330	31.8	344,121	33.7	13,218	3.8	191,394	18.7
Upper	337	32.4	362,427	35.5	8,660	2.4	423,164	41.4
Unknown	41	3.9	12,936	1.3	1,582	12.2	0	0.0
Total AA	**1,039**	**100.0**	**1,022,205**	**100.0**	**54,938**	**5.4**	**1,022,205**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	132,500	30,475	3.5	23.0	92,364	69.7	9,661	7.3
Moderate	380,058	167,123	19.2	44.0	192,481	50.6	20,454	5.4
Middle	557,444	306,586	35.3	55.0	221,156	39.7	29,702	5.3
Upper	587,052	356,898	41.1	60.8	192,755	32.8	37,399	6.4
Unknown	41,149	7,819	0.9	19.0	29,308	71.2	4,022	9.8
Total AA	**1,698,203**	**868,901**	**100.0**	**51.2**	**728,064**	**42.9**	**101,238**	**6.0**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	12,707	6.1	11,497	6.0	1,133	7.0	77	7.1
Moderate	37,017	17.8	34,329	18.0	2,527	15.6	161	14.8
Middle	62,536	30.1	57,736	30.3	4,493	27.8	307	28.2
Upper	84,600	40.7	77,739	40.8	6,394	39.5	467	42.8
Unknown	10,846	5.2	9,148	4.8	1,620	10.0	78	7.2
Total AA	**207,706**	**100.0**	**190,449**	**100.0**	**16,167**	**100.0**	**1,090**	**100.0**
Percentage of Total Businesses:				**91.7**		**7.8**		**0.5**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	50	4.7	48	4.7	2	5.1	0	0.0
Moderate	176	16.4	169	16.4	7	17.9	0	0.0
Middle	261	24.3	250	24.2	11	28.2	0	0.0
Upper	566	52.7	547	53.0	18	46.2	1	50.0
Unknown	20	1.9	18	1.7	1	2.6	1	50.0
Total AA	**1,073**	**100.0**	**1,032**	**100.0**	**39**	**100.0**	**2**	**100.0**
Percentage of Total Farms:				**96.2**		**3.6**		**0.2**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Comerica's lending performance in the San Francisco Bay Metropolitan AA is good. The bank's small business lending generally carried more weight when drawing overall conclusions as this product comprised the largest volume of lending in the AA. Additionally, conclusions regarding HMDA-lending were based on the bank's origination of refinance, home improvement, and other purpose lines of credit loan products. A separate evaluation of Home Purchase, Multifamily, Other Purpose Closed/Exempt, and Purpose Not Applicable loans was not performed, as the volume of originations during the review period would not have allowed for a meaningful analysis.

Lending Activity

The bank's lending activity in the San Francisco Bay Metropolitan AA reflects good responsiveness to AA credit needs. Comerica makes use of innovative and/or flexible lending practices to serve the AA communities. During the review period, the bank demonstrated flexible lending practices through its participation in numerous industry-recognized, government-guaranteed lending programs, including 28 SBA loan originations and 170 small business micro loans.

Comerica extended 341 home mortgage loans and 449 small business loans between January 1, 2023, and December 31, 2024. The loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good penetration throughout the AA. Comerica's lending in middle- and upper-income geographies did not affect conclusions reached about the bank's lending in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA reportable loans reflects good penetration throughout the AA. The bank's distribution of HMDA loans among low-income census tract is above aggregate HMDA reporter lending as well as the demographic figure for 2023 and 2024. Among moderate-income census tracts, the bank's lending is comparable to aggregate lending and below the number of owner-occupied units in the area (the demographic figure).

Home Refinance Lending

The geographic distribution of home refinance lending is adequate. Comerica's performance, compared to that of aggregate HMDA reporters, reflects a level of penetration that is commensurate with the demand for these products. The bank's volume of refinancing home loans in LMI census tracts is low; however, additional context must be considered. During the review period, borrowers experienced the highest mortgage loan interest rates in over a decade. Elevated interest rates generally decrease loan demand, as borrowers do not want to lose a lower interest rate previously locked in. Moreover, the rise in interest rates and resulting rise in mortgage payments would impact potential low-income borrowers, who already spend elevated levels of housing cost burden, further discouraging them from refinancing their mortgages. Finally, the rising interest rates would have a more significant impact to the AA than other areas in the nation given the extremely high property values. Given this context, Comerica's performance in originating refinance loans in LMI census tracts is adequate. While Comerica did not originate any refinance loans in low-income census tracts in 2023, the bank's lending was slightly above both aggregate HMDA reporters lending and the demographic figure in 2024. Among moderate income census tracts, the bank's lending is below aggregate HMDA reporters and the demographic figure for both 2023 and 2024. This is less an indicator of poor performance than a condition resulting from a highly competitive market during a time when fewer borrowers were interested in refinancing.

Home Improvement Lending

The geographic distribution of home improvement lending is good. In 2023, the bank exceeded the performance of aggregate HMDA reporters and the demographic figure (number of owner-occupied homes) in low-income census tracts. In 2024, the bank's home improvement lending was above aggregate HMDA reporters and comparable to the demographic figure. Among moderate-income census tracts, the bank's lending was comparable to both the aggregate HMDA reporters and the demographic figure for 2023 and 2024. Home improvement lending represents the largest portion of Comerica's HMDA-reportable loans in the AA and given the older median age of the housing stock, these loans are considered particularly responsive to credit needs.

Other Purpose Lines of Credit Lending

The geographic distribution of other purpose lines of credit is good. The distribution among low-income census tracts exceeded the aggregate HMDA reporters lending, by more than double, as well as exceeding the demographic figure, in both 2023 and 2024. Among moderate-income census tracts, the bank exceeded in 2023 and was comparable to aggregate HMDA reporters in 2024. Neither the bank nor aggregate HMDA reporters met the demographic number for the review period. Aggregate lending serves as a better proxy for loan demand than the demographic figure when evaluating the bank's geographic distribution of HMDA lending.

Table 102A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: San Francisco Bay Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	4.4	0	0.0	2.4	0	0.0	4.4	0	0.0	2.5	3.5
Moderate	0	0.0	19.7	0	0.0	13.4	2	20.0	21.1	1,156	13.1	14.9	19.2
Middle	1	25.0	35.1	329	9.3	29.9	4	40.0	38.5	2,031	22.9	34.5	35.3
Upper	3	75.0	38.8	3,225	90.7	52.7	4	40.0	34.9	5,671	64.0	47.2	41.1
Unknown	0	0.0	2.0	0	0.0	1.5	0	0.0	1.1	0	0.0	0.9	0.9
Total	4	100.0	100.0	3,554	100.0	100.0	10	100.0	100.0	8,858	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.2	0	0.0	2.0	2	4.0	3.7	804	3.6	2.1	3.5
Moderate	4	7.0	16.7	793	3.6	9.2	5	10.0	18.9	941	4.2	13.1	19.2
Middle	20	35.1	28.6	5,945	27.0	22.2	12	24.0	36.8	3,374	14.9	31.3	35.3
Upper	33	57.9	48.6	15,303	69.4	65.3	29	58.0	39.9	17,030	75.4	52.7	41.1
Unknown	0	0.0	1.9	0	0.0	1.3	2	4.0	0.7	423	1.9	0.8	0.9
Total	57	100.0	100.0	22,041	100.0	100.0	50	100.0	100.0	22,572	100.0	100.0	100.0
Home Improvement Loans													
Low	5	6.2	2.1	994	4.4	1.2	2	3.3	2.8	288	1.8	1.6	3.5
Moderate	12	14.8	15.2	2,943	13.1	10.2	10	16.7	17.8	1,515	9.6	12.3	19.2
Middle	19	23.5	34.2	5,310	23.6	25.6	17	28.3	37.4	3,565	22.6	30.8	35.3
Upper	45	55.6	47.8	13,214	58.8	62.3	30	50.0	41.6	10,310	65.5	54.8	41.1
Unknown	0	0.0	0.7	0	0.0	0.7	1	1.7	0.5	70	0.4	0.5	0.9
Total	81	100.0	100.0	22,461	100.0	100.0	60	100.0	100.0	15,748	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	13.4	0	0.0	14.6	0	0.0	9.2	0	0.0	12.1	12.8
Moderate	0	0.0	25.8	0	0.0	25.1	0	0.0	25.8	0	0.0	13.7	22.9
Middle	0	0.0	25.0	0	0.0	16.0	0	0.0	31.3	0	0.0	39.1	28.4
Upper	1	100.0	31.2	5,775	100.0	38.8	2	100.0	29.8	34,340	100.0	27.0	29.9
Unknown	0	0.0	4.6	0	0.0	5.6	0	0.0	3.9	0	0.0	8.0	6.1
Total	1	100.0	100.0	5,775	100.0	100.0	2	100.0	100.0	34,340	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	8	4.4	3.9	1,472	2.4	2.7	7	4.4	3.9	1,349	1.4	3.1	3.5
Moderate	22	12.1	17.4	5,168	8.3	11.9	23	14.5	20.1	5,158	5.5	14.2	19.2
Middle	59	32.4	31.5	16,058	25.7	25.2	49	30.8	38.0	13,136	14.1	33.8	35.3
Upper	93	51.1	45.3	39,770	63.7	58.5	76	47.8	37.1	72,615	77.9	47.5	41.1
Unknown	0	0.0	2.0	0	0.0	1.7	4	2.5	0.9	993	1.1	1.4	0.9
Total	182	100.0	100.0	62,468	100.0	100.0	159	100.0	100.0	93,251	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 102B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: San Francisco Bay Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	3	7.7	2.2	478	5.5	1.2	2	5.7	2.2	169	1.5	1.2	3.5
Moderate	6	15.4	12.9	1,432	16.6	5.9	5	14.3	18.1	1,305	11.4	12.0	19.2
Middle	19	48.7	29.6	4,474	51.8	19.7	16	45.7	39.4	4,166	36.5	33.1	35.3
Upper	11	28.2	54.7	2,253	26.1	72.5	11	31.4	40.0	5,264	46.2	53.3	41.1
Unknown	0	0.0	0.7	0	0.0	0.7	1	2.9	0.3	500	4.4	0.4	0.9
Total	39	100.0	100.0	8,637	100.0	100.0	35	100.0	100.0	11,404	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.2	0	0.0	0.7	1	50.0	2.6	88	26.7	1.0	3.5
Moderate	0	0.0	13.8	0	0.0	3.6	1	50.0	20.4	241	73.3	7.7	19.2
Middle	0	0.0	29.8	0	0.0	11.0	0	0.0	39.6	0	0.0	23.6	35.3
Upper	0	0.0	53.1	0	0.0	83.1	0	0.0	36.9	0	0.0	67.0	41.1
Unknown	0	0.0	1.1	0	0.0	1.6	0	0.0	0.5	0	0.0	0.7	0.9
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	329	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.2	0	0.0	1.7	0	0.0	7.1	0	0.0	4.6	3.5
Moderate	0	0.0	11.8	0	0.0	7.1	0	0.0	23.2	0	0.0	14.9	19.2
Middle	0	0.0	19.9	0	0.0	14.0	0	0.0	33.9	0	0.0	30.7	35.3
Upper	0	0.0	61.5	0	0.0	74.3	0	0.0	35.7	0	0.0	49.8	41.1
Unknown	0	0.0	3.6	0	0.0	2.9	0	0.0	0.0	0	0.0	0.0	0.9
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business loans reflects good penetration throughout the AA. The bank's small business lending performance within low-income census tracts exceeds the aggregate CRA reporters lending as well as demographic figure for 2023. In 2024, the bank's small business lending in low-income census tracts is comparable to aggregate CRA reporters as well as the demographic figure. Among moderate-income census tracts, the bank's lending is comparable to the aggregate CRA reporters as well as the number of small businesses located in moderate-income census tracts for both 2023 and 2024.

Table 103

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: San Francisco Bay Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	16	6.7	5.5	2,181	4.0	5.8	10	4.8	5.0	2,275	4.2	5.7	6.1
Moderate	41	17.1	19.0	10,501	19.1	17.1	29	13.9	18.9	8,350	15.6	17.8	17.8
Middle	77	32.1	31.8	16,543	30.1	29.4	68	32.5	32.0	19,277	36.0	30.0	30.1
Upper	81	33.8	39.6	19,752	35.9	41.5	82	39.2	40.4	18,666	34.8	41.4	40.7
Unknown	25	10.4	3.8	6,013	10.9	6.2	20	9.6	3.4	5,003	9.3	5.0	5.2
Total	240	100.0	100.0	54,990	100.0	100.0	209	100.0	100.0	53,571	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of loans reflects an adequate penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's lending to middle- and upper-income borrowers did not affect conclusions reached about the bank's lending to LMI borrowers.

Residential Real Estate (HMDA) Lending

Comerica's HMDA-reportable lending by borrower income in the AA is good when compared to demographic characteristics of the community and the performance of aggregate HMDA reporters with loan originations or purchases in the AA. The dispersion of HMDA loans among low-income borrowers exceeds aggregate lending in 2023 and is comparable to aggregate HMDA reporters in 2024. Both the bank and the aggregate lenders fell substantially below the number of LMI families in the AA (the demographic figure). As previously mentioned, it is often more difficult for low-income borrowers to qualify for mortgages, especially in a high-interest rate environment and the very high cost of housing in the AA. Despite the increase in mortgage costs, Comerica outperformed aggregate HMDA reporters in 2023 and was very close to aggregate lending in 2024, reflecting favorably on its willingness to extend credit to low-income borrowers. Among moderate-income borrowers, the bank exceeded aggregate HMDA reporters in both 2023 and 2024, while falling just below the demographic figure.

Table 104A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: San Francisco Bay Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.4	0	0.0	0.5	0	0.0	2.3	0	0.0	1.1	23.5
Moderate	0	0.0	6.9	0	0.0	2.9	3	30.0	9.1	1,556	17.6	4.2	16.4
Middle	0	0.0	14.0	0	0.0	8.7	2	20.0	17.9	896	10.1	11.9	18.7
Upper	4	100.0	42.4	3,554	100.0	48.4	5	50.0	55.3	6,406	72.3	68.8	41.4
Unknown	0	0.0	35.3	0	0.0	39.5	0	0.0	15.4	0	0.0	14.0	0.0
Total	4	100.0	100.0	3,554	100.0	100.0	10	100.0	100.0	8,858	100.0	100.0	100.0
Refinance Loans													
Low	3	5.3	4.1	432	2.0	1.4	1	2.0	7.6	137	0.6	3.7	23.5
Moderate	9	15.8	6.4	2,229	10.1	2.0	4	8.0	11.4	668	3.0	5.2	16.4
Middle	8	14.0	7.6	2,246	10.2	2.9	4	8.0	16.8	688	3.0	10.6	18.7
Upper	35	61.4	17.6	16,554	75.1	12.3	40	80.0	48.5	18,579	82.3	62.5	41.4
Unknown	2	3.5	64.3	580	2.6	81.3	1	2.0	15.6	2,500	11.1	18.0	0.0
Total	57	100.0	100.0	22,041	100.0	100.0	50	100.0	100.0	22,572	100.0	100.0	100.0
Home Improvement Loans													
Low	3	3.7	4.8	249	1.1	2.4	4	6.7	6.6	423	2.7	3.7	23.5
Moderate	6	7.4	10.9	857	3.8	5.2	8	13.3	14.3	1,057	6.7	8.6	16.4
Middle	14	17.3	17.9	3,186	14.2	10.9	12	20.0	22.2	1,984	12.6	15.1	18.7
Upper	57	70.4	43.9	17,769	79.1	47.2	34	56.7	50.6	11,599	73.7	62.9	41.4
Unknown	1	1.2	22.6	400	1.8	34.4	2	3.3	6.3	685	4.3	9.6	0.0
Total	81	100.0	100.0	22,461	100.0	100.0	60	100.0	100.0	15,748	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	8	4.4	2.5	878	1.5	0.8	6	3.8	4.5	679	1.2	1.9	23.5
Moderate	23	12.7	6.7	4,086	7.2	2.5	22	14.0	10.7	4,138	7.0	4.7	16.4
Middle	35	19.3	11.4	8,527	15.0	6.2	24	15.3	18.3	4,894	8.3	11.6	18.7
Upper	112	61.9	31.5	42,222	74.5	33.7	102	65.0	52.2	46,015	78.1	66.9	41.4
Unknown	3	1.7	48.0	980	1.7	56.8	3	1.9	14.2	3,185	5.4	14.9	0.0
Total	181	100.0	100.0	56,693	100.0	100.0	157	100.0	100.0	58,911	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table 104B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: San Francisco Bay Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	2	5.1	4.0	197	2.3	2.6	1	2.9	7.0	119	1.0	5.6	23.5
Moderate	8	20.5	9.0	1,000	11.6	3.6	5	14.3	14.7	528	4.6	7.8	16.4
Middle	13	33.3	14.7	3,095	35.8	7.4	6	17.1	22.6	1,326	11.6	15.9	18.7
Upper	16	41.0	34.2	4,345	50.3	33.0	23	65.7	46.5	9,431	82.7	58.9	41.4
Unknown	0	0.0	38.1	0	0.0	53.5	0	0.0	9.2	0	0.0	11.7	0.0
Total	39	100.0	100.0	8,637	100.0	100.0	35	100.0	100.0	11,404	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	5.1	0	0.0	0.7	0	0.0	8.9	0	0.0	3.1	23.5
Moderate	0	0.0	11.0	0	0.0	1.8	2	100.0	17.2	329	100.0	5.0	16.4
Middle	0	0.0	13.2	0	0.0	2.2	0	0.0	21.6	0	0.0	7.0	18.7
Upper	0	0.0	30.9	0	0.0	26.3	0	0.0	42.5	0	0.0	66.3	41.4
Unknown	0	0.0	39.7	0	0.0	69.0	0	0.0	9.8	0	0.0	18.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	329	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	23.5
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.4
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	2.7	0	0.0	3.6	18.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	12.5	0	0.0	27.2	41.4
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	84.8	0	0.0	69.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

Considering the bank's performance when compared to aggregate CRA reporters, the borrower distribution of small business loans by revenue size of businesses is poor. According to available data, 91.7 percent of AA businesses have revenues under $1 million. While demographic figure is not presumed to be representative of loan demand, aggregate CRA reporters originated 58.3 percent and 58.7 percent of small business loans to businesses with revenues less than $1 million, in 2023 and 2024, respectively. The distribution of Comerica's small business loan originations during that time is significantly below the performance of aggregate CRA reporters when considering both the number of loans, as well as the dollar amount. As shown in the table below, in 2023 and 2024 Comerica originated 29.6 percent and 31.6 percent of business loans to businesses with revenues less than $1 million, respectively, indicating that the bank's lending strategies favor larger businesses. In this regard, the bank's performance reflects poorly on Comerica's efforts to meet the credits needs of very small businesses.

Table 105

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: San Francisco Bay Metropolitan													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	71	29.6	58.3	9,072	16.5	33.7	66	31.6	58.7	11,747	21.9	37.1	91.7
Over $1 Million	145	60.4		41,548	75.6		128	61.2		37,844	70.6		7.8
Revenue Unknown	24	10.0		4,370	7.9		15	7.2		3,980	7.4		0.5
Total	240	100.0		54,990	100.0		209	100.0		53,571	100.0		100.0
By Loan Size													
$100,000 or Less	114	47.5	96.8	7,188	13.1	53.5	106	50.7	97.1	8,141	15.2	57.6	
$100,001 - $250,000	64	26.7	1.8	12,019	21.9	12.4	40	19.1	1.7	8,198	15.3	12.3	
$250,001 - $1 Million	62	25.8	1.5	35,783	65.1	34.1	63	30.1	1.2	37,232	69.5	30.0	
Total	240	100.0	100.0	54,990	100.0	100.0	209	100.0	100.0	53,571	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	48	67.6		2,335	25.7		42	63.6		3,140	26.7		
$100,001 - $250,000	17	23.9		3,092	34.1		13	19.7		2,825	24.0		
$250,001 - $1 Million	6	8.5		3,645	40.2		11	16.7		5,782	49.2		
Total	71	100.0		9,072	100.0		66	100.0		11,747	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

The bank makes a relatively high level of CD loans in the AA. During the review period, the bank originated 41 qualifying CD loans, totaling $98.1 million. Since the previous evaluation, the number and dollar amount of CD lending has decreased; however, the decrease is largely attributable to the cessation of the SBA's PPP ending in May 2021, in which Comerica was heavily involved. Considering the ending of the SBA's PPP and the shorter length of review period compared to the previous evaluation, Comerica's CD lending is consistent in the AA, while the dollar amount has decreased. Comerica continues to serve the CD needs of the AA; some examples of the bank's CD lending activities include:

- A $1.3 million line of credit to a nonprofit organization that provides emergency rental assistance to community members to prevent homelessness. This is responsive as homelessness and affordable housing assistance are identified as needs in the area by community contact.
- A $10 million line of credit for a manufacturer who is providing permanent jobs to local LMI individuals.

Table 106

Community Development Lending Assessment Area: San Francisco Bay Metropolitan		
Purpose	**#**	**$(000)**
Affordable Housing	4	5,116
Community Services	1	250
Economic Development	36	92,705
Revitalization and Stabilization	0	0
Total	**41**	**98,071**
Note: Discrepancies in dollar volume totals are possible due to rounding.		

INVESTMENT TEST

Comerica's performance under the Investment Test in the San Francisco Bay Metropolitan AA is excellent. The bank has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors and is often in a leadership position given its occasional use of innovative or complex investments to support CD initiatives. Comerica exhibits excellent responsiveness to AA needs, which is highlighted by the bank's continued efforts in affordable housing as this was an identified need by a local community contact.

Comerica has continued to provide an excellent level of CD investments compared to the prior evaluation. Due to the shorter review period of this evaluation, examiners did a comparison on a monthly breakdown to gain an accurate comparison method and found that Comerica increased the total dollar amount of combined donations and investments by 17.3 percent. Table 107 illustrates the breakdown of Comerica's CD investments that remain on the bank's ledger, current period investments purchased during the current review period, and CD donations made since the previous evaluation. The substantial majority (96.4 percent) of investments made in this AA were for LIHTC-eligible funds for the construction or preservation of affordable housing projects.

Table 107

Investment, Grants, and Donations Assessment Area: San Francisco Bay Metropolitan								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	**$(000)**	**#**	**$(000)**	**#**	**$(000)**	**#**	**$(000)**
Affordable Housing	42	22,433	2	4,245	4	90	48	26,768
Community Services	0	0	0	0	32	370	32	370
Economic Development	1	1,000	0	0	9	255	10	1,255
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**43**	**23,433**	**2**	**4,245**	**45**	**715**	**90**	**28,393**

[1] Book value of investment
[2] Original market value of investment
Note: Discrepancies in dollar volume totals are possible due to rounding.

SERVICE TEST

The bank's Service Test performance in the San Francisco Bay Metropolitan AA is good primarily due to Comerica's leadership in providing CD services as well as delivery systems being reasonably accessible to geographies and individuals of different income levels.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its AA. The distribution of the bank's 16 branch offices and 16 full-service ATMs as of June 23, 2025, was compared to the distribution of the population and businesses among the tract categories within the AA. The table below summarizes the bank's retail locations in the San Francisco Bay Metropolitan AA.

Table 108

Branch and Full-Service ATM Locations Assessment Area: San Francisco Bay Metropolitan							
Tract Income	**% of Geographies**	**% of Households**	**% of Businesses**	**Branches**		**Full-Service ATMs**	
				#	**%**	**#**	**%**
Low	8.8	7.7	6.1	0	0.0	0	0.0
Moderate	23.1	22.5	17.8	3	18.8	3	18.8
Middle	31.8	33.0	30.1	5	31.3	5	31.3
Upper	32.4	34.4	40.8	7	43.8	7	43.8
Unknown	3.9	2.3	5.2	1	6.3	1	6.3
Total	**100.0**	**100.0**	**100.0**	**16**	**100.0**	**16**	**100.0**
Note: Percentages may not total 100.0 percent due to rounding.							

The bank closed two branches, one in a low-income census tract, and one in an upper-income census tract in the AA. While Comerica closed a branch located in a low-income census tract, the bank operates a location that is approximately four miles from the location of the closed branch. Thus, Comerica is reasonably able to serve the residents of the low-income census tract in which the branch was closed.

The bank's record of opening or closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Moreover, banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are consistent throughout the AA.

Community Development Services

Comerica is a leader in providing CD services in the AA. Comerica's employees served in various capacities, for 19 different organizations offering CD services that aid LMI individuals for a total of 741 hours. Comerica demonstrates significant responsiveness to AA CD needs. Since the prior evaluation, the hours served by Comerica employees has increased by 17.4 percent, which is especially notable considering the nine-month shorter review period for this evaluation. Comerica employees serving more hours in a shorter review period demonstrates the bank's continued commitment to serving the needs of their AA.

Comerica employees served the AA in a variety of ways, including:

- Dedicating over 300 hours to providing financial literacy to individuals in the community, as well as 45 hours to providing technical assistance to small business owners.
- 138 hours of serving on boards of directors for a variety of organizations that are providing a wide range of community services to meet the needs of LMI individuals and families of the AA.

Table 109

Community Development Services Assessment Area: San Francisco Bay Metropolitan		
Purpose	**#**	**Hours**
Affordable Housing	0	0
Community Services	151	741
Economic Development	0	0
Revitalize and Stabilize	0	0
Total	**151**	**741**

METROPOLITAN ASSESSMENT AREAS
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE CALIFORNIA METROPOLITAN ASSESSMENT AREAS

Inland Empire MSA Assessment Area

- The Inland Empire MSA AA is comprised of the entirety of Riverside and San Bernadino counties, which make up the Riverside-San Bernadino-Ontario MSA in California.
- As of June 23, 2025, Comerica operated three branches in the AA, representing 0.8 percent of total branches.
- As of June 30, 2024, the bank had $97.6 million in deposits in this AA, representing a market share of 0.1 percent and 0.2 percent of the bank's total deposits.
- In 2024, 708 institutions originated or purchased 99,925 HMDA-reportable loans in the AA. The bank ranked 133rd with 88 home mortgage originations representing 0.1 percent of total reportable loans in the AA.
- The bank ranked 54th among 182 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 137,952 CRA-reportable loans made in the AA, the bank originated 57, or less than 0.1 percent.
- According to ACS data, the AA consists of 984 census tracts, including 48 low-, 282 moderate-, 362 middle-, 279 upper-, and 13 unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 4,599,839, representing 11.6 percent of the state's population.
- The AA includes 1,029,309 families, of which 21.8 percent are low-, 17.5 percent are moderate-, 19.3 percent are middle-, and 41.4 percent are upper-income. Approximately 10.5 percent of AA families live below the poverty level.

Salinas MSA Assessment Area

- The Salinas MSA AA is comprised of the entirety of Monterey County, which is coterminous with the Salinas MSA in California.
- As of June 23, 2025, Comerica operated three branches in the AA, representing 0.8 percent of total branches.
- As of June 30, 2024, the bank had $283.5 million in deposits in this AA, representing a market share of 2.4 percent and 0.5 percent of the bank's total deposits.
- In 2024, 297 institutions originated or purchased 4,456 HMDA-reportable loans in the AA. The bank ranked 28th with 36 home mortgage originations representing 0.8 percent of total HMDA-reportable loans in the AA.
- The bank ranked 29th among 92 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 9,249 CRA-reportable loans made in the AA, Comerica originated 23, or 0.2 percent.
- According to ACS data, the AA consists of 104 census tracts, including four low-, 26 moderate-, 34 middle-, 36 upper-, and four unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 439,035, representing 1.1 percent of the state's population.
- The AA includes 92,948 families, of which 21.8 percent are low-, 17.5 percent are moderate-, 20.5 percent are middle-, and 40.2 percent are upper-income. Approximately 8.8 percent of AA families live below the poverty level.

San Diego MSA Assessment Area

- The San Diego MSA AA is comprised of the entirety of San Diego County, which is coterminous with the San Diego-Chula Vista-Carlsbad MSA, in California.
- As of June 23, 2025, Comerica operated 13 branches in the AA, representing 3.4 percent of total branches.
- As of June 30, 2024, the bank had $455.4 million in deposits in this AA, representing a market share of 0.4 percent and 0.7 percent of the bank's total deposits.
- In 2024, 623 institutions originated or purchased 53,700 HMDA-reportable loans in the AA. Comerica ranked 74th with 132 home mortgage originations representing 0.2 percent of total reportable loans in the AA.
- The bank ranked 42nd among 187 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 123,320 CRA-reportable loans made in the AA, the bank originated 120, or 0.1 percent.
- According to ACS data, the AA consists of 737 census tracts, including 46 low-, 167 moderate-, 262 middle-, 248 upper-, and 14 unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 3,298,634, representing 8.3 percent of the state's population.
- The AA includes 759,418 families, of which 22.8 percent are low-, 17.3 percent are moderate-, 18.7 percent are middle-, and 41.2 percent are upper-income. Approximately 7.3 percent of AA families live below the poverty level.

San Jose Metropolitan Assessment Area

- The San Jose Metropolitan AA is comprised of the entirety of Santa Clara County, which along with San Benito County (excluded from the AA) comprises the San Jose-Sunnyvale-Santa Clara, MSA in California.
- As of June 23, 2025, Comerica operated 13 branches in the AA, representing 3.4 percent of total branches.
- As of June 30, 2024, the bank had $4.3 billion in deposits in this AA, representing a market share of 2.7 percent and 6.8 percent of the bank's total deposits.
- In 2024, 455 institutions originated or purchased 23,403 HMDA-reportable loans in the AA. The bank ranked 41st with 116 HMDA-reportable originations representing 0.5 percent of total reportable loans in the AA.
- The bank ranked 16th among 139 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 79,968 CRA-reportable loans made in the AA, the bank originated 206, or 0.3 percent.
- According to ACS data, the AA consists of 408 census tracts, including 29 low-, 89 moderate-, 165 middle-, 124 upper-, and one unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 1,936,259, representing 4.9 percent of the state's population.
- The AA includes 454,149 families, of which 22.9 percent are low-, 16.1 percent are moderate-, 18.7 percent are middle-, and 42.2 percent are upper-income. Approximately 4.3 percent of AA families live below the poverty level.

Santa Cruz MSA Assessment Area

- The Santa Cruz MSA AA is comprised of the entirety of Santa Cruz County, which is coterminous with the Santa Cruz-Watsonville MSA in California.
- As of June 23, 2025, Comerica operated six branches in the AA, representing 1.6 percent of total branches.
- As of June 30, 2024, the bank had $763.0 million in deposits in this AA, representing a market share of 9.5 percent and 1.2 percent of the bank's total deposits.

- In 2024, 274 institutions originated or purchased 3,089 HMDA-reportable loans in the AA. The bank ranked 19th with 30 home mortgage originations representing 1.0 percent of total reportable loans in the AA.
- The bank ranked 12th among 76 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 7,064 CRA-reportable loans made in the AA, the bank originated 63, or 0.9 percent.
- According to ACS data, the AA consists of 70 census tracts, including five low-, 12 moderate-, 29 middle-, 23 upper-, and one unknown-income tract.
- The total population of the AA based on 2020 ACS data was 270,861, representing 0.7 percent of the state's population.
- The AA includes 60,870 families, of which 22.1 percent are low-, 16.7 percent are moderate-, 19.3 percent are middle-, and 42.0 percent are upper-income. Approximately 6.7 percent of AA families live below the poverty level.

Ventura County MSA Assessment Area

- The Ventura County MSA AA is comprised of the entirety of Ventura County, which is coterminous with the Oxnard-Thousand Oaks-Ventura MSA in California.
- As of June 23, 2025, Comerica operated one branch in the AA, representing 0.3 percent of total branches.
- As of June 30, 2024, the bank had $36.1 million in deposits in this AA, representing a market share of 0.2 percent and 0.1 percent of the bank's total deposits.
- In 2024, 461 institutions originated or purchased 12,844 HMDA-reportable loans in the AA. The bank ranked 65th with 22 home mortgage originations representing 0.2 percent of total reportable loans in the AA.
- The bank ranked 48th among 128 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 30,248 CRA-reportable loans made in the AA, the bank originated 17, or 0.1 percent.
- According to ACS data, the AA consists of 190 census tracts, including nine low-, 46 moderate-, 77 middle-, 55 upper-, and three unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 843,843, representing 2.1 percent of the state's population.
- The AA includes 196,312 families, of which 22.0 percent are low-, 16.5 percent are moderate-, 20.8 percent are middle-, and 40.7 percent are upper-income. Approximately 6.1 percent of AA families live below the poverty level.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Additional information regarding detailed demographic information and the HMDA- and CRA-reportable lending for the limited-scope AAs can be found in Appendix C.

Conclusions regarding performance are as follows:

Table 110

Assessment Area	Lending Test	Investment Test	Service Test
Inland Empire MSA	Consistent	Consistent	Consistent
Salinas MSA	Consistent	Consistent	Consistent
San Diego MSA	Consistent	Consistent	Consistent
San Jose Metropolitan	Consistent	Consistent	Consistent
Santa Cruz MSA	Consistent	Consistent	Below
Ventura County MSA	Consistent	Consistent	Below

The institution's lending, investment, and service performance in the area is generally consistent with the overall performance in the state. Though the institution's service performance in the Santa Cruz MSA and Ventura County MSA AA is below Comerica's overall performance in the state, it does not impact the assessed rating.

STATE OF FLORIDA

CRA RATING FOR FLORIDA: Satisfactory

The Lending Test is rated High Satisfactory.
The Investment Test is rated High Satisfactory.
The Service Test is rated High Satisfactory.

Major factors supporting the institution's rating include:

Lending Test

- Lending activity reflects good responsiveness and record of serving the AAs' credit needs, including low-income individuals, low-income areas, and very small businesses.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels, including LMI individuals, and businesses of different sizes is good.
- Comerica makes a relatively high level of CD loans.
- The bank makes limited use of innovative and/or flexible lending practices in serving AA's needs.

Investment Test

- Comerica has a significant level of qualified CD investments and grants, particularly those not routinely provided by private investors and is occassionally in a leadership position.
- The bank makes occasional use of innovative and/or complex investments to support community development initiatives.
- Comerica exhibits good responsiveness to credit and CD needs.

Service Test

- Delivery systems are reasonably accessible to individuals of different income levels throughout the bank's AAs.
- The bank did not open or close any branches in the state of Florida during the review period; therefore, Comerica's record of opening and closing of branches was not evaluated.
- Services do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.
- Comerica provides a relatively high level of CD services.

SCOPE OF THE EVALUATION

The scope of the review for the state of Florida is consistent with the overall scope for the institution, including evaluations under the Lending, Investment, and Service tests. The period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

Comerica has two delineated AAs in the state of Florida: Fort Lauderdale-West Palm Beach Metropolitan and Naples MSA AA. The Fort Lauderdale-West Palm Beach Metropolitan AA was reviewed using full-scope procedures while the Naples MSA AA received a limited-scope review. Factors considered to determine the AA receiving a full-scope review include strategic importance of the AA to the bank operations; volume of lending; number of branches; percentage of total deposits; and length of time since the AA received a full-scope review. Approximately 89.2 percent of lending activity (by number of loans), 87.1 percent of total deposits, and 71.4 percent of total branches within the state of Florida were evaluated through full-scope review.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN FLORIDA

The bank delineates two of its 27 AAs and operates seven of its 379 branches in the state of Florida. As of June 30, 2024, Comerica had $393.1 million in deposits in the state, representing 0.6 percent of total deposits. According to the FDIC Summary of Deposits as of June 30, 2024, the bank had a deposit market share of 0.1 percent and ranked 96th out of 188 FDIC-insured financial institutions across the state.

Of the 7,225 HMDA-reportable loans and 11,551 small business loans originated and purchased by Comerica during the review period, 198 HMDA-reportable loans (2.7 percent) and 154 small business loans (1.3 percent) were extended in the Florida AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Comerica's Lending Test performance in the state of Florida is High Satisfactory. The Lending Test conclusion in the Fort Lauderdale-West Palm Beach Metropolitan AA is good, which is consistent with the overall state rating. The bank's performance in the AA that received limited-scope review is below the performance in the state of Florida.

Lending Activity

Comerica's lending activities in the state of Florida reflect good responsiveness to the credit needs of its AAs. The bank makes limited use of innovative and/or flexible lending programs through its participation in industry-recognized, government-guaranteed programs, including one FHA/VA loan, nine SBA loans, and 57 small business micro loans in the state of Florida.

As outlined in Table 111, this evaluation considered 352 loans totaling $122.8 million. The loan products and origination volumes are consistent with the credit needs of the bank's Florida AAs. The number of small business and HMDA loans extended by the bank was compared against the number of loans made by aggregate lenders during the review period.

Table 111

Summary of Lending Activity – January 1, 2023 through December 31, 2024 Florida Assessment Areas				
Loan Type	**#**	**%**	**$(000)**	**%**
Home Purchase	92	26.1	30,944	25.2
Refinancing	38	10.8	8,369	6.8
Home Improvement	40	11.4	7,946	6.5
Multifamily	1	0.3	26,500	21.6
Other Purpose LOC	19	5.4	4,029	3.3
Other Purpose Closed/Exempt	8	2.3	11,737	9.6
Purpose Not Applicable	0	0.0	0	0,0
Total HMDA-Related	**198**	**56.3**	**89,525**	**72.9**
Total Small Business	**154**	**43.8**	**33,290**	**27.1**
Total Small Farm	**0**	**0.0**	**0**	**0.0**
TOTAL LOANS	**352**	**100.0**	**122,815**	**100.0**
Note: Discrepancies in dollar amount totals are possible due to rounding				

A detailed discussion of the facts and data supporting the overall conclusions regarding Comerica's Lending Test is presented in the Conclusions with Respect to Performance Criteria section for each AA.

Geographic Distribution of Loans

The overall geographic distribution of lending reflects good penetration throughout the bank's AAs in Florida. This performance is consistent across the bank's Fort Lauderdale-West Palm Beach Metropolitan AA.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's overall lending reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. This performance is consistent with the bank's Fort Lauderdale-West Palm Beach Metropolitan AA.

Community Development Lending

Comerica makes a relatively high level of CD loans in the state of Florida. As reflected in Table 112, the bank originated nine CD loans totaling approximately $28.5 million within the state, which comprises 1.1 percent of overall bank-wide CD loan volume by number and 0.8 percent by dollar amount.

CD levels in Florida decreased since the prior evaluation; however, two factors impacting lending levels are noted. First, Comerica was heavily involved in the SBA's PPP, which ceased in 2021; as such, these loans rolled off the bank's portfolio and were paid off. Second, this review period is nine months shorter than the previous evaluation's review period. Adjusting for those factors, Comerica's CD lending in Florida remained consistent with the prior evaluation, with a 5.4 percent increase in dollar amount relative to the length of the review period.

Comerica extended CD loans for a variety of purposes, as noted in Table 112. The bank originated the majority of CD loans with an emphasis on economic development loans supporting small businesses, which aligns with the bank's strategic focuses and demonstrates intentional efforts to serve its AAs in ways that reflect lenders' expertise.

Table 112

Community Development Lending Florida Assessment Areas		
Purpose	**#**	**$(000)**
Affordable Housing	2	400
Community Services	0	0
Economic Development	6	27,969
Revitalization and Stabilization	1	150
Total	**9**	**28,519**
Note: Discrepancies in total amounts possible due to rounding		

INVESTMENT TEST

Comerica's Investment Test in the state of Florida is rated High Satisfactory. The Investment Test conclusions in the Fort Lauderdale-West Palm Beach Metropolitan AA is consistent with the overall state rating. The bank's performance in the AA that received limited-scope review is below the performance in the state of Florida.

Comerica has a significant level of qualified CD investment and grants, particularly those not routinely provided by private investors and is occasionally in a leadership position. While Comerica makes occasional use of innovative and or/complex investments, the bank exhibits good responsiveness to the credit and CD needs of its AAs. Due to the review period being nine months shorter than the prior evaluation's review period, examiners evaluated the total combined amount of donations and investments and found that Comerica increased the total dollar amount by 23.1 percent compared to the prior evaluation.

In addition to the investments made within the bank's AAs, Comerica made four investments in the broader statewide area. The bank invested in a minority owned-depository institution in conjunction with a mentor-protégé relationship focused on capacity building for the depository institution for both years of the review period. The bank also made two $500,000 dollar investments into two different loan funds to help entrepreneurs build their small businesses by providing access to capital. As the bank was sufficiently responsive to the CD needs of its AAs, the qualified activity in which the bank engaged in the broader statewide area is favorably considered as representing the bank's overall responsiveness to CD needs.

Specific details regarding CD investments and donations within the bank's AAs in Florida can be found in the Conclusions with Respect to Performance Tests section for each AA.

Table 113

Investments, Grants, and Donations Florida Assessment Areas								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	**$(000)**	**#**	**$(000)**	**#**	**$(000)**	**#**	**$(000)**
Affordable Housing	11	10,662	2	3,500	2	5	15	14,167
Community Services	0	0	0	0	75	394	75	394
Economic Development	2	723	4	2,000	7	73	13	2,796
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**13**	**11,385**	**6**	**5,500**	**84**	**472**	**103**	**17,357**

[1] Book value of investment
[2] Original market value of investment
Note: Discrepancies in dollar amount totals are possible due to rounding

SERVICE TEST

Comerica's performance under the Service Test in the state of Florida is High Satisfactory. The Service Test conclusions in the Fort Lauderdale-West Palm Beach Metropolitan AA is consistent with the overall state rating. Generally, Comerica's performance in the AA that received a limited-scope review is consistent with the performance in the state of Florida. Details of the bank's explicit retail and CD services can be found in the Conclusions with Respect to Performance Tests section for each AA.

Retail Services

Branch locations, drive-through facilities, and alternative delivery systems, such as online and mobile banking, are reasonably accessible to geographies and individuals of different income levels in the bank's AAs. Of Comerica's seven full-service branches and seven full-service ATMs in the state of Florida, one branch and one ATM are located in LMI census tracts, which aligns reasonably with the distribution of geographies, households, and businesses. Refer to Table 114 for the distribution of Florida branches and full-service ATMs by income level of geography.

Table 114

Branch and Full-Service ATM Locations Florida Assessment Areas								
Tract Income	**Census Tracts**		**% of Households**	**% of Businesses**	**Branches**		**Full-Service ATMs**	
	#	**%**			**#**	**%**	**#**	**%**
Low	53	5.9	4.8	3.1	0	0.0	0	0.0
Moderate	239	26.6	27.7	23.6	1	14.3	1	14.3
Middle	279	31.0	32.2	31.0	2	28.6	2	28.6
Upper	302	33.6	34.2	40.8	4	57.1	4	57.1
Unknown	26	2.9	1.1	1.4	0	0.0	0	0.0
Total	**899**	**100.0**	**100.0**	**100.0**	**7**	**100.0**	**7**	**100.0**

Note: Percentages may not total 100.0 percent due to rounding.

Comerica's record of opening or closing branches was not evaluated, as the bank had not opened or closed any branches during the review period. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. Moreover, Comerica's operations and product and service offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Banking Services section of this evaluation.

Community Development Services

Comerica provides a relatively high level of CD services in its Florida AAs. Provision of CD services in the bank's Fort Lauderdale-West Palm Beach Metropolitan AA is consistent with the overall state rating. Durning the review period, bank representatives provided 269 services, totaling 803 hours, within its Florida AAs. The bank's directors, officers, and personnel are involved with several organizations providing CD services to LMI individuals and/or geographies. Taking into consideration the length of the review period compared to the prior evaluation, Comerica's efforts in CD services were comparable, and the number of hours was substantially similar. Due to the nine-month difference in review period, examiners broke down activity and hours served per month and found that Comerica has sustained its efforts in its Florida AAs, indicating Comerica's commitment to providing CD services remains. The bank's significant efforts to promote CD services are noted through board participation, financial literacy, and entrepreneurship training.

Table 115

Community Development Services Florida Assessment Areas		
Purpose	**#**	**Hours**
Affordable Housing	0	0
Community Services	269	803
Economic Development	0	0
Revitalize and Stabilize	0	0
Total	**269**	**803**

FORT LAUDERDALE-WEST PALM BEACH METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE FORT LAUDERDALE-WEST PALM BEACH METROPOLITAN ASSESSMENT AREA

- The bank's Fort Lauderdale-West Palm Beach Metropolitan AA consists of Boward and Palm Beach counties in Florida. These counties, along with Miami Dade County, which is excluded from the AA, represent the Miami-Fort Lauderdale-Pompano Beach MSA in Florida. See Appendix A for an AA map and Appendix B for additional demographic data.
- There have been no changes to the delineation of the AA since the previous evaluation.
- The AA is comprised of 790 total census tracts, of which 5.7 percent are designated as low-income, 27.6 percent are moderate-income, 29.7 percent are middle-income, 34.1 percent are upper-income, and 2.9 percent are designated as unknown-income.
- The bank operates five full-service branches in the AA, including one in moderate-income, two in middle-income, and two in upper-income census tracts.
- According to the FDIC Deposit Market Share Report as of June 30, 2024, the bank had a 0.3 percent market share, ranking 29th out of 64 FDIC-insured depository institutions operating in the AA.
- In 2024, the bank ranked 105th out of 885 HMDA reporters in the AA with 84 HMDA originations and purchases, and 57th out of 232 CRA reporters with 68 CRA small business loans.
- Community contacts indicated affordable housing, financial literacy, technical assistance training for small businesses, as well as access to capital are prevalent needs in the area.

Table 116

Population Change Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Fort Lauderdale-West Palm Beach Metropolitan	3,221,958	3,436,566	6.7
Broward County, FL	1,843,152	1,944,375	5.5
Palm Beach County, FL	1,378,806	1,492,191	8.2
West Palm Beach-Boca Raton-Delray Beach, FL MD	1,378,806	1,492,191	8.2
Florida	19,645,772	21,538,187	9.6
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- Population in the AA between 2015 and 2020 increased moderately but was below the statewide growth rate.
- Approximately 34.1 percent of the AA population reside in LMI census tracts, and 39.9 percent of families in this AA are considered LMI.
- A local contact noted that population growth has been relatively steady and without any notable changes.

Table 117

Median Family Income Change Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan			
Area	2015 Median Family Income ($)	2020 Median Family Income ($)	Percent Change
Fort Lauderdale-West Palm Beach Metropolitan	69,282	76,223	10.0
Broward County, FL	67,531	73,430	8.7
Palm Beach County, FL	72,016	79,785	10.8
West Palm Beach-Boca Raton-Delray Beach, FL MD	72,016	79,785	10.8
Florida	62,828	69,670	10.9

Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- As shown in the table above, the AA's MFI increased at a comparable rate to that of the state of Florida between 2015 and 2020.
- According to FFIEC data, 8.9 percent of AA families live below the poverty level, which is slightly below the statewide figure at 9.5 percent.
- A local contact who works closely with homeless families in transition from homelessness, noted that many LMI families work low-wage jobs and cannot afford necessities, including gas, food, electricity, healthcare, etc.

Table 118

Housing Cost Burden Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Fort Lauderdale-West Palm Beach Metropolitan	85.6	75.6	56.3	71.9	45.2	30.3
Broward County, FL	86.4	78.2	57.5	73.2	47.5	31.9
Palm Beach County, FL	84.3	71.5	54.4	70.4	42.5	28.4
West Palm Beach-Boca Raton-Delray Beach, FL MD	84.3	71.5	54.4	70.4	42.5	28.4
Florida	81.1	67.2	51.3	63.5	38.7	24.0

Cost burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

- Housing within the AA for low-income renters is a significantly greater burden than the burden on homeowners at any other level.
- Overall, the cost burden for homeowners and renters in the AA is above the housing cost burden for homeowners and renters statewide.
- The 2024 housing affordability ratio[9] in the AA, at 21.4 percent, is below the statewide ratio of 24.9 percent. This indicates AA housing is less affordable than housing statewide.
- A local contact noted that there is a shortage of affordable housing units and land, thus availability for new affordable housing buildouts is minimal. Additionally, historically disadvantaged neighborhoods are becoming rapidly gentrified due to investors purchasing properties, which drives up the cost of rent and exacerbates community and credit needs for LMI households.

[9] The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

Table 119

Unemployment Rates Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan					
Area	**2019**	**2020**	**2021**	**2022**	**2023**
Fort Lauderdale-West Palm Beach Metropolitan	3.2	8.8	4.7	3.0	2.9
Broward County, FL	3.1	9.4	4.9	3.0	2.9
Palm Beach County, FL	3.3	8.0	4.4	3.0	3.0
West Palm Beach-Boca Raton-Delray Beach, FL MD	3.3	8.0	4.4	3.0	3.0
Florida	3.3	8.1	4.7	3.0	2.9
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- As shown in Table 119, unemployment rates for the AA were similar to the statewide rates between 2019 and 2023.
- In 2020, unemployment rates more than doubled due to the COVID-19 pandemic, as many businesses laid off employees due to the statewide stay-at-home and social distancing orders and expectations. Since 2022, the unemployment rates have stabilized and returned to pre-pandemic levels.
- Major employment industries within the AA include health care and social assistance, retail trade, and accommodation and food services.
- Major employers within the AA include Memorial Health Care System, Tenet Healthcare, NextEra Energy, America Express, and AutoNation.
- A local contact noted that workforce development is a need, especially among LMI individuals so that they can attain higher-paying jobs.

Table 120 details selected characteristics of the AA.

Table 120

2024 Fort Lauderdale-West Palm Beach Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	45	5.7	33,645	4.2	9,279	27.6	175,492	22.0
Moderate	218	27.6	217,683	27.2	31,226	14.3	143,372	17.9
Middle	235	29.7	246,788	30.9	17,102	6.9	146,276	18.3
Upper	269	34.1	293,725	36.7	12,330	4.2	334,200	41.8
Unknown	23	2.9	7,499	0.9	1,490	19.9	0	0.0
Total AA	**790**	**100.0**	**799,340**	**100.0**	**71,427**	**8.9**	**799,340**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	74,462	28,528	3.4	38.3	33,125	44.5	12,809	17.2
Moderate	431,917	198,311	23.8	45.9	166,501	38.5	67,105	15.5
Middle	462,879	262,957	31.5	56.8	133,231	28.8	66,691	14.4
Upper	529,008	336,753	40.4	63.7	97,695	18.5	94,560	17.9
Unknown	18,191	7,357	0.9	40.4	6,082	33.4	4,752	26.1
Total AA	**1,516,457**	**833,906**	**100.0**	**55.0**	**436,634**	**28.8**	**245,917**	**16.2**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	8,208	3.2	7,547	3.1	582	4.3	79	2.5
Moderate	64,367	24.7	59,691	24.5	4,092	30.2	584	18.8
Middle	77,722	29.9	73,393	30.1	3,536	26.1	793	25.6
Upper	105,965	40.7	99,638	40.9	4,745	35.1	1,582	51.0
Unknown	3,846	1.5	3,201	1.3	582	4.3	63	2.0
Total AA	**260,108**	**100.0**	**243,470**	**100.0**	**13,537**	**100.0**	**3,101**	**100.0**
Percentage of Total Businesses:				**93.6**		**5.2**		**1.2**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	32	2.6	26	2.2	6	12.5	0	0.0
Moderate	218	17.6	206	17.3	12	25.0	0	0.0
Middle	370	29.9	358	30.1	12	25.0	0	0.0
Upper	605	48.9	589	49.5	16	33.3	0	0.0
Unknown	12	1.0	10	0.8	2	4.2	0	0.0
Total AA	**1,237**	**100.0**	**1,189**	**100.0**	**48**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.1**		**3.9**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Comerica's lending performance in the Fort Lauderdale-West Palm Beach AA is good. For this evaluation, the bank's home mortgage and small business lending carried similar weight. Home purchase lending is the only home mortgage loan product to be separately evaluated, as the volume of originations of the remaining products would not have allowed for a meaningful analysis.

Lending Activity

The bank's lending activity in the Fort Lauderdale-West Palm Beach AA reflects good responsiveness to AA credit needs. Comerica makes limited use of innovative and/or flexible lending practices to serve the AA communities through its participation in numerous industry-recognized, government-guaranteed programs. During the review period, Comerica originated nine SBA loans and 54 small business micro loans for a combined total of $13.3 million. The bank's level of lending to these programs demonstrates Comerica's record of serving the credit needs of low-income individuals and very small businesses.

Comerica extended 167 home mortgage and 147 small business loans between January 1, 2023, and December 31, 2024. The loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good penetration throughout LMI census tracts. Comerica's lending in middle- and upper-income geographies did not affect conclusions reached about the bank's lending in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA-reportable loans reflects excellent penetration throughout the AA. Comerica's distribution of HMDA-reportable loans among low-income census tracts is comparable to aggregate HMDA reporters and the demographic figure in 2023. In 2024, the bank exceeded the aggregate HMDA reporters as well as the demographic figure. Among moderate-income census tracts, Comerica significantly exceeded the aggregate HMDA reporters by number of loans and dollar amount as well as the demographic figure for both 2023 and 2024.

Home Purchase Lending

The geographic distribution of home purchase lending is excellent. The distribution of 2023 home purchase loans among low-income census tracts is comparable to aggregate HMDA reporters as well as the demographic figure. In 2024, Comerica increased lending among low-income census tracts, exceeding the aggregate HMDA reporters as well as the demographic figure. Among moderate-income census tracts, Comerica's lending significantly exceeded aggregate HMDA reporters as well as the demographic figure for both 2023 and 2024, with 82.1 and 82.9 percent of home purchase loans originated in moderate-income census tracts. The bank's performance far surpasses that of aggregate HMDA reporters and the demographic, indicating concentrated efforts to lend in LMI census tracts and reflects favorably on Comerica's overall performance in meeting credit needs in all areas of its AA.

Table 121A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	2.6	3.4	249	1.9	1.9	3	8.6	3.4	817	8.1	1.9	3.4
Moderate	32	82.1	28.1	9,274	70.3	17.9	29	82.9	27.1	8,390	83.7	17.4	23.8
Middle	1	2.6	33.0	255	1.9	28.4	2	5.7	34.4	326	3.3	32.5	31.5
Upper	5	12.8	34.9	3,419	25.9	50.5	1	2.9	34.6	494	4.9	47.0	40.4
Unknown	0	0.0	0.6	0	0.0	1.3	0	0.0	0.6	0	0.0	1.2	0.9
Total	39	100.0	100.0	13,197	100.0	100.0	35	100.0	100.0	10,027	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.0	0	0.0	0.5	0	0.0	2.2	0	0.0	1.7	3.4
Moderate	9	52.9	22.3	2,320	64.0	9.7	8	50.0	23.5	1,533	46.5	14.7	23.8
Middle	5	29.4	31.7	742	20.5	20.8	4	25.0	32.5	557	16.9	23.6	31.5
Upper	3	17.6	43.2	565	15.6	60.8	4	25.0	41.2	1,207	36.6	59.1	40.4
Unknown	0	0.0	0.8	0	0.0	8.1	0	0.0	0.7	0	0.0	0.8	0.9
Total	17	100.0	100.0	3,627	100.0	100.0	16	100.0	100.0	3,297	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.8	0	0.0	1.1	0	0.0	1.2	0	0.0	0.6	3.4
Moderate	2	12.5	16.0	102	3.4	9.9	8	38.1	16.7	1,329	32.5	10.5	23.8
Middle	4	25.0	29.4	380	12.7	22.1	1	4.8	31.9	92	2.3	25.3	31.5
Upper	10	62.5	52.3	2,514	83.9	65.6	12	57.1	49.6	2,663	65.2	62.8	40.4
Unknown	0	0.0	0.5	0	0.0	1.3	0	0.0	0.6	0	0.0	0.8	0.9
Total	16	100.0	100.0	2,996	100.0	100.0	21	100.0	100.0	4,084	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	12.7	0	0.0	10.9	0	0.0	19.1	0	0.0	2.5	7.8
Moderate	1	100.0	41.8	26,500	100.0	26.8	0	0.0	44.3	0	0.0	23.1	33.5
Middle	0	0.0	22.8	0	0.0	17.7	0	0.0	18.3	0	0.0	53.9	28.7
Upper	0	0.0	20.9	0	0.0	44.3	0	0.0	17.4	0	0.0	20.3	28.1
Unknown	0	0.0	1.9	0	0.0	0.2	0	0.0	0.9	0	0.0	0.1	1.9
Total	1	100.0	100.0	26,500	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	1.2	2.9	249	0.5	1.9	3	3.6	2.8	817	3.9	1.8	3.4
Moderate	44	53.0	25.1	38,196	79.3	15.5	51	60.7	24.8	11,858	56.3	16.8	23.8
Middle	14	16.9	32.1	1,684	3.5	25.0	9	10.7	33.5	2,233	10.6	32.2	31.5
Upper	24	28.9	39.2	8,009	16.6	54.3	21	25.0	38.2	6,138	29.2	47.8	40.4
Unknown	0	0.0	0.7	0	0.0	3.3	0	0.0	0.6	0	0.0	1.4	0.9
Total	83	100.0	100.0	48,138	100.0	100.0	84	100.0	100.0	21,046	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 121B

Geographic Income Level	2023 Bank #	2023 Bank #%	2023 Agg #%	2023 Bank $(000)	2023 Bank $%	2023 Agg $%	2024 Bank #	2024 Bank #%	2024 Agg #%	2024 Bank $(000)	2024 Bank $%	2024 Agg $%	Owner Occupied Units %
Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography — Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan													
Other Purpose LOC													
Low	0	0.0	1.9	0	0.0	0.8	0	0.0	1.5	0	0.0	0.7	3.4
Moderate	0	0.0	15.5	0	0.0	7.5	2	33.3	18.5	185	19.3	9.9	23.8
Middle	4	40.0	29.5	307	16.9	21.2	1	16.7	31.4	298	31.0	22.8	31.5
Upper	6	60.0	52.3	1,511	83.1	68.7	3	50.0	47.9	478	49.7	66.2	40.4
Unknown	0	0.0	0.7	0	0.0	1.8	0	0.0	0.7	0	0.0	0.5	0.9
Total	10	100.0	100.0	1,818	100.0	100.0	6	100.0	100.0	961	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.9	0	0.0	0.6	0	0.0	2.3	0	0.0	0.6	3.4
Moderate	0	0.0	16.8	0	0.0	5.3	4	66.7	18.8	421	15.7	6.3	23.8
Middle	0	0.0	28.8	0	0.0	11.0	1	16.7	31.4	960	35.9	18.6	31.5
Upper	0	0.0	51.4	0	0.0	73.8	1	16.7	46.5	1,296	48.4	58.4	40.4
Unknown	0	0.0	1.2	0	0.0	9.5	0	0.0	1.0	0	0.0	16.2	0.9
Total	0	0.0	100.0	0	0.0	100.0	6	100.0	100.0	2,677	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.6	0	0.0	0.2	0	0.0	1.4	0	0.0	1.7	3.4
Moderate	0	0.0	28.7	0	0.0	10.5	0	0.0	26.7	0	0.0	18.8	23.8
Middle	0	0.0	19.3	0	0.0	6.9	0	0.0	42.5	0	0.0	40.4	31.5
Upper	0	0.0	48.0	0	0.0	68.2	0	0.0	29.5	0	0.0	39.1	40.4
Unknown	0	0.0	2.5	0	0.0	14.3	0	0.0	0.0	0	0.0	0.0	0.9
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business loans reflects adequate penetration throughout the AA. Small business lending within low-income census tracts is comparable to aggregate CRA-reporters by number of loans and is above aggregate CRA reporters by dollar volume for both 2023 and 2024. Comerica's small business lending in low-income census tracts is comparable to the demographic figure for the review period. Among moderate-income census tracts, the bank's lending is comparable to the aggregate CRA reporters by number of loans and dollar volume, as well as the demographic figure for both 2023 and 2024. The bank's distribution of small business loans reflects favorably on Comerica's performance in meeting small business credit needs among businesses operating in LMI census tracts.

Table 122

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	2	2.5	3.2	905	4.9	3.8	2	2.9	3.1	905	6.4	3.6	3.2
Moderate	16	20.3	25.1	3,787	20.6	26.5	16	23.5	24.6	3,397	23.9	26.4	24.7
Middle	22	27.8	28.8	6,295	34.3	26.9	20	29.4	28.5	3,901	27.5	27.0	29.9
Upper	30	38.0	41.1	5,882	32.1	40.2	19	27.9	41.9	4,968	35.0	40.2	40.7
Unknown	9	11.4	1.6	1,478	8.1	2.4	11	16.2	1.7	1,020	7.2	2.6	1.5
Total	79	100.0	100.0	18,347	100.0	100.0	68	100.0	100.0	14,191	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of loans reflects good penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's lending to middle- and upper-income borrowers did not affect conclusions reached about the bank's lending to LMI borrowers.

Residential Real Estate (HMDA) Lending

HMDA lending by borrower income in the AA is good when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA reporters with loan originations or purchases in the AA. As previously indicated, there are numerous challenges facing LMI borrowers, including higher payments resulting from increased interest rates and shortage of affordable housing stock in the AA. Notwithstanding these challenges, Comerica's performance in originating HMDA-reportable loans to low-income borrowers is good. The bank outperformed aggregate HMDA reporters in both 2023 and 2024 by number of loans and dollar volume, indicating that relative to competitors, Comerica generally does a better job reaching low-income borrowers. While Comerica's performance falls significantly below the demographic (percentage of AA families classified as low-income), it does not reflect a lack of effort to meet the credit needs of low-income borrowers given the challenges noted in originating loans to low-income borrowers.

Among moderate-income borrowers, Comerica's performance exceeded that of aggregate HMDA reporters in 2023 and 2024 by both number of loans and dollar volume. Additionally, the bank's performance was comparable to the percentage of AA families classified as moderate-income within the AA for both 2023 and 2024.

Table 123A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.0	0	0.0	0.7	0	0.0	1.8	0	0.0	0.6	22.0
Moderate	6	15.4	8.8	1,358	10.3	3.9	3	8.6	8.2	558	5.6	3.6	17.9
Middle	13	33.3	17.5	3,672	27.8	11.8	17	48.6	16.2	4,264	42.5	10.6	18.3
Upper	19	48.7	46.3	7,886	59.8	57.9	15	42.9	48.0	5,205	51.9	58.9	41.8
Unknown	1	2.6	25.4	281	2.1	25.7	0	0.0	25.7	0	0.0	26.3	0.0
Total	39	100.0	100.0	13,197	100.0	100.0	35	100.0	100.0	10,027	100.0	100.0	100.0
Refinance Loans													
Low	3	17.6	5.9	519	14.3	1.5	4	25.0	5.3	543	16.5	2.5	22.0
Moderate	5	29.4	12.3	930	25.6	2.9	4	25.0	11.2	618	18.7	5.0	17.9
Middle	1	5.9	18.8	164	4.5	5.6	3	18.8	17.6	557	16.9	9.8	18.3
Upper	7	41.2	43.2	1,814	50.0	21.9	4	25.0	44.7	1,387	42.1	44.5	41.8
Unknown	1	5.9	19.7	200	5.5	68.1	1	6.3	21.2	192	5.8	38.1	0.0
Total	17	100.0	100.0	3,627	100.0	100.0	16	100.0	100.0	3,297	100.0	100.0	100.0
Home Improvement Loans													
Low	1	6.3	3.7	100	3.3	1.6	1	4.8	3.0	92	2.3	1.0	22.0
Moderate	1	6.3	9.4	50	1.7	4.3	3	14.3	10.5	336	8.2	4.7	17.9
Middle	2	12.5	19.0	127	4.2	11.0	3	14.3	18.5	410	10.0	10.4	18.3
Upper	11	68.8	60.4	2,519	84.1	69.9	13	61.9	61.3	3,146	77.0	73.1	41.8
Unknown	1	6.3	7.5	200	6.7	13.2	1	4.8	6.7	100	2.4	10.7	0.0
Total	16	100.0	100.0	2,996	100.0	100.0	21	100.0	100.0	4,084	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	5	6.1	3.0	763	3.5	0.9	6	7.1	2.9	685	3.3	1.1	22.0
Moderate	14	17.1	9.5	2,443	11.3	3.6	15	17.9	9.3	2,126	10.1	3.9	17.9
Middle	16	19.5	17.8	3,963	18.3	9.7	23	27.4	16.9	5,231	24.9	10.3	18.3
Upper	44	53.7	47.4	13,788	63.7	48.2	37	44.0	48.9	12,670	60.2	56.6	41.8
Unknown	3	3.7	22.3	681	3.1	37.5	3	3.6	22.1	334	1.6	28.1	0.0
Total	82	100.0	100.0	21,638	100.0	100.0	84	100.0	100.0	21,046	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table 123B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	10.0	4.2	144	7.9	2.3	0	0.0	4.3	0	0.0	2.9	22.0
Moderate	2	20.0	9.6	105	5.8	3.9	2	33.3	10.1	243	25.3	4.5	17.9
Middle	0	0.0	17.9	0	0.0	8.6	0	0.0	18.6	0	0.0	10.2	18.3
Upper	7	70.0	55.5	1,569	86.3	63.9	3	50.0	55.9	676	70.3	71.1	41.8
Unknown	0	0.0	12.9	0	0.0	21.3	1	16.7	11.1	42	4.4	11.3	0.0
Total	10	100.0	100.0	1,818	100.0	100.0	6	100.0	100.0	961	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	5.8	0	0.0	1.1	1	16.7	5.6	50	1.9	1.6	22.0
Moderate	0	0.0	11.2	0	0.0	2.1	3	50.0	12.4	371	13.9	3.2	17.9
Middle	0	0.0	19.0	0	0.0	3.8	0	0.0	20.2	0	0.0	5.7	18.3
Upper	0	0.0	46.5	0	0.0	44.0	2	33.3	51.6	2,256	84.3	62.0	41.8
Unknown	0	0.0	17.5	0	0.0	49.0	0	0.0	10.2	0	0.0	27.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	6	100.0	100.0	2,677	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.9	0	0.0	0.2	0	0.0	1.4	0	0.0	0.2	22.0
Moderate	0	0.0	1.6	0	0.0	0.4	0	0.0	2.7	0	0.0	1.3	17.9
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.3
Upper	0	0.0	0.6	0	0.0	0.4	0	0.0	2.7	0	0.0	5.5	41.8
Unknown	0	0.0	96.9	0	0.0	99.0	0	0.0	93.2	0	0.0	93.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

Considering the bank's performance when compared to aggregate CRA reporters, the borrower distribution of small business loans by revenue size of businesses is good. The distribution of loan originations to businesses with revenues of $1 million or less for both 2023 and 2024 is comparable to the performance of aggregate CRA reporters when considering the number of loans as well as the dollar amount. While both the bank and the aggregate CRA reporters were significantly below the 93.6 percent of businesses in the AA that reported revenues of $1 million or less, the demographic figure is not presumed to be representative of loan demand. A local contact noted that small dollar loans in the amount of $250,000 or less are needed for businesses in the area. Notably, in both 2023 and 2024, the majority of small business loans extended were in amounts of $250,000, which reflects the bank's willingness to lend to small businesses, as they often require smaller dollar loans.

Table 124

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	43	54.4	54.7	7,027	38.3	40.7	33	48.5	52.9	3,747	26.4	39.7	93.6
Over $1 Million	28	35.4		8,535	46.5		27	39.7		8,905	62.8		5.2
Revenue Unknown	8	10.1		2,785	15.2		8	11.8		1,539	10.8		1.2
Total	79	100.0		18,347	100.0		68	100.0		14,191	100.0		100.0
By Loan Size													
$100,000 or Less	43	54.4	95.8	1,732	9.4	50.7	40	58.8	95.7	2,487	17.5	51.8	
$100,001 - $250,000	13	16.5	2.5	2,565	14.0	15.7	11	16.2	2.6	2,189	15.4	15.8	
$250,001 - $1 Million	23	29.1	1.7	14,050	76.6	33.6	17	25.0	1.7	9,515	67.0	32.4	
Total	79	100.0	100.0	18,347	100.0	100.0	68	100.0	100.0	14,191	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	29	67.4		982	14.0		24	72.7		1,337	35.7		
$100,001 - $250,000	5	11.6		895	12.7		5	15.2		950	25.4		
$250,001 - $1 Million	9	20.9		5,150	73.3		4	12.1		1,460	39.0		
Total	43	100.0		7,027	100.0		33	100.0		3,747	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

The bank makes a relatively high level of CD loans in the Fort Lauderdale-West Palm Beach Metropolitan AA. During the review period, the bank originated nine qualifying CD loans totaling $28.5 million. Since the previous evaluation, the number and dollar amount of CD loans decreased; however, this decrease is partially attributable to the cessation of the SBA's PPP and a shorter review period than the prior evaluation. Considering the shorter review period, examiners evaluated the number of loans and dollar amounts on a monthly basis to gain an accurate comparison. Based on this analysis, the bank's efforts were comparable in number of loans and increased, by 5.4 percent, the dollar amount of CD lending in the AA. This demonstrates Comerica's continued commitment to serve the community through CD lending.

Comerica's CD lending exhibits a good record of serving the credit needs of LMI individuals and very small businesses. The majority of CD lending promoted economic development in the area by providing lines of credit to various businesses enabling permanent jobs for local LMI residents. A local community contact noted work-force development and affordable housing as needs in the area. To address these needs, Comerica funded lines of credit to multiple organizations that serve LMI individuals, including affordable housing and a job coaching program.

Table 125

Community Development Lending Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan		
Purpose	**#**	**$(000)**
Affordable Housing	2	400
Community Services	0	0
Economic Development	6	27,969
Revitalization and Stabilization	1	150
Total	**9**	**28,519**
Note: Discrepancies in dollar volume totals are possible due to rounding.		

INVESTMENT TEST

The bank's performance under the Investment Test is good. Comerica has a significant level of qualified CD investments and grants, particularly those not routinely provided by private investors and is occassionally in a leadership position. The bank makes occasional use of innovative or complex investments to support CD initiatives. Comerica exhibits good responsiveness to AA needs, including those highlighted by a local community contact. Since the prior evaluation, Comerica's investments decreased slightly. However, when considering the shorter review period, as compared to the prior evaluation, both the number and dollar amount of investments increased. When comparing the investments by months of review, the combined dollar amount of donations and investments increased by 30.9 percent compared to the prior evaluation. This reflects Comerica's continued commitment to CD within the AA.

Table 126 illustrates the breakdown of Comerica's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the review period, and CD donations made since the previous evaluation. Some notable investments include:

- Comerica invested or retained investments totaling $13.3 million in affordable housing initiatives. These investments are considered particularly responsive given the shortage of affordable housing options in the AA.
- A $2.5 million investment into the rehabilitation of a 164-unit apartment complex targeting low-income families. All the units will benefit from a HUD project-based Section 8 Housing Assistance Payments Contract.
- A $55,000 donation to an organization that provides a range of technical assistance, including preparation of business plans, marketing strategies, and management and accounting training to small businesses in the AA, which was noted by a local contact as a need in the area.

Table 126

Investment, Grants, and Donations Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan								
Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	10	9,780	2	3,500	2	5	14	13,285
Community Services	0	0	0	0	57	305	57	305
Economic Development	1	222	1	1,000	4	53	6	1,275
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**11**	**10,002**	**3**	**4,500**	**63**	**363**	**77**	**14,865**

[1] Book value of investment
[2] Original market value of investment
Note: Discrepancies in dollar volume totals are possible due to rounding.

SERVICE TEST

The bank's Service Test performance is good primarily due to Comerica providing a relatively high level of CD services as well as delivery systems being reasonably accessible to geographies and individuals of different income levels in the Fort Lauderdale-West Palm Beach Metropolitan AA.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its AA. The distribution of the bank's five branch offices and five full-service ATMs as of June 23, 2025, was compared to the distribution of the population and businesses among the tract categories within the AA. The table below summarizes the bank's retail locations in the Fort Lauderdale-West Palm Beach Metropolitan AA relative to geographies, households, and businesses in the area.

Table 127

Branch and Full-Service ATM Locations Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan							
Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	5.7	4.9	3.2	0	0.0	0	0.0
Moderate	27.6	28.7	24.7	1	20.0	1	20.0
Middle	29.7	31.2	29.9	2	40.0	2	40.0
Upper	34.1	34.2	40.8	2	40.0	2	40.0
Unknown	2.9	1.1	1.5	0	0.0	0	0.0
Total	**100.0**	**100.0**	**100.0**	**5**	**100.0**	**5**	**100.0**

Note: Percentages may not total 100.0 percent due to rounding.

Comerica's record of opening or closing branches was not evaluated, as the bank had not opened or closed any branches during the review period.. Moreover, banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals.

Community Development Services

Comerica provides a relatively high level of CD services in the AA. Comerica's employees served in various capacities for 29 different organizations, offering 190 CD services that aid LMI individuals for a total of 503 hours. Since the prior evaluation, the number of services and hours has decreased overall; however, when considering the length of the review period, both number of services and service hours per month have actually increased. Because the review period was nine months longer at the prior evaluation, examiners compared how many services and service hours Comerica employees contributed per month of the review period to gain an accurate comparison and noted an increase of 19.0 percent in number of CD services and an increase of 17.2 percent number of hours. Examiners determined Comerica provided more CD services and hours when broken down on a monthly basis. This reflects Comerica's continued commitment to serve the LMI individuals within their AA.

Examples of CD services in the AA include:

- Employees partnered various small businesses programs to provide 244 hours of technical assistance to current and future small business owners. Small business technical assistance was identified as a need by a local community contact.
- Employees served with various organizations to provide 135 hours of financial literacy education to LMI individuals, including several programs for educating young people. Financial education was also identified as a need by a local community contact.
- Employees dedicated 132 hours to serving with an organization whose mission is to inspire young entrepreneurs. This organization works with students by providing financial education, including how to start and run a business, as well as programs to foster creative ideas.

Table 128

Community Development Services Assessment Area: Fort Lauderdale-West Palm Beach Metropolitan		
Purpose	**#**	**Hours**
Affordable Housing	0	0
Community Services	190	503
Economic Development	0	0
Revitalize and Stabilize	0	0
Total	**190**	**503**

METROPOLITAN ASSESSMENT AREA
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE FLORIDA METROPOLITAN ASSESSMENT AREA

Naples MSA Assessment Area

- The Naples MSA AA is comprised of the entirety of Collier County, which is coterminous with the Naples-Marco Island MSA in Florida.
- As of June 23, 2025, Comerica operated two branches in the AA, representing 0.5 percent of total branches.
- As of June 30, 2024, the bank had $50.5 million in deposits in this AA, representing a market share of 0.3 percent and 0.1 percent of the bank's total deposits.
- In 2024, 619 institutions originated or purchased 10,762 HMDA-reportable loans in the AA. The bank ranked 70th with 16 home mortgage originations representing 0.1 percent of total reportable loans in the AA.
- The bank ranked 48th among 133 institutions originating or purchasing CRA-reportable loans in the AA in 2024. Of the 18,327 CRA-reportable loans made in the AA, the bank originated three, or less than 0.1 percent.
- According to ACS data, the AA consists of 109 census tracts, including eight low-, 21 moderate-, 44 middle-, 33 upper-, and three unknown-income tracts.
- The total population of the AA based on 2020 ACS data was 375,752, representing 1.7 percent of the state's population.
- The AA includes 98,121 families, of which 21.9 percent are low-, 18.0 percent are moderate-, 19.6 percent are middle-, and 40.5 percent are upper-income. Approximately 7.1 percent of AA families live below the poverty level.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Additional information regarding detailed demographic information and the HMDA- and CRA-reportable lending for the limited scope AA can be found in Appendix C.

Conclusions regarding performance are as follows:

Table 129

Assessment Area	Lending Test	Investment Test	Service Test
Naples MSA	Below	Below	Consistent

The institution's lending and investment performance in the AA is below Comerica's performance in the state; however, it does not impact the assessed rating.

STATE OF ARIZONA

CRA RATING FOR ARIZONA: Satisfactory

The Lending Test is rated High Satisfactory.
The Investment Test is rated High Satisfactory.
The Service Test is rated High Satisfactory.

Major factors supporting the institution's rating include:

Lending Test

- Lending activity reflects good responsiveness and record of serving the AAs' credit needs, including low-income individuals, low-income areas, and very small businesses.
- The geographic distribution of loans reflects good penetration throughout the AAs.
- The bank's distribution of loans among individuals of different income levels, including LMI individuals, and businesses of different sizes is excellent.
- Comerica makes a relatively high level of CD loans.
- The bank makes use of innovative and/or flexible lending practices in serving AA's needs.

Investment Test

- Comerica has a significant level of qualified CD investments and grants, particularly those not routinely provided by private investors and is occassionally in a leadership position.
- The bank makes occasional use of innovative and/or complex investments to support CD initiatives.
- Comerica exhibits good responsiveness to credit and CD needs.

Service Test

- Delivery systems are reasonably accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.
- Comerica provides a relatively high level of CD services.

SCOPE OF THE EVALUATION

The scope of the review for the state of Arizona is consistent with the overall scope for the institution, including evaluations under the Lending, Investment, and Service tests. The time period and products evaluated for this state are also unchanged from the scope discussed in the Institution section of this report.

The bank designates the Phoenix Metropolitan AA as its single AA in the state of Arizona. As such, the Phoenix Metropolitan AA was reviewed using full-scope examination procedures. Accordingly, the statewide rating is based on the CRA performance within this AA and any other investment or services that are provided on a broader, statewide basis.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN ARIZONA

Comerica bank delineates one of its 27 AAs and operates 12 of its 379 branches in the state of Arizona. As of June 30, 2024, Comerica had $609.9 million in deposits in the state, representing 1.0 percent of total deposits. According to the FDIC Deposit Market Share Report as of June 30, 2024, the bank had a 0.4 percent market share, ranking 18th out of 60 FDIC-insured depository institutions operating in the state.

Of the 7,225 HMDA-reportable loans and 11,551 small business loans originated and purchased by Comerica during the review period, 370 HMDA-reportable loans (5.1 percent) and 239 small business loans (2.1 percent) were extended in the Arizona AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions with respect to Comerica's performance in the state of Arizona are solely based on the bank's performance in the only delineated AA within the state. See the Pheonix Metropolitan AA section below for information on the bank's CRA performance in the state of Arizona.

PHOENIX METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE PHOENIX METROPOLITAN ASSESSMENT AREA

- The bank's Phoenix Metropolitan AA is comprised of Maricopa County but excludes Pinal County, which represents a portion of the Phoenix-Mesa-Chandler, AZ MSA. Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- There have been no changes to the delineation of the AA since the previous evaluation.
- The AA is comprised of 1,009 total census tracts, of which 6.3 percent are designated as low-income, 25.7 percent are moderate-income, 31.1 percent are middle-income, 34.5 percent are upper-income, and 2.4 percent are designated as unknown-income.
- The bank operates 12 full-service branches in the AA, including four in moderate-income, four in middle-income, and four in upper-income census tracts.
- According to the FDIC Deposit Market Share Report as of June 30, 2024, the bank had a 0.4 percent market share, ranking 18th out of 60 FDIC-insured depository institutions operating in the AA.
- In 2024, the bank ranked 105th out of 866 HMDA reporters in the AA with 159 HMDA originations and purchases, and 43rd out of 240 CRA reporters with 118 CRA small business loans.
- Community contacts indicated a significant need for affordable housing, financial education for small businesses owners and LMI families seeking homeownership, and workforce development. Additionally, community contact identified access to capital and technical assistance as needs for small businesses operating in the AA.

Table 130

Population Change Assessment Area: Phoenix Metropolitan AA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Phoenix Metropolitan	4,018,143	4,420,568	10.0
Phoenix-Mesa-Chandler, AZ MSA	4,407,915	4,845,832	9.9
Arizona	6,641,928	7,151,502	7.7
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- The AA experienced modest population growth between 2015 and 2020, exceeding the growth rate of the Phoenix-Mesa-Chandler, AZ MSA and the state of Arizona.
- Several colleges and universities are located in downtown Phoenix including Grand Canyon University, Arizona State University, and University of Phoenix.
- A community contact attributed the significant population growth in the AA to employment opportunities and lower cost of living compared to other metropolitan areas in the U.S. Additionally, the community contact noted that the AA experiences seasonal population increases as affluent people from Southern California and the mid-west vacation in the AA during the winter months.

Table 131

Median Family Income Change Assessment Area: Phoenix Metropolitan AA			
Area	2015 Median Family Income ($)	2020 Median Family Income ($)	Percent Change
Phoenix Metropolitan	70,745	80,161	13.3
Phoenix-Mesa-Chandler, AZ MSA	69,582	78,930	13.4
Arizona	64,986	73,456	13.0

Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- As noted in the table above, the AA's MFI increased at a commensurate rate to the MFIs for the Phoenix-Mesa-Chandler, AZ MSA and the state of Arizona, at approximately 13.3 percent.
- According to 2020 FFIEC data, approximately 9.1 percent of AA families live below the poverty level, which is similar to the 10.1 percent statewide figure.
- A community contact noted that the COVID-19 pandemic, and inflation, exacerbated credit and community needs for LMI families, and as a result many LMI families within the AA struggle to afford basic life necessities such as food, housing, gas etc.

Table 132

Housing Cost Burden Assessment Area: Phoenix Metropolitan AA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Phoenix Metropolitan	81.1	57.7	44.0	63.8	37.7	19.8
Phoenix-Mesa-Chandler, AZ MSA	80.1	56.6	43.6	62.5	37.1	19.8
Arizona	78.5	54.7	43.0	60.0	36.2	19.7

Cost burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on renters and owners at any other income level.
- Overall, the cost burden for homeowners and renters in the AA is comparable to the housing cost burden for homeowners and renters statewide in Arizona.
- The 2024 housing affordability ratio[10] in the AA, at 24.2 percent, is slightly below the statewide ratio of 25.4 percent. This indicates AA housing is generally less affordable in the AA than statewide housing.
- A community contact indicated that housing within the AA has historically been affordable; however, recently there is a shortage of affordable housing within the AA, which adversely impacts LMI families and contributes to the rise of homelessness.
- The community contact attributed the limited affordable housing to significant population increase, inflation and the high-interest rate environment, and shortage of numerous housing construction supplies and ongoing supply chain issues resulting from the COVID-19 pandemic. In addition, homeownership for LMI families is particularly unattainable due to the high-interest rate environment.

[10] The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

Table 133

Unemployment Rates Assessment Area: Phoenix Metropolitan AA					
Region	**2019**	**2020**	**2021**	**2022**	**2023**
Phoenix Metropolitan	4.1	7.3	4.6	3.3	3.4
Phoenix-Mesa-Chandler, AZ MSA	4.2	7.3	4.6	3.4	3.5
Arizona	4.8	7.8	5.1	3.8	3.9
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- Unemployment rates in the AA consistently remained below the overall statewide figure.
- Unemployment rates significantly increased in 2020 due to the COVID-19 pandemic, as many businesses laid off their employees given the statewide stay at home and social distancing mandates. In 2021, the AA and statewide unemployment rates stabilized and continue to decrease.
- Major employment industries in the AA include healthcare and social assistance, retail trade, and government. The top employers in the AA include the State of Arizona, City of Phoenix, Walmart Stores, and the Banner Health system.
- A community contact noted that Taiwan Semiconductor Manufacturing Company, global leader in semiconductor manufacturing, recently opened a chip facility within the AA providing over 40,000 permanent employment opportunities.

The following table detail selected characteristics of the AA.

Table 134

2024 Phoenix Metropolitan AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	64	6.3	52,329	5.0	16,580	31.7	213,662	20.4
Moderate	259	25.7	249,837	23.8	39,265	15.7	187,650	17.9
Middle	314	31.1	346,377	33.1	25,076	7.2	209,528	20.0
Upper	348	34.5	396,593	37.8	13,719	3.5	437,059	41.7
Unknown	24	2.4	2,763	0.3	638	23.1	0	0.0
Total AA	**1,009**	**100.0**	**1,047,899**	**100.0**	**95,278**	**9.1**	**1,047,899**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	94,740	26,498	2.6	28.0	58,759	62.0	9,483	10.0
Moderate	467,263	208,235	20.6	44.6	209,530	44.8	49,498	10.6
Middle	590,915	349,840	34.7	59.2	186,145	31.5	54,930	9.3
Upper	606,362	422,448	41.9	69.7	129,770	21.4	54,144	8.9
Unknown	6,600	1,466	0.1	22.2	4,093	62.0	1,041	15.8
Total AA	**1,765,880**	**1,008,487**	**100.0**	**57.1**	**588,297**	**33.3**	**169,096**	**9.6**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	8,989	3.7	7,995	3.6	920	7.3	74	2.5
Moderate	44,863	18.7	40,910	18.2	3,485	27.8	468	15.6
Middle	70,109	29.2	66,251	29.5	3,131	25.0	727	24.2
Upper	114,288	47.7	107,815	48.1	4,745	37.9	1,728	57.4
Unknown	1,558	0.6	1,307	0.6	240	1.9	11	0.4
Total AA	**239,807**	**100.0**	**224,278**	**100.0**	**12,521**	**100.0**	**3,008**	**100.0**
Percentage of Total Businesses:				**93.5**		**5.2**		**1.3**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	35	2.0	31	1.8	4	5.6	0	0.0
Moderate	220	12.5	207	12.3	13	18.3	0	0.0
Middle	528	30.1	505	30.0	23	32.4	0	0.0
Upper	967	55.1	936	55.5	31	43.7	0	0.0
Unknown	6	0.3	6	0.4	0	0.0	0	0.0
Total AA	**1,756**	**100.0**	**1,685**	**100.0**	**71**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.0**		**4.0**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Comerica's lending performance in the Phoenix Metropolitan AA is good. Lending activity reflects good responsiveness to AA credit needs. The geographic distribution of loans reflects good penetration throughout the AA. In addition, the distribution of borrowers reflects excellent penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of CD loans.

Lending Activity

The bank's lending activity in the Phoenix AZ Metropolitan AA reflects good responsiveness to AA credit needs, Comerica makes use of innovative and/or flexible lending practices to serve the AA communities through its participation in numerous industry-recognized, government-guaranteed programs, including two FHA/VA loans, 29 SBA loans, and 128 small business micro loans in the AA.

As noted in Table 135, Comerica originated 370 HMDA-reportable and 239 small business loans between January 1, 2023, and December 31, 2024. The loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus on commercial and residential real estate lending.

Table 135

Summary of Lending Activity – January 1, 2023 through December 31, 2024 Assessment Area: Phoenix Metropolitan				
Loan Type	**#**	**%**	**$(000)**	**%**
Home Purchase	58	9.5	14,916	12.0
Refinancing	107	17.6	32,193	25.9
Home Improvement	130	21.3	18,355	14.7
Multifamily	0	0.0	0	0.0
Other Purpose LOC	63	10.3	8,320	6.7
Other Purpose Closed/Exempt	12	2.0	2,571	2.1
Purpose Not Applicable	0	0.0	0	0,0
Total HMDA-Related	**370**	**60.8**	**76,355**	**61.3**
Total Small Business	**239**	**39.2**	**48,128**	**38.7**
Total Small Farm	**0**	**0.0**	**0**	**0.0**
TOTAL LOANS	**609**	**100.0**	**124,483**	**100.0**
Note: Discrepancies in dollar amount totals are possible due to rounding				

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good penetration throughout the AA. Comerica's lending in middle- and upper-income geographies did not affect conclusions reached about the bank's lending in LMI geographies. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA-reportable loans reflects good penetration throughout the AA. The bank's distribution of HMDA-reportable loans among LMI census tracts generally exceeds the performance of aggregate HMDA reporters and is comparable to demographic data for both 2023 and 2024.

Home Purchase Lending

The geographic distribution of home purchase lending is excellent. The distribution of 2023 among low-income census tracts is slightly above aggregate and the demographic figure. Comerica's home purchase lending among moderate-income census tracts in 2023 substantially exceeded the aggregate data and the demographic figure.

In 2024, the bank's lending among LMI census tracts significantly exceeded the performance of aggregate lenders and the percentage of owner-occupied units in these tracts. Comerica's home purchase performance among LMI census tracts in 2024 was more than twice that of aggregate lenders and the percentage of owner-occupied units in these tracts.

Home Refinance Lending

The geographic distribution of home refinance lending is good. The distribution of 2023 home refinance loans among low-income census tracts is comparable to aggregate data and the demographic figure. The bank's refinance lending in moderate-income census tracts is below both aggregate lending data and the demographic figure.

Among low-income census tracts in 2024, the bank's refinance lending performance was slightly above aggregate lending performance and the demographic figure. Comerica's home refinance lending performance among moderate-income tracts was significantly above aggregate lending performance and the demographic figure.

Home Improvement Lending

The geographic distribution of home improvement lending is adequate. In 2023, Comerica did not extend any home improvement loans in low-income census tracts; however, the bank's performance is comparable to aggregate data. Additionally, there was a limited or low percentage of owner-occupied units within low-income census tracts, which indicates minimal loan demand. Among moderate-income census tracts the bank's distribution of home improvement lending was below aggregate data and significantly below the demographic figure.

In 2024, home improvement loans among low-income census tracts is comparable to aggregate data and the demographic figure. However, the bank's home improvement lending in moderate-income census tracts is below aggregate data and significantly below the demographic figure.

Other Purpose Lines of Credit Lending

The geographic distribution of other purpose lines of credit is good. In 2023, other purpose lines of credit among LMI census tracts is above aggregate data and the demographic figure. Among moderate-income census tracts, the bank's performance is above aggregate data and below the percentage of owner-occupied units in these tracts. Comerica did not originate any other purpose lines of credit in LMI census tracts in 2024.

Table 136A

Geographic Income Level	2023 Bank #	2023 Bank #%	2023 Agg #%	2023 Bank $(000)	2023 Bank $%	2023 Agg $%	2024 Bank #	2024 Bank #%	2024 Agg #%	2024 Bank $(000)	2024 Bank $%	2024 Agg $%	Owner Occupied Units %
Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography — Assessment Area: Phoenix Metropolitan — Bank And Aggregate Loans by Year													
Home Purchase Loans													
Low	1	3.4	2.2	324	5.0	1.4	4	13.8	2.2	1,161	13.8	1.3	2.6
Moderate	15	51.7	18.5	4,065	62.8	13.2	18	62.1	18.4	5,157	61.1	12.9	20.6
Middle	7	24.1	38.4	785	12.1	33.0	2	6.9	37.7	263	3.1	32.2	34.7
Upper	6	20.7	40.8	1,300	20.1	52.3	5	17.2	41.6	1,861	22.0	53.6	41.9
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.1
Total	29	100.0	100.0	6,474	100.0	100.0	29	100.0	100.0	8,442	100.0	100.0	100.0
Refinance Loans													
Low	1	1.9	2.5	240	1.4	1.0	3	5.6	2.3	578	4.0	1.7	2.6
Moderate	7	13.2	19.2	1,193	6.7	11.2	18	33.3	18.1	3,692	25.5	13.7	20.6
Middle	18	34.0	35.9	3,492	19.7	30.2	18	33.3	35.7	2,739	18.9	30.7	34.7
Upper	27	50.9	42.3	12,791	72.2	57.6	15	27.8	43.7	7,468	51.6	53.9	41.9
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.1
Total	53	100.0	100.0	17,716	100.0	100.0	54	100.0	100.0	14,477	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.5	0	0.0	1.1	1	1.9	1.9	46	0.7	1.3	2.6
Moderate	7	9.1	14.1	826	6.9	10.0	4	7.5	14.9	406	6.3	10.4	20.6
Middle	24	31.2	33.0	3,377	28.3	25.9	22	41.5	34.1	1,909	29.6	26.4	34.7
Upper	46	59.7	51.3	7,710	64.7	62.9	26	49.1	49.1	4,081	63.3	61.8	41.9
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0.1
Total	77	100.0	100.0	11,913	100.0	100.0	53	100.0	100.0	6,442	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	18.1	0	0.0	10.5	0	0.0	16.3	0	0.0	6.7	10.0
Moderate	0	0.0	38.7	0	0.0	32.1	0	0.0	36.0	0	0.0	31.9	35.9
Middle	0	0.0	23.5	0	0.0	25.7	0	0.0	27.6	0	0.0	25.0	29.9
Upper	0	0.0	18.5	0	0.0	30.7	0	0.0	19.7	0	0.0	36.0	23.3
Unknown	0	0.0	1.2	0	0.0	1.1	0	0.0	0.5	0	0.0	0.3	0.9
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	4	1.9	2.2	700	1.6	1.9	8	5.0	2.1	1,785	5.4	1.8	2.6
Moderate	39	18.5	17.7	6,976	16.0	13.8	43	27.0	17.7	9,759	29.7	14.3	20.6
Middle	61	28.9	36.9	9,345	21.5	31.4	51	32.1	36.8	5,829	17.7	31.0	34.7
Upper	107	50.7	43.1	26,446	60.8	52.8	57	35.8	43.4	15,515	47.2	52.9	41.9
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.1
Total	211	100.0	100.0	43,467	100.0	100.0	159	100.0	100.0	32,888	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 136B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Phoenix Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	2	4.7	1.0	136	2.6	0.6	0	0.0	1.4	0	0.0	0.9	2.6
Moderate	7	16.3	12.8	564	10.6	8.0	0	0.0	14.3	0	0.0	9.7	20.6
Middle	8	18.6	32.5	1,206	22.8	23.9	9	45.0	34.8	918	30.4	26.6	34.7
Upper	26	60.5	53.6	3,391	64.0	67.4	11	55.0	49.5	2,105	69.6	62.7	41.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.1
Total	43	100.0	100.0	5,297	100.0	100.0	20	100.0	100.0	3,023	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.6	0	0.0	1.0	0	0.0	1.5	0	0.0	1.0	2.6
Moderate	3	33.3	14.4	328	15.9	6.9	3	100.0	15.1	504	100.0	8.8	20.6
Middle	4	44.4	35.7	485	23.5	20.4	0	0.0	37.5	0	0.0	22.9	34.7
Upper	2	22.2	48.3	1,254	60.7	71.7	0	0.0	45.8	0	0.0	67.3	41.9
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.1
Total	9	100.0	100.0	2,067	100.0	100.0	3	100.0	100.0	504	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.7	0	0.0	2.7	0	0.0	1.6	0	0.0	0.5	2.6
Moderate	0	0.0	27.9	0	0.0	24.2	0	0.0	23.3	0	0.0	16.1	20.6
Middle	0	0.0	42.0	0	0.0	34.5	0	0.0	51.9	0	0.0	42.6	34.7
Upper	0	0.0	27.4	0	0.0	38.6	0	0.0	23.3	0	0.0	40.8	41.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the AA. Comerica's small business lending among low-income census tracts exceeds aggregate CRA-reporters and the number of total businesses (the demographic figure) in both 2023 and 2024. Among moderate-income census tracts, Comerica's lending is also above aggregate CRA-reporters as well as the demographic figure for both 2023 and 2024.

Table 137

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Phoenix Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	8	6.6	3.5	1,137	5.0	5.0	10	8.5	3.3	2,810	11.2	5.7	3.7
Moderate	33	27.3	17.6	4,823	21.0	20.5	28	23.7	16.7	4,797	19.1	19.2	18.7
Middle	35	28.9	28.4	7,645	33.3	25.9	30	25.4	28.0	7,185	28.5	26.1	29.2
Upper	43	35.5	49.6	8,904	38.8	47.1	48	40.7	51.1	9,627	38.2	47.6	47.7
Unknown	2	1.7	0.7	450	2.0	1.5	2	1.7	0.6	750	3.0	1.3	0.6
Total	121	100.0	100.0	22,959	100.0	100.0	118	100.0	100.0	25,169	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of loans reflects excellent penetration among individuals of different income levels and businesses of different revenue sizes. Comerica's lending to middle- and upper-income borrowers did not affect conclusions reached about the bank's lending to LMI borrowers.

Residential Real Estate (HMDA) Lending

Comerica's home mortgage lending by borrower income in the Phoenix AZ Metropolitan AA is excellent when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA reporters with loan originations or purchases in the AA. The dispersion of the bank's HMDA-reportable loans among low-income borrowers exceeds the 2023 and 2024 performance of aggregate HMDA reporters but is below the percentage of AA families classified as low-income families (demographic). While the bank's performance fell below the demographic, aggregate data serves as a better proxy for loan demand than the demographic figure.

The dispersion of the bank's HMDA-reportable loans among moderate-income borrowers exceeds the 2023 and 2024 performance of aggregate HMDA reporters and the percentage of AA families classified as low-income families (demographic). Despite the increase in mortgage costs and high market competition, the bank's performance reflects favorably on its willingness to extend credit to low-income borrowers.

Table 138A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Phoenix Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	3.4	2.5	73	1.1	1.1	0	0.0	2.2	0	0.0	1.0	20.4
Moderate	11	37.9	13.4	2,138	33.0	8.7	4	13.8	13.3	773	9.2	8.6	17.9
Middle	8	27.6	22.2	2,157	33.3	18.3	10	34.5	21.4	3,134	37.1	17.5	20.0
Upper	8	27.6	40.1	1,788	27.6	50.0	15	51.7	38.3	4,535	53.7	48.3	41.7
Unknown	1	3.4	21.8	318	4.9	21.9	0	0.0	24.8	0	0.0	24.5	0.0
Total	29	100.0	100.0	6,474	100.0	100.0	29	100.0	100.0	8,442	100.0	100.0	100.0
Refinance Loans													
Low	10	18.9	9.8	1,237	7.0	2.9	14	25.9	7.1	1,597	11.0	3.6	20.4
Moderate	17	32.1	19.1	3,474	19.6	7.1	10	18.5	16.1	2,126	14.7	10.0	17.9
Middle	7	13.2	20.9	1,307	7.4	8.9	12	22.2	18.3	2,284	15.8	13.8	20.0
Upper	18	34.0	34.6	6,698	37.8	21.2	17	31.5	34.7	5,904	40.8	42.4	41.7
Unknown	1	1.9	15.6	5,000	28.2	59.9	1	1.9	23.9	2,566	17.7	30.3	0.0
Total	53	100.0	100.0	17,716	100.0	100.0	54	100.0	100.0	14,477	100.0	100.0	100.0
Home Improvement Loans													
Low	3	3.9	6.1	192	1.6	3.5	2	3.8	6.5	72	1.1	3.4	20.4
Moderate	8	10.4	16.5	650	5.5	10.3	11	20.8	17.1	762	11.8	10.5	17.9
Middle	18	23.4	24.5	1,713	14.4	19.1	8	15.1	22.7	565	8.8	16.5	20.0
Upper	44	57.1	47.7	7,227	60.7	60.7	32	60.4	47.7	5,043	78.3	59.1	41.7
Unknown	4	5.2	5.3	2,131	17.9	6.4	0	0.0	5.9	0	0.0	10.5	0.0
Total	77	100.0	100.0	11,913	100.0	100.0	53	100.0	100.0	6,442	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	16	7.6	4.4	1,599	3.7	1.7	18	11.3	4.1	1,919	5.8	1.7	20.4
Moderate	47	22.3	14.9	7,431	17.1	8.3	30	18.9	14.7	3,980	12.1	9.0	17.9
Middle	47	22.3	22.2	6,589	15.2	16.1	38	23.9	21.1	7,160	21.8	16.7	20.0
Upper	95	45.0	40.2	20,399	46.9	44.1	72	45.3	38.7	17,263	52.5	47.7	41.7
Unknown	6	2.8	18.3	7,449	17.1	29.9	1	0.6	21.4	2,566	7.8	24.9	0.0
Total	211	100.0	100.0	43,467	100.0	100.0	159	100.0	100.0	32,888	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table 138B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Phoenix Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	5.0	0	0.0	4.0	1	5.0	5.7	130	4.3	3.6	20.4
Moderate	6	14.0	14.7	299	5.6	8.7	5	25.0	16.4	319	10.6	9.9	17.9
Middle	13	30.2	21.7	1,312	24.8	14.9	6	30.0	23.8	793	26.2	17.9	20.0
Upper	24	55.8	44.9	3,686	69.6	58.9	8	40.0	43.5	1,781	58.9	57.6	41.7
Unknown	0	0.0	13.7	0	0.0	13.5	0	0.0	10.6	0	0.0	10.9	0.0
Total	43	100.0	100.0	5,297	100.0	100.0	20	100.0	100.0	3,023	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	2	22.2	7.1	97	4.7	3.9	1	33.3	7.2	120	23.8	3.6	20.4
Moderate	5	55.6	18.3	870	42.1	8.4	0	0.0	20.5	0	0.0	11.1	17.9
Middle	1	11.1	25.5	100	4.8	13.1	2	66.7	24.6	384	76.2	13.8	20.0
Upper	1	11.1	41.9	1,000	48.4	62.3	0	0.0	39.2	0	0.0	57.2	41.7
Unknown	0	0.0	7.3	0	0.0	12.2	0	0.0	8.4	0	0.0	14.3	0.0
Total	9	100.0	100.0	2,067	100.0	100.0	3	100.0	100.0	504	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.5	0	0.0	0.1	0	0.0	2.3	0	0.0	1.0	20.4
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	3.9	0	0.0	5.2	17.9
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	6.2	0	0.0	23.5	41.7
Unknown	0	0.0	99.5	0	0.0	99.9	0	0.0	87.6	0	0.0	70.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

Comerica's distribution of small business loans by revenue size of businesses is good. The distribution of 2023 loan originations to businesses with revenues of $1 million or less is below the performance of aggregate lenders and significantly below the percent of businesses within the AA when considering the number of loans as well as the dollar amount. However, the distribution of 2024 loan originations to businesses with revenues of $1 million or less is comparable to the performance of aggregate lenders but significantly below the percent of businesses within the AA when considering the number of loans as well as the dollar amount. While both the bank and the aggregate lenders were significantly below the 93.5 percent of businesses within the AA that reported revenues of $1 million or less, the demographic figure is not presumed to be representative of loan demand.

Additionally, a significant majority of the loans extended during the review period were in amounts less than $250,000. A community contact noted a significant need for small dollar loans for small businesses. Comerica originated 76.9 percent of small business loans in amounts of $250,000 or less, which reflects favorably on the bank's willingness to meet the critical needs of small businesses in the AA and aligns with the bank's strategic focus on small business lending.

Table 139

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Phoenix Metropolitan													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	54	44.6	55.6	5,873	25.6	31.7	65	55.1	54.3	7,303	29.0	31.4	93.5
Over $1 Million	55	45.5		15,618	68.0		48	40.7		16,513	65.6		5.2
Revenue Unknown	12	9.9		1,468	6.4		5	4.2		1,353	5.4		1.3
Total	121	100.0		22,959	100.0		118	100.0		25,169	100.0		100.0
By Loan Size													
$100,000 or Less	67	55.4	95.6	4,317	18.8	46.8	65	55.1	95.5	4,205	16.7	48.2	
$100,001 - $250,000	26	21.5	2.3	4,784	20.8	13.7	25	21.2	2.6	4,707	18.7	14.8	
$250,001 - $1 Million	28	23.1	2.1	13,858	60.4	39.6	28	23.7	1.9	16,257	64.6	37.0	
Total	121	100.0	100.0	22,959	100.0	100.0	118	100.0	100.0	25,169	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	40	74.1		2,347	40.0		49	75.4		2,992	41.0		
$100,001 - $250,000	10	18.5		1,761	30.0		10	15.4		1,864	25.5		
$250,001 - $1 Million	4	7.4		1,765	30.1		6	9.2		2,447	33.5		
Total	54	100.0		5,873	100.0		65	100.0		7,303	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

Comerica makes a relatively high level of CD loans in the Phoenix Metropolitan AA. During the review period, the bank originated a total of 14 qualifying CD loans, totaling $72.1 million. While the number and dollar volume of CD loans has decreased since the previous evaluation, this quantitative decrease is attributable to the cessation of the SBA's PPP and a shorter review period than the previous evaluation.

A community contact noted workforce development and permanent employment opportunities as significant needs in the AA. Comerica strategically met these critical AA and community needs by extending all CD loans in the AA to promote economic development by financing small businesses and supporting permanent job creation, retention, or improvement for LMI persons or in LMI geographies. This level of lending reflects favorably on the bank as it aligns with the bank's strategic focus on small business lending. Examples of the bank's CD lending activities that were considered responsive to AA credit needs include:

- Lines of credit to support ongoing operations of small businesses (e.g., wholesale auto company, a lighting manufacturer, and a bakery) that provide permanent employment to LMI individuals.
- $25.6 million loan to an assisted living community that provides permanent employment opportunities, where 99.0 percent of the company's workforce are LMI individuals.

- A $16.0 million line of credit to a business that helped retain and provide permanent employment opportunities for 88 LMI individuals.

Table 140

Community Development Lending Assessment Area: Phoenix Metropolitan		
Purpose	**#**	**$(000)**
Affordable Housing	0	0
Community Services	0	0
Economic Development	14	72,126
Revitalization and Stabilization	0	0
Total	14	**72,126**
Note: Discrepancies in dollar volume totals are possible due to rounding.		

INVESTMENT TEST

Comerica's performance under the Investment Test in the Phoenix Metropolitan AA is good. Due to the shorter review period of this evaluation, examiners conducted an evaluation of numbers on a monthly basis and determined Comerica's overall dollar amount of CD investments and donations increased by 42.5 percent since the previous evaluation. Comerica makes a significant level of qualified CD investments and grants, particularly those not routinely provided by private investors, and is occasionally in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of the AA. A community contact identified affordable housing and economic development as critical needs within the AA, particularly identifying a need for an increase in the AA affordable housing stock. Comerica strategically extended a meaningful volume of investments in the AA to meet these needs.

Table 141 illustrates the breakdown of Comerica's CD investments and donations within the AA, including prior period investments that remain on the bank's ledger, current period investments purchased during the current review period, and CD donations made since the previous evaluation. Examples of notable CD investment and donation activities include:

- A $5 million LIHTC investment to finance the construction of an affordable housing development, where 60 units will provide housing for LMI individuals.
- A $784,000 New Market Tax Credit equity investment to support an organization with a defined mission of providing low-income children with education, health, and financial services. This project will also help retain and provide permanent employment opportunities for 98 LMI individuals.
- A donation totaling $25,000 to support a CDFI that provides loan capital and technical assistance to small businesses operating in the Southwestern region of the United States, including the Phoenix Metropolitan AA.

Table 141

Investments, Grants, and Donations Assessment Area: Phoenix Metropolitan								
Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	10	15,170	1	5,000	0	0	11	20,170
Community Services	0	0	0	0	25	132	25	132
Economic Development	0	0	1	250	6	90	7	340
Revitalization and Stabilization	0	0	0	0	1	11	1	11
Total	**10**	**15,170**	**2**	**5,250**	**32**	**233**	**44**	**20,653**

[1] Book value of investment
[2] Original market value of investment
Note: Discrepancies in dollar amount totals are possible due to rounding

SERVICE TEST

The bank's Service Test performance in the Phoenix Metropolitan AA is good primarily due to Comerica providing a relatively high level of CD services as well as delivery systems being reasonable accessible to geographies and individuals of different income levels in the Phoenix Metropolitan AA.

Retail Services

Comerica's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its AA. The distribution of the bank's 12 branch offices and 14 ATMs as of June 23, 2025, was compared to the distribution of the population and businesses among the tract categories within the AA. The table below summarizes the bank's retail locations in the Phoenix Metropolitan AA.

Table 142

Branch and Full-Service ATM Locations Assessment Area: Phoenix Metropolitan							
Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	5.3	5.3	3.7	0	0.0	0	0.0
Moderate	25.7	26.2	18.7	4	33.3	4	28.6
Middle	31.1	33.6	29.2	4	33.3	4	28.6
Upper	34.5	34.6	47.7	4	33.3	6	42.9
Unknown	2.4	0.3	0.6	0	0.0	0	0.0
Total	**100.0**	**100.0**	**100.0**	**12**	**100.0**	**14**	**100.0**

Note: Percentages may not total 100.0 percent due to rounding.

Since the previous evalaution, the bank did not open any new branches in the AA; however, it closed five branches: one in a middle-income and four in upper-income census tracts. Each of the branches closed served an area that is sufficeintly serviced by another location. Therefore, the bank's record of opening or closing branches did not adversely affect the accesibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Moreover, banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals.

Community Development Services

The bank provides a relatively high level of CD services in the AA. Comerica's employees served in various capacities for 12 organizations offering CD services targeted toward LMI individuals. During the review period, bank employees provided 88 CD services totaling 348 hours. This represents an increase from the previous evaluation, with the number of qualified CD services growing by 22.2 percent; while total hours this represents a decrease of 15.9 percent. However, when broken down to a monthly total, the number of hours provided increased by 20.1 percent when compared to the prior evaluation. The bank's efforts in providing qualified services throughout the AA, given the shortened review period, demonstrates Comerica's commitment to addressing the AA needs by giving more than just dollars. Examples of CD services performed by bank employees include:

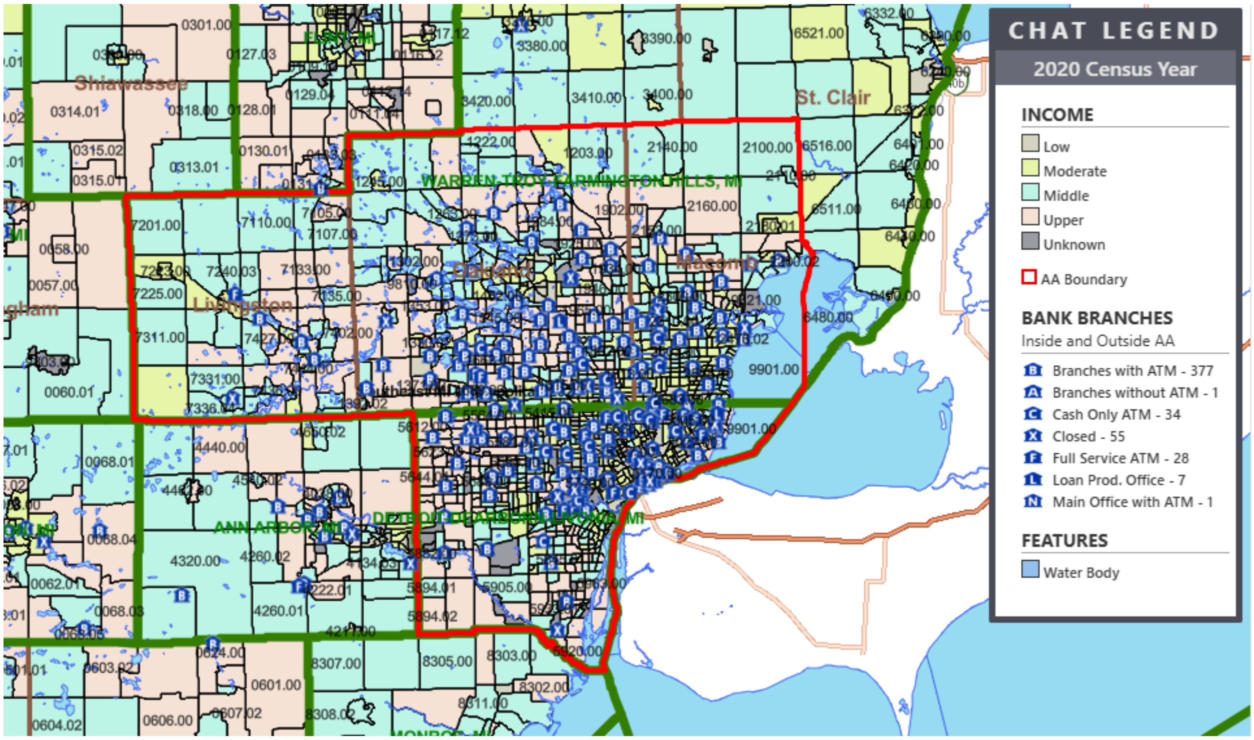
- Bank employees provided over 45 hours of technical services by serving as board members for nonprofit organizations with missions providing community services and financial literacy to LMI students.
- 35 bank employees helped facilitate financial education sessions which provided LMI students with best practices on budgeting, savings, credit, and career readiness. A substantial majority of student participants are considered LMI.
- A bank employee partnered with a nonprofit organization to provide small businessowners with revenues of $1 million or less with technical assistance.

Table 143

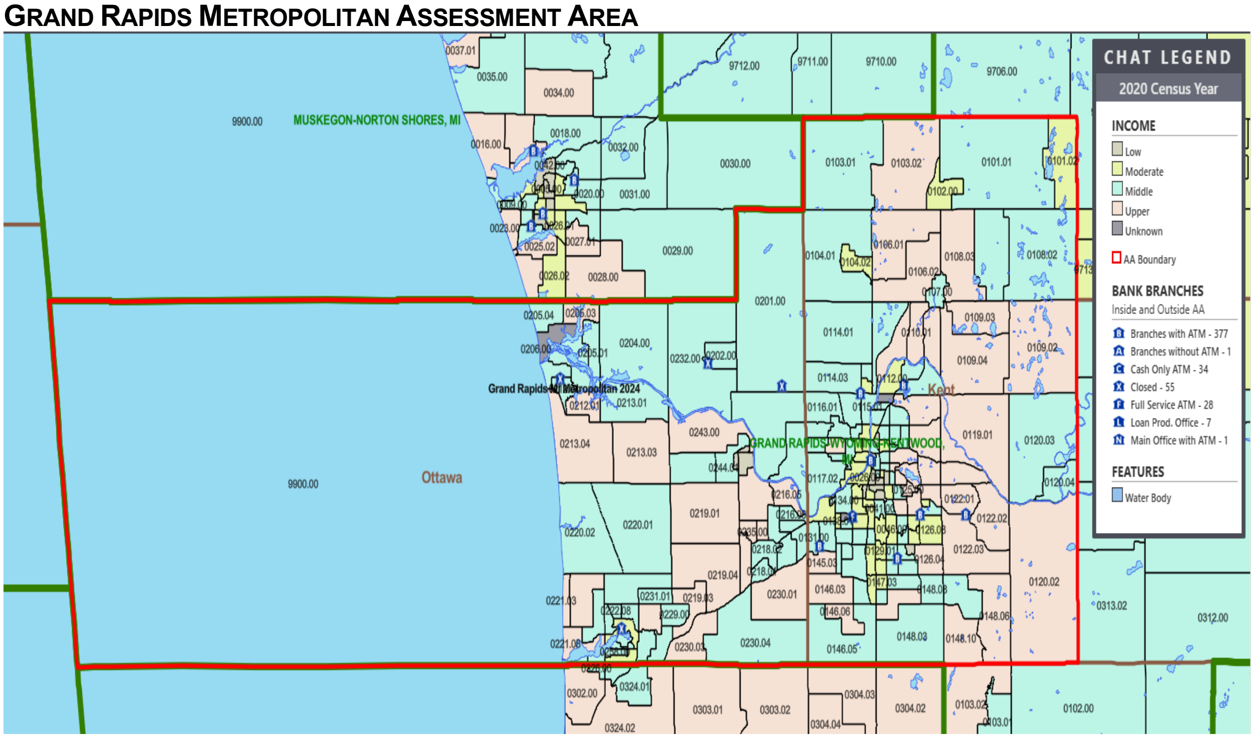
Community Development Services Assessment Area: Phoenix Metropolitan		
Purpose	**#**	**Hours**
Affordable Housing	0	0
Community Services	88	348
Economic Development	0	0
Revitalize and Stabilize	0	0
Total	**88**	**348**

APPENDIX A – MAPS OF THE ASSESSMENT AREAS

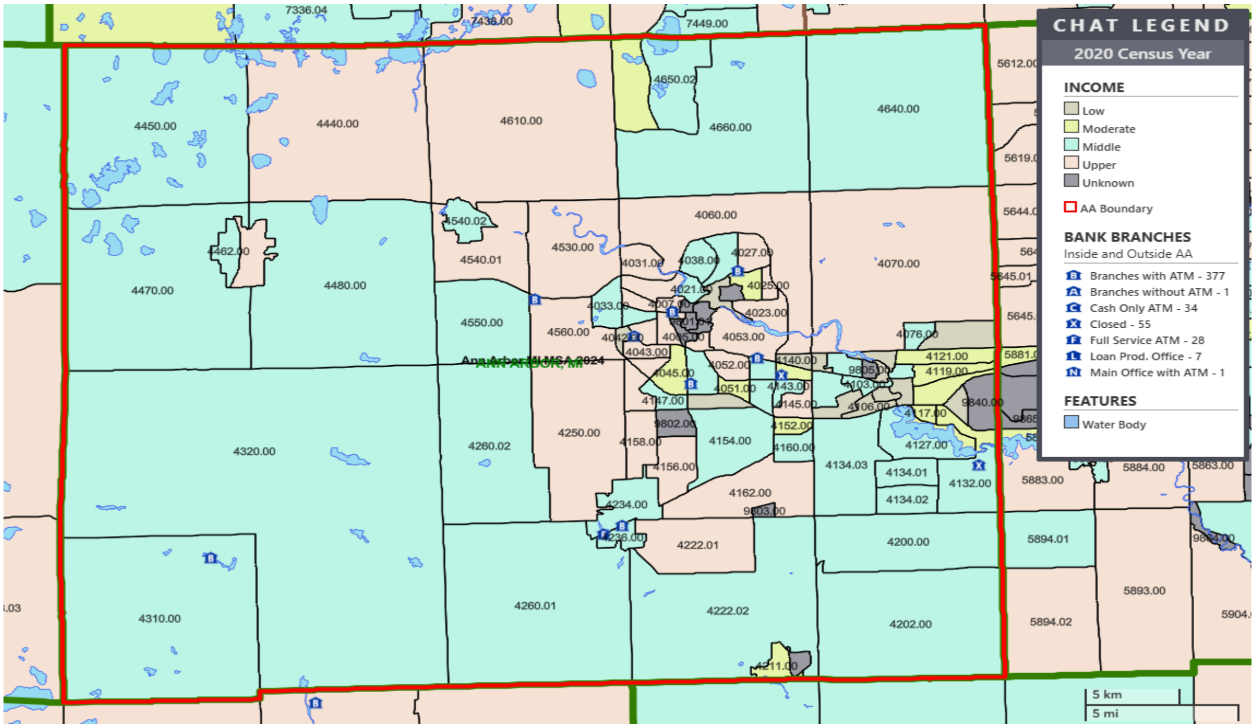
SOUTHEAST MICHIGAN METROPOLITAN ASSESSMENT AREA



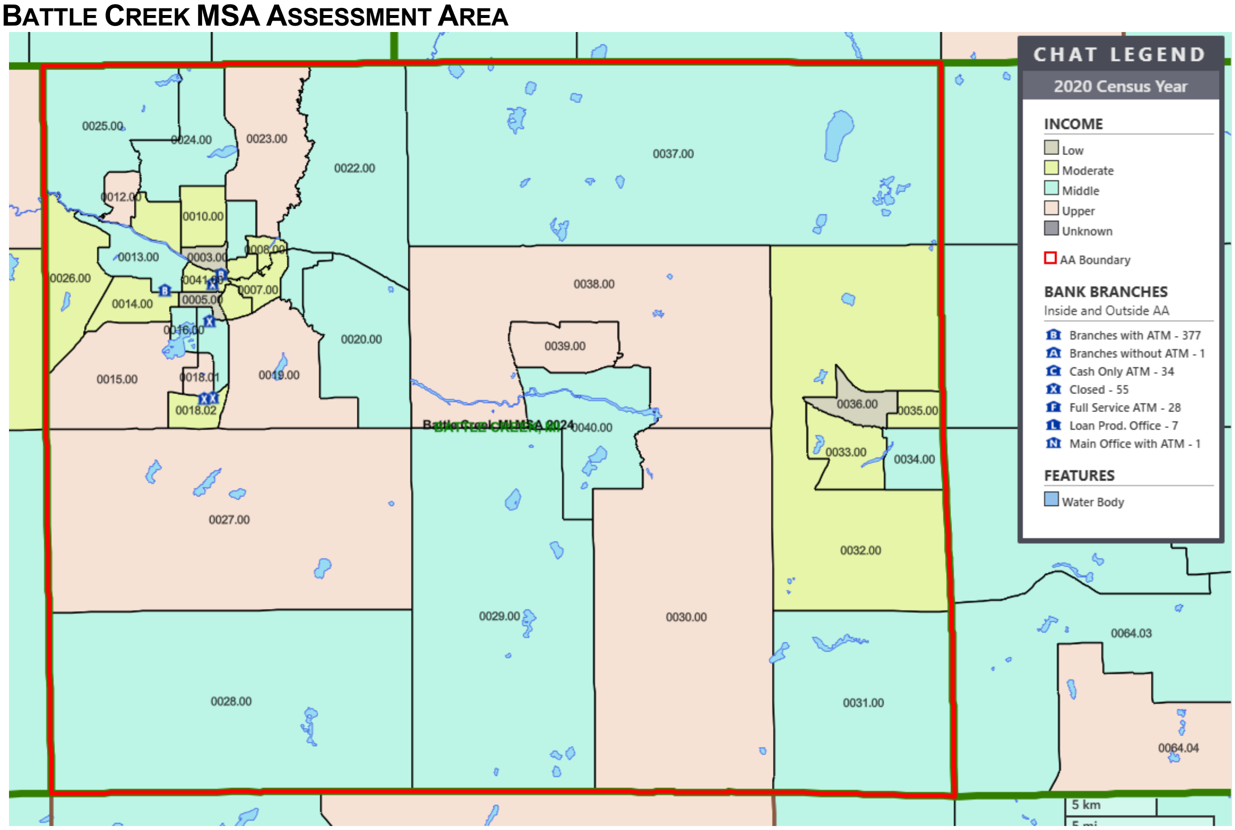
GRAND RAPIDS METROPOLITAN ASSESSMENT AREA



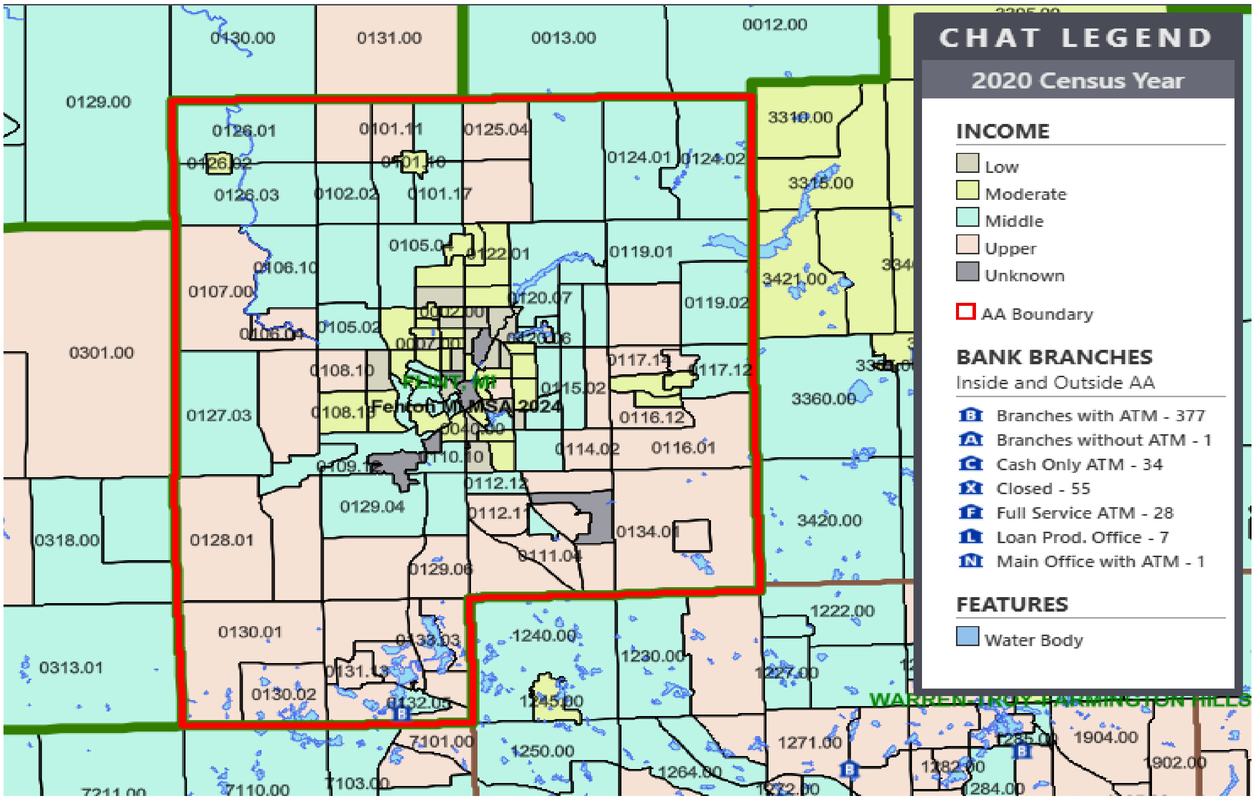
ANN ARBOR MSA ASSESSMENT AREA



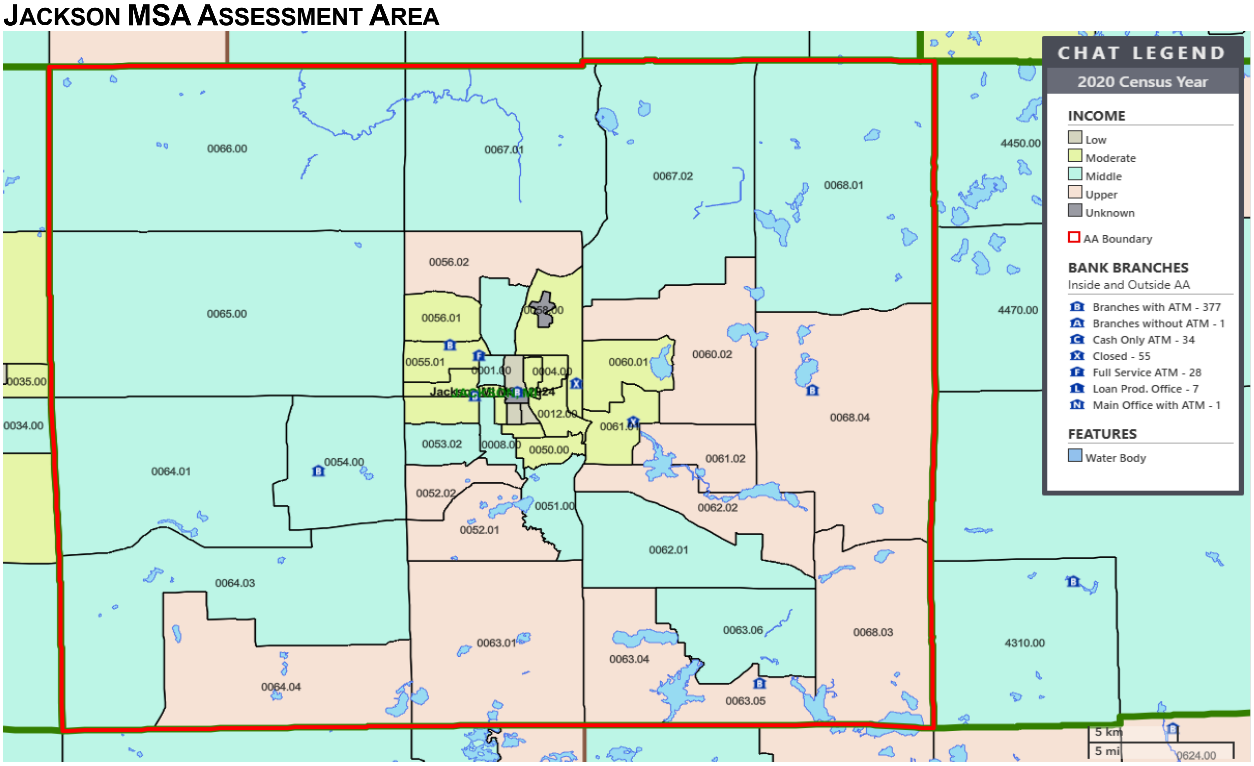
BATTLE CREEK MSA ASSESSMENT AREA



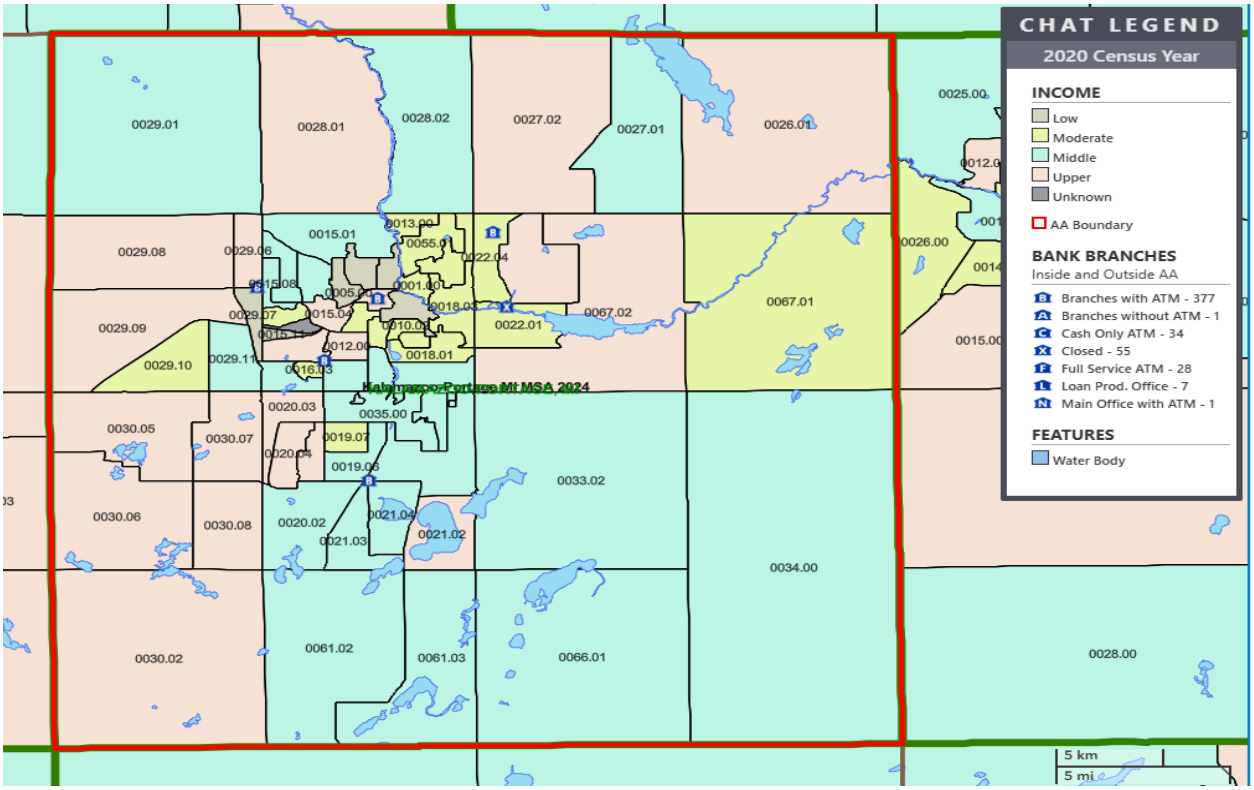
Fenton MSA Assessment Area



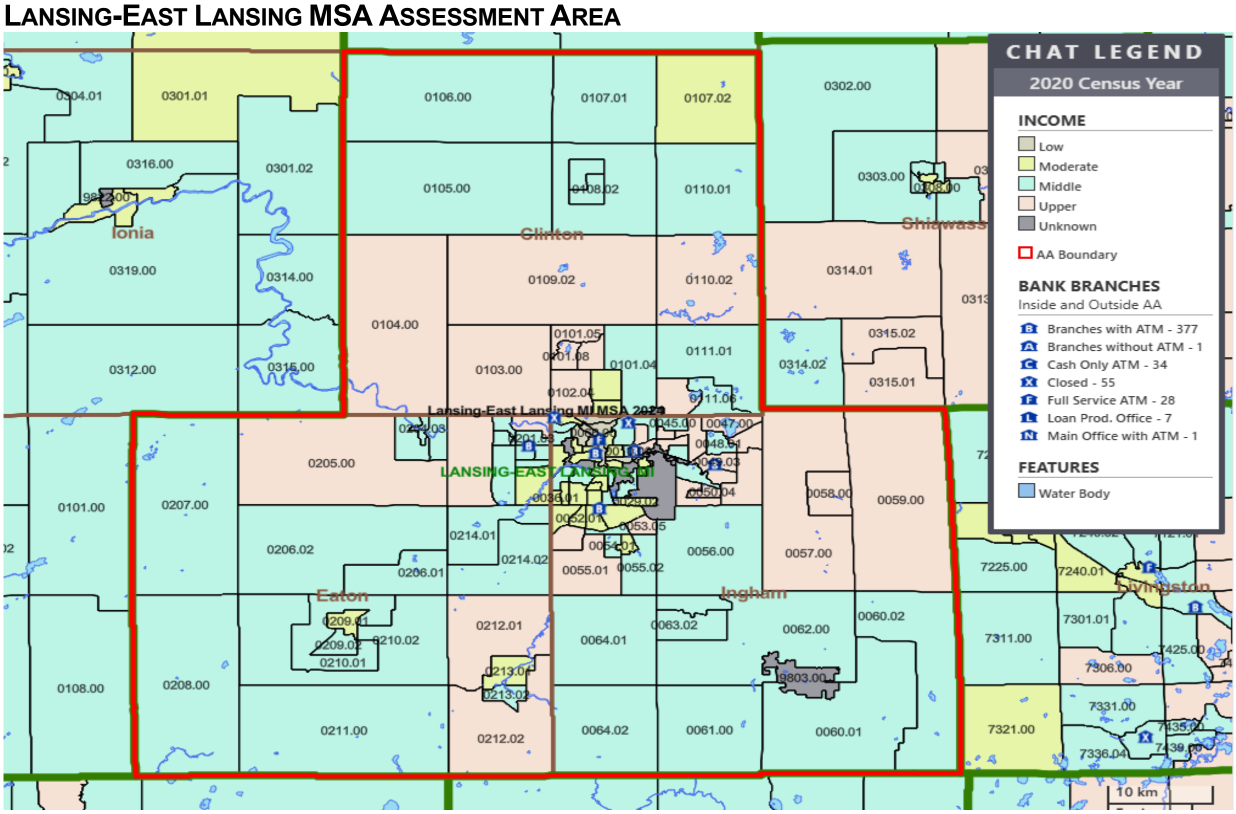
Jackson MSA Assessment Area



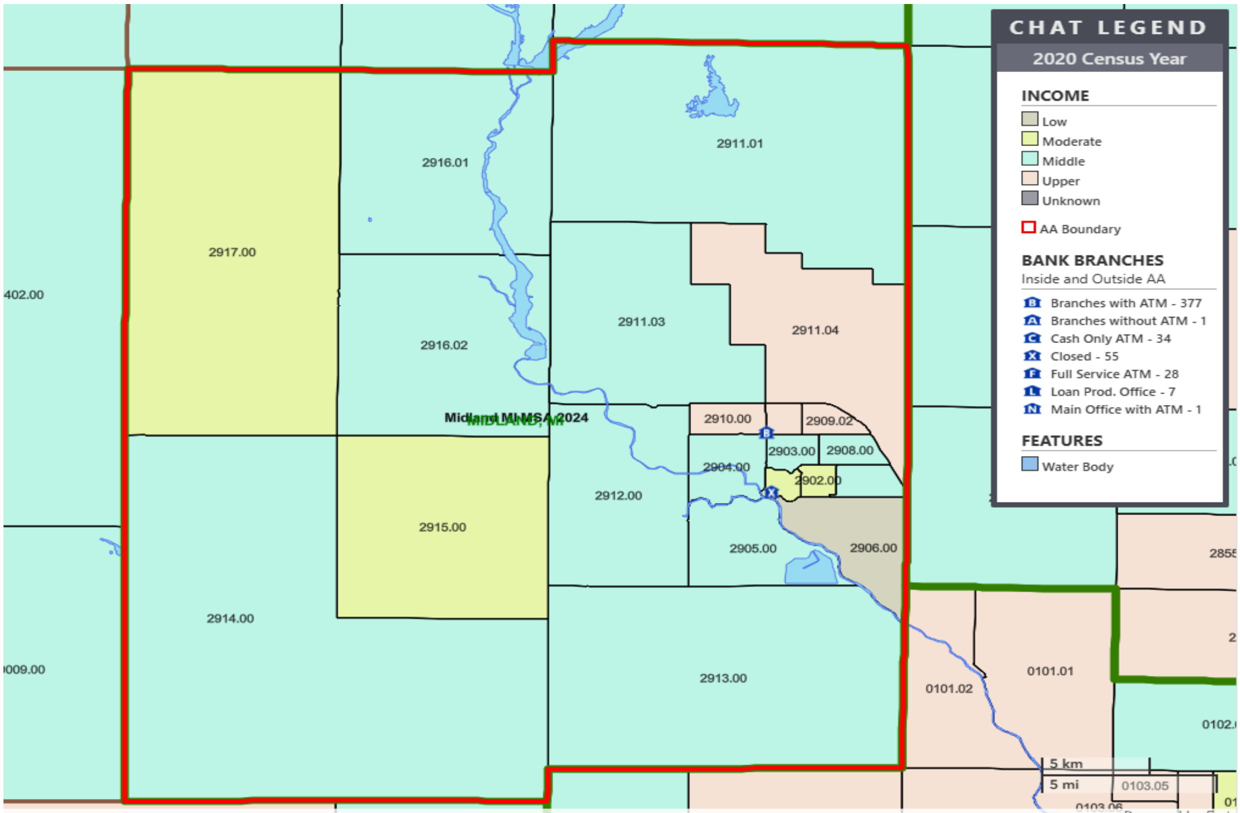
KALAMAZOO-PORTAGE MSA ASSESSMENT AREA



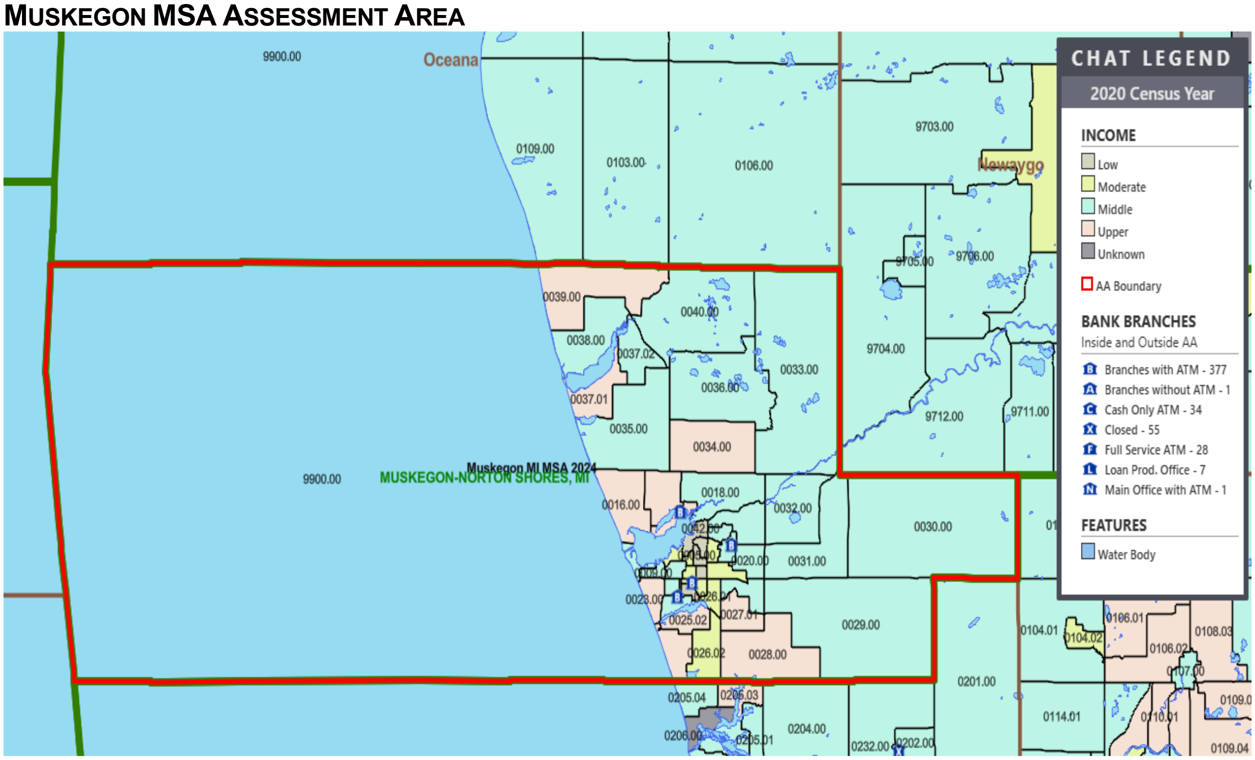
LANSING-EAST LANSING MSA ASSESSMENT AREA



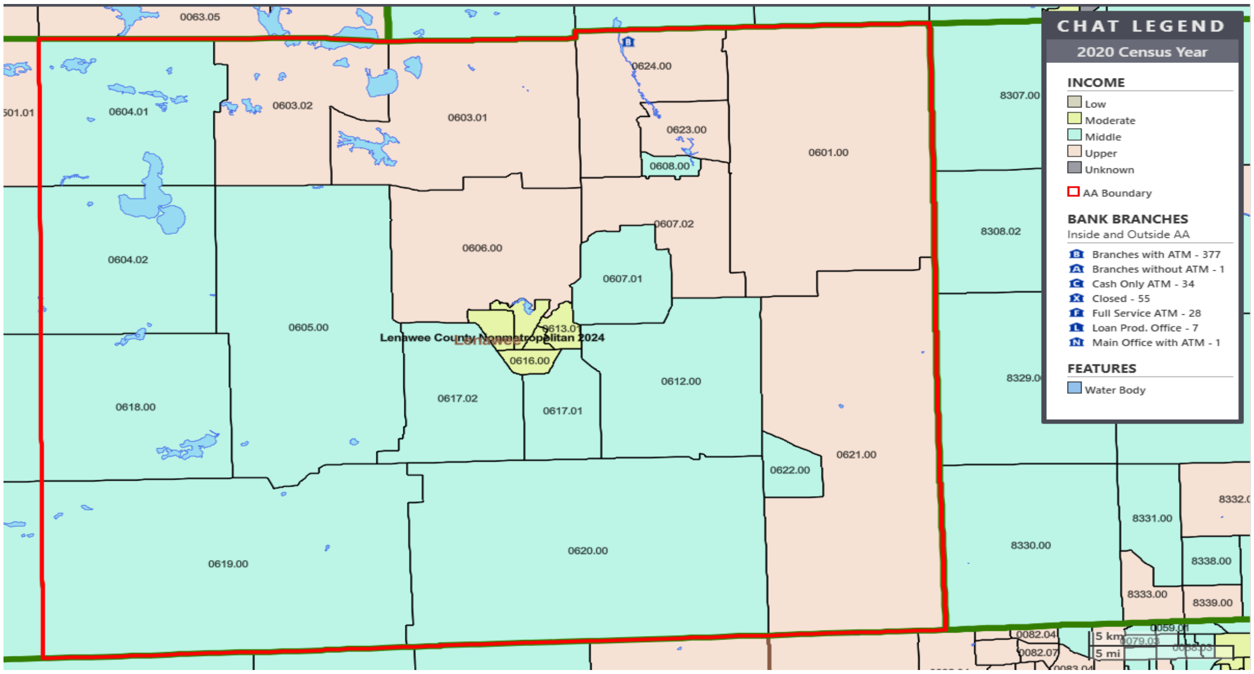
MIDLAND MSA ASSESSMENT AREA



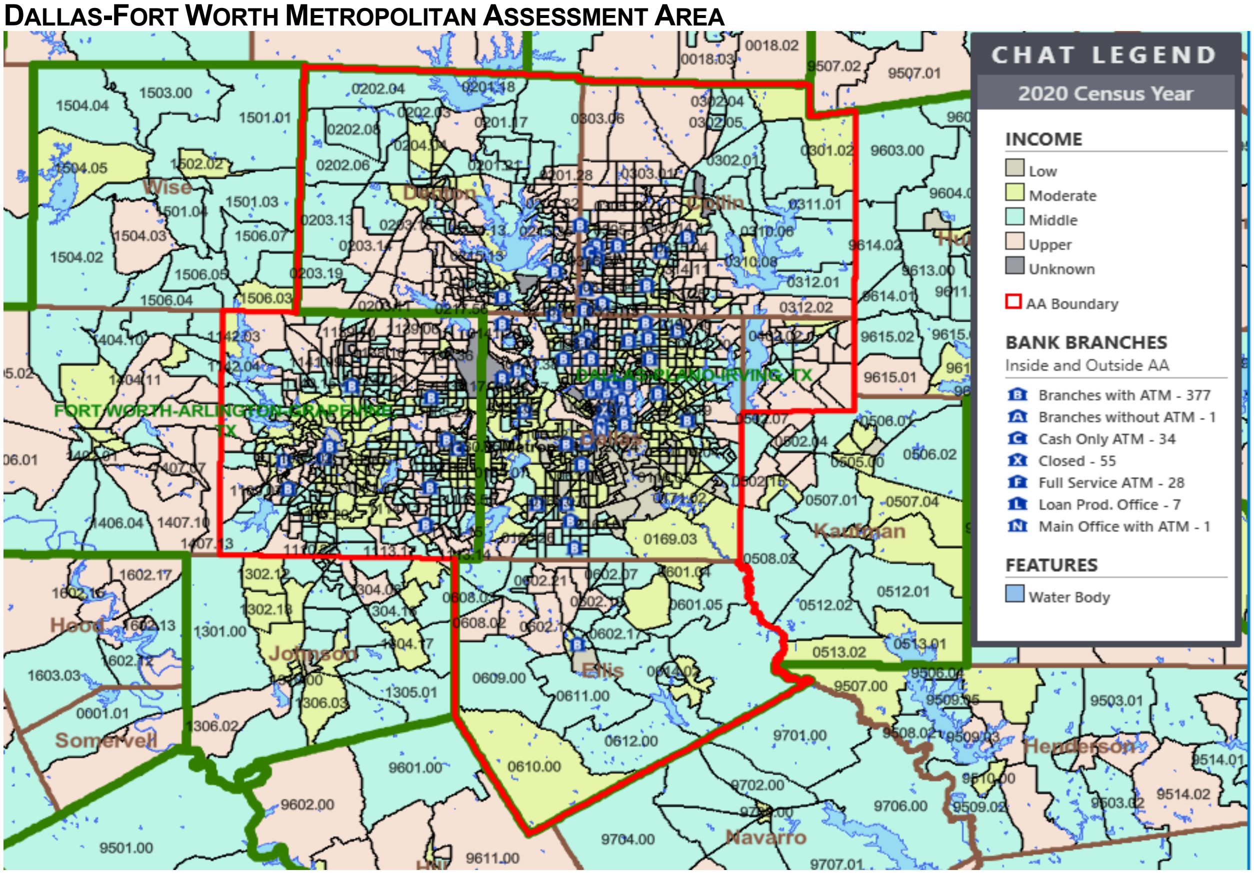
MUSKEGON MSA ASSESSMENT AREA



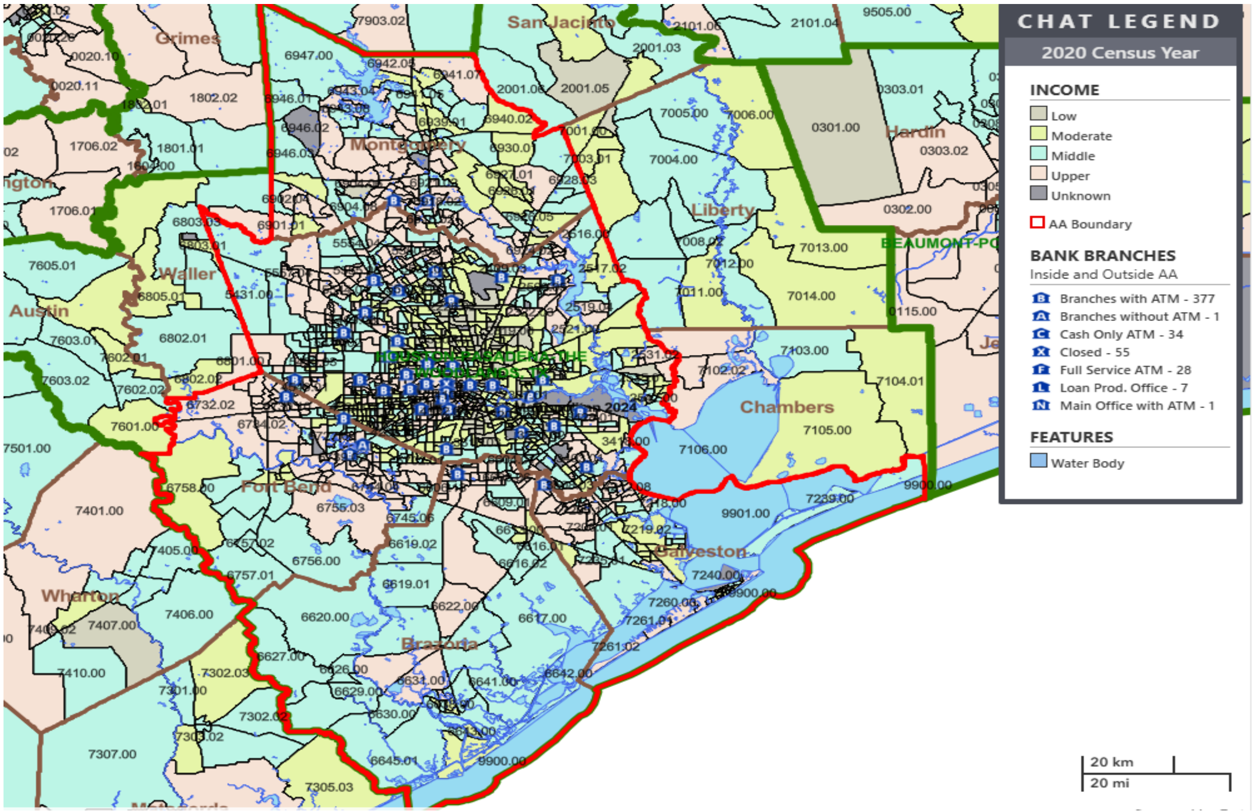
LENAWEE COUNTY NONMETROPOLITAN ASSESSMENT AREA



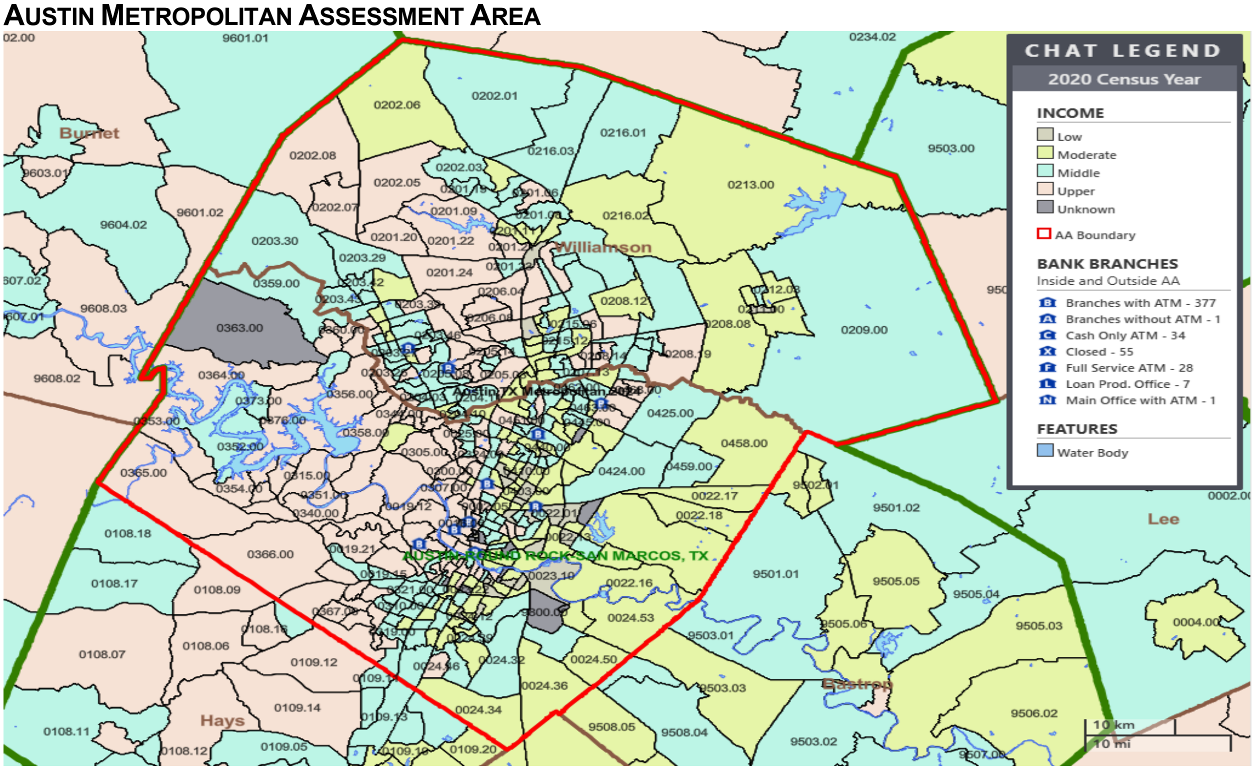
DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA



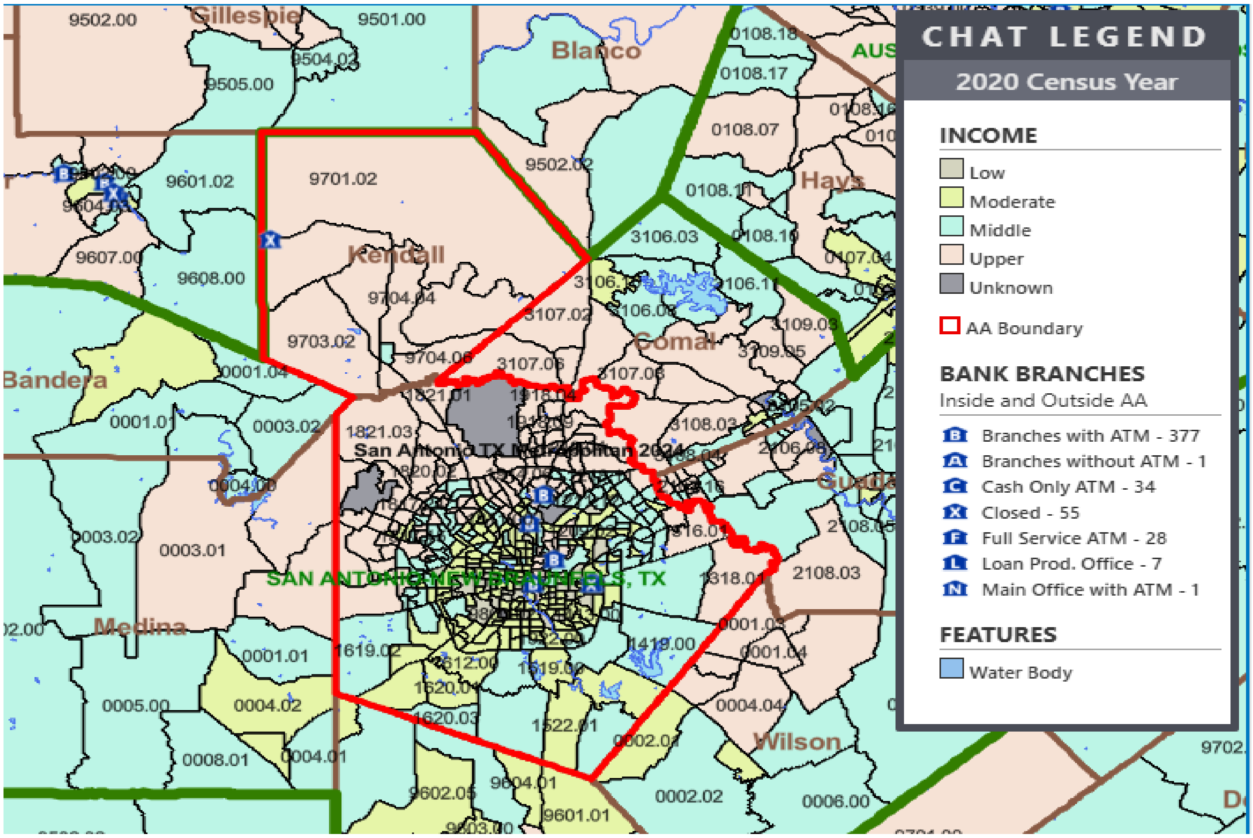
HOUSTON METROPOLITAN ASSESSMENT AREA



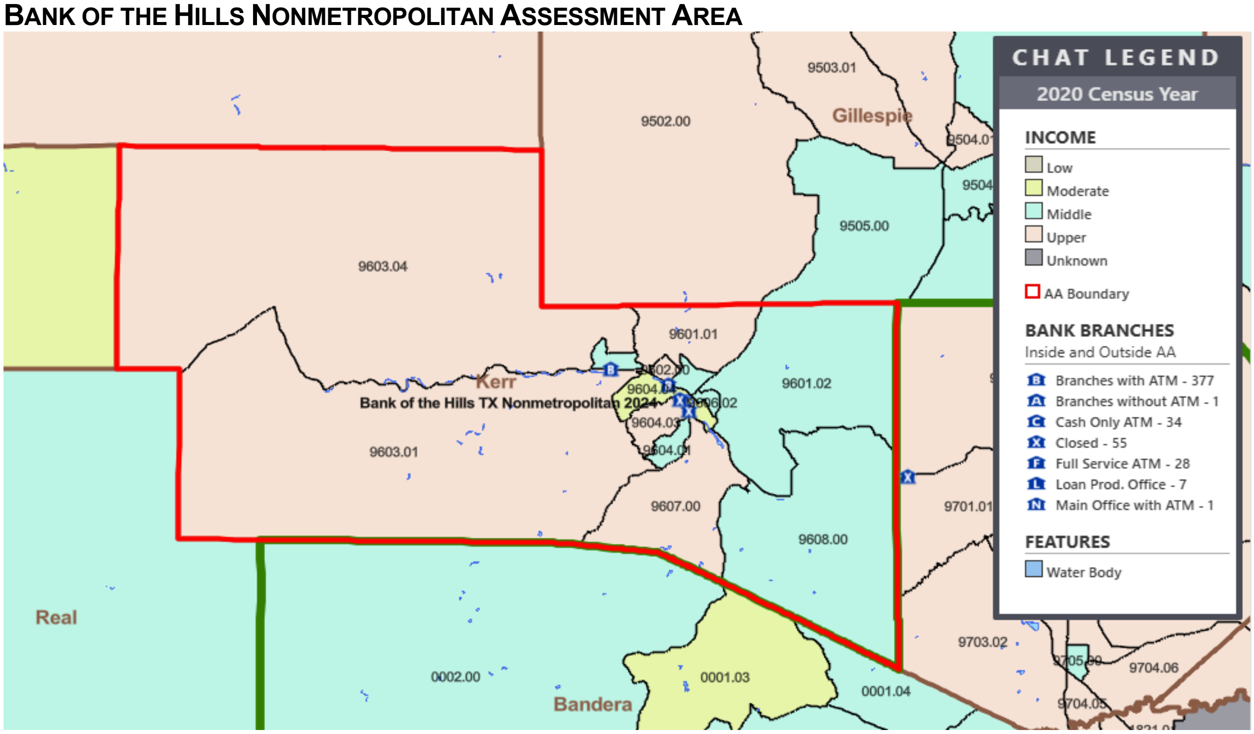
AUSTIN METROPOLITAN ASSESSMENT AREA



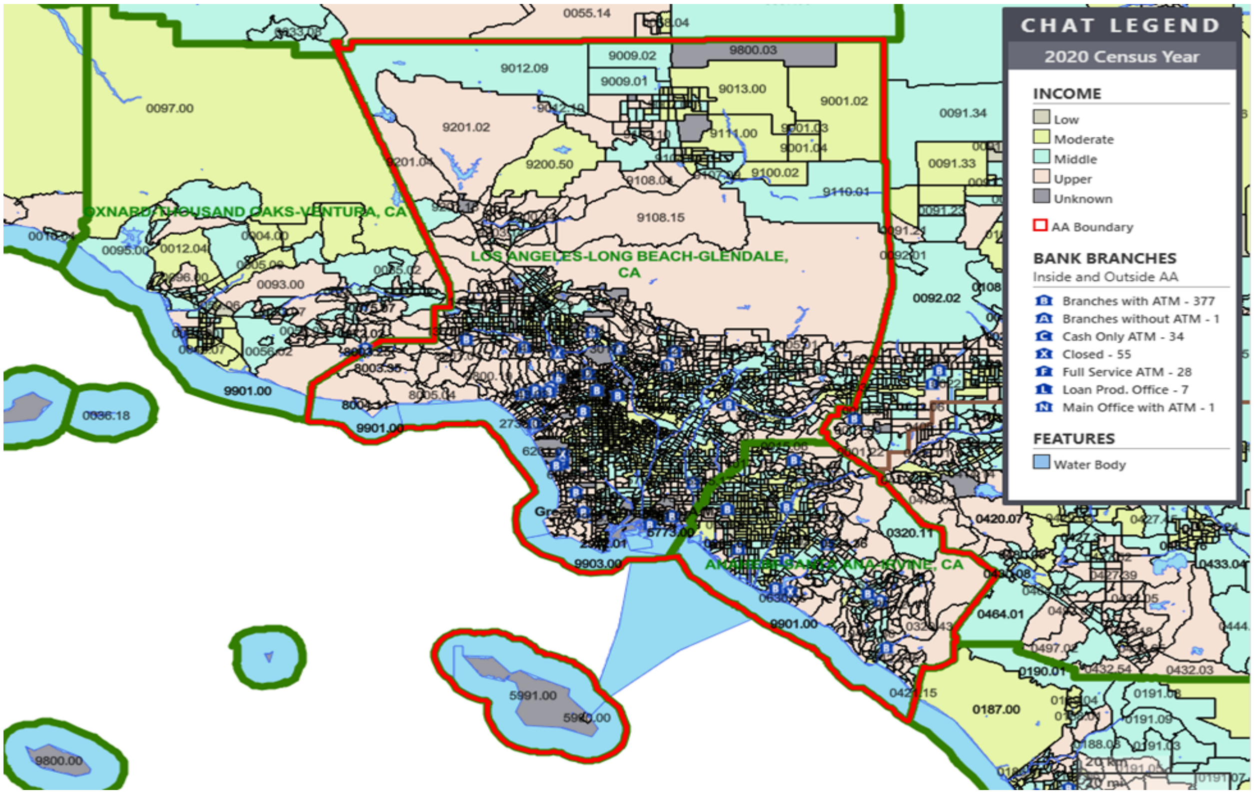
San Antonio Metropolitan Assessment Area



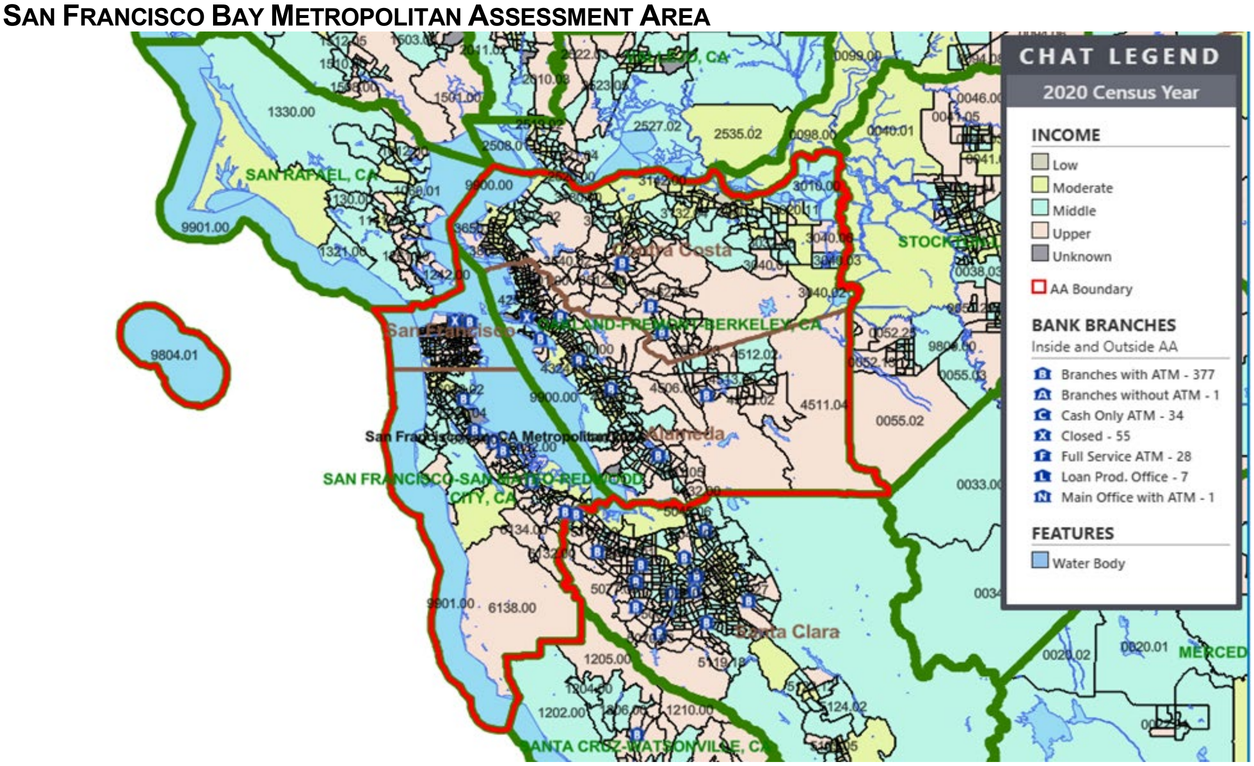
Bank of the Hills Nonmetropolitan Assessment Area



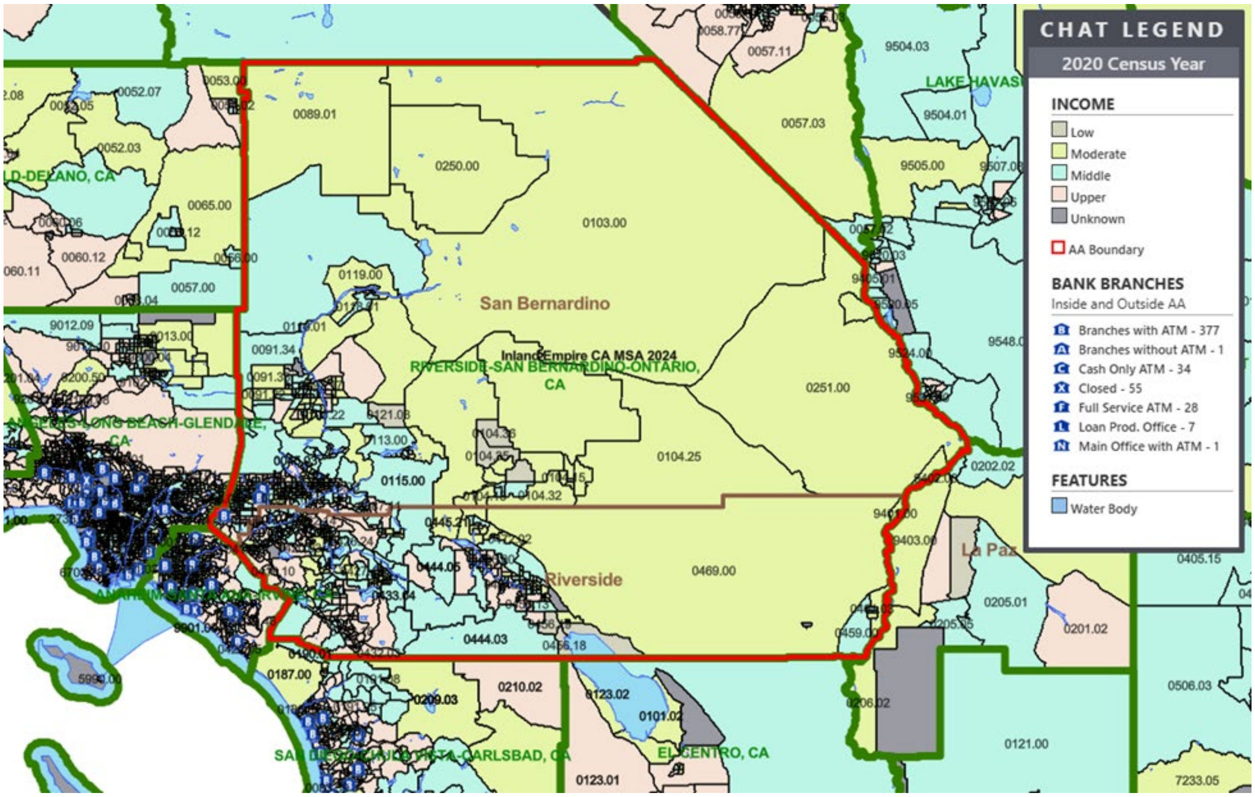
GREATER LOS ANGELES MSA ASSESSMENT AREA



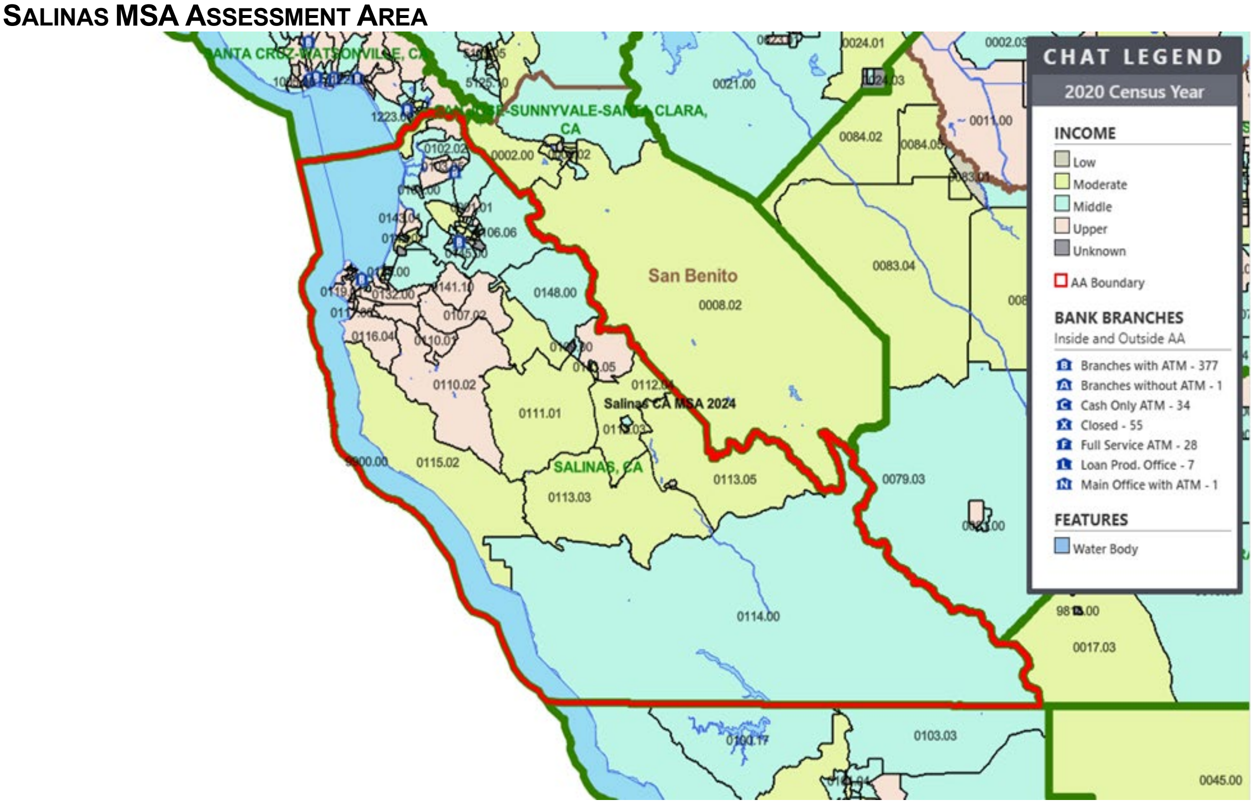
SAN FRANCISCO BAY METROPOLITAN ASSESSMENT AREA



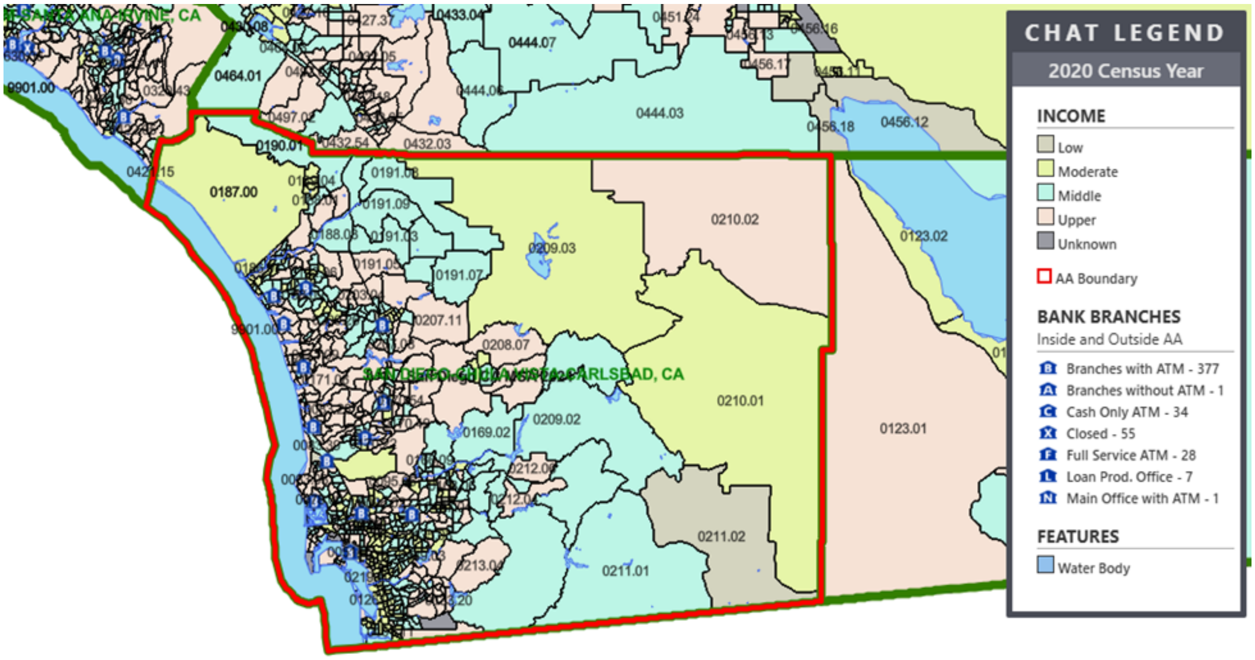
INLAND EMPIRE MSA ASSESSMENT AREA



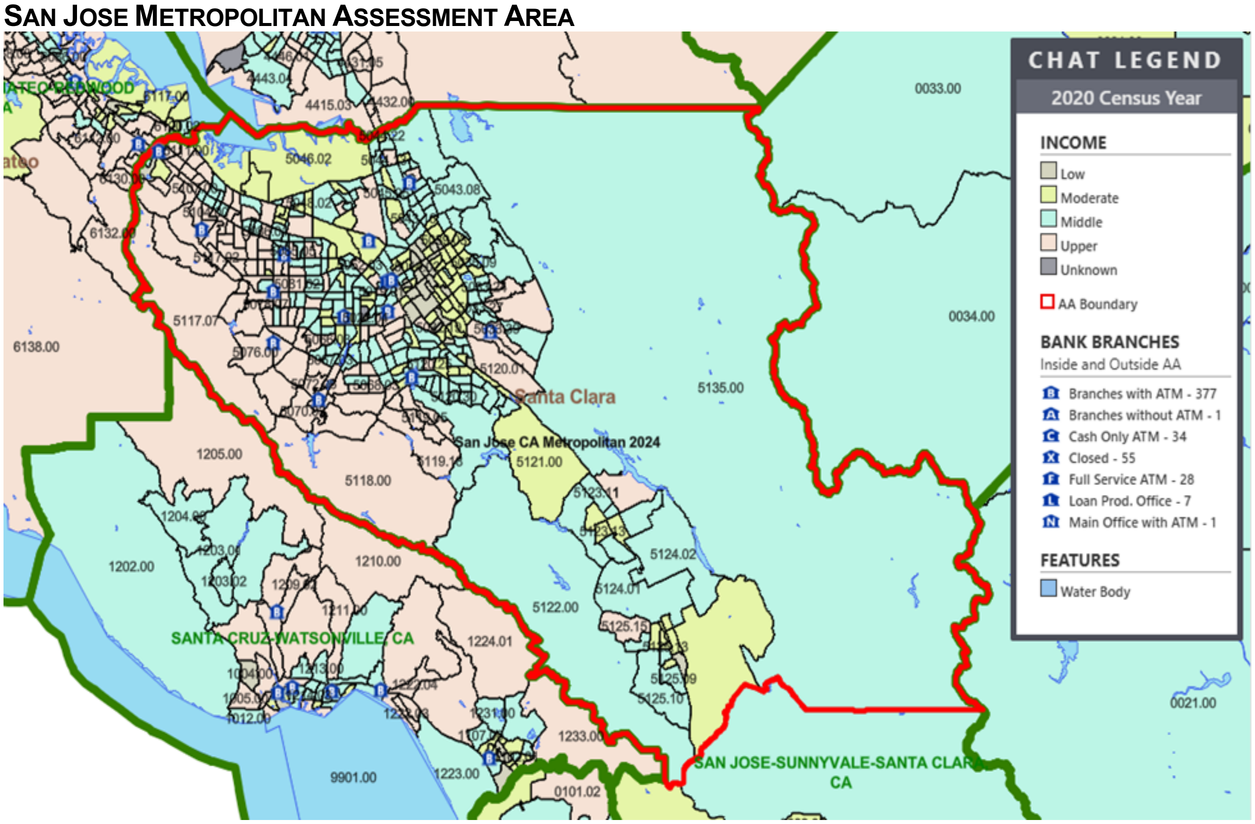
SALINAS MSA ASSESSMENT AREA



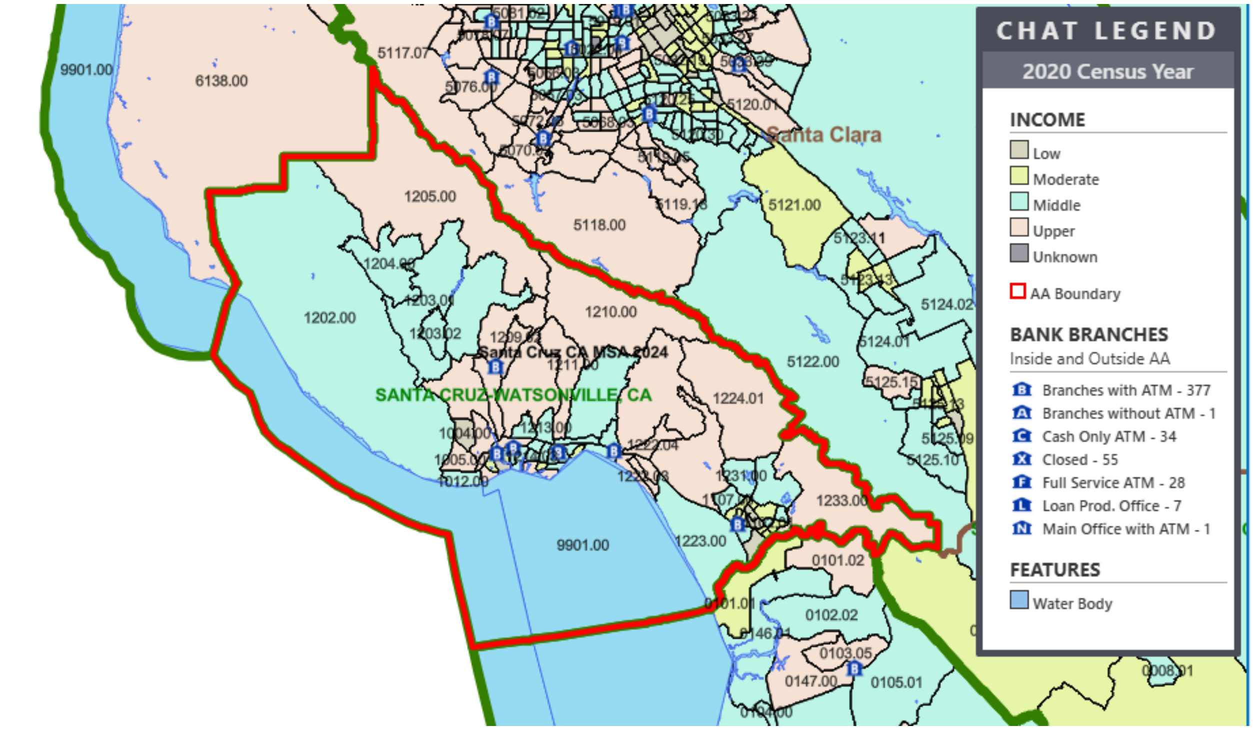
SAN DIEGO MSA ASSESSMENT AREA



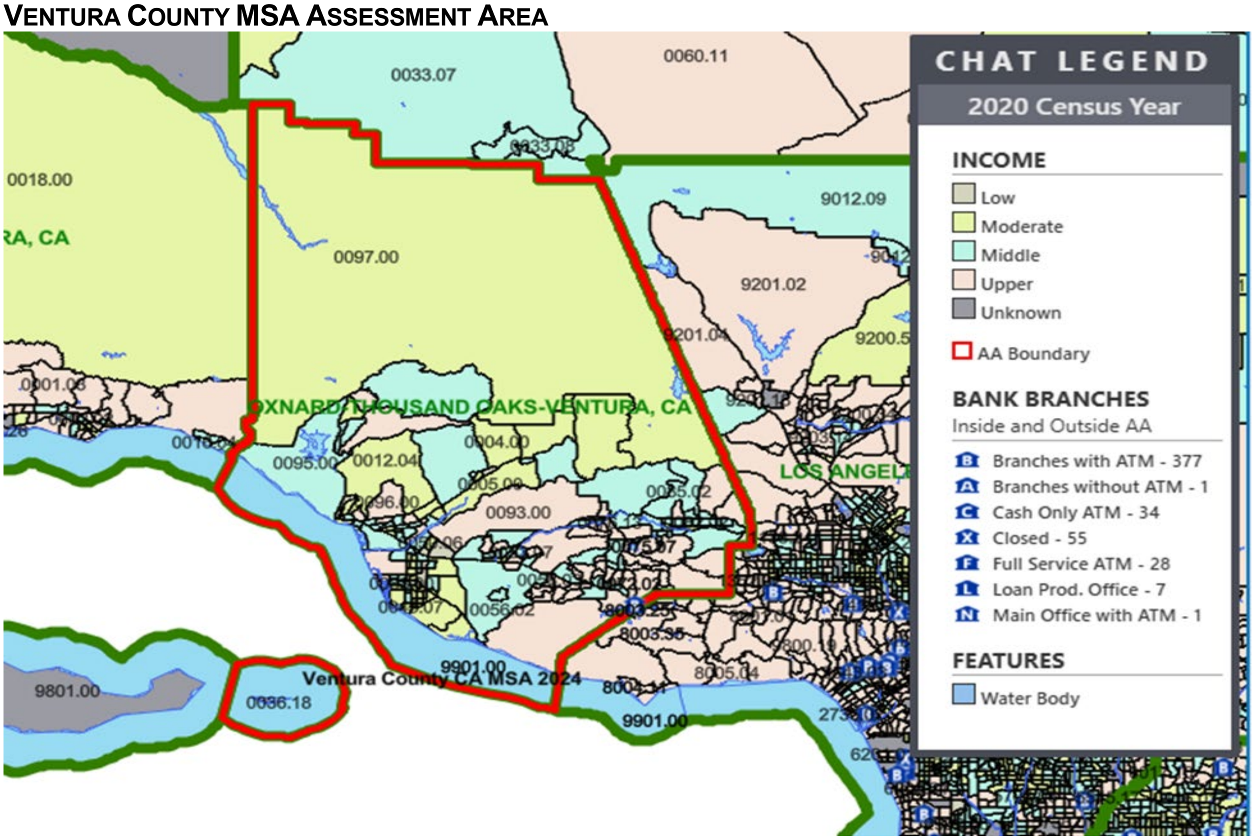
SAN JOSE METROPOLITAN ASSESSMENT AREA



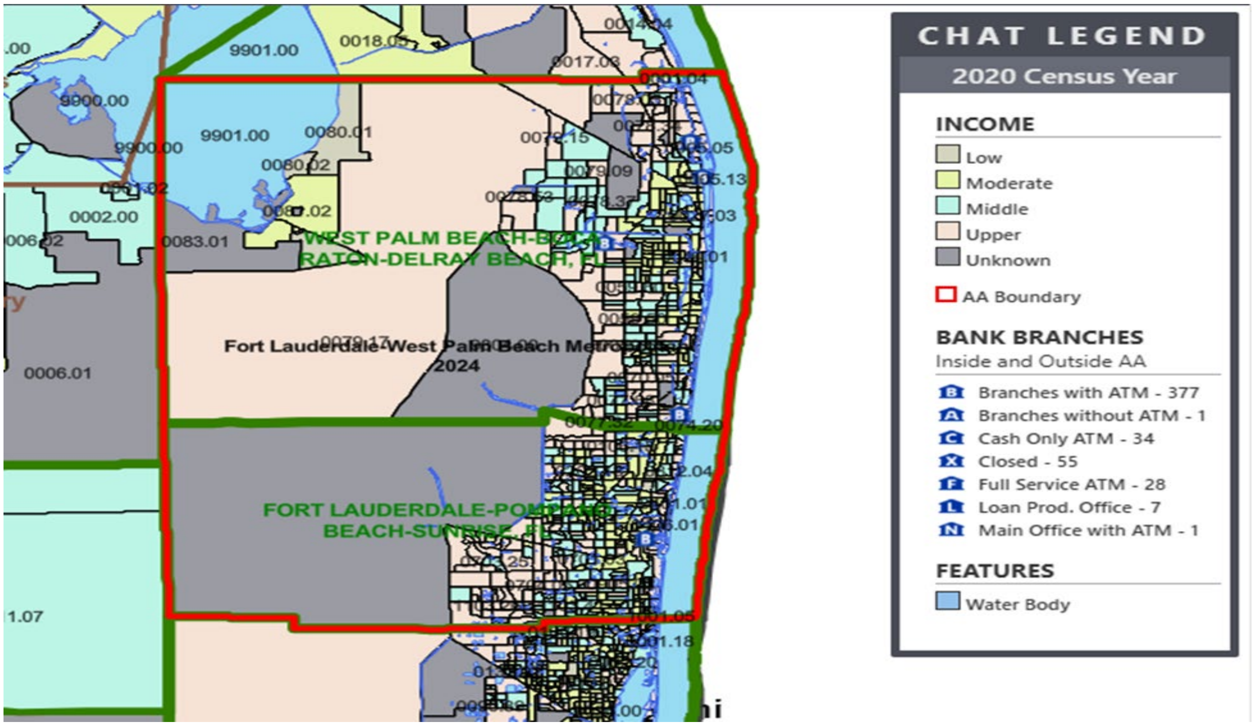
Santa Cruz MSA Assessment Area



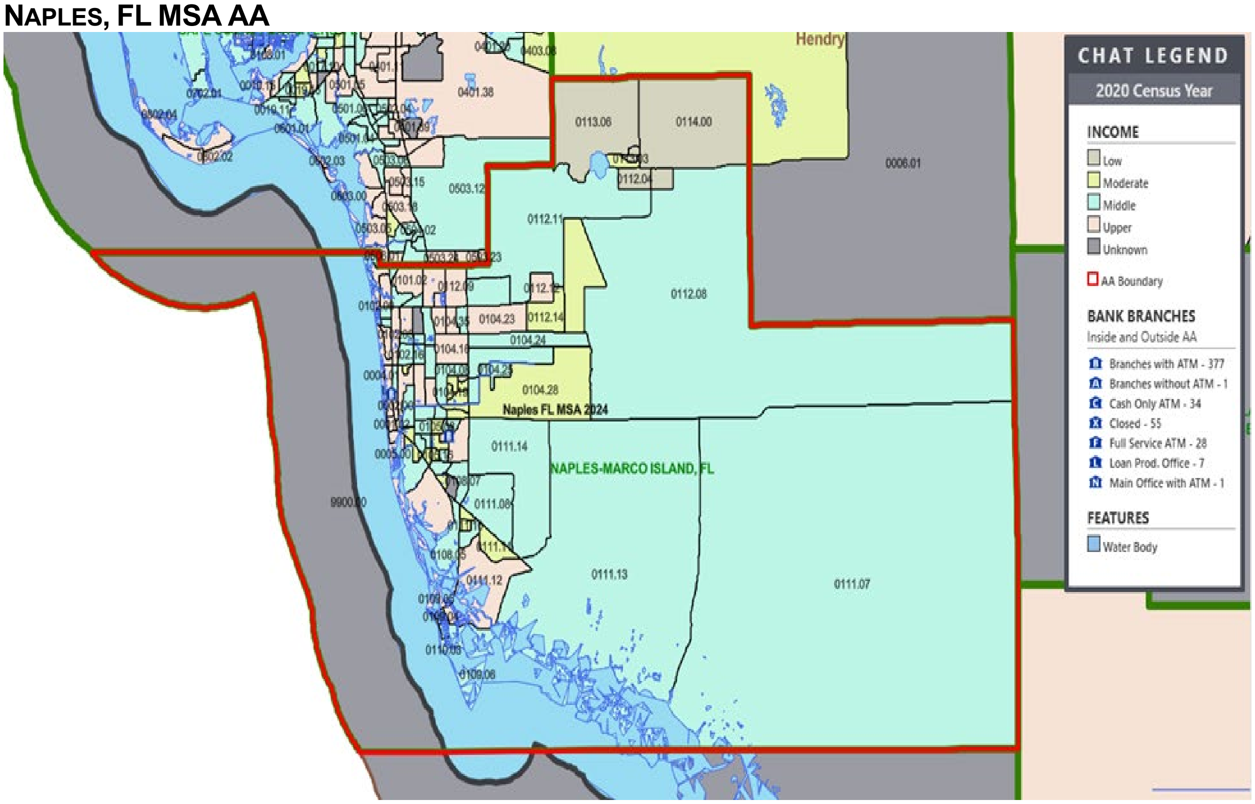
Ventura County MSA Assessment Area



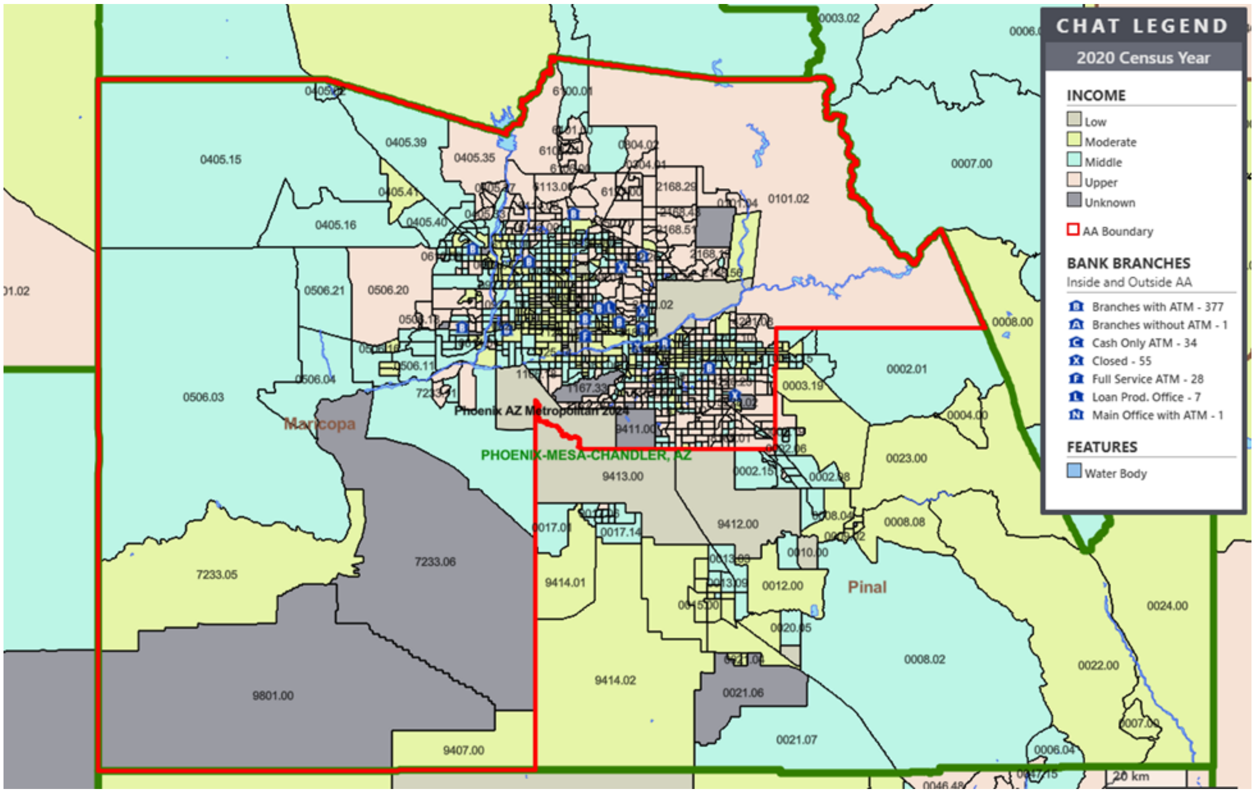
FORT LAUDERDALE-WEST PALM BEACH METROPOLITAN ASSESSMENT AREA



NAPLES, FL MSA AA



PHOENIX METROPOLITAN ASSESSMENT AREA



APPENDIX B – FULL-SCOPE ASSESSMENT AREAS DEMOGRAPHICS TABLES

SOUTHEAST MICHIGAN METROPOLITAN ASSESSMENT AREA

TABLE B-1

2023 Southeast MI Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	121	9.3	66,823	6.4	24,062	36.0	224,058	21.6
Moderate	334	25.6	244,745	23.5	40,114	16.4	176,534	17.0
Middle	382	29.3	341,826	32.9	23,825	7.0	206,769	19.9
Upper	384	29.4	380,227	36.6	12,019	3.2	432,326	41.6
Unknown	84	6.4	6,066	0.6	2,470	40.7	0	0.0
Total AA	**1,305**	**100.0**	**1,039,687**	**100.0**	**102,490**	**9.9**	**1,039,687**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	166,190	49,868	4.3	30.0	80,494	48.4	35,828	21.6
Moderate	489,835	245,791	21.4	50.2	176,244	36.0	67,800	13.8
Middle	581,341	392,450	34.2	67.5	151,152	26.0	37,739	6.5
Upper	579,941	453,744	39.6	78.2	95,993	16.6	30,204	5.2
Unknown	21,262	5,399	0.5	25.4	9,598	45.1	6,265	29.5
Total AA	**1,838,569**	**1,147,252**	**100.0**	**62.4**	**513,481**	**27.9**	**177,836**	**9.7**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	14,107	6.7	12,709	6.6	1,311	8.3	87	5.6
Moderate	46,250	22.1	42,578	22.2	3,384	21.5	288	18.6
Middle	64,089	30.7	59,210	30.9	4,410	28.0	469	30.4
Upper	79,844	38.2	73,512	38.3	5,677	36.0	655	42.4
Unknown	4,729	2.3	3,697	1.9	986	6.3	46	3.0
Total AA	**209,019**	**100.0**	**191,706**	**100.0**	**15,768**	**100.0**	**1,545**	**100.0**
Percentage of Total Businesses:				**91.7**		**7.5**		**0.7**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	43	3.4	42	3.5	1	3.2	0	0.0
Moderate	235	18.8	231	19.0	4	12.9	0	0.0
Middle	538	43.1	525	43.1	13	41.9	0	0.0
Upper	422	33.8	410	33.7	12	38.7	0	0.0
Unknown	10	0.8	9	0.7	1	3.2	0	0.0
Total AA	**1,248**	**100.0**	**1,217**	**100.0**	**31**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.5**		**2.5**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

GRAND RAPIDS METROPOLITAN ASSESSMENT AREA

TABLE B-2

2023 Grand Rapids Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	5.2	7,745	3.3	1,899	24.5	42,756	18.0
Moderate	38	18.1	35,778	15.0	4,831	13.5	42,648	17.9
Middle	104	49.5	114,401	48.1	6,320	5.5	55,302	23.2
Upper	53	25.2	76,884	32.3	1,435	1.9	97,259	40.9
Unknown	4	1.9	3,157	1.3	320	10.1	0	0.0
Total AA	**210**	**100.0**	**237,965**	**100.0**	**14,805**	**6.2**	**237,965**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	14,123	4,702	1.8	33.3	8,410	59.5	1,011	7.2
Moderate	63,324	33,249	13.1	52.5	25,855	40.8	4,220	6.7
Middle	182,519	125,886	49.5	69.0	48,033	26.3	8,600	4.7
Upper	102,929	87,435	34.4	84.9	11,436	11.1	4,058	3.9
Unknown	4,768	2,919	1.1	61.2	1,456	30.5	393	8.2
Total AA	**367,663**	**254,191**	**100.0**	**69.1**	**95,190**	**25.9**	**18,282**	**5.0**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	955	2.4	855	2.4	98	2.5	2	0.6
Moderate	6,870	17.5	5,860	16.8	967	24.2	43	13.9
Middle	18,219	46.4	16,278	46.5	1,799	45.1	142	45.8
Upper	12,916	32.9	11,692	33.4	1,105	27.7	119	38.4
Unknown	320	0.8	293	0.8	23	0.6	4	1.3
Total AA	**39,280**	**100.0**	**34,978**	**100.0**	**3,992**	**100.0**	**310**	**100.0**
Percentage of Total Businesses:				**89.0**		**10.2**		**0.8**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	7	0.9	7	1.0	0	0.0	0	0.0
Moderate	55	7.0	48	6.6	7	12.7	0	0.0
Middle	427	54.5	396	54.4	31	56.4	0	0.0
Upper	289	36.9	272	37.4	17	30.9	0	0.0
Unknown	5	0.6	5	0.7	0	0.0	0	0.0
Total AA	**783**	**100.0**	**728**	**100.0**	**55**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**93.0**		**7.0**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA

TABLE B-3

2023 Dallas-Fort Worth Metropolitan AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	150	9.5	133,215	8.0	34,671	26.0	364,225	22.0
Moderate	409	26.0	393,808	23.8	54,122	13.7	285,539	17.2
Middle	454	28.9	503,984	30.4	29,654	5.9	318,348	19.2
Upper	535	34.0	618,103	37.3	16,723	2.7	689,234	41.6
Unknown	24	1.5	8,236	0.5	1,272	15.4	0	0.0
Total AA	**1,572**	**100.0**	**1,657,346**	**100.0**	**136,442**	**8.2**	**1,657,346**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	249,345	62,642	4.4	25.1	159,061	63.8	27,642	11.1
Moderate	650,771	276,691	19.6	42.5	320,530	49.3	53,550	8.2
Middle	793,625	447,020	31.7	56.3	295,959	37.3	50,646	6.4
Upper	884,505	618,809	43.9	70.0	215,382	24.4	50,314	5.7
Unknown	23,757	5,212	0.4	21.9	15,068	63.4	3,477	14.6
Total AA	**2,602,003**	**1,410,374**	**100.0**	**54.2**	**1,006,000**	**38.7**	**185,629**	**7.1**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	20,319	5.4	18,640	5.3	1,544	6.5	135	3.1
Moderate	73,522	19.5	67,422	19.3	5,515	23.3	585	13.2
Middle	115,056	30.5	106,735	30.6	7,223	30.5	1,098	24.8
Upper	164,739	43.7	153,149	43.9	9,011	38.1	2,579	58.3
Unknown	3,199	0.8	2,790	0.8	380	1.6	29	0.7
Total AA	**376,835**	**100.0**	**348,736**	**100.0**	**23,673**	**100.0**	**4,426**	**100.0**
Percentage of Total Businesses:				**92.5**		**6.3**		**1.2**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	71	2.4	70	2.4	1	2.8	0	0.0
Moderate	369	12.5	363	12.5	6	16.7	0	0.0
Middle	1,009	34.2	998	34.3	10	27.8	1	33.3
Upper	1,485	50.3	1,464	50.3	19	52.8	2	66.7
Unknown	17	0.6	17	0.6	0	0.0	0	0.0
Total AA	**2,951**	**100.0**	**2,912**	**100.0**	**36**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**98.7**		**1.2**		**0.1**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

HOUSTON METROPOLITAN ASSESSMENT AREA

TABLE B-4

2023 Houston Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	215	13.8	168,037	10.2	54,180	32.2	389,059	23.6
Moderate	385	24.6	377,238	22.9	60,353	16.0	273,834	16.6
Middle	408	26.1	472,141	28.6	36,171	7.7	294,579	17.8
Upper	505	32.3	614,325	37.2	20,536	3.3	693,387	42.0
Unknown	49	3.1	19,118	1.2	4,477	23.4	0	0.0
Total AA	**1,562**	**100.0**	**1,650,859**	**100.0**	**175,717**	**10.6**	**1,650,859**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	297,280	71,836	5.1	24.2	187,981	63.2	37,463	12.6
Moderate	604,210	274,443	19.4	45.4	273,153	45.2	56,614	9.4
Middle	714,369	428,552	30.3	60.0	224,956	31.5	60,861	8.5
Upper	903,672	625,964	44.3	69.3	211,220	23.4	66,488	7.4
Unknown	48,212	12,289	0.9	25.5	28,761	59.7	7,162	14.9
Total AA	**2,567,743**	**1,413,084**	**100.0**	**55.0**	**926,071**	**36.1**	**228,588**	**8.9**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	30,169	8.8	27,284	8.6	2,702	11.6	183	4.7
Moderate	67,790	19.7	61,878	19.5	5,412	23.3	500	13.0
Middle	89,000	25.9	82,854	26.1	5,334	23.0	812	21.0
Upper	151,678	44.1	140,170	44.2	9,215	39.7	2,293	59.4
Unknown	5,626	1.6	5,006	1.6	548	2.4	72	1.9
Total AA	**344,263**	**100.0**	**317,192**	**100.0**	**23,211**	**100.0**	**3,860**	**100.0**
Percentage of Total Businesses:				**92.1**		**6.7**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	71	3.1	68	3.0	3	7.5	0	0.0
Moderate	303	13.1	290	12.8	12	30.0	1	20.0
Middle	688	29.8	675	29.8	9	22.5	4	80.0
Upper	1,217	52.7	1,202	53.1	15	37.5	0	0.0
Unknown	30	1.3	29	1.3	1	2.5	0	0.0
Total AA	**2,309**	**100.0**	**2,264**	**100.0**	**40**	**100.0**	**5**	**100.0**
Percentage of Total Farms:				**98.1**		**1.7**		**0.2**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

GREATER LOS ANGELES MSA ASSESSMENT AREA

TABLE B-5

2023 Greater Los Angeles MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	178	5.7	142,545	4.8	39,818	27.9	699,400	23.7
Moderate	856	27.5	792,186	26.8	125,169	15.8	486,097	16.5
Middle	926	29.8	905,587	30.7	73,556	8.1	529,772	17.9
Upper	1,071	34.4	1,098,658	37.2	43,367	3.9	1,238,213	41.9
Unknown	81	2.6	14,506	0.5	1,991	13.7	0	0.0
Total AA	**3,112**	**100.0**	**2,953,482**	**100.0**	**283,901**	**9.6**	**2,953,482**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	225,201	29,216	1.4	13.0	183,218	81.4	12,767	5.7
Moderate	1,184,434	364,211	17.1	30.7	758,418	64.0	61,805	5.2
Middle	1,388,988	672,356	31.6	48.4	643,632	46.3	73,000	5.3
Upper	1,803,716	1,056,633	49.6	58.6	613,113	34.0	133,970	7.4
Unknown	58,695	7,284	0.3	12.4	44,424	75.7	6,987	11.9
Total AA	**4,661,034**	**2,129,700**	**100.0**	**45.7**	**2,242,805**	**48.1**	**288,529**	**6.2**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	24,833	3.5	22,469	3.4	2,239	4.3	125	2.9
Moderate	138,904	19.6	126,184	19.3	12,061	23.0	659	15.3
Middle	198,869	28.0	182,251	27.9	15,514	29.6	1,104	25.6
Upper	330,393	46.5	307,942	47.1	20,149	38.4	2,302	53.4
Unknown	17,221	2.4	14,650	2.2	2,450	4.7	121	2.8
Total AA	**710,220**	**100.0**	**653,496**	**100.0**	**52,413**	**100.0**	**4,311**	**100.0**
Percentage of Total Businesses:				**92.0**		**7.4**		**0.6**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	47	2.0	47	2.0	0	0.0	0	0.0
Moderate	364	15.3	342	14.9	22	26.5	0	0.0
Middle	571	24.0	551	24.0	20	24.1	0	0.0
Upper	1,357	57.0	1,316	57.3	41	49.4	0	0.0
Unknown	41	1.7	41	1.8	0	0.0	0	0.0
Total AA	**2,380**	**100.0**	**2,297**	**100.0**	**83**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.5**		**3.5**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

San Francisco Bay Metropolitan Assessment Area

Table B-6

2023 San Francisco Bay Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	91	8.8	72,932	7.1	13,583	18.6	240,172	23.5
Moderate	240	23.1	229,789	22.5	17,895	7.8	167,475	16.4
Middle	330	31.8	344,121	33.7	13,218	3.8	191,394	18.7
Upper	337	32.4	362,427	35.5	8,660	2.4	423,164	41.4
Unknown	41	3.9	12,936	1.3	1,582	12.2	0	0.0
Total AA	**1,039**	**100.0**	**1,022,205**	**100.0**	**54,938**	**5.4**	**1,022,205**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	132,500	30,475	3.5	23.0	92,364	69.7	9,661	7.3
Moderate	380,058	167,123	19.2	44.0	192,481	50.6	20,454	5.4
Middle	557,444	306,586	35.3	55.0	221,156	39.7	29,702	5.3
Upper	587,052	356,898	41.1	60.8	192,755	32.8	37,399	6.4
Unknown	41,149	7,819	0.9	19.0	29,308	71.2	4,022	9.8
Total AA	**1,698,203**	**868,901**	**100.0**	**51.2**	**728,064**	**42.9**	**101,238**	**6.0**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	13,867	6.1	12,523	6.0	1,267	7.1	77	6.3
Moderate	40,644	18.0	37,665	18.2	2,797	15.8	182	15.0
Middle	67,793	30.0	62,588	30.2	4,855	27.4	350	28.8
Upper	91,682	40.6	84,121	40.6	7,043	39.7	518	42.6
Unknown	12,059	5.3	10,200	4.9	1,770	10.0	89	7.3
Total AA	**226,045**	**100.0**	**207,097**	**100.0**	**17,732**	**100.0**	**1,216**	**100.0**
Percentage of Total Businesses:				**91.6**		**7.8**		**0.5**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	56	4.8	54	4.8	2	4.8	0	0.0
Moderate	201	17.3	194	17.4	7	16.7	0	0.0
Middle	285	24.6	271	24.3	14	33.3	0	0.0
Upper	595	51.3	576	51.7	18	42.9	1	50.0
Unknown	22	1.9	20	1.8	1	2.4	1	50.0
Total AA	**1,159**	**100.0**	**1,115**	**100.0**	**42**	**100.0**	**2**	**100.0**
Percentage of Total Farms:				**96.2**		**3.6**		**0.2**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

FORT LAUDERDALE-WEST PALM BEACH METROPOLITAN ASSESSMENT AREA

TABLE B-7

2023 Fort Lauderdale-West Palm Beach Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	45	5.7	33,645	4.2	9,279	27.6	175,492	22.0
Moderate	218	27.6	217,683	27.2	31,226	14.3	143,372	17.9
Middle	235	29.7	246,788	30.9	17,102	6.9	146,276	18.3
Upper	269	34.1	293,725	36.7	12,330	4.2	334,200	41.8
Unknown	23	2.9	7,499	0.9	1,490	19.9	0	0.0
Total AA	**790**	**100.0**	**799,340**	**100.0**	**71,427**	**8.9**	**799,340**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	74,462	28,528	3.4	38.3	33,125	44.5	12,809	17.2
Moderate	431,917	198,311	23.8	45.9	166,501	38.5	67,105	15.5
Middle	462,879	262,957	31.5	56.8	133,231	28.8	66,691	14.4
Upper	529,008	336,753	40.4	63.7	97,695	18.5	94,560	17.9
Unknown	18,191	7,357	0.9	40.4	6,082	33.4	4,752	26.1
Total AA	**1,516,457**	**833,906**	**100.0**	**55.0**	**436,634**	**28.8**	**245,917**	**16.2**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	9,464	3.2	8,659	3.2	720	4.8	85	2.4
Moderate	70,653	24.3	65,550	24.0	4,457	29.8	646	18.6
Middle	86,088	29.6	81,453	29.9	3,753	25.1	882	25.4
Upper	120,169	41.3	113,063	41.4	5,320	35.6	1,786	51.4
Unknown	4,879	1.7	4,110	1.5	695	4.7	74	2.1
Total AA	**291,253**	**100.0**	**272,835**	**100.0**	**14,945**	**100.0**	**3,473**	**100.0**
Percentage of Total Businesses:				**93.7**		**5.1**		**1.2**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	35	2.5	30	2.2	5	8.8	0	0.0
Moderate	231	16.4	218	16.1	13	22.8	0	0.0
Middle	427	30.3	413	30.6	14	24.6	0	0.0
Upper	700	49.7	677	50.1	23	40.4	0	0.0
Unknown	15	1.1	13	1.0	2	3.5	0	0.0
Total AA	**1,408**	**100.0**	**1,351**	**100.0**	**57**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.0**		**4.0**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

PHOENIX METROPOLITAN ASSESSMENT AREA

TABLE B-8

2023 Phoenix Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	64	6.3	52,329	5.0	16,580	31.7	213,662	20.4
Moderate	259	25.7	249,837	23.8	39,265	15.7	187,650	17.9
Middle	314	31.1	346,377	33.1	25,076	7.2	209,528	20.0
Upper	348	34.5	396,593	37.8	13,719	3.5	437,059	41.7
Unknown	24	2.4	2,763	0.3	638	23.1	0	0.0
Total AA	**1,009**	**100.0**	**1,047,899**	**100.0**	**95,278**	**9.1**	**1,047,899**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	94,740	26,498	2.6	28.0	58,759	62.0	9,483	10.0
Moderate	467,263	208,235	20.6	44.6	209,530	44.8	49,498	10.6
Middle	590,915	349,840	34.7	59.2	186,145	31.5	54,930	9.3
Upper	606,362	422,448	41.9	69.7	129,770	21.4	54,144	8.9
Unknown	6,600	1,466	0.1	22.2	4,093	62.0	1,041	15.8
Total AA	**1,765,880**	**1,008,487**	**100.0**	**57.1**	**588,297**	**33.3**	**169,096**	**9.6**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	9,055	3.7	8,015	3.5	970	7.3	70	2.3
Moderate	45,206	18.4	41,079	17.9	3,663	27.6	464	15.2
Middle	71,776	29.2	67,698	29.5	3,351	25.3	727	23.8
Upper	118,282	48.1	111,519	48.5	4,985	37.6	1,778	58.2
Unknown	1,746	0.7	1,450	0.6	282	2.1	14	0.5
Total AA	**246,065**	**100.0**	**229,761**	**100.0**	**13,251**	**100.0**	**3,053**	**100.0**
Percentage of Total Businesses:				**93.4**		**5.4**		**1.2**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	32	1.7	29	1.7	3	3.8	0	0.0
Moderate	223	12.2	206	11.8	17	21.5	0	0.0
Middle	540	29.5	516	29.4	24	30.4	0	0.0
Upper	1,027	56.1	992	56.6	35	44.3	0	0.0
Unknown	10	0.5	10	0.6	0	0.0	0	0.0
Total AA	**1,832**	**100.0**	**1,753**	**100.0**	**79**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**95.7**		**4.3**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX C – METROPOLITAN LIMITED-SCOPE ASSESSMENT AREAS

ANN ARBOR MSA ASSESSMENT AREA

TABLE C-1

2024 Ann Arbor MI MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
w	13	12.1	6,681	8.2	1,746	26.1	16,915	20.8
derate	13	12.1	8,250	10.1	1,081	13.1	14,355	17.7
ddle	40	37.4	35,113	43.2	1,354	3.9	17,415	21.4
per	30	28.0	30,648	37.7	772	2.5	32,607	40.1
known	11	10.3	600	0.7	169	28.2	0	0.0
Total AA	**107**	**100.0**	**81,292**	**100.0**	**5,122**	**6.3**	**81,292**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
w	18,022	4,152	4.7	23.0	12,606	69.9	1,264	7.0
derate	18,144	7,606	8.6	41.9	9,361	51.6	1,177	6.5
ddle	61,211	41,259	46.9	67.4	16,959	27.7	2,993	4.9
per	47,883	34,598	39.3	72.3	10,746	22.4	2,539	5.3
known	6,493	323	0.4	5.0	5,430	83.6	740	11.4
Total AA	**151,753**	**87,938**	**100.0**	**57.9**	**55,102**	**36.3**	**8,713**	**5.7**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
w	1,234	7.5	1,124	7.5	102	7.9	8	5.9
derate	1,486	9.0	1,408	9.4	72	5.5	6	4.4
ddle	6,830	41.5	6,218	41.4	541	41.7	71	52.2
per	6,361	38.6	5,790	38.5	523	40.3	48	35.3
known	551	3.3	488	3.2	60	4.6	3	2.2
Total AA	**16,462**	**100.0**	**15,028**	**100.0**	**1,298**	**100.0**	**136**	**100.0**
Percentage of Total Businesses:				**91.3**		**7.9**		**0.8**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
w	6	1.8	6	1.8	0	0.0	0	0.0
derate	9	2.7	9	2.7	0	0.0	0	0.0
ddle	218	64.7	215	64.6	3	100.0	0	0.0
per	104	30.9	103	30.9	0	0.0	1	100.0
known	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**337**	**100.0**	**333**	**100.0**	**3**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.8**		**0.9**		**0.3**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-2

2023 Ann Arbor MI MSA AA Demographics										
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income			
	#	%	#	%	#	%	#	%		
w	13	12.1	6,681	8.2	1,746	26.1	16,915	20.8		
derate	13	12.1	8,250	10.1	1,081	13.1	14,355	17.7		
ddle	40	37.4	35,113	43.2	1,354	3.9	17,415	21.4		
per	30	28.0	30,648	37.7	772	2.5	32,607	40.1		
known	11	10.3	600	0.7	169	28.2	0	0.0		
Total AA	**107**	**100.0**	**81,292**	**100.0**	**5,122**	**6.3**	**81,292**	**100.0**		
	Housing Units by Tract	Housing Type by Tract								
		Owner-occupied			Rental		Vacant			
		#	% by tract	% by unit	#	% by unit	#	% by unit		
w	18,022	4,152	4.7	23.0	12,606	69.9	1,264	7.0		
derate	18,144	7,606	8.6	41.9	9,361	51.6	1,177	6.5		
ddle	61,211	41,259	46.9	67.4	16,959	27.7	2,993	4.9		
per	47,883	34,598	39.3	72.3	10,746	22.4	2,539	5.3		
known	6,493	323	0.4	5.0	5,430	83.6	740	11.4		
Total AA	**151,753**	**87,938**	**100.0**	**57.9**	**55,102**	**36.3**	**8,713**	**5.7**		
	Total Businesses by Tract		Businesses by Tract & Revenue Size							
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%		
w	1,332	7.5	1,220	7.6	102	7.5	10	6.7		
derate	1,547	8.8	1,465	9.1	75	5.5	7	4.7		
ddle	7,370	41.7	6,723	41.6	570	42.1	77	51.3		
per	6,817	38.6	6,223	38.5	540	39.9	54	36.0		
known	588	3.3	519	3.2	67	4.9	2	1.3		
Total AA	**17,654**	**100.0**	**16,150**	**100.0**	**1,354**	**100.0**	**150**	**100.0**		
Percentage of Total Businesses:				**91.5**		**7.7**		**0.8**		
	Total Farms by Tract		Farms by Tract & Revenue Size							
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%		
w	8	2.3	8	2.3	0	0.0	0	0.0		
derate	11	3.1	11	3.2	0	0.0	0	0.0		
ddle	228	64.8	225	64.7	3	100.0	0	0.0		
per	105	29.8	104	29.9	0	0.0	1	100.0		
known	0	0.0	0	0.0	0	0.0	0	0.0		
Total AA	**352**	**100.0**	**348**	**100.0**	**3**	**100.0**	**1**	**100.0**		
Percentage of Total Farms:				**98.9**		**0.9**		**0.3**		

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-3A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Ann Arbor MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	6.2	0	0.0	3.3	1	20.0	6.7	196	14.0	4.0	4.7
Moderate	0	0.0	10.3	0	0.0	5.8	1	20.0	10.0	312	22.3	6.0	8.6
Middle	1	25.0	51.5	200	21.2	45.8	2	40.0	49.3	738	52.9	43.6	46.9
Upper	3	75.0	31.6	743	78.8	44.4	1	20.0	33.4	150	10.7	45.0	39.3
Unknown	0	0.0	0.4	0	0.0	0.7	0	0.0	0.6	0	0.0	1.5	0.4
Total	4	100.0	100.0	943	100.0	100.0	5	100.0	100.0	1,396	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	6.3	0	0.0	3.5	2	5.4	6.8	326	3.9	4.1	4.7
Moderate	1	4.0	8.7	120	2.9	5.2	1	2.7	9.6	69	0.8	5.5	8.6
Middle	9	36.0	49.7	1,002	24.5	42.9	17	45.9	47.3	2,833	34.2	43.4	46.9
Upper	15	60.0	33.6	2,974	72.6	41.8	17	45.9	34.8	5,050	61.0	43.2	39.3
Unknown	0	0.0	1.6	0	0.0	6.6	0	0.0	1.6	0	0.0	3.9	0.4
Total	25	100.0	100.0	4,096	100.0	100.0	37	100.0	100.0	8,278	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.4	0	0.0	2.1	0	0.0	5.2	0	0.0	3.2	4.7
Moderate	0	0.0	8.4	0	0.0	4.7	2	11.8	6.4	250	12.5	3.9	8.6
Middle	5	22.7	47.8	580	15.5	41.7	10	58.8	45.6	797	39.7	40.8	46.9
Upper	17	77.3	40.0	3,172	84.5	49.4	5	29.4	42.5	960	47.8	51.9	39.3
Unknown	0	0.0	0.4	0	0.0	2.1	0	0.0	0.3	0	0.0	0.2	0.4
Total	22	100.0	100.0	3,752	100.0	100.0	17	100.0	100.0	2,007	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	3.3	0	0.0	0.5	0	0.0	4.2	0	0.0	0.4	25.3
Moderate	0	0.0	6.7	0	0.0	35.0	0	0.0	14.6	0	0.0	78.3	17.7
Middle	0	0.0	13.3	0	0.0	21.0	0	0.0	4.2	0	0.0	0.5	27.0
Upper	0	0.0	33.3	0	0.0	39.3	0	0.0	14.6	0	0.0	12.7	19.4
Unknown	0	0.0	43.3	0	0.0	4.2	0	0.0	62.5	0	0.0	8.1	10.7
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	5.6	0	0.0	2.6	3	4.5	6.3	522	4.1	3.2	4.7
Moderate	1	1.7	9.6	120	1.2	12.5	5	7.5	9.4	786	6.2	21.0	8.6
Middle	22	36.7	50.3	2,777	27.8	39.3	35	52.2	48.3	5,177	40.7	34.3	46.9
Upper	37	61.7	33.7	7,093	71.0	43.4	24	35.8	34.8	6,220	49.0	38.4	39.3
Unknown	0	0.0	0.8	0	0.0	2.1	0	0.0	1.2	0	0.0	3.2	0.4
Total	60	100.0	100.0	9,990	100.0	100.0	67	100.0	100.0	12,705	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-3B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Ann Arbor MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	3.4	0	0.0	1.9	0	0.0	4.2	0	0.0	2.5	4.7
Moderate	0	0.0	8.4	0	0.0	4.0	0	0.0	8.0	0	0.0	5.5	8.6
Middle	6	75.0	46.5	731	78.2	38.6	6	85.7	50.5	809	93.1	42.8	46.9
Upper	2	25.0	41.2	204	21.8	53.2	1	14.3	37.0	60	6.9	48.9	39.3
Unknown	0	0.0	0.5	0	0.0	2.2	0	0.0	0.2	0	0.0	0.2	0.4
Total	8	100.0	100.0	935	100.0	100.0	7	100.0	100.0	869	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.3	0	0.0	1.6	0	0.0	4.1	0	0.0	1.8	4.7
Moderate	0	0.0	8.1	0	0.0	4.9	1	100.0	9.5	155	100.0	5.3	8.6
Middle	1	100.0	50.2	264	100.0	42.8	0	0.0	53.8	0	0.0	37.1	46.9
Upper	0	0.0	37.4	0	0.0	50.6	0	0.0	32.1	0	0.0	53.8	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.5	0	0.0	2.1	0.4
Total	1	100.0	100.0	264	100.0	100.0	1	100.0	100.0	155	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	4.3	0	0.0	3.6	0	0.0	9.1	0	0.0	5.7	4.7
Moderate	0	0.0	4.3	0	0.0	5.9	0	0.0	18.2	0	0.0	19.6	8.6
Middle	0	0.0	60.9	0	0.0	59.8	0	0.0	27.3	0	0.0	40.7	46.9
Upper	0	0.0	30.4	0	0.0	30.6	0	0.0	36.4	0	0.0	14.2	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	9.1	0	0.0	19.9	0.4
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-4

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Ann Arbor MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	9	6.7	6.3	1,985	6.4	6.8	7	5.7	6.3	1,510	5.3	6.2	7.5
Moderate	12	9.0	8.2	3,341	10.8	7.5	7	5.7	9.0	1,845	6.4	8.7	9.0
Middle	56	41.8	42.4	13,839	44.9	43.0	62	50.4	41.6	15,809	55.0	41.2	41.5
Upper	53	39.6	41.1	11,257	36.5	40.4	44	35.8	40.9	9,174	31.9	40.2	38.6
Unknown	4	3.0	1.7	430	1.4	2.1	3	2.4	2.0	380	1.3	3.8	3.3
Total	134	100.0	100.0	30,852	100.0	100.0	123	100.0	100.0	28,718	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-5A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Ann Arbor MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	25.0	10.0	97	10.3	4.2	0	0.0	7.3	0	0.0	2.9	20.8
Moderate	0	0.0	19.3	0	0.0	12.7	0	0.0	18.3	0	0.0	10.9	17.7
Middle	1	25.0	21.4	200	21.2	19.4	2	40.0	19.8	647	46.3	16.6	21.4
Upper	2	50.0	35.7	646	68.5	52.4	3	60.0	40.5	749	53.7	54.5	40.1
Unknown	0	0.0	13.6	0	0.0	11.3	0	0.0	14.1	0	0.0	15.2	0.0
Total	4	100.0	100.0	943	100.0	100.0	5	100.0	100.0	1,396	100.0	100.0	100.0
Refinance Loans													
Low	7	28.0	12.9	747	18.2	7.5	9	24.3	10.3	809	9.8	4.7	20.8
Moderate	6	24.0	27.3	1,108	27.1	20.6	6	16.2	19.2	849	10.3	12.7	17.7
Middle	2	8.0	21.8	290	7.1	19.6	2	5.4	21.2	298	3.6	18.4	21.4
Upper	9	36.0	28.4	1,750	42.7	38.4	17	45.9	32.1	5,172	62.5	41.0	40.1
Unknown	1	4.0	9.7	201	4.9	13.9	3	8.1	17.2	1,150	13.9	23.2	0.0
Total	25	100.0	100.0	4,096	100.0	100.0	37	100.0	100.0	8,278	100.0	100.0	100.0
Home Improvement Loans													
Low	1	4.5	12.2	89	2.4	7.1	3	17.6	8.9	267	13.3	5.1	20.8
Moderate	9	40.9	23.0	1,370	36.5	17.2	6	35.3	19.6	616	30.7	13.9	17.7
Middle	3	13.6	25.2	594	15.8	22.4	3	17.6	23.5	244	12.2	20.9	21.4
Upper	9	40.9	37.4	1,699	45.3	49.6	5	29.4	46.4	880	43.8	58.8	40.1
Unknown	0	0.0	2.1	0	0.0	3.8	0	0.0	1.7	0	0.0	1.2	0.0
Total	22	100.0	100.0	3,752	100.0	100.0	17	100.0	100.0	2,007	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	12	20.0	11.1	1,153	11.5	4.9	13	19.4	8.3	1,176	9.3	3.4	20.8
Moderate	15	25.0	21.3	2,478	24.8	14.2	13	19.4	18.8	1,527	12.0	11.4	17.7
Middle	8	13.3	22.2	1,398	14.0	19.5	9	13.4	21.2	1,640	12.9	17.4	21.4
Upper	24	40.0	34.4	4,760	47.6	50.2	28	41.8	39.3	7,057	55.5	52.0	40.1
Unknown	1	1.7	11.1	201	2.0	11.1	4	6.0	12.5	1,305	10.3	15.7	0.0
Total	60	100.0	100.0	9,990	100.0	100.0	67	100.0	100.0	12,705	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table C-5B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Ann Arbor MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	3	37.5	14.6	220	23.5	9.8	1	14.3	8.2	100	11.5	4.9	20.8
Moderate	0	0.0	23.9	0	0.0	18.2	1	14.3	18.6	62	7.1	12.7	17.7
Middle	1	12.5	23.9	50	5.3	21.1	2	28.6	27.3	451	51.9	22.9	21.4
Upper	4	50.0	34.9	665	71.1	48.5	3	42.9	42.5	256	29.5	57.0	40.1
Unknown	0	0.0	2.7	0	0.0	2.4	0	0.0	3.4	0	0.0	2.5	0.0
Total	8	100.0	100.0	935	100.0	100.0	7	100.0	100.0	869	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	13.7	0	0.0	7.4	0	0.0	10.4	0	0.0	5.7	20.8
Moderate	0	0.0	23.7	0	0.0	21.0	0	0.0	23.1	0	0.0	12.2	17.7
Middle	1	100.0	28.0	264	100.0	17.2	0	0.0	24.0	0	0.0	18.9	21.4
Upper	0	0.0	29.4	0	0.0	46.5	0	0.0	38.5	0	0.0	55.2	40.1
Unknown	0	0.0	5.2	0	0.0	7.9	1	100.0	4.1	155	100.0	8.1	0.0
Total	1	100.0	100.0	264	100.0	100.0	1	100.0	100.0	155	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.8
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.7
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.4
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	40.1
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-6

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Ann Arbor MI MSA													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	42	31.3	52.7	7,034	22.8	32.6	48	39.0	51.8	6,284	21.9	35.3	91.3
Over $1 Million	70	52.2		19,766	64.1		60	48.8		19,025	66.2		7.9
Revenue Unknown	22	16.4		4,052	13.1		15	12.2		3,409	11.9		0.8
Total	134	100.0		30,852	100.0		123	100.0		28,718	100.0		100.0
By Loan Size													
$100,000 or Less	70	52.2	96.0	4,205	13.6	48.5	65	52.8	95.7	4,412	15.4	46.3	
$100,001 - $250,000	27	20.1	2.3	5,466	17.7	14.5	24	19.5	2.3	5,170	18.0	14.3	
$250,001 - $1 Million	37	27.6	1.7	21,181	68.7	36.9	34	27.6	2.0	19,136	66.6	39.3	
Total	134	100.0	100.0	30,852	100.0	100.0	123	100.0	100.0	28,718	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	28	66.7		1,744	24.8		33	68.8		2,276	36.2		
$100,001 - $250,000	8	19.0		1,550	22.0		11	22.9		2,450	39.0		
$250,001 - $1 Million	6	14.3		3,740	53.2		4	8.3		1,558	24.8		
Total	42	100.0		7,034	100.0		48	100.0		6,284	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

BATTLE CREEK MSA ASSESSMENT AREA

TABLE C-7

2024 Battle Creek MI MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	7.5	1,757	5.3	727	41.4	7,285	21.9
Moderate	13	32.5	8,250	24.8	1,711	20.7	5,731	17.2
Middle	15	37.5	13,123	39.4	983	7.5	6,582	19.8
Upper	9	22.5	10,184	30.6	470	4.6	13,716	41.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**40**	**100.0**	**33,314**	**100.0**	**3,891**	**11.7**	**33,314**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,580	1,462	3.9	40.8	1,525	42.6	593	16.6
Moderate	18,404	8,093	21.5	44.0	7,658	41.6	2,653	14.4
Middle	23,662	15,678	41.7	66.3	5,526	23.4	2,458	10.4
Upper	15,243	12,403	33.0	81.4	1,779	11.7	1,061	7.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**60,889**	**37,636**	**100.0**	**61.8**	**16,488**	**27.1**	**6,765**	**11.1**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	258	6.1	229	6.0	27	7.1	2	4.0
Moderate	1,279	30.3	1,114	29.4	156	41.2	9	18.0
Middle	1,636	38.8	1,476	39.0	134	35.4	26	52.0
Upper	1,043	24.7	968	25.6	62	16.4	13	26.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4,216**	**100.0**	**3,787**	**100.0**	**379**	**100.0**	**50**	**100.0**
Percentage of Total Businesses:				**89.8**		**9.0**		**1.2**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.6	1	0.6	0	0.0	0	0.0
Moderate	24	14.4	23	14.6	1	12.5	0	0.0
Middle	85	50.9	82	51.9	3	37.5	0	0.0
Upper	57	34.1	52	32.9	4	50.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**167**	**100.0**	**158**	**100.0**	**8**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**94.6**		**4.8**		**0.6**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-8

2023 Battle Creek MI MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	7.5	1,757	5.3	727	41.4	7,285	21.9
Moderate	13	32.5	8,250	24.8	1,711	20.7	5,731	17.2
Middle	15	37.5	13,123	39.4	983	7.5	6,582	19.8
Upper	9	22.5	10,184	30.6	470	4.6	13,716	41.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**40**	**100.0**	**33,314**	**100.0**	**3,891**	**11.7**	**33,314**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,580	1,462	3.9	40.8	1,525	42.6	593	16.6
Moderate	18,404	8,093	21.5	44.0	7,658	41.6	2,653	14.4
Middle	23,662	15,678	41.7	66.3	5,526	23.4	2,458	10.4
Upper	15,243	12,403	33.0	81.4	1,779	11.7	1,061	7.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**60,889**	**37,636**	**100.0**	**61.8**	**16,488**	**27.1**	**6,765**	**11.1**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	260	5.9	227	5.8	31	7.8	2	3.8
Moderate	1,335	30.5	1,162	29.5	162	41.0	11	21.2
Middle	1,691	38.6	1,529	38.8	136	34.4	26	50.0
Upper	1,097	25.0	1,018	25.9	66	16.7	13	25.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4,383**	**100.0**	**3,936**	**100.0**	**395**	**100.0**	**52**	**100.0**
Percentage of Total Businesses:				**89.8**		**9.0**		**1.2**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.2	2	1.3	0	0.0	0	0.0
Moderate	23	13.7	22	13.8	1	14.3	0	0.0
Middle	86	51.2	83	51.9	3	42.9	0	0.0
Upper	57	33.9	53	33.1	3	42.9	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**168**	**100.0**	**160**	**100.0**	**7**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**95.2**		**4.2**		**0.6**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-9A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Battle Creek MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	6.4	0	0.0	3.9	0	0.0	6.8	0	0.0	4.0	3.9
Moderate	0	0.0	24.0	0	0.0	17.1	0	0.0	26.2	0	0.0	19.1	21.5
Middle	1	33.3	38.4	87	30.1	39.7	0	0.0	39.5	0	0.0	42.2	41.7
Upper	2	66.7	31.2	202	69.9	39.3	0	0.0	27.6	0	0.0	34.6	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	289	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	2	10.0	3.4	85	5.7	1.9	0	0.0	2.3	0	0.0	1.5	3.9
Moderate	4	20.0	23.6	335	22.6	16.5	1	12.5	20.9	73	5.6	16.3	21.5
Middle	9	45.0	41.1	710	48.0	42.4	4	50.0	43.3	716	55.3	44.8	41.7
Upper	5	25.0	32.0	350	23.6	39.1	3	37.5	33.5	506	39.1	37.4	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	20	100.0	100.0	1,480	100.0	100.0	8	100.0	100.0	1,295	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.6	0	0.0	4.1	0	0.0	2.8	0	0.0	2.2	3.9
Moderate	4	36.4	19.8	162	24.8	17.6	0	0.0	22.7	0	0.0	17.8	21.5
Middle	6	54.5	40.4	402	61.5	43.6	3	75.0	38.8	201	80.1	40.5	41.7
Upper	1	9.1	35.3	90	13.8	34.7	1	25.0	35.7	50	19.9	39.5	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	11	100.0	100.0	654	100.0	100.0	4	100.0	100.0	251	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	9.0
Moderate	0	0.0	50.0	0	0.0	11.4	0	0.0	33.3	0	0.0	81.7	49.4
Middle	0	0.0	33.3	0	0.0	23.1	0	0.0	66.7	0	0.0	18.3	35.1
Upper	0	0.0	16.7	0	0.0	65.5	0	0.0	0.0	0	0.0	0.0	6.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	2	5.6	5.3	85	3.3	3.3	0	0.0	4.9	0	0.0	3.1	3.9
Moderate	8	22.2	23.3	497	19.3	16.7	1	6.3	24.2	73	4.0	23.0	21.5
Middle	17	47.2	39.1	1,219	47.4	39.2	7	43.8	40.9	917	50.8	41.0	41.7
Upper	9	25.0	32.3	771	30.0	40.8	8	50.0	30.0	816	45.2	32.9	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	36	100.0	100.0	2,572	100.0	100.0	16	100.0	100.0	1,806	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-9B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Battle Creek MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	4.1	0	0.0	1.9	0	0.0	4.2	0	0.0	2.7	3.9
Moderate	0	0.0	13.9	0	0.0	12.2	0	0.0	20.0	0	0.0	16.2	21.5
Middle	1	100.0	46.7	20	100.0	47.4	0	0.0	45.8	0	0.0	49.2	41.7
Upper	0	0.0	35.2	0	0.0	38.5	4	100.0	30.0	260	100.0	31.8	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	20	100.0	100.0	4	100.0	100.0	260	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.0	0	0.0	4.6	0	0.0	1.7	0	0.0	1.4	3.9
Moderate	0	0.0	25.4	0	0.0	24.4	0	0.0	23.7	0	0.0	21.3	21.5
Middle	0	0.0	28.6	0	0.0	22.7	0	0.0	44.9	0	0.0	41.0	41.7
Upper	1	100.0	42.1	129	100.0	48.3	0	0.0	29.7	0	0.0	36.3	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	129	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	14.3	0	0.0	1.6	3.9
Moderate	0	0.0	54.5	0	0.0	41.9	0	0.0	42.9	0	0.0	32.8	21.5
Middle	0	0.0	27.3	0	0.0	26.7	0	0.0	28.6	0	0.0	44.1	41.7
Upper	0	0.0	18.2	0	0.0	31.4	0	0.0	14.3	0	0.0	21.5	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-10

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Battle Creek MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	5	9.3	5.0	1,120	7.6	2.5	4	9.5	5.1	226	2.3	4.1	6.1
Moderate	25	46.3	26.2	7,620	51.8	30.6	17	40.5	23.8	5,105	52.8	33.6	30.3
Middle	18	33.3	37.8	4,728	32.2	34.2	15	35.7	38.0	3,585	37.1	32.2	38.8
Upper	6	11.1	30.4	1,233	8.4	32.5	6	14.3	32.6	753	7.8	30.0	24.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	54	100.0	100.0	14,701	100.0	100.0	42	100.0	100.0	9,669	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-11A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Battle Creek MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	33.3	10.5	87	30.1	5.8	0	0.0	8.1	0	0.0	4.4	21.9
Moderate	0	0.0	26.8	0	0.0	20.1	0	0.0	26.3	0	0.0	19.7	17.2
Middle	2	66.7	24.8	202	69.9	25.4	0	0.0	24.4	0	0.0	24.1	19.8
Upper	0	0.0	22.3	0	0.0	32.4	0	0.0	24.7	0	0.0	34.3	41.2
Unknown	0	0.0	15.6	0	0.0	16.3	0	0.0	16.5	0	0.0	17.5	0.0
Total	3	100.0	100.0	289	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	5	25.0	13.3	345	23.3	7.4	0	0.0	9.8	0	0.0	4.9	21.9
Moderate	8	40.0	27.4	688	46.5	21.1	1	12.5	20.8	115	8.9	14.6	17.2
Middle	2	10.0	26.1	150	10.1	26.3	1	12.5	23.7	73	5.6	20.0	19.8
Upper	3	15.0	26.4	197	13.3	35.0	5	62.5	33.0	987	76.2	39.0	41.2
Unknown	2	10.0	6.7	100	6.8	10.3	1	12.5	12.7	120	9.3	21.5	0.0
Total	20	100.0	100.0	1,480	100.0	100.0	8	100.0	100.0	1,295	100.0	100.0	100.0
Home Improvement Loans													
Low	2	18.2	14.0	92	14.1	9.4	0	0.0	9.9	0	0.0	6.1	21.9
Moderate	4	36.4	23.1	156	23.9	20.2	2	50.0	22.4	101	40.2	16.1	17.2
Middle	3	27.3	27.7	216	33.0	22.8	1	25.0	28.0	100	39.8	24.2	19.8
Upper	2	18.2	34.0	190	29.1	46.2	1	25.0	38.5	50	19.9	52.2	41.2
Unknown	0	0.0	1.2	0	0.0	1.3	0	0.0	1.2	0	0.0	1.5	0.0
Total	11	100.0	100.0	654	100.0	100.0	4	100.0	100.0	251	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	10	27.8	11.9	673	26.2	6.4	0	0.0	8.7	0	0.0	4.6	21.9
Moderate	12	33.3	26.0	844	32.8	20.2	4	25.0	24.3	236	13.1	18.3	17.2
Middle	7	19.4	25.1	568	22.1	25.3	3	18.8	24.5	273	15.1	23.1	19.8
Upper	5	13.9	25.7	387	15.0	33.9	7	43.8	29.5	1,137	63.0	36.6	41.2
Unknown	2	5.6	11.2	100	3.9	14.1	2	12.5	13.0	160	8.9	17.4	0.0
Total	36	100.0	100.0	2,572	100.0	100.0	16	100.0	100.0	1,806	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-11B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Battle Creek MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	100.0	13.1	20	100.0	8.1	0	0.0	9.2	0	0.0	9.5	21.9
Moderate	0	0.0	16.4	0	0.0	12.1	1	25.0	24.2	20	7.7	19.5	17.2
Middle	0	0.0	23.0	0	0.0	25.4	1	25.0	29.2	100	38.5	27.7	19.8
Upper	0	0.0	46.7	0	0.0	53.8	1	25.0	33.3	100	38.5	40.9	41.2
Unknown	0	0.0	0.8	0	0.0	0.6	1	25.0	4.2	40	15.4	2.5	0.0
Total	1	100.0	100.0	20	100.0	100.0	4	100.0	100.0	260	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	100.0	18.3	129	100.0	14.6	0	0.0	5.9	0	0.0	4.7	21.9
Moderate	0	0.0	27.0	0	0.0	26.8	0	0.0	24.6	0	0.0	15.3	17.2
Middle	0	0.0	22.2	0	0.0	19.3	0	0.0	20.3	0	0.0	21.4	19.8
Upper	0	0.0	31.0	0	0.0	37.2	0	0.0	48.3	0	0.0	55.8	41.2
Unknown	0	0.0	1.6	0	0.0	2.2	0	0.0	0.8	0	0.0	2.8	0.0
Total	1	100.0	100.0	129	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.9
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.2
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	41.2
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-12

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Battle Creek MI MSA													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	19	35.2	55.2	2,618	17.8	32.5	18	42.9	50.6	1,339	13.8	28.3	89.8
Over $1 Million	29	53.7		11,299	76.9		23	54.8		8,290	85.7		9.0
Revenue Unknown	6	11.1		784	5.3		1	2.4		40	0.4		1.2
Total	54	100.0		14,701	100.0		42	100.0		9,669	100.0		100.0
By Loan Size													
$100,000 or Less	24	44.4	94.2	1,618	11.0	41.9	24	57.1	93.5	1,644	17.0	40.6	
$100,001 - $250,000	9	16.7	3.4	1,515	10.3	19.7	7	16.7	4.1	1,300	13.4	21.1	
$250,001 - $1 Million	21	38.9	2.3	11,568	78.7	38.5	11	26.2	2.4	6,725	69.6	38.3	
Total	54	100.0	100.0	14,701	100.0	100.0	42	100.0	100.0	9,669	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	13	68.4		843	32.2		16	88.9		1,014	75.7		
$100,001 - $250,000	4	21.1		639	24.4		2	11.1		325	24.3		
$250,001 - $1 Million	2	10.5		1,136	43.4		0	0.0		0	0.0		
Total	19	100.0		2,618	100.0		18	100.0		1,339	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

FENTON MSA ASSESSMENT AREA

TABLE C-13

2024 Fenton MI MSA AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%
Low	16	11.9	9,012	8.3	3,511	39.0	23,052	21.3
Moderate	33	24.6	21,362	19.7	5,018	23.5	18,958	17.5
Middle	41	30.6	34,988	32.3	3,341	9.5	22,509	20.8
Upper	39	29.1	40,177	37.1	1,776	4.4	43,911	40.5
Unknown	5	3.7	2,891	2.7	393	13.6	0	0.0
Total AA	**134**	**100.0**	**108,430**	**100.0**	**14,039**	**12.9**	**108,430**	**100.0**
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	20,522	8,014	6.7	39.1	7,401	36.1	5,107	24.9
Moderate	47,988	20,839	17.5	43.4	18,764	39.1	8,385	17.5
Middle	58,678	39,973	33.5	68.1	14,016	23.9	4,689	8.0
Upper	60,706	47,609	39.9	78.4	9,692	16.0	3,405	5.6
Unknown	4,689	2,949	2.5	62.9	1,324	28.2	416	8.9
Total AA	**192,583**	**119,384**	**100.0**	**62.0**	**51,197**	**26.6**	**22,002**	**11.4**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	824	5.9	771	5.9	49	4.9	4	3.8
Moderate	2,835	20.2	2,615	20.2	203	20.5	17	16.2
Middle	4,907	34.9	4,451	34.3	414	41.8	42	40.0
Upper	4,760	33.8	4,473	34.5	251	25.3	36	34.3
Unknown	742	5.3	662	5.1	74	7.5	6	5.7
Total AA	**14,068**	**100.0**	**12,972**	**100.0**	**991**	**100.0**	**105**	**100.0**
Percentage of Total Businesses:				**92.2**		**7.0**		**0.7**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.1	2	1.1	0	0.0	0	0.0
Moderate	8	4.3	8	4.4	0	0.0	0	0.0
Middle	84	45.4	81	44.8	3	75.0	0	0.0
Upper	88	47.6	87	48.1	1	25.0	0	0.0
Unknown	3	1.6	3	1.7	0	0.0	0	0.0
Total AA	**185**	**100.0**	**181**	**100.0**	**4**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.8**		**2.2**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-14

2023 Fenton MI MSA AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	16	11.9	9,012	8.3	3,511	39.0	23,052	21.3
Moderate	33	24.6	21,362	19.7	5,018	23.5	18,958	17.5
Middle	41	30.6	34,988	32.3	3,341	9.5	22,509	20.8
Upper	39	29.1	40,177	37.1	1,776	4.4	43,911	40.5
Unknown	5	3.7	2,891	2.7	393	13.6	0	0.0
Total AA	**134**	**100.0**	**108,430**	**100.0**	**14,039**	**12.9**	**108,430**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	20,522	8,014	6.7	39.1	7,401	36.1	5,107	24.9
Moderate	47,988	20,839	17.5	43.4	18,764	39.1	8,385	17.5
Middle	58,678	39,973	33.5	68.1	14,016	23.9	4,689	8.0
Upper	60,706	47,609	39.9	78.4	9,692	16.0	3,405	5.6
Unknown	4,689	2,949	2.5	62.9	1,324	28.2	416	8.9
Total AA	**192,583**	**119,384**	**100.0**	**62.0**	**51,197**	**26.6**	**22,002**	**11.4**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	873	5.9	817	5.9	53	5.2	3	2.5
Moderate	2,903	19.5	2,680	19.5	206	20.1	17	14.3
Middle	5,153	34.6	4,682	34.1	425	41.5	46	38.7
Upper	5,205	35.0	4,896	35.6	264	25.8	45	37.8
Unknown	757	5.1	673	4.9	76	7.4	8	6.7
Total AA	**14,891**	**100.0**	**13,748**	**100.0**	**1,024**	**100.0**	**119**	**100.0**
Percentage of Total Businesses:				**92.3**		**6.9**		**0.8**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3	1.5	3	1.6	0	0.0	0	0.0
Moderate	10	5.1	10	5.2	0	0.0	0	0.0
Middle	87	44.2	84	43.5	3	75.0	0	0.0
Upper	94	47.7	93	48.2	1	25.0	0	0.0
Unknown	3	1.5	3	1.6	0	0.0	0	0.0
Total AA	**197**	**100.0**	**193**	**100.0**	**4**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.0**		**2.0**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-15A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Fenton MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	3.2	0	0.0	1.7	1	33.3	3.4	156	34.5	1.7	6.7
Moderate	0	0.0	13.9	0	0.0	8.5	0	0.0	15.0	0	0.0	9.0	17.5
Middle	1	50.0	37.4	90	24.5	31.8	0	0.0	34.6	0	0.0	29.4	33.5
Upper	1	50.0	44.2	278	75.5	56.1	2	66.7	44.9	296	65.5	57.0	39.9
Unknown	0	0.0	1.3	0	0.0	1.9	0	0.0	2.2	0	0.0	2.9	2.5
Total	2	100.0	100.0	368	100.0	100.0	3	100.0	100.0	452	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.3	0	0.0	1.2	0	0.0	2.4	0	0.0	1.3	6.7
Moderate	0	0.0	11.9	0	0.0	7.1	0	0.0	10.8	0	0.0	6.7	17.5
Middle	0	0.0	33.5	0	0.0	30.3	0	0.0	33.8	0	0.0	30.6	33.5
Upper	5	100.0	49.3	398	100.0	57.1	1	100.0	50.5	123	100.0	58.2	39.9
Unknown	0	0.0	2.9	0	0.0	4.3	0	0.0	2.4	0	0.0	3.2	2.5
Total	5	100.0	100.0	398	100.0	100.0	1	100.0	100.0	123	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.7	0	0.0	1.4	0	0.0	1.6	0	0.0	1.1	6.7
Moderate	0	0.0	10.1	0	0.0	6.3	0	0.0	10.0	0	0.0	7.3	17.5
Middle	2	50.0	28.9	65	46.4	21.3	2	66.7	29.9	119	66.5	25.8	33.5
Upper	2	50.0	56.4	75	53.6	68.9	0	0.0	56.3	0	0.0	63.2	39.9
Unknown	0	0.0	1.9	0	0.0	2.0	1	33.3	2.2	60	33.5	2.6	2.5
Total	4	100.0	100.0	140	100.0	100.0	3	100.0	100.0	179	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	10.0	0	0.0	1.6	0	0.0	5.3	0	0.0	2.3	8.9
Moderate	0	0.0	40.0	0	0.0	33.3	0	0.0	31.6	0	0.0	17.9	36.1
Middle	0	0.0	10.0	0	0.0	2.2	0	0.0	47.4	0	0.0	71.9	23.6
Upper	0	0.0	30.0	0	0.0	41.2	0	0.0	15.8	0	0.0	7.9	26.9
Unknown	0	0.0	10.0	0	0.0	21.6	0	0.0	0.0	0	0.0	0.0	4.5
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	2.9	0	0.0	1.6	1	11.1	3.0	156	18.8	1.6	6.7
Moderate	0	0.0	12.9	0	0.0	8.8	1	11.1	13.1	42	5.1	8.6	17.5
Middle	4	26.7	35.3	203	18.1	30.3	2	22.2	33.8	119	14.3	30.6	33.5
Upper	11	73.3	47.1	921	81.9	56.6	4	44.4	47.7	454	54.6	56.2	39.9
Unknown	0	0.0	1.8	0	0.0	2.8	1	11.1	2.4	60	7.2	2.9	2.5
Total	15	100.0	100.0	1,124	100.0	100.0	9	100.0	100.0	831	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-15B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Fenton MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	1.0	0	0.0	0.7	0	0.0	1.8	0	0.0	1.0	6.7
Moderate	0	0.0	9.0	0	0.0	5.1	1	50.0	7.3	42	54.5	4.2	17.5
Middle	1	33.3	30.7	48	40.7	27.8	0	0.0	29.8	0	0.0	27.1	33.5
Upper	2	66.7	57.6	70	59.3	65.0	1	50.0	56.1	35	45.5	61.3	39.9
Unknown	0	0.0	1.7	0	0.0	1.3	0	0.0	5.0	0	0.0	6.4	2.5
Total	3	100.0	100.0	118	100.0	100.0	2	100.0	100.0	77	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.8	0	0.0	1.6	0	0.0	3.3	0	0.0	2.1	6.7
Moderate	0	0.0	10.7	0	0.0	7.2	0	0.0	11.5	0	0.0	9.3	17.5
Middle	0	0.0	31.5	0	0.0	25.9	0	0.0	35.3	0	0.0	33.4	33.5
Upper	1	100.0	51.8	100	100.0	60.3	0	0.0	47.7	0	0.0	53.0	39.9
Unknown	0	0.0	3.2	0	0.0	5.1	0	0.0	2.1	0	0.0	2.2	2.5
Total	1	100.0	100.0	100	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	8.3	0	0.0	2.9	0	0.0	0.0	0	0.0	0.0	6.7
Moderate	0	0.0	25.0	0	0.0	20.2	0	0.0	20.0	0	0.0	13.9	17.5
Middle	0	0.0	41.7	0	0.0	48.1	0	0.0	30.0	0	0.0	32.2	33.5
Upper	0	0.0	25.0	0	0.0	28.8	0	0.0	40.0	0	0.0	47.8	39.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	10.0	0	0.0	6.2	2.5
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-16

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Fenton MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	1	4.0	3.4	85	1.3	4.4	1	5.3	3.4	85	1.5	3.5	5.9
Moderate	3	12.0	16.3	495	7.4	19.4	4	21.1	16.1	1,673	30.1	20.7	20.2
Middle	15	60.0	30.3	4,687	70.5	34.0	8	42.1	30.9	1,915	34.4	34.8	34.9
Upper	6	24.0	44.3	1,385	20.8	37.6	6	31.6	44.0	1,890	34.0	36.2	33.8
Unknown	0	0.0	5.1	0	0.0	4.4	0	0.0	5.1	0	0.0	4.7	5.3
Total	25	100.0	100.0	6,652	100.0	100.0	19	100.0	100.0	5,563	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-17A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Fenton MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	50.0	7.6	90	24.5	3.3	0	0.0	7.5	0	0.0	3.2	21.3
Moderate	0	0.0	19.3	0	0.0	13.3	2	66.7	18.9	296	65.5	12.5	17.5
Middle	0	0.0	23.2	0	0.0	22.4	1	33.3	22.3	156	34.5	20.7	20.8
Upper	0	0.0	26.6	0	0.0	38.8	0	0.0	27.9	0	0.0	40.4	40.5
Unknown	1	50.0	23.2	278	75.5	22.2	0	0.0	23.4	0	0.0	23.2	0.0
Total	2	100.0	100.0	368	100.0	100.0	3	100.0	100.0	452	100.0	100.0	100.0
Refinance Loans													
Low	1	20.0	10.1	31	7.8	5.1	0	0.0	8.1	0	0.0	4.2	21.3
Moderate	1	20.0	22.7	104	26.1	18.3	1	100.0	19.3	123	100.0	13.3	17.5
Middle	0	0.0	27.4	0	0.0	26.6	0	0.0	23.1	0	0.0	20.5	20.8
Upper	1	20.0	30.3	61	15.3	38.2	0	0.0	29.5	0	0.0	34.5	40.5
Unknown	2	40.0	9.5	202	50.8	11.7	0	0.0	20.0	0	0.0	27.6	0.0
Total	5	100.0	100.0	398	100.0	100.0	1	100.0	100.0	123	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	9.0	0	0.0	5.3	1	33.3	6.9	19	10.6	4.0	21.3
Moderate	1	25.0	16.4	14	10.0	11.0	1	33.3	20.4	100	55.9	15.3	17.5
Middle	1	25.0	28.4	51	36.4	22.5	1	33.3	26.4	60	33.5	23.0	20.8
Upper	2	50.0	44.5	75	53.6	59.7	0	0.0	44.3	0	0.0	55.4	40.5
Unknown	0	0.0	1.8	0	0.0	1.4	0	0.0	2.0	0	0.0	2.2	0.0
Total	4	100.0	100.0	140	100.0	100.0	3	100.0	100.0	179	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	13.3	8.3	121	10.8	3.8	1	11.1	7.8	19	2.3	3.6	21.3
Moderate	3	20.0	19.3	138	12.3	13.9	4	44.4	19.1	519	62.5	12.8	17.5
Middle	3	20.0	24.5	201	17.9	22.9	3	33.3	23.4	251	30.2	21.0	20.8
Upper	4	26.7	30.8	184	16.4	40.2	0	0.0	31.2	0	0.0	40.1	40.5
Unknown	3	20.0	17.1	480	42.7	19.2	1	11.1	18.5	42	5.1	22.5	0.0
Total	15	100.0	100.0	1,124	100.0	100.0	9	100.0	100.0	831	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-17B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Fenton MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	7.6	0	0.0	5.8	0	0.0	7.0	0	0.0	4.7	21.3
Moderate	1	33.3	16.6	20	16.9	13.8	0	0.0	19.3	0	0.0	14.4	17.5
Middle	1	33.3	26.1	50	42.4	21.2	1	50.0	24.8	35	45.5	25.0	20.8
Upper	1	33.3	46.1	48	40.7	56.0	0	0.0	45.5	0	0.0	53.2	40.5
Unknown	0	0.0	3.7	0	0.0	3.2	1	50.0	3.4	42	54.5	2.7	0.0
Total	3	100.0	100.0	118	100.0	100.0	2	100.0	100.0	77	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	10.2	0	0.0	6.6	0	0.0	12.1	0	0.0	8.3	21.3
Moderate	0	0.0	18.5	0	0.0	14.8	0	0.0	18.6	0	0.0	15.2	17.5
Middle	1	100.0	25.0	100	100.0	21.8	0	0.0	29.2	0	0.0	25.4	20.8
Upper	0	0.0	44.1	0	0.0	54.2	0	0.0	38.2	0	0.0	48.9	40.5
Unknown	0	0.0	2.3	0	0.0	2.5	0	0.0	1.8	0	0.0	2.2	0.0
Total	1	100.0	100.0	100	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.3
Moderate	0	0.0	2.1	0	0.0	2.6	0	0.0	0.0	0	0.0	0.0	17.5
Middle	0	0.0	2.1	0	0.0	4.8	0	0.0	0.0	0	0.0	0.0	20.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	40.5
Unknown	0	0.0	95.8	0	0.0	92.6	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-18

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Fenton MI MSA													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	4	16.0	51.2	510	7.7	27.7	3	15.8	49.9	410	7.4	29.3	92.2
Over $1 Million	19	76.0		6,030	90.6		14	73.7		4,253	76.5		7.0
Revenue Unknown	2	8.0		112	1.7		2	10.5		900	16.2		0.7
Total	25	100.0		6,652	100.0		19	100.0		5,563	100.0		100.0
By Loan Size													
$100,000 or Less	11	44.0	93.5	732	11.0	39.6	8	42.1	93.4	605	10.9	39.3	
$100,001 - $250,000	8	32.0	4.2	1,725	25.9	20.1	5	26.3	4.3	1,100	19.8	19.6	
$250,001 - $1 Million	6	24.0	2.2	4,195	63.1	40.3	6	31.6	2.4	3,858	69.4	41.2	
Total	25	100.0	100.0	6,652	100.0	100.0	19	100.0	100.0	5,563	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	3	75.0		260	51.0		2	66.7		160	39.0		
$100,001 - $250,000	1	25.0		250	49.0		1	33.3		250	61.0		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	4	100.0		510	100.0		3	100.0		410	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

JACKSON MSA ASSESSMENT AREA

TABLE C-19

2024 Jackson MI MSA AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	3	6.5	1,363	3.4	588	43.1	7,477	18.7	
Moderate	14	30.4	10,314	25.8	1,558	15.1	7,599	19.0	
Middle	15	32.6	16,650	41.7	898	5.4	8,365	21.0	
Upper	12	26.1	11,451	28.7	343	3.0	16,467	41.3	
Unknown	2	4.3	130	0.3	41	31.5	0	0.0	
Total AA	**46**	**100.0**	**39,908**	**100.0**	**3,428**	**8.6**	**39,908**	**100.0**	
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	3,196	814	1.8	25.5	1,810	56.6	572	17.9	
Moderate	20,487	10,871	23.5	53.1	7,666	37.4	1,950	9.5	
Middle	26,856	19,868	43.0	74.0	4,636	17.3	2,352	8.8	
Upper	18,320	14,638	31.7	79.9	1,325	7.2	2,357	12.9	
Unknown	860	40	0.1	4.7	548	63.7	272	31.6	
Total AA	**69,719**	**46,231**	**100.0**	**66.3**	**15,985**	**22.9**	**7,503**	**10.8**	
	Total Businesses by Tract		Businesses by Tract & Revenue Size						
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	183	3.6	154	3.4	28	5.7	1	2.0	
Moderate	1,552	30.6	1,340	29.6	209	42.4	3	6.0	
Middle	1,907	37.6	1,735	38.3	146	29.6	26	52.0	
Upper	1,113	21.9	1,033	22.8	64	13.0	16	32.0	
Unknown	318	6.3	268	5.9	46	9.3	4	8.0	
Total AA	**5,073**	**100.0**	**4,530**	**100.0**	**493**	**100.0**	**50**	**100.0**	
Percentage of Total Businesses:				**89.3**		**9.7**		**1.0**	
	Total Farms by Tract		Farms by Tract & Revenue Size						
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	7	3.8	7	3.9	0	0.0	0	0.0	
Middle	113	61.4	111	61.7	2	50.0	0	0.0	
Upper	63	34.2	61	33.9	2	50.0	0	0.0	
Unknown	1	0.5	1	0.6	0	0.0	0	0.0	
Total AA	**184**	**100.0**	**180**	**100.0**	**4**	**100.0**	**0**	**0.0**	
Percentage of Total Farms:				**97.8**		**2.2**		**0.0**	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-20

2023 Jackson MI MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	6.5	1,363	3.4	588	43.1	7,477	18.7
Moderate	14	30.4	10,314	25.8	1,558	15.1	7,599	19.0
Middle	15	32.6	16,650	41.7	898	5.4	8,365	21.0
Upper	12	26.1	11,451	28.7	343	3.0	16,467	41.3
Unknown	2	4.3	130	0.3	41	31.5	0	0.0
Total AA	**46**	**100.0**	**39,908**	**100.0**	**3,428**	**8.6**	**39,908**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,196	814	1.8	25.5	1,810	56.6	572	17.9
Moderate	20,487	10,871	23.5	53.1	7,666	37.4	1,950	9.5
Middle	26,856	19,868	43.0	74.0	4,636	17.3	2,352	8.8
Upper	18,320	14,638	31.7	79.9	1,325	7.2	2,357	12.9
Unknown	860	40	0.1	4.7	548	63.7	272	31.6
Total AA	**69,719**	**46,231**	**100.0**	**66.3**	**15,985**	**22.9**	**7,503**	**10.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	177	3.2	148	3.0	28	5.4	1	1.8
Moderate	1,680	30.7	1,448	29.6	226	43.5	6	10.7
Middle	2,058	37.6	1,879	38.4	152	29.2	27	48.2
Upper	1,240	22.7	1,153	23.6	69	13.3	18	32.1
Unknown	316	5.8	267	5.5	45	8.7	4	7.1
Total AA	**5,471**	**100.0**	**4,895**	**100.0**	**520**	**100.0**	**56**	**100.0**
Percentage of Total Businesses:				**89.5**		**9.5**		**1.0**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	7	3.6	7	3.6	0	0.0	0	0.0
Middle	120	61.2	118	61.1	2	66.7	0	0.0
Upper	68	34.7	67	34.7	1	33.3	0	0.0
Unknown	1	0.5	1	0.5	0	0.0	0	0.0
Total AA	**196**	**100.0**	**193**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.5**		**1.5**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-21A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Jackson MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	3.2	0	0.0	1.7	0	0.0	2.6	0	0.0	1.2	1.8
Moderate	2	66.7	28.4	130	58.6	19.6	1	33.3	27.0	130	31.1	18.4	23.5
Middle	0	0.0	41.9	0	0.0	42.7	1	33.3	44.0	152	36.4	43.6	43.0
Upper	1	33.3	26.3	92	41.4	36.0	1	33.3	26.2	136	32.5	36.6	31.7
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0.1
Total	3	100.0	100.0	222	100.0	100.0	3	100.0	100.0	418	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.1	0	0.0	0.7	0	0.0	1.8	0	0.0	0.8	1.8
Moderate	5	17.2	23.7	376	11.1	15.7	5	14.7	21.6	539	11.9	15.5	23.5
Middle	13	44.8	40.8	1,466	43.2	41.8	16	47.1	42.0	2,044	45.0	44.9	43.0
Upper	11	37.9	33.8	1,554	45.8	41.3	13	38.2	34.1	1,956	43.1	38.2	31.7
Unknown	0	0.0	0.6	0	0.0	0.5	0	0.0	0.5	0	0.0	0.6	0.1
Total	29	100.0	100.0	3,396	100.0	100.0	34	100.0	100.0	4,539	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.7	0	0.0	0.2	0	0.0	0.6	0	0.0	0.5	1.8
Moderate	3	15.8	17.0	36	2.4	10.5	7	43.8	20.7	483	31.9	15.1	23.5
Middle	7	36.8	43.6	643	42.8	39.1	4	25.0	41.7	370	24.5	38.5	43.0
Upper	9	47.4	38.8	825	54.9	50.2	5	31.3	36.3	660	43.6	45.8	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.6	0	0.0	0.2	0.1
Total	19	100.0	100.0	1,504	100.0	100.0	16	100.0	100.0	1,513	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	29.4	0	0.0	5.1	0	0.0	11.1	0	0.0	37.6	8.3
Moderate	0	0.0	29.4	0	0.0	65.6	0	0.0	44.4	0	0.0	19.4	60.9
Middle	0	0.0	17.6	0	0.0	6.7	0	0.0	0.0	0	0.0	0.0	22.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	11.1	0	0.0	0.2	1.6
Unknown	0	0.0	23.5	0	0.0	22.6	0	0.0	33.3	0	0.0	42.9	6.9
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	2.5	0	0.0	1.7	1	1.5	2.2	58	0.8	2.9	1.8
Moderate	15	21.4	25.8	851	12.8	21.9	14	21.5	24.9	1,172	15.6	17.7	23.5
Middle	29	41.4	41.7	2,655	39.8	39.8	27	41.5	43.0	3,034	40.4	41.5	43.0
Upper	26	37.1	29.5	3,159	47.4	34.9	23	35.4	29.5	3,247	43.2	35.5	31.7
Unknown	0	0.0	0.4	0	0.0	1.8	0	0.0	0.4	0	0.0	2.4	0.1
Total	70	100.0	100.0	6,665	100.0	100.0	65	100.0	100.0	7,511	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-21B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Jackson MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	1	8.3	1.7	58	5.6	1.1	1.8
Moderate	5	26.3	25.9	309	20.0	17.4	1	8.3	17.6	20	1.9	13.7	23.5
Middle	9	47.4	32.1	546	35.4	39.7	6	50.0	48.7	468	45.0	43.0	43.0
Upper	5	26.3	41.1	688	44.6	42.4	4	33.3	31.1	495	47.6	41.6	31.7
Unknown	0	0.0	0.9	0	0.0	0.5	0	0.0	0.8	0	0.0	0.5	0.1
Total	19	100.0	100.0	1,543	100.0	100.0	12	100.0	100.0	1,041	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.6	0	0.0	1.3	0	0.0	0.9	0	0.0	0.9	1.8
Moderate	0	0.0	19.1	0	0.0	13.5	0	0.0	23.9	0	0.0	19.0	23.5
Middle	0	0.0	48.1	0	0.0	45.3	0	0.0	39.0	0	0.0	42.2	43.0
Upper	0	0.0	31.1	0	0.0	39.8	0	0.0	35.8	0	0.0	37.6	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.5	0	0.0	0.4	0.1
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	8.7	0	0.0	5.9	0	0.0	33.3	0	0.0	16.0	1.8
Moderate	0	0.0	26.1	0	0.0	20.2	0	0.0	66.7	0	0.0	84.0	23.5
Middle	0	0.0	39.1	0	0.0	39.5	0	0.0	0.0	0	0.0	0.0	43.0
Upper	0	0.0	26.1	0	0.0	34.4	0	0.0	0.0	0	0.0	0.0	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-22

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Jackson MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	6	4.4	2.2	1,445	4.3	2.9	4	3.6	1.5	1,210	4.2	2.0	3.6
Moderate	57	41.6	27.2	15,237	45.7	35.2	45	40.5	28.1	13,543	47.3	36.8	30.6
Middle	42	30.7	38.8	9,816	29.5	34.5	31	27.9	41.1	6,480	22.6	36.8	37.6
Upper	26	19.0	27.6	5,565	16.7	24.4	23	20.7	24.4	5,752	20.1	17.8	21.9
Unknown	6	4.4	3.4	1,250	3.8	2.8	8	7.2	4.4	1,664	5.8	5.0	6.3
Total	137	100.0	100.0	33,313	100.0	100.0	111	100.0	100.0	28,649	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-23A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Jackson MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	66.7	11.8	130	58.6	5.8	0	0.0	8.6	0	0.0	4.1	18.7
Moderate	0	0.0	24.2	0	0.0	17.6	2	66.7	24.1	288	68.9	17.1	19.0
Middle	1	33.3	22.3	92	41.4	22.2	0	0.0	20.8	0	0.0	20.0	21.0
Upper	0	0.0	25.3	0	0.0	37.6	0	0.0	26.6	0	0.0	41.0	41.3
Unknown	0	0.0	16.4	0	0.0	16.8	1	33.3	19.9	130	31.1	17.9	0.0
Total	3	100.0	100.0	222	100.0	100.0	3	100.0	100.0	418	100.0	100.0	100.0
Refinance Loans													
Low	7	24.1	14.3	632	18.6	8.2	4	11.8	12.1	306	6.7	6.6	18.7
Moderate	5	17.2	25.4	424	12.5	19.3	10	29.4	21.3	1,064	23.4	16.8	19.0
Middle	8	27.6	21.5	903	26.6	20.0	10	29.4	21.6	1,359	29.9	19.5	21.0
Upper	9	31.0	28.9	1,437	42.3	39.9	9	26.5	26.3	1,575	34.7	34.0	41.3
Unknown	0	0.0	9.9	0	0.0	12.6	1	2.9	18.7	235	5.2	23.1	0.0
Total	29	100.0	100.0	3,396	100.0	100.0	34	100.0	100.0	4,539	100.0	100.0	100.0
Home Improvement Loans													
Low	6	31.6	12.5	397	26.4	8.7	2	12.5	7.6	93	6.1	4.0	18.7
Moderate	7	36.8	19.7	393	26.1	13.9	3	18.8	24.5	202	13.4	17.1	19.0
Middle	4	21.1	23.2	268	17.8	22.8	2	12.5	24.8	260	17.2	21.6	21.0
Upper	2	10.5	43.6	446	29.7	53.6	7	43.8	41.7	859	56.8	54.9	41.3
Unknown	0	0.0	1.0	0	0.0	1.2	2	12.5	1.3	99	6.5	2.4	0.0
Total	19	100.0	100.0	1,504	100.0	100.0	16	100.0	100.0	1,513	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	20	28.6	12.3	1,318	19.8	6.4	8	12.3	9.5	458	6.1	4.8	18.7
Moderate	15	21.4	24.0	967	14.5	17.8	18	27.7	23.7	1,835	24.4	17.2	19.0
Middle	15	21.4	22.2	1,413	21.2	21.7	15	23.1	21.9	1,730	23.0	20.0	21.0
Upper	19	27.1	28.3	2,925	43.9	38.8	19	29.2	28.6	2,924	38.9	40.2	41.3
Unknown	1	1.4	13.1	42	0.6	15.2	5	7.7	16.4	564	7.5	17.9	0.0
Total	70	100.0	100.0	6,665	100.0	100.0	65	100.0	100.0	7,511	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-23B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Jackson MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	5	26.3	7.1	159	10.3	5.0	2	16.7	10.1	59	5.7	7.1	18.7
Moderate	3	15.8	25.9	150	9.7	19.9	3	25.0	19.3	281	27.0	14.3	19.0
Middle	2	10.5	23.2	150	9.7	19.1	3	25.0	29.4	111	10.7	25.0	21.0
Upper	8	42.1	39.3	1,042	67.5	53.7	3	25.0	40.3	490	47.1	52.9	41.3
Unknown	1	5.3	4.5	42	2.7	2.4	1	8.3	0.8	100	9.6	0.8	0.0
Total	19	100.0	100.0	1,543	100.0	100.0	12	100.0	100.0	1,041	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	15.8	0	0.0	12.0	0	0.0	11.5	0	0.0	8.3	18.7
Moderate	0	0.0	24.6	0	0.0	22.0	0	0.0	29.4	0	0.0	26.7	19.0
Middle	0	0.0	24.6	0	0.0	20.8	0	0.0	25.2	0	0.0	19.2	21.0
Upper	0	0.0	32.2	0	0.0	41.9	0	0.0	32.1	0	0.0	43.7	41.3
Unknown	0	0.0	2.7	0	0.0	3.3	0	0.0	1.8	0	0.0	2.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.7
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	41.3
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-24

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Jackson MI MSA													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	49	35.8	53.2	8,776	26.3	31.6	38	34.2	50.2	7,124	24.9	32.0	89.3
Over $1 Million	65	47.4		20,121	60.4		55	49.5		15,937	55.6		9.7
Revenue Unknown	23	16.8		4,416	13.3		18	16.2		5,588	19.5		1.0
Total	137	100.0		33,313	100.0		111	100.0		28,649	100.0		100.0
By Loan Size													
$100,000 or Less	52	38.0	96.2	3,672	11.0	53.8	38	34.2	96.2	2,838	9.9	56.3	
$100,001 - $250,000	40	29.2	2.1	7,429	22.3	13.6	33	29.7	2.5	6,845	23.9	16.8	
$250,001 - $1 Million	45	32.8	1.6	22,212	66.7	32.6	40	36.0	1.3	18,966	66.2	26.9	
Total	137	100.0	100.0	33,313	100.0	100.0	111	100.0	100.0	28,649	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	24	49.0		1,612	18.4		15	39.5		1,109	15.6		
$100,001 - $250,000	13	26.5		2,363	26.9		15	39.5		3,115	43.7		
$250,001 - $1 Million	12	24.5		4,801	54.7		8	21.1		2,900	40.7		
Total	49	100.0		8,776	100.0		38	100.0		7,124	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

KALAMAZOO-PORTAGE MSA ASSESSMENT AREA

TABLE C-25

2024 Kalamazoo-Portage MI MSA AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%
Low	6	8.8	3,425	5.5	927	27.1	13,444	21.5
Moderate	17	25.0	13,119	20.9	1,918	14.6	11,488	18.3
Middle	23	33.8	24,426	39.0	1,307	5.4	12,327	19.7
Upper	21	30.9	21,569	34.4	986	4.6	25,405	40.5
Unknown	1	1.5	125	0.2	79	63.2	0	0.0
Total AA	**68**	**100.0**	**62,664**	**100.0**	**5,217**	**8.3**	**62,664**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	7,630	1,880	2.8	24.6	4,427	58.0	1,323	17.3
Moderate	26,160	12,400	18.4	47.4	11,618	44.4	2,142	8.2
Middle	44,697	28,681	42.6	64.2	13,362	29.9	2,654	5.9
Upper	32,329	24,212	36.0	74.9	6,246	19.3	1,871	5.8
Unknown	1,769	82	0.1	4.6	1,370	77.4	317	17.9
Total AA	**112,585**	**67,255**	**100.0**	**59.7**	**37,023**	**32.9**	**8,307**	**7.4**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	640	7.1	559	7.0	79	9.3	2	2.9
Moderate	1,715	19.1	1,557	19.4	144	17.0	14	20.0
Middle	3,705	41.4	3,317	41.3	361	42.7	27	38.6
Upper	2,856	31.9	2,569	31.9	260	30.8	27	38.6
Unknown	40	0.4	39	0.5	1	0.1	0	0.0
Total AA	**8,956**	**100.0**	**8,041**	**100.0**	**845**	**100.0**	**70**	**100.0**
Percentage of Total Businesses:				**89.8**		**9.4**		**0.8**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5	2.5	5	2.8	0	0.0	0	0.0
Moderate	25	12.7	19	10.7	6	31.6	0	0.0
Middle	106	53.8	99	55.6	7	36.8	0	0.0
Upper	61	31.0	55	30.9	6	31.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**197**	**100.0**	**178**	**100.0**	**19**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**90.4**		**9.6**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-26

2023 Kalamazoo-Portage MI MSA AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	6	8.8	3,425	5.5	927	27.1	13,444	21.5
Moderate	17	25.0	13,119	20.9	1,918	14.6	11,488	18.3
Middle	23	33.8	24,426	39.0	1,307	5.4	12,327	19.7
Upper	21	30.9	21,569	34.4	986	4.6	25,405	40.5
Unknown	1	1.5	125	0.2	79	63.2	0	0.0
Total AA	**68**	**100.0**	**62,664**	**100.0**	**5,217**	**8.3**	**62,664**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	7,630	1,880	2.8	24.6	4,427	58.0	1,323	17.3
Moderate	26,160	12,400	18.4	47.4	11,618	44.4	2,142	8.2
Middle	44,697	28,681	42.6	64.2	13,362	29.9	2,654	5.9
Upper	32,329	24,212	36.0	74.9	6,246	19.3	1,871	5.8
Unknown	1,769	82	0.1	4.6	1,370	77.4	317	17.9
Total AA	**112,585**	**67,255**	**100.0**	**59.7**	**37,023**	**32.9**	**8,307**	**7.4**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	654	6.6	567	6.4	85	9.4	2	2.8
Moderate	1,871	19.0	1,696	19.1	161	17.7	14	19.4
Middle	4,038	40.9	3,633	40.9	377	41.5	28	38.9
Upper	3,256	33.0	2,943	33.1	285	31.4	28	38.9
Unknown	42	0.4	41	0.5	1	0.1	0	0.0
Total AA	**9,861**	**100.0**	**8,880**	**100.0**	**909**	**100.0**	**72**	**100.0**
Percentage of Total Businesses:				**90.1**		**9.2**		**0.7**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	4	1.8	4	2.0	0	0.0	0	0.0
Moderate	31	14.2	25	12.6	6	30.0	0	0.0
Middle	106	48.6	99	50.0	7	35.0	0	0.0
Upper	77	35.3	70	35.4	7	35.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**218**	**100.0**	**198**	**100.0**	**20**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**90.8**		**9.2**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-27A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Kalamazoo-Portage MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	4.6	0	0.0	2.4	0	0.0	4.0	0	0.0	2.1	2.8
Moderate	2	100.0	23.3	410	100.0	15.8	1	33.3	22.3	68	10.3	14.6	18.4
Middle	0	0.0	38.4	0	0.0	38.1	2	66.7	38.8	591	89.7	36.9	42.6
Upper	0	0.0	33.1	0	0.0	43.3	0	0.0	34.4	0	0.0	46.0	36.0
Unknown	0	0.0	0.6	0	0.0	0.4	0	0.0	0.4	0	0.0	0.4	0.1
Total	2	100.0	100.0	410	100.0	100.0	3	100.0	100.0	659	100.0	100.0	100.0
Refinance Loans													
Low	1	5.3	2.1	106	4.7	1.6	0	0.0	2.2	0	0.0	1.3	2.8
Moderate	3	15.8	19.6	339	14.9	14.2	1	9.1	18.7	50	3.2	13.9	18.4
Middle	7	36.8	42.3	588	25.9	41.0	5	45.5	41.4	527	33.7	37.5	42.6
Upper	8	42.1	35.8	1,241	54.6	43.0	5	45.5	37.5	987	63.1	46.9	36.0
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0.1
Total	19	100.0	100.0	2,274	100.0	100.0	11	100.0	100.0	1,564	100.0	100.0	100.0
Home Improvement Loans													
Low	1	14.3	2.9	15	2.6	2.4	0	0.0	1.8	0	0.0	1.7	2.8
Moderate	2	28.6	15.3	141	24.5	10.3	2	33.3	19.0	80	10.2	12.2	18.4
Middle	3	42.9	43.7	342	59.5	43.0	0	0.0	39.1	0	0.0	36.4	42.6
Upper	1	14.3	37.9	77	13.4	44.2	4	66.7	40.0	707	89.8	49.6	36.0
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0	0.1
Total	7	100.0	100.0	575	100.0	100.0	6	100.0	100.0	787	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	10.7	0	0.0	1.7	0	0.0	4.3	0	0.0	0.2	12.4
Moderate	0	0.0	21.4	0	0.0	3.4	0	0.0	26.1	0	0.0	7.0	26.0
Middle	0	0.0	39.3	0	0.0	45.2	0	0.0	56.5	0	0.0	76.6	40.0
Upper	0	0.0	14.3	0	0.0	44.9	0	0.0	13.0	0	0.0	16.2	16.8
Unknown	0	0.0	14.3	0	0.0	4.8	0	0.0	0.0	0	0.0	0.0	4.8
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	3	9.1	3.6	139	3.9	2.2	0	0.0	3.1	0	0.0	1.6	2.8
Moderate	7	21.2	20.5	890	24.9	13.5	5	17.9	20.4	264	7.3	13.5	18.4
Middle	10	30.3	40.6	930	26.1	39.9	9	32.1	39.8	1,293	35.7	41.9	42.6
Upper	13	39.4	34.7	1,609	45.1	43.6	14	50.0	36.4	2,062	57.0	42.7	36.0
Unknown	0	0.0	0.5	0	0.0	0.9	0	0.0	0.3	0	0.0	0.3	0.1
Total	33	100.0	100.0	3,568	100.0	100.0	28	100.0	100.0	3,619	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-27B

Geographic Income Level	2023 Bank #	2023 Bank #%	2023 Agg #%	2023 Bank $(000)	2023 Bank $%	2023 Agg $%	2024 Bank #	2024 Bank #%	2024 Agg #%	2024 Bank $(000)	2024 Bank $%	2024 Agg $%	Owner Occupied Units %
Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Kalamazoo-Portage MI MSA													
Other Purpose LOC													
Low	1	20.0	2.1	18	5.8	1.7	0	0.0	2.4	0	0.0	2.2	2.8
Moderate	0	0.0	11.7	0	0.0	8.6	0	0.0	14.3	0	0.0	10.0	18.4
Middle	0	0.0	45.1	0	0.0	42.1	2	28.6	38.9	175	32.2	34.9	42.6
Upper	4	80.0	40.9	291	94.2	47.4	5	71.4	44.3	368	67.8	52.8	36.0
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	0.1
Total	5	100.0	100.0	309	100.0	100.0	7	100.0	100.0	543	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.7	0	0.0	2.0	0	0.0	1.5	0	0.0	0.6	2.8
Moderate	0	0.0	16.5	0	0.0	11.0	1	100.0	20.5	66	100.0	20.5	18.4
Middle	0	0.0	44.1	0	0.0	43.4	0	0.0	41.4	0	0.0	36.3	42.6
Upper	0	0.0	36.4	0	0.0	43.2	0	0.0	36.6	0	0.0	42.6	36.0
Unknown	0	0.0	0.4	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	66	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	6.7	0	0.0	1.3	2.8
Moderate	0	0.0	29.2	0	0.0	22.0	0	0.0	33.3	0	0.0	13.2	18.4
Middle	0	0.0	54.2	0	0.0	61.5	0	0.0	53.3	0	0.0	58.7	42.6
Upper	0	0.0	16.7	0	0.0	16.5	0	0.0	6.7	0	0.0	26.8	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-28

Geographic Income Level	2023 Bank #	2023 Bank #%	2023 Agg #%	2023 Bank $(000)	2023 Bank $%	2023 Agg $%	2024 Bank #	2024 Bank #%	2024 Agg #%	2024 Bank $(000)	2024 Bank $%	2024 Agg $%	Total Businesses %
Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Kalamazoo-Portage MI MSA													
Low	5	7.6	5.6	1,610	9.9	5.7	5	8.5	5.1	1,438	11.6	6.8	7.1
Moderate	15	22.7	15.9	3,201	19.7	14.0	8	13.6	15.7	1,535	12.4	14.8	19.1
Middle	27	40.9	39.2	6,413	39.5	46.4	31	52.5	40.0	5,649	45.5	40.2	41.4
Upper	19	28.8	38.8	5,031	31.0	33.7	14	23.7	38.3	3,725	30.0	37.7	31.9
Unknown	0	0.0	0.2	0	0.0	0.1	1	1.7	0.7	69	0.6	0.3	0.4
Total	66	100.0	100.0	16,255	100.0	100.0	59	100.0	100.0	12,416	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-29A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Kalamazoo-Portage MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	50.0	11.2	139	33.9	5.3	1	33.3	11.7	68	10.3	5.8	21.5
Moderate	1	50.0	24.4	271	66.1	17.2	0	0.0	23.4	0	0.0	16.6	18.3
Middle	0	0.0	21.5	0	0.0	20.1	0	0.0	20.7	0	0.0	19.6	19.7
Upper	0	0.0	29.0	0	0.0	43.5	2	66.7	29.9	591	89.7	44.6	40.5
Unknown	0	0.0	13.9	0	0.0	13.9	0	0.0	14.3	0	0.0	13.4	0.0
Total	2	100.0	100.0	410	100.0	100.0	3	100.0	100.0	659	100.0	100.0	100.0
Refinance Loans													
Low	5	26.3	13.3	550	24.2	8.3	1	9.1	14.9	50	3.2	9.1	21.5
Moderate	3	15.8	21.7	205	9.0	17.9	5	45.5	23.5	514	32.9	18.0	18.3
Middle	4	21.1	25.7	423	18.6	24.7	2	18.2	24.1	488	31.2	21.8	19.7
Upper	6	31.6	31.3	932	41.0	39.0	3	27.3	24.7	512	32.7	31.7	40.5
Unknown	1	5.3	8.1	164	7.2	10.1	0	0.0	12.7	0	0.0	19.3	0.0
Total	19	100.0	100.0	2,274	100.0	100.0	11	100.0	100.0	1,564	100.0	100.0	100.0
Home Improvement Loans													
Low	1	14.3	10.2	20	3.5	7.3	1	16.7	14.5	25	3.2	10.3	21.5
Moderate	2	28.6	23.6	157	27.3	18.8	3	50.0	21.4	316	40.2	15.3	18.3
Middle	2	28.6	23.5	198	34.4	21.4	1	16.7	25.6	202	25.7	23.8	19.7
Upper	0	0.0	41.3	0	0.0	51.3	1	16.7	35.0	244	31.0	46.6	40.5
Unknown	2	28.6	1.5	200	34.8	1.2	0	0.0	3.5	0	0.0	4.1	0.0
Total	7	100.0	100.0	575	100.0	100.0	6	100.0	100.0	787	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	8	24.2	11.6	727	20.4	6.1	5	17.9	13.3	245	6.8	7.0	21.5
Moderate	6	18.2	23.4	633	17.7	17.4	13	46.4	23.4	1,287	35.6	17.1	18.3
Middle	8	24.2	23.2	746	20.9	21.0	4	14.3	22.6	740	20.4	20.5	19.7
Upper	6	18.2	31.6	932	26.1	43.3	6	21.4	28.9	1,347	37.2	41.3	40.5
Unknown	5	15.2	10.2	530	14.9	12.3	0	0.0	11.8	0	0.0	14.1	0.0
Total	33	100.0	100.0	3,568	100.0	100.0	28	100.0	100.0	3,619	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-29B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Kalamazoo-Portage MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	20.0	11.5	18	5.8	6.8	2	28.6	14.6	102	18.8	10.6	21.5
Moderate	0	0.0	24.0	0	0.0	19.0	4	57.1	25.9	391	72.0	22.0	18.3
Middle	2	40.0	27.3	125	40.5	22.8	1	14.3	23.0	50	9.2	20.3	19.7
Upper	0	0.0	35.2	0	0.0	49.4	0	0.0	33.5	0	0.0	43.9	40.5
Unknown	2	40.0	2.1	166	53.7	1.9	0	0.0	3.0	0	0.0	3.2	0.0
Total	5	100.0	100.0	309	100.0	100.0	7	100.0	100.0	543	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	13.4	0	0.0	10.3	0	0.0	16.4	0	0.0	11.5	21.5
Moderate	0	0.0	19.9	0	0.0	14.5	1	100.0	26.5	66	100.0	21.4	18.3
Middle	0	0.0	26.4	0	0.0	22.7	0	0.0	28.0	0	0.0	32.3	19.7
Upper	0	0.0	38.7	0	0.0	50.7	0	0.0	27.2	0	0.0	32.4	40.5
Unknown	0	0.0	1.5	0	0.0	1.8	0	0.0	1.9	0	0.0	2.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	66	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	4.2	0	0.0	6.6	0	0.0	0.0	0	0.0	0.0	21.5
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.3
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	40.5
Unknown	0	0.0	95.8	0	0.0	93.4	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-30

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Kalamazoo-Portage MI MSA													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	20	30.3	50.8	2,807	17.3	25.3	24	40.7	52.3	2,886	23.2	35.1	89.8
Over $1 Million	34	51.5		11,361	69.9		28	47.5		7,713	62.1		9.4
Revenue Unknown	12	18.2		2,087	12.8		7	11.9		1,817	14.6		0.8
Total	66	100.0		16,255	100.0		59	100.0		12,416	100.0		100.0
By Loan Size													
$100,000 or Less	31	47.0	91.7	1,662	10.2	31.8	31	52.5	92.4	2,109	17.0	34.8	
$100,001 - $250,000	19	28.8	4.2	3,926	24.2	16.6	16	27.1	4.2	3,143	25.3	17.5	
$250,001 - $1 Million	16	24.2	4.0	10,667	65.6	51.6	12	20.3	3.4	7,164	57.7	47.7	
Total	66	100.0	100.0	16,255	100.0	100.0	59	100.0	100.0	12,416	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	15	75.0		757	27.0		20	83.3		1,367	47.4		
$100,001 - $250,000	3	15.0		700	24.9		3	12.5		519	18.0		
$250,001 - $1 Million	2	10.0		1,350	48.1		1	4.2		1,000	34.7		
Total	20	100.0		2,807	100.0		24	100.0		2,886	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

LANSING-EAST LANSING MSA ASSESSMENT AREA

TABLE C-31

2024 Lansing-East Lansing MI MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	5.1	3,827	3.4	1,317	34.4	22,562	20.3
Moderate	28	20.6	19,292	17.4	2,967	15.4	19,150	17.2
Middle	57	41.9	53,082	47.8	3,298	6.2	24,347	21.9
Upper	32	23.5	34,719	31.2	1,076	3.1	45,098	40.6
Unknown	12	8.8	237	0.2	73	30.8	0	0.0
Total AA	**136**	**100.0**	**111,157**	**100.0**	**8,731**	**7.9**	**111,157**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,171	3,136	2.5	34.2	4,614	50.3	1,421	15.5
Moderate	42,102	19,081	15.3	45.3	18,514	44.0	4,507	10.7
Middle	95,160	61,415	49.4	64.5	27,900	29.3	5,845	6.1
Upper	53,270	40,531	32.6	76.1	10,518	19.7	2,221	4.2
Unknown	3,911	193	0.2	4.9	2,995	76.6	723	18.5
Total AA	**203,614**	**124,356**	**100.0**	**61.1**	**64,541**	**31.7**	**14,717**	**7.2**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	937	5.4	828	5.2	105	7.6	4	2.1
Moderate	3,722	21.3	3,300	20.8	368	26.6	54	28.3
Middle	7,548	43.3	6,875	43.3	603	43.5	70	36.6
Upper	4,689	26.9	4,373	27.6	261	18.8	55	28.8
Unknown	541	3.1	485	3.1	48	3.5	8	4.2
Total AA	**17,437**	**100.0**	**15,861**	**100.0**	**1,385**	**100.0**	**191**	**100.0**
Percentage of Total Businesses:				**91.0**		**7.9**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3	0.5	3	0.5	0	0.0	0	0.0
Moderate	46	7.2	45	7.2	1	6.7	0	0.0
Middle	368	57.5	359	57.5	8	53.3	1	100.0
Upper	217	33.9	213	34.1	4	26.7	0	0.0
Unknown	6	0.9	4	0.6	2	13.3	0	0.0
Total AA	**640**	**100.0**	**624**	**100.0**	**15**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.5**		**2.3**		**0.2**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-32

2023 Lansing-East Lansing MI Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	5.1	3,827	3.4	1,317	34.4	22,238	20.0
Moderate	26	19.1	18,104	16.3	2,789	15.4	18,899	17.0
Middle	57	41.9	51,512	46.3	3,315	6.4	24,193	21.8
Upper	34	25.0	37,477	33.7	1,237	3.3	45,827	41.2
Unknown	12	8.8	237	0.2	73	30.8	0	0.0
Total AA	**136**	**100.0**	**111,157**	**100.0**	**8,731**	**7.9**	**111,157**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,171	3,136	2.5	34.2	4,614	50.3	1,421	15.5
Moderate	39,788	17,590	14.1	44.2	17,917	45.0	4,281	10.8
Middle	92,813	59,391	47.8	64.0	27,450	29.6	5,972	6.4
Upper	57,931	44,046	35.4	76.0	11,565	20.0	2,320	4.0
Unknown	3,911	193	0.2	4.9	2,995	76.6	723	18.5
Total AA	**203,614**	**124,356**	**100.0**	**61.1**	**64,541**	**31.7**	**14,717**	**7.2**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	985	5.3	871	5.2	109	7.6	5	2.5
Moderate	3,691	20.0	3,279	19.5	361	25.0	51	25.2
Middle	7,916	42.8	7,228	42.9	613	42.5	75	37.1
Upper	5,331	28.8	4,955	29.4	313	21.7	63	31.2
Unknown	560	3.0	505	3.0	47	3.3	8	4.0
Total AA	**18,483**	**100.0**	**16,838**	**100.0**	**1,443**	**100.0**	**202**	**100.0**
Percentage of Total Businesses:				**91.1**		**7.8**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3	0.5	3	0.5	0	0.0	0	0.0
Moderate	25	3.8	25	3.9	0	0.0	0	0.0
Middle	386	59.1	376	59.0	9	60.0	1	100.0
Upper	233	35.7	229	35.9	4	26.7	0	0.0
Unknown	6	0.9	4	0.6	2	13.3	0	0.0
Total AA	**653**	**100.0**	**637**	**100.0**	**15**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.5**		**2.3**		**0.2**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-33A

Distribution of 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Lansing-East Lansing MI MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	4.7	0	0.0	2.2	2.5
Moderate	5	71.4	19.6	828	53.1	12.8	15.3
Middle	0	0.0	48.0	0	0.0	46.2	49.4
Upper	2	28.6	27.3	730	46.9	38.4	32.6
Unknown	0	0.0	0.3	0	0.0	0.4	0.2
Total	7	100.0	100.0	1,558	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.9	0	0.0	1.7	2.5
Moderate	7	26.9	15.4	704	20.6	10.8	15.3
Middle	8	30.8	49.5	834	24.4	47.9	49.4
Upper	11	42.3	32.2	1,878	55.0	39.5	32.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Total	26	100.0	100.0	3,416	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.9	0	0.0	1.6	2.5
Moderate	4	44.4	12.5	261	38.1	8.7	15.3
Middle	4	44.4	52.7	324	47.3	48.1	49.4
Upper	1	11.1	32.9	100	14.6	41.5	32.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Total	9	100.0	100.0	685	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	5.4	0	0.0	0.3	3.6
Moderate	0	0.0	40.5	0	0.0	27.8	24.6
Middle	0	0.0	37.8	0	0.0	31.2	46.0
Upper	0	0.0	10.8	0	0.0	37.8	18.3
Unknown	0	0.0	5.4	0	0.0	3.0	7.5
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	3.8	0	0.0	1.9	2.5
Moderate	18	39.1	17.6	1,853	30.5	13.3	15.3
Middle	13	28.3	49.1	1,267	20.8	45.6	49.4
Upper	15	32.6	29.3	2,958	48.7	38.7	32.6
Unknown	0	0.0	0.3	0	0.0	0.5	0.2
Total	46	100.0	100.0	6,078	100.0	100.0	100.0

TABLE C-33B

Distribution of 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Lansing-East Lansing MI MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	1.4	0	0.0	0.8	2.5
Moderate	2	50.0	14.2	60	14.3	8.8	15.3
Middle	1	25.0	50.3	109	26.0	46.9	49.4
Upper	1	25.0	33.5	250	59.7	43.0	32.6
Unknown	0	0.0	0.5	0	0.0	0.5	0.2
Total	4	100.0	100.0	419	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	3.6	0	0.0	2.8	2.5
Moderate	0	0.0	16.6	0	0.0	14.8	15.3
Middle	0	0.0	52.1	0	0.0	48.6	49.4
Upper	0	0.0	27.5	0	0.0	33.1	32.6
Unknown	0	0.0	0.3	0	0.0	0.7	0.2
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	2.5
Moderate	0	0.0	8.3	0	0.0	2.4	15.3
Middle	0	0.0	75.0	0	0.0	83.7	49.4
Upper	0	0.0	16.7	0	0.0	13.9	32.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-34A

Distribution of 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: Lansing-East Lansing MI Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	4.3	0	0.0	2.1	2.5
Moderate	0	0.0	18.8	0	0.0	12.4	14.1
Middle	2	40.0	46.9	492	51.4	44.4	47.8
Upper	3	60.0	29.8	465	48.6	40.9	35.4
Unknown	0	0.0	0.1	0	0.0	0.2	0.2
Total	5	100.0	100.0	957	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.6	0	0.0	1.4	2.5
Moderate	2	10.5	15.7	254	8.8	11.0	14.1
Middle	9	47.4	48.2	902	31.3	47.8	47.8
Upper	8	42.1	33.3	1,728	59.9	39.6	35.4
Unknown	0	0.0	0.2	0	0.0	0.2	0.2
Total	19	100.0	100.0	2,884	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.8	0	0.0	1.3	2.5
Moderate	2	18.2	11.0	80	13.1	7.4	14.1
Middle	7	63.6	47.9	435	71.0	44.3	47.8
Upper	2	18.2	39.3	98	16.0	47.0	35.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Total	11	100.0	100.0	613	100.0	100.0	100.0
Multifamily Loans							**Multi-family Units %**
Low	0	0.0	10.1	0	0.0	1.8	3.6
Moderate	0	0.0	42.0	0	0.0	25.7	24.0
Middle	0	0.0	30.4	0	0.0	24.3	44.7
Upper	0	0.0	17.4	0	0.0	48.1	20.2
Unknown	0	0.0	0.0	0	0.0	0.0	7.5
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							**Owner Occupied Units %**
Low	0	0.0	3.6	0	0.0	1.9	2.5
Moderate	5	11.1	17.1	434	8.1	13.4	14.1
Middle	26	57.8	46.9	2,468	45.9	42.6	47.8
Upper	14	31.1	32.3	2,470	46.0	42.0	35.4
Unknown	0	0.0	0.1	0	0.0	0.1	0.2
Total	45	100.0	100.0	5,372	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-34B

Distribution of 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Lansing-East Lansing MI Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	1.8	0	0.0	1.1	2.5
Moderate	1	11.1	13.1	100	13.5	7.9	14.1
Middle	7	77.8	41.7	463	62.4	38.5	47.8
Upper	1	11.1	43.1	179	24.1	52.3	35.4
Unknown	0	0.0	0.2	0	0.0	0.1	0.2
Total	9	100.0	100.0	742	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.9	0	0.0	2.3	2.5
Moderate	0	0.0	11.2	0	0.0	8.8	14.1
Middle	1	100.0	56.2	176	100.0	55.4	47.8
Upper	0	0.0	30.7	0	0.0	33.5	35.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Total	1	100.0	100.0	176	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	2.3	0	0.0	0.4	2.5
Moderate	0	0.0	23.3	0	0.0	5.2	14.1
Middle	0	0.0	58.1	0	0.0	89.7	47.8
Upper	0	0.0	16.3	0	0.0	4.8	35.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-35

Distribution of 2024 Small Business Lending by Income Level of Geography Assessment Area: Lansing-East Lansing MI MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	3	4.9	4.5	263	2.0	7.7	5.4
Moderate	19	31.1	17.5	5,698	42.6	20.3	21.3
Middle	28	45.9	39.8	5,016	37.5	40.9	43.3
Upper	11	18.0	36.0	2,413	18.0	28.0	26.9
Unknown	0	0.0	1.9	0	0.0	3.0	3.1
Total	61	100.0	100.0	13,390	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-36

Distribution of 2023 Small Business Lending by Income Level of Geography Assessment Area: Lansing-East Lansing MI Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	4	6.0	4.7	1,031	6.7	6.5	5.3
Moderate	21	31.3	15.7	4,955	32.4	20.1	20.0
Middle	25	37.3	40.7	5,247	34.3	40.8	42.8
Upper	17	25.4	36.6	4,063	26.6	29.4	28.8
Unknown	0	0.0	1.9	0	0.0	2.9	3.0
Total	67	100.0	100.0	15,296	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-37A

Distribution of 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Lansing-East Lansing MI MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	9.3	0	0.0	4.6	20.3
Moderate	2	28.6	25.7	174	11.2	17.8	17.2
Middle	3	42.9	22.0	657	42.2	20.8	21.9
Upper	2	28.6	30.2	727	46.7	44.0	40.6
Unknown	0	0.0	12.7	0	0.0	12.8	0.0
Total	7	100.0	100.0	1,558	100.0	100.0	100.0
Refinance Loans							
Low	6	23.1	9.4	364	10.7	5.4	20.3
Moderate	7	26.9	21.7	763	22.3	16.7	17.2
Middle	5	19.2	24.7	761	22.3	22.3	21.9
Upper	8	30.8	28.5	1,528	44.7	34.5	40.6
Unknown	0	0.0	15.7	0	0.0	21.1	0.0
Total	26	100.0	100.0	3,416	100.0	100.0	100.0
Home Improvement Loans							
Low	2	22.2	8.0	110	16.1	4.5	20.3
Moderate	2	22.2	21.5	201	29.3	16.1	17.2
Middle	3	33.3	25.0	179	26.1	21.6	21.9
Upper	1	11.1	41.7	45	6.6	53.1	40.6
Unknown	1	11.1	3.8	150	21.9	4.7	0.0
Total	9	100.0	100.0	685	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	8	17.4	9.2	474	7.8	4.8	20.3
Moderate	13	28.3	24.0	1,297	21.3	17.4	17.2
Middle	12	26.1	23.5	1,607	26.4	21.3	21.9
Upper	12	26.1	31.5	2,550	42.0	42.6	40.6
Unknown	1	2.2	11.9	150	2.5	13.9	0.0
Total	46	100.0	100.0	6,078	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-37B

Distribution of 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Lansing-East Lansing MI MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	7.2	0	0.0	4.2	20.3
Moderate	2	50.0	21.1	159	37.9	14.3	17.2
Middle	1	25.0	28.9	10	2.4	23.3	21.9
Upper	1	25.0	36.9	250	59.7	54.0	40.6
Unknown	0	0.0	5.9	0	0.0	4.2	0.0
Total	4	100.0	100.0	419	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	13.3	0	0.0	9.2	20.3
Moderate	0	0.0	24.3	0	0.0	21.4	17.2
Middle	0	0.0	26.3	0	0.0	26.3	21.9
Upper	0	0.0	32.8	0	0.0	40.0	40.6
Unknown	0	0.0	3.3	0	0.0	3.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	20.3
Moderate	0	0.0	0.0	0	0.0	0.0	17.2
Middle	0	0.0	0.0	0	0.0	0.0	21.9
Upper	0	0.0	0.0	0	0.0	0.0	40.6
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-38A

Distribution of 2023 Home Mortgage Lending by Borrower Income Level Assessment Area: Lansing-East Lansing MI Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	1	20.0	13.1	124	13.0	6.9	20.0
Moderate	1	20.0	24.9	119	12.4	19.0	17.0
Middle	1	20.0	23.2	120	12.5	23.4	21.8
Upper	2	40.0	25.2	594	62.1	38.4	41.2
Unknown	0	0.0	13.5	0	0.0	12.4	0.0
Total	5	100.0	100.0	957	100.0	100.0	100.0
Refinance Loans							
Low	3	15.8	14.8	250	8.7	9.6	20.0
Moderate	6	31.6	26.8	728	25.2	23.2	17.0
Middle	6	31.6	25.3	829	28.7	25.3	21.8
Upper	4	21.1	24.1	1,077	37.3	31.1	41.2
Unknown	0	0.0	9.1	0	0.0	10.8	0.0
Total	19	100.0	100.0	2,884	100.0	100.0	100.0
Home Improvement Loans							
Low	2	18.2	12.6	79	12.9	8.2	20.0
Moderate	1	9.1	23.9	25	4.1	19.4	17.0
Middle	3	27.3	25.5	141	23.0	24.4	21.8
Upper	3	27.3	34.9	270	44.0	43.5	41.2
Unknown	2	18.2	3.2	98	16.0	4.5	0.0
Total	11	100.0	100.0	613	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	6	13.3	12.9	453	8.4	7.2	20.0
Moderate	12	26.7	24.4	1,256	23.4	19.2	17.0
Middle	12	26.7	24.2	1,180	22.0	23.6	21.8
Upper	11	24.4	27.6	2,245	41.8	38.0	41.2
Unknown	4	8.9	10.9	238	4.4	11.9	0.0
Total	45	100.0	100.0	5,372	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-38B

Distribution of 2023 Home Mortgage Lending by Borrower Income Level Assessment Area: Lansing-East Lansing MI Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	9.7	0	0.0	6.0	20.0
Moderate	3	33.3	20.4	208	28.0	15.5	17.0
Middle	2	22.2	27.1	90	12.1	24.7	21.8
Upper	2	22.2	40.6	304	41.0	52.0	41.2
Unknown	2	22.2	2.3	140	18.9	1.8	0.0
Total	9	100.0	100.0	742	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	15.0	0	0.0	11.8	20.0
Moderate	1	100.0	22.4	176	100.0	19.2	17.0
Middle	0	0.0	28.1	0	0.0	27.1	21.8
Upper	0	0.0	31.9	0	0.0	38.5	41.2
Unknown	0	0.0	2.6	0	0.0	3.4	0.0
Total	1	100.0	100.0	176	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	20.0
Moderate	0	0.0	0.0	0	0.0	0.0	17.0
Middle	0	0.0	0.0	0	0.0	0.0	21.8
Upper	0	0.0	0.0	0	0.0	0.0	41.2
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-39

Distribution of 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Lansing-East Lansing MI MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	34	55.7	51.3	5,756	43.0	38.2	91.0
Over $1 Million	22	36.1		6,128	45.8		7.9
Revenue Unknown	5	8.2		1,506	11.2		1.1
Total	61	100.0		13,390	100.0		100.0
By Loan Size							
$100,000 or Less	24	39.3	94.0	1,297	9.7	40.4	
$100,001 - $250,000	22	36.1	3.2	4,413	33.0	16.7	
$250,001 - $1 Million	15	24.6	2.7	7,680	57.4	42.9	
Total	61	100.0	100.0	13,390	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	18	52.9		1,044	18.1		
$100,001 - $250,000	11	32.4		2,232	38.8		
$250,001 - $1 Million	5	14.7		2,480	43.1		
Total	34	100.0		5,756	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-40

Distribution of 2023 Small Business Lending by Revenue Size of Businesses Assessment Area: Lansing-East Lansing MI Metropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	20	29.9	53.9	3,296	21.5	32.1	91.1
Over $1 Million	41	61.2		10,884	71.2		7.8
Revenue Unknown	6	9.0		1,116	7.3		1.1
Total	67	100.0		15,296	100.0		100.0
By Loan Size							
$100,000 or Less	27	40.3	94.0	1,712	11.2	41.2	
$100,001 - $250,000	20	29.9	3.3	3,790	24.8	16.9	
$250,001 - $1 Million	20	29.9	2.7	9,794	64.0	41.9	
Total	67	100.0	100.0	15,296	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	10	50.0		575	17.4		
$100,001 - $250,000	8	40.0		1,775	53.9		
$250,001 - $1 Million	2	10.0		946	28.7		
Total	20	100.0		3,296	100.0		

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

MIDLAND MSA ASSESSMENT AREA

TABLE C-41

2024 Midland MI MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	4.8	491	2.1	101	20.6	4,561	19.8
Moderate	4	19.0	3,812	16.5	568	14.9	4,183	18.1
Middle	12	57.1	12,940	56.1	730	5.6	5,081	22.0
Upper	4	19.0	5,814	25.2	267	4.6	9,232	40.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**21**	**100.0**	**23,057**	**100.0**	**1,666**	**7.2**	**23,057**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,029	573	2.2	55.7	346	33.6	110	10.7
Moderate	7,637	4,362	16.5	57.1	2,403	31.5	872	11.4
Middle	19,870	15,590	58.9	78.5	2,829	14.2	1,451	7.3
Upper	8,529	5,941	22.4	69.7	2,209	25.9	379	4.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**37,065**	**26,466**	**100.0**	**71.4**	**7,787**	**21.0**	**2,812**	**7.6**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	169	5.8	117	4.4	51	19.9	1	2.9
Moderate	630	21.5	574	21.8	47	18.4	9	26.5
Middle	1,353	46.3	1,233	46.8	100	39.1	20	58.8
Upper	772	26.4	710	27.0	58	22.7	4	11.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,924**	**100.0**	**2,634**	**100.0**	**256**	**100.0**	**34**	**100.0**
Percentage of Total Businesses:				**90.1**		**8.8**		**1.2**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	1.2	1	1.2	0	0.0	0	0.0
Moderate	15	17.6	15	18.5	0	0.0	0	0.0
Middle	58	68.2	54	66.7	4	100.0	0	0.0
Upper	11	12.9	11	13.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**85**	**100.0**	**81**	**100.0**	**4**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**95.3**		**4.7**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-42

2023 Midland MI MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	4.8	491	2.1	101	20.6	4,561	19.8
Moderate	4	19.0	3,812	16.5	568	14.9	4,183	18.1
Middle	12	57.1	12,940	56.1	730	5.6	5,081	22.0
Upper	4	19.0	5,814	25.2	267	4.6	9,232	40.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**21**	**100.0**	**23,057**	**100.0**	**1,666**	**7.2**	**23,057**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,029	573	2.2	55.7	346	33.6	110	10.7
Moderate	7,637	4,362	16.5	57.1	2,403	31.5	872	11.4
Middle	19,870	15,590	58.9	78.5	2,829	14.2	1,451	7.3
Upper	8,529	5,941	22.4	69.7	2,209	25.9	379	4.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**37,065**	**26,466**	**100.0**	**71.4**	**7,787**	**21.0**	**2,812**	**7.6**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	177	5.6	125	4.3	51	19.8	1	2.9
Moderate	664	20.9	605	21.0	50	19.4	9	26.5
Middle	1,432	45.1	1,313	45.6	100	38.8	19	55.9
Upper	900	28.4	838	29.1	57	22.1	5	14.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3,173**	**100.0**	**2,881**	**100.0**	**258**	**100.0**	**34**	**100.0**
Percentage of Total Businesses:				**90.8**		**8.1**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	1.1	1	1.1	0	0.0	0	0.0
Moderate	17	18.7	17	19.1	0	0.0	0	0.0
Middle	59	64.8	57	64.0	2	100.0	0	0.0
Upper	14	15.4	14	15.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**91**	**100.0**	**89**	**100.0**	**2**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.8**		**2.2**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-43A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Midland MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.2	0	0.0	0.7	0	0.0	2.8	0	0.0	1.4	2.2
Moderate	0	0.0	18.9	0	0.0	13.0	0	0.0	16.7	0	0.0	11.9	16.5
Middle	0	0.0	57.2	0	0.0	56.2	1	100.0	57.2	143	100.0	56.7	58.9
Upper	1	100.0	22.7	200	100.0	30.2	0	0.0	23.4	0	0.0	29.9	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	200	100.0	100.0	1	100.0	100.0	143	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.2	0	0.0	3.7	0	0.0	1.8	0	0.0	1.0	2.2
Moderate	2	40.0	18.6	170	30.4	14.9	0	0.0	15.3	0	0.0	11.5	16.5
Middle	2	40.0	62.1	190	33.9	61.5	1	100.0	66.8	110	100.0	64.2	58.9
Upper	1	20.0	15.0	200	35.7	19.8	0	0.0	16.1	0	0.0	23.3	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	560	100.0	100.0	1	100.0	100.0	110	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.0	0	0.0	0.8	0	0.0	1.2	0	0.0	1.0	2.2
Moderate	0	0.0	12.5	0	0.0	8.3	1	50.0	12.2	68	73.1	11.9	16.5
Middle	0	0.0	57.9	0	0.0	60.7	1	50.0	65.9	25	26.9	64.1	58.9
Upper	0	0.0	27.6	0	0.0	30.3	0	0.0	20.7	0	0.0	23.0	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	93	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	3.5
Moderate	0	0.0	37.5	0	0.0	52.7	0	0.0	44.4	0	0.0	16.2	29.3
Middle	0	0.0	37.5	0	0.0	32.2	0	0.0	55.6	0	0.0	83.8	27.5
Upper	0	0.0	25.0	0	0.0	15.1	0	0.0	0.0	0	0.0	0.0	39.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	1.7	0	0.0	1.0	0	0.0	2.1	0	0.0	1.3	2.2
Moderate	2	33.3	18.1	170	22.4	14.1	1	16.7	15.9	68	15.1	12.0	16.5
Middle	2	33.3	58.5	190	25.0	56.3	4	66.7	60.9	326	72.3	59.3	58.9
Upper	2	33.3	21.7	400	52.6	28.5	1	16.7	21.0	57	12.6	27.5	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	6	100.0	100.0	760	100.0	100.0	6	100.0	100.0	451	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-43B

Geographic Income Level	2023 Bank #	2023 Bank #%	2023 Agg #%	2023 Bank $(000)	2023 Bank $%	2023 Agg $%	2024 Bank #	2024 Bank #%	2024 Agg #%	2024 Bank $(000)	2024 Bank $%	2024 Agg $%	Owner Occupied Units %
Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography – Assessment Area: Midland MI MSA													
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	2.2
Moderate	0	0.0	11.7	0	0.0	10.1	0	0.0	10.6	0	0.0	8.1	16.5
Middle	0	0.0	63.3	0	0.0	61.5	1	50.0	70.2	48	45.7	69.6	58.9
Upper	0	0.0	25.0	0	0.0	28.4	1	50.0	19.1	57	54.3	22.3	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	105	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.3	0	0.0	0.8	0	0.0	0.8	0	0.0	1.1	2.2
Moderate	0	0.0	17.5	0	0.0	16.4	0	0.0	18.9	0	0.0	15.8	16.5
Middle	0	0.0	61.3	0	0.0	46.4	0	0.0	59.8	0	0.0	61.3	58.9
Upper	0	0.0	20.0	0	0.0	36.4	0	0.0	20.5	0	0.0	21.9	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	2.2
Moderate	0	0.0	25.0	0	0.0	24.7	0	0.0	0.0	0	0.0	0.0	16.5
Middle	0	0.0	75.0	0	0.0	75.3	0	0.0	100.0	0	0.0	100.0	58.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-44

Geographic Income Level	2023 Bank #	2023 Bank #%	2023 Agg #%	2023 Bank $(000)	2023 Bank $%	2023 Agg $%	2024 Bank #	2024 Bank #%	2024 Agg #%	2024 Bank $(000)	2024 Bank $%	2024 Agg $%	Total Businesses %
Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography – Assessment Area: Midland MI MSA													
Low	3	33.3	3.6	890	50.3	9.9	3	33.3	4.7	890	65.5	10.2	5.8
Moderate	1	11.1	17.5	75	4.2	15.1	0	0.0	16.9	0	0.0	18.3	21.5
Middle	4	44.4	53.2	659	37.2	48.7	6	66.7	48.3	469	34.5	43.9	46.3
Upper	1	11.1	25.3	147	8.3	26.1	0	0.0	29.6	0	0.0	27.5	26.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	9	100.0	100.0	1,771	100.0	100.0	9	100.0	100.0	1,359	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-45A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Midland MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	10.9	0	0.0	5.6	0	0.0	12.3	0	0.0	6.7	19.8
Moderate	0	0.0	24.8	0	0.0	18.2	0	0.0	26.2	0	0.0	19.3	18.1
Middle	0	0.0	19.6	0	0.0	18.0	1	100.0	22.9	143	100.0	23.3	22.0
Upper	1	100.0	28.1	200	100.0	42.5	0	0.0	22.6	0	0.0	35.4	40.0
Unknown	0	0.0	16.6	0	0.0	15.7	0	0.0	16.0	0	0.0	15.4	0.0
Total	1	100.0	100.0	200	100.0	100.0	1	100.0	100.0	143	100.0	100.0	100.0
Refinance Loans													
Low	1	20.0	17.6	90	16.1	9.6	0	0.0	18.7	0	0.0	11.5	19.8
Moderate	1	20.0	26.8	100	17.9	23.5	0	0.0	24.5	0	0.0	19.4	18.1
Middle	1	20.0	21.6	70	12.5	22.9	1	100.0	15.8	110	100.0	15.6	22.0
Upper	2	40.0	23.2	300	53.6	30.6	0	0.0	20.0	0	0.0	26.0	40.0
Unknown	0	0.0	10.8	0	0.0	13.3	0	0.0	21.1	0	0.0	27.6	0.0
Total	5	100.0	100.0	560	100.0	100.0	1	100.0	100.0	110	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	14.5	0	0.0	9.2	1	50.0	15.2	25	26.9	11.8	19.8
Moderate	0	0.0	23.7	0	0.0	14.1	0	0.0	24.4	0	0.0	21.3	18.1
Middle	0	0.0	25.0	0	0.0	24.8	0	0.0	26.2	0	0.0	26.2	22.0
Upper	0	0.0	36.2	0	0.0	51.7	1	50.0	29.3	68	73.1	34.9	40.0
Unknown	0	0.0	0.7	0	0.0	0.1	0	0.0	4.9	0	0.0	5.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	93	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	16.7	12.5	90	11.8	6.4	1	16.7	14.2	25	5.5	7.8	19.8
Moderate	1	16.7	24.9	100	13.2	18.6	1	16.7	25.9	48	10.6	19.6	18.1
Middle	1	16.7	20.9	70	9.2	19.2	3	50.0	22.1	310	68.7	21.9	22.0
Upper	3	50.0	28.5	500	65.8	41.5	1	16.7	23.3	68	15.1	34.0	40.0
Unknown	0	0.0	13.2	0	0.0	14.3	0	0.0	14.6	0	0.0	16.7	0.0
Total	6	100.0	100.0	760	100.0	100.0	6	100.0	100.0	451	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-45B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Midland MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	5.0	0	0.0	4.3	0	0.0	16.0	0	0.0	10.0	19.8
Moderate	0	0.0	23.3	0	0.0	16.1	1	50.0	28.7	48	45.7	31.6	18.1
Middle	0	0.0	30.0	0	0.0	23.2	1	50.0	27.7	57	54.3	28.3	22.0
Upper	0	0.0	41.7	0	0.0	56.4	0	0.0	25.5	0	0.0	28.6	40.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.1	0	0.0	1.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	105	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	17.5	0	0.0	11.2	0	0.0	13.9	0	0.0	6.9	19.8
Moderate	0	0.0	23.8	0	0.0	15.4	0	0.0	27.9	0	0.0	21.0	18.1
Middle	0	0.0	23.8	0	0.0	25.4	0	0.0	25.4	0	0.0	18.9	22.0
Upper	0	0.0	31.3	0	0.0	44.2	0	0.0	30.3	0	0.0	51.0	40.0
Unknown	0	0.0	3.8	0	0.0	3.8	0	0.0	2.5	0	0.0	2.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.8
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.1
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	40.0
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-46

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Midland MI MSA													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	4	44.4	62.2	366	20.7	49.5	5	55.6	56.6	369	27.2	37.5	90.1
Over $1 Million	3	33.3		890	50.3		4	44.4		990	72.8		8.8
Revenue Unknown	2	22.2		515	29.1		0	0.0		0	0.0		1.2
Total	9	100.0		1,771	100.0		9	100.0		1,359	100.0		100.0
By Loan Size													
$100,000 or Less	6	66.7	94.3	374	21.1	43.0	8	88.9	94.7	609	44.8	43.8	
$100,001 - $250,000	1	11.1	2.9	147	8.3	14.7	0	0.0	3.1	0	0.0	18.8	
$250,001 - $1 Million	2	22.2	2.8	1,250	70.6	42.3	1	11.1	2.1	750	55.2	37.4	
Total	9	100.0	100.0	1,771	100.0	100.0	9	100.0	100.0	1,359	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	3	75.0		219	59.8		5	100.0		369	100.0		
$100,001 - $250,000	1	25.0		147	40.2		0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	4	100.0		366	100.0		5	100.0		369	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

MUSKEGON MSA ASSESSMENT AREA

TABLE C-47

2024 Muskegon MI MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	10.9	3,618	8.2	1,197	33.1	9,041	20.4
Moderate	8	17.4	5,626	12.7	1,117	19.9	8,299	18.7
Middle	21	45.7	22,575	50.9	1,827	8.1	9,396	21.2
Upper	11	23.9	12,571	28.3	429	3.4	17,654	39.8
Unknown	1	2.2	0	0.0	0	0.0	0	0.0
Total AA	**46**	**100.0**	**44,390**	**100.0**	**4,570**	**10.3**	**44,390**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	8,134	2,962	5.9	36.4	3,639	44.7	1,533	18.8
Moderate	9,909	5,299	10.5	53.5	3,388	34.2	1,222	12.3
Middle	37,465	26,613	52.8	71.0	7,319	19.5	3,533	9.4
Upper	18,827	15,488	30.8	82.3	1,356	7.2	1,983	10.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**74,335**	**50,362**	**100.0**	**67.8**	**15,702**	**21.1**	**8,271**	**11.1**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	677	12.0	601	11.9	73	14.1	3	6.4
Moderate	1,015	18.0	822	16.2	189	36.4	4	8.5
Middle	2,546	45.2	2,335	46.1	180	34.7	31	66.0
Upper	1,390	24.7	1,304	25.8	77	14.8	9	19.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**5,628**	**100.0**	**5,062**	**100.0**	**519**	**100.0**	**47**	**100.0**
Percentage of Total Businesses:				**89.9**		**9.2**		**0.8**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.8	1	0.8	0	0.0	0	0.0
Moderate	6	4.5	6	4.8	0	0.0	0	0.0
Middle	99	75.0	95	75.4	4	66.7	0	0.0
Upper	26	19.7	24	19.0	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**132**	**100.0**	**126**	**100.0**	**6**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**95.5**		**4.5**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-48

2023 Muskegon MI MSA AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	10.9	3,618	8.2	1,197	33.1	9,041	20.4
Moderate	8	17.4	5,626	12.7	1,117	19.9	8,299	18.7
Middle	21	45.7	22,575	50.9	1,827	8.1	9,396	21.2
Upper	11	23.9	12,571	28.3	429	3.4	17,654	39.8
Unknown	1	2.2	0	0.0	0	0.0	0	0.0
Total AA	**46**	**100.0**	**44,390**	**100.0**	**4,570**	**10.3**	**44,390**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	8,134	2,962	5.9	36.4	3,639	44.7	1,533	18.8
Moderate	9,909	5,299	10.5	53.5	3,388	34.2	1,222	12.3
Middle	37,465	26,613	52.8	71.0	7,319	19.5	3,533	9.4
Upper	18,827	15,488	30.8	82.3	1,356	7.2	1,983	10.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**74,335**	**50,362**	**100.0**	**67.8**	**15,702**	**21.1**	**8,271**	**11.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	732	12.1	652	12.0	76	14.1	4	8.2
Moderate	1,047	17.3	853	15.7	189	35.1	5	10.2
Middle	2,699	44.7	2,481	45.5	188	34.9	30	61.2
Upper	1,557	25.8	1,461	26.8	86	16.0	10	20.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**6,035**	**100.0**	**5,447**	**100.0**	**539**	**100.0**	**49**	**100.0**
Percentage of Total Businesses:				**90.3**		**8.9**		**0.8**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	5	3.8	5	4.0	0	0.0	0	0.0
Middle	99	75.6	95	76.0	4	66.7	0	0.0
Upper	27	20.6	25	20.0	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**131**	**100.0**	**125**	**100.0**	**6**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**95.4**		**4.6**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-49A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Muskegon MI MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	11.0	0	0.0	7.2	0	0.0	10.7	0	0.0	6.9	5.9
Moderate	1	50.0	13.9	545	84.0	10.6	0	0.0	13.4	0	0.0	9.5	10.5
Middle	1	50.0	50.0	104	16.0	49.2	0	0.0	49.8	0	0.0	50.1	52.8
Upper	0	0.0	25.0	0	0.0	33.1	1	100.0	26.1	300	100.0	33.4	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	649	100.0	100.0	1	100.0	100.0	300	100.0	100.0	100.0
Refinance Loans													
Low	1	6.3	4.9	53	2.6	3.0	1	11.1	5.0	336	25.7	3.6	5.9
Moderate	0	0.0	9.2	0	0.0	7.4	0	0.0	11.4	0	0.0	8.6	10.5
Middle	10	62.5	53.6	1,237	60.5	53.3	2	22.2	50.9	260	19.9	50.7	52.8
Upper	5	31.3	32.3	755	36.9	36.3	6	66.7	32.6	709	54.3	37.1	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	16	100.0	100.0	2,045	100.0	100.0	9	100.0	100.0	1,305	100.0	100.0	100.0
Home Improvement Loans													
Low	2	14.3	6.5	100	13.2	4.8	1	10.0	4.9	18	2.2	2.6	5.9
Moderate	1	7.1	6.9	100	13.2	5.1	0	0.0	8.2	0	0.0	5.6	10.5
Middle	5	35.7	50.2	301	39.6	52.1	4	40.0	53.2	249	30.6	52.9	52.8
Upper	6	42.9	36.4	259	34.1	38.0	5	50.0	33.7	548	67.2	38.9	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	14	100.0	100.0	760	100.0	100.0	10	100.0	100.0	815	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	40.0	0	0.0	21.4	0	0.0	50.0	0	0.0	15.5	20.0
Moderate	0	0.0	10.0	0	0.0	35.6	0	0.0	0.0	0	0.0	0.0	21.8
Middle	0	0.0	20.0	0	0.0	14.8	0	0.0	30.0	0	0.0	58.7	52.0
Upper	0	0.0	30.0	0	0.0	28.2	0	0.0	20.0	0	0.0	25.7	6.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	4	9.3	8.5	168	3.9	6.8	3	12.0	8.1	406	14.4	6.2	5.9
Moderate	2	4.7	11.6	645	15.1	10.6	1	4.0	11.9	53	1.9	8.7	10.5
Middle	23	53.5	51.1	2,013	47.2	48.6	8	32.0	50.6	771	27.3	50.6	52.8
Upper	14	32.6	28.8	1,443	33.8	34.0	13	52.0	29.4	1,598	56.5	34.5	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	43	100.0	100.0	4,269	100.0	100.0	25	100.0	100.0	2,828	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-49B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Muskegon MI MSA												
Geographic Income Level	Bank And Aggregate Loans by Year											Owner Occupied Units %
	2023						2024					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	10.0	3.0	15	2.2	3.1	0	0.0	3.5	0	0.0	6.1	5.9
Moderate	0	0.0	7.5	0	0.0	5.9	1	33.3	7.5	53	16.8	6.7	10.5
Middle	6	60.0	50.7	250	36.0	47.2	2	66.7	46.5	262	83.2	39.0	52.8
Upper	3	30.0	38.8	429	61.8	43.7	0	0.0	42.5	0	0.0	48.2	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	10	100.0	100.0	694	100.0	100.0	3	100.0	100.0	315	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.6	0	0.0	5.0	1	50.0	4.8	52	55.9	2.7	5.9
Moderate	0	0.0	8.4	0	0.0	8.9	0	0.0	10.9	0	0.0	9.9	10.5
Middle	1	100.0	56.6	121	100.0	49.3	0	0.0	55.2	0	0.0	53.4	52.8
Upper	0	0.0	31.3	0	0.0	36.8	1	50.0	29.0	41	44.1	33.9	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	121	100.0	100.0	2	100.0	100.0	93	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	8.3	0	0.0	16.0	5.9
Moderate	0	0.0	5.9	0	0.0	4.0	0	0.0	16.7	0	0.0	12.7	10.5
Middle	0	0.0	41.2	0	0.0	33.9	0	0.0	58.3	0	0.0	28.4	52.8
Upper	0	0.0	52.9	0	0.0	62.1	0	0.0	16.7	0	0.0	42.9	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-50

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Muskegon MI MSA												
Geographic Income Level	Bank And Aggregate Loans by Year											Total Businesses %
	2023						2024					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	4	8.0	8.4	1,202	10.6	7.4	3	7.0	11.2	1,105	9.6	12.5	12.0
Moderate	19	38.0	18.1	4,715	41.6	26.8	22	51.2	16.7	7,040	61.4	24.9	18.0
Middle	19	38.0	45.9	3,530	31.1	42.7	11	25.6	44.0	1,692	14.8	41.9	45.2
Upper	8	16.0	27.2	1,890	16.7	22.9	7	16.3	27.9	1,630	14.2	20.0	24.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	50	100.0	100.0	11,337	100.0	100.0	43	100.0	100.0	11,467	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-51A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Muskegon MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	6.5	0	0.0	3.2	0	0.0	4.0	0	0.0	1.9	20.4
Moderate	1	50.0	23.0	104	16.0	16.9	0	0.0	24.1	0	0.0	16.5	18.7
Middle	0	0.0	23.6	0	0.0	22.1	0	0.0	24.2	0	0.0	22.2	21.2
Upper	1	50.0	27.9	545	84.0	40.5	1	100.0	30.7	300	100.0	42.2	39.8
Unknown	0	0.0	19.0	0	0.0	17.3	0	0.0	17.1	0	0.0	17.2	0.0
Total	2	100.0	100.0	649	100.0	100.0	1	100.0	100.0	300	100.0	100.0	100.0
Refinance Loans													
Low	2	12.5	9.0	153	7.5	5.0	0	0.0	7.1	0	0.0	3.7	20.4
Moderate	5	31.3	24.4	355	17.4	20.0	4	44.4	21.8	383	29.3	15.3	18.7
Middle	5	31.3	25.9	826	40.4	25.4	3	33.3	22.9	426	32.6	19.7	21.2
Upper	2	12.5	30.8	479	23.4	38.7	2	22.2	28.2	496	38.0	35.1	39.8
Unknown	2	12.5	9.9	232	11.3	10.9	0	0.0	20.0	0	0.0	26.3	0.0
Total	16	100.0	100.0	2,045	100.0	100.0	9	100.0	100.0	1,305	100.0	100.0	100.0
Home Improvement Loans													
Low	3	21.4	8.4	142	18.7	4.8	3	30.0	9.0	158	19.4	4.6	20.4
Moderate	2	14.3	19.2	64	8.4	15.9	0	0.0	19.1	0	0.0	14.0	18.7
Middle	4	28.6	27.8	305	40.1	24.1	5	50.0	31.1	307	37.7	26.6	21.2
Upper	4	28.6	42.3	149	19.6	52.8	2	20.0	39.7	350	42.9	53.7	39.8
Unknown	1	7.1	2.3	100	13.2	2.4	0	0.0	1.1	0	0.0	1.2	0.0
Total	14	100.0	100.0	760	100.0	100.0	10	100.0	100.0	815	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	6	14.0	7.5	310	7.3	3.7	3	12.0	5.7	158	5.6	2.6	20.4
Moderate	12	27.9	22.8	814	19.1	17.4	6	24.0	23.0	477	16.9	16.1	18.7
Middle	11	25.6	24.5	1,199	28.1	22.4	8	32.0	24.6	733	25.9	21.7	21.2
Upper	11	25.6	31.1	1,614	37.8	41.3	7	28.0	32.0	1,340	47.4	41.4	39.8
Unknown	3	7.0	14.1	332	7.8	15.1	1	4.0	14.8	120	4.2	18.2	0.0
Total	43	100.0	100.0	4,269	100.0	100.0	25	100.0	100.0	2,828	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-51B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Muskegon MI MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	10.0	7.5	15	2.2	4.4	0	0.0	5.0	0	0.0	3.3	20.4
Moderate	3	30.0	24.9	170	24.5	20.7	1	33.3	23.5	53	16.8	18.0	18.7
Middle	2	20.0	20.4	68	9.8	15.7	0	0.0	25.5	0	0.0	21.4	21.2
Upper	4	40.0	42.3	441	63.5	55.6	1	33.3	43.0	142	45.1	55.5	39.8
Unknown	0	0.0	5.0	0	0.0	3.8	1	33.3	3.0	120	38.1	1.8	0.0
Total	10	100.0	100.0	694	100.0	100.0	3	100.0	100.0	315	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	11.2	0	0.0	7.6	0	0.0	11.3	0	0.0	6.7	20.4
Moderate	1	100.0	21.7	121	100.0	16.6	1	50.0	25.8	41	44.1	17.4	18.7
Middle	0	0.0	27.3	0	0.0	17.8	0	0.0	22.6	0	0.0	18.8	21.2
Upper	0	0.0	37.3	0	0.0	55.7	1	50.0	37.9	52	55.9	50.9	39.8
Unknown	0	0.0	2.4	0	0.0	2.4	0	0.0	2.4	0	0.0	6.2	0.0
Total	1	100.0	100.0	121	100.0	100.0	2	100.0	100.0	93	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	5.9	0	0.0	5.3	0	0.0	0.0	0	0.0	0.0	20.4
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.7
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	8.3	0	0.0	3.6	39.8
Unknown	0	0.0	94.1	0	0.0	94.7	0	0.0	91.7	0	0.0	96.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-52

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Muskegon MI MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	16	32.0	55.3	1,696	15.0	28.4	12	27.9	53.2	1,912	16.7	23.2	89.9
Over $1 Million	29	58.0		8,972	79.1		31	72.1		9,555	83.3		9.2
Revenue Unknown	5	10.0		669	5.9		0	0.0		0	0.0		0.8
Total	50	100.0		11,337	100.0		43	100.0		11,467	100.0		100.0
By Loan Size													
$100,000 or Less	23	46.0	91.5	1,307	11.5	28.3	20	46.5	90.9	1,322	11.5	27.9	
$100,001 - $250,000	11	22.0	3.8	2,029	17.9	14.9	8	18.6	4.3	1,620	14.1	16.3	
$250,001 - $1 Million	16	32.0	4.7	8,001	70.6	56.8	15	34.9	4.8	8,525	74.3	55.8	
Total	50	100.0	100.0	11,337	100.0	100.0	43	100.0	100.0	11,467	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	11	68.8		627	37.0		8	66.7		522	27.3		
$100,001 - $250,000	4	25.0		720	42.5		3	25.0		545	28.5		
$250,001 - $1 Million	1	6.3		349	20.6		1	8.3		845	44.2		
Total	16	100.0		1,696	100.0		12	100.0		1,912	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

AUSTIN METROPOLITAN ASSESSMENT AREA

TABLE C-53

2024 Austin TX Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	27	6.4	21,562	5.2	5,043	23.4	84,820	20.4
Moderate	100	23.5	88,697	21.3	9,409	10.6	70,060	16.8
Middle	142	33.4	148,541	35.7	7,483	5.0	86,524	20.8
Upper	140	32.9	154,103	37.0	3,732	2.4	174,832	42.0
Unknown	16	3.8	3,333	0.8	868	26.0	0	0.0
Total AA	**425**	**100.0**	**416,236**	**100.0**	**26,535**	**6.4**	**416,236**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	46,024	9,969	2.6	21.7	31,665	68.8	4,390	9.5
Moderate	168,410	68,287	17.6	40.5	88,696	52.7	11,427	6.8
Middle	257,600	145,995	37.6	56.7	95,133	36.9	16,472	6.4
Upper	245,168	162,416	41.8	66.2	67,066	27.4	15,686	6.4
Unknown	11,984	2,028	0.5	16.9	8,389	70.0	1,567	13.1
Total AA	**729,186**	**388,695**	**100.0**	**53.3**	**290,949**	**39.9**	**49,542**	**6.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3,664	3.8	3,318	3.7	303	5.3	43	3.2
Moderate	17,060	17.7	15,639	17.6	1,261	22.0	160	11.8
Middle	28,542	29.7	26,558	29.8	1,686	29.4	298	21.9
Upper	44,768	46.5	41,647	46.8	2,298	40.1	823	60.5
Unknown	2,145	2.2	1,922	2.2	187	3.3	36	2.6
Total AA	**96,179**	**100.0**	**89,084**	**100.0**	**5,735**	**100.0**	**1,360**	**100.0**
Percentage of Total Businesses:				**92.6**		**6.0**		**1.4**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	26	2.6	24	2.4	2	20.0	0	0.0
Moderate	193	19.4	187	19.0	6	60.0	0	0.0
Middle	300	30.2	300	30.5	0	0.0	0	0.0
Upper	467	46.9	466	47.3	1	10.0	0	0.0
Unknown	9	0.9	8	0.8	1	10.0	0	0.0
Total AA	**995**	**100.0**	**985**	**100.0**	**10**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.0**		**1.0**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-54

2023 Austin TX Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	27	6.4	21,562	5.2	5,043	23.4	84,820	20.4
Moderate	100	23.5	88,697	21.3	9,409	10.6	70,060	16.8
Middle	142	33.4	148,541	35.7	7,483	5.0	86,524	20.8
Upper	140	32.9	154,103	37.0	3,732	2.4	174,832	42.0
Unknown	16	3.8	3,333	0.8	868	26.0	0	0.0
Total AA	**425**	**100.0**	**416,236**	**100.0**	**26,535**	**6.4**	**416,236**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	46,024	9,969	2.6	21.7	31,665	68.8	4,390	9.5
Moderate	168,410	68,287	17.6	40.5	88,696	52.7	11,427	6.8
Middle	257,600	145,995	37.6	56.7	95,133	36.9	16,472	6.4
Upper	245,168	162,416	41.8	66.2	67,066	27.4	15,686	6.4
Unknown	11,984	2,028	0.5	16.9	8,389	70.0	1,567	13.1
Total AA	**729,186**	**388,695**	**100.0**	**53.3**	**290,949**	**39.9**	**49,542**	**6.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3,983	3.7	3,604	3.7	335	5.3	44	2.9
Moderate	18,351	17.3	16,846	17.1	1,330	21.0	175	11.7
Middle	30,936	29.1	28,869	29.3	1,749	27.6	318	21.3
Upper	49,994	47.0	46,443	47.2	2,646	41.7	905	60.6
Unknown	3,027	2.8	2,697	2.7	278	4.4	52	3.5
Total AA	**106,291**	**100.0**	**98,459**	**100.0**	**6,338**	**100.0**	**1,494**	**100.0**
Percentage of Total Businesses:				**92.6**		**6.0**		**1.4**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	29	2.7	27	2.5	2	20.0	0	0.0
Moderate	210	19.6	204	19.2	6	60.0	0	0.0
Middle	321	30.0	321	30.3	0	0.0	0	0.0
Upper	497	46.4	496	46.7	1	10.0	0	0.0
Unknown	14	1.3	13	1.2	1	10.0	0	0.0
Total AA	**1,071**	**100.0**	**1,061**	**100.0**	**10**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.1**		**0.9**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-55A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Austin TX Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.8	0	0.0	1.5	0	0.0	1.5	0	0.0	1.2	2.6
Moderate	1	14.3	21.4	78	1.5	17.5	0	0.0	20.9	0	0.0	16.9	17.6
Middle	1	14.3	40.7	225	4.5	34.8	3	50.0	39.3	463	34.0	33.1	37.6
Upper	5	71.4	35.4	4,740	94.0	45.6	3	50.0	37.9	900	66.0	48.3	41.8
Unknown	0	0.0	0.7	0	0.0	0.5	0	0.0	0.4	0	0.0	0.4	0.5
Total	7	100.0	100.0	5,043	100.0	100.0	6	100.0	100.0	1,363	100.0	100.0	100.0
Refinance Loans													
Low	1	6.3	2.8	147	2.7	2.1	0	0.0	2.3	0	0.0	1.8	2.6
Moderate	3	18.8	18.3	310	5.6	13.4	3	16.7	18.8	581	13.3	14.3	17.6
Middle	3	18.8	38.7	483	8.8	28.3	6	33.3	37.1	1,221	27.9	28.1	37.6
Upper	9	56.3	39.8	4,547	82.9	55.4	9	50.0	41.5	2,574	58.8	55.2	41.8
Unknown	0	0.0	0.5	0	0.0	0.7	0	0.0	0.4	0	0.0	0.6	0.5
Total	16	100.0	100.0	5,487	100.0	100.0	18	100.0	100.0	4,376	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.3	0	0.0	0.9	1	5.9	1.7	300	10.2	1.0	2.6
Moderate	3	14.3	12.2	475	12.3	7.7	1	5.9	13.3	400	13.5	8.8	17.6
Middle	4	19.0	35.4	284	7.4	23.0	1	5.9	32.7	10	0.3	23.2	37.6
Upper	14	66.7	50.8	3,091	80.3	68.1	14	82.4	52.1	2,245	76.0	66.8	41.8
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0.5
Total	21	100.0	100.0	3,850	100.0	100.0	17	100.0	100.0	2,955	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	7.5	0	0.0	5.2	0	0.0	12.3	0	0.0	8.7	12.0
Moderate	0	0.0	26.3	0	0.0	24.6	0	0.0	33.3	0	0.0	20.5	27.5
Middle	0	0.0	37.5	0	0.0	33.2	0	0.0	27.2	0	0.0	28.6	30.0
Upper	0	0.0	21.3	0	0.0	31.7	0	0.0	19.8	0	0.0	39.0	27.1
Unknown	0	0.0	7.5	0	0.0	5.3	0	0.0	7.4	0	0.0	3.1	3.4
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	1	1.7	1.9	147	0.8	1.9	1	2.0	1.7	300	3.0	2.2	2.6
Moderate	9	15.5	20.4	1,089	6.3	17.5	4	8.0	20.2	981	9.7	16.9	17.6
Middle	12	20.7	40.1	1,795	10.3	33.6	13	26.0	38.7	2,096	20.8	31.7	37.6
Upper	36	62.1	36.9	14,347	82.6	45.9	32	64.0	39.0	6,718	66.5	48.4	41.8
Unknown	0	0.0	0.7	0	0.0	1.0	0	0.0	0.4	0	0.0	0.8	0.5
Total	58	100.0	100.0	17,378	100.0	100.0	50	100.0	100.0	10,095	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-55B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Austin TX Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	1.1	0	0.0	0.7	0	0.0	1.3	0	0.0	0.9	2.6
Moderate	2	14.3	9.6	226	7.5	6.8	0	0.0	11.9	0	0.0	5.9	17.6
Middle	4	28.6	33.4	803	26.8	20.9	3	33.3	33.4	402	28.7	19.8	37.6
Upper	8	57.1	55.6	1,969	65.7	71.5	6	66.7	53.3	999	71.3	73.3	41.8
Unknown	0	0.0	0.3	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.5
Total	14	100.0	100.0	2,998	100.0	100.0	9	100.0	100.0	1,401	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.8	0	0.0	1.4	0	0.0	2.2	0	0.0	2.9	2.6
Moderate	0	0.0	13.2	0	0.0	5.6	0	0.0	15.7	0	0.0	10.7	17.6
Middle	0	0.0	38.5	0	0.0	17.7	0	0.0	39.5	0	0.0	24.1	37.6
Upper	0	0.0	46.3	0	0.0	75.2	0	0.0	42.6	0	0.0	62.3	41.8
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.5
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	8.5	0	0.0	16.6	0	0.0	5.0	0	0.0	12.3	2.6
Moderate	0	0.0	32.9	0	0.0	28.7	0	0.0	39.7	0	0.0	24.6	17.6
Middle	0	0.0	37.2	0	0.0	26.8	0	0.0	39.0	0	0.0	29.9	37.6
Upper	0	0.0	20.5	0	0.0	27.2	0	0.0	14.9	0	0.0	30.2	41.8
Unknown	0	0.0	0.9	0	0.0	0.7	0	0.0	1.4	0	0.0	2.9	0.5
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-56

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Austin TX Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	8	5.2	3.4	1,250	3.8	3.5	6	4.3	3.1	925	3.3	3.4	3.8
Moderate	42	27.3	17.2	9,596	29.3	18.1	40	28.6	17.2	10,311	36.7	17.4	17.7
Middle	31	20.1	30.3	10,122	30.9	28.2	25	17.9	29.9	6,708	23.9	28.5	29.7
Upper	66	42.9	46.8	10,525	32.1	47.3	60	42.9	47.6	9,030	32.1	47.9	46.5
Unknown	7	4.5	2.0	1,310	4.0	2.8	9	6.4	1.8	1,135	4.0	2.7	2.2
Total	154	100.0	100.0	32,803	100.0	100.0	140	100.0	100.0	28,109	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-57A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Austin TX Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	14.3	2.2	78	1.5	0.9	1	16.7	2.7	33	2.4	1.3	20.4
Moderate	0	0.0	11.3	0	0.0	7.3	0	0.0	12.2	0	0.0	8.0	16.8
Middle	1	14.3	20.0	2,438	48.3	16.5	1	16.7	19.3	50	3.7	16.1	20.8
Upper	5	71.4	39.4	2,527	50.1	49.2	3	50.0	38.0	1,034	75.9	47.4	42.0
Unknown	0	0.0	27.0	0	0.0	26.0	1	16.7	27.7	246	18.0	27.3	0.0
Total	7	100.0	100.0	5,043	100.0	100.0	6	100.0	100.0	1,363	100.0	100.0	100.0
Refinance Loans													
Low	2	12.5	9.0	180	3.3	4.2	0	0.0	7.2	0	0.0	2.9	20.4
Moderate	3	18.8	17.5	275	5.0	9.5	2	11.1	14.6	239	5.5	7.3	16.8
Middle	2	12.5	21.8	465	8.5	14.7	4	22.2	18.5	996	22.8	12.4	20.8
Upper	8	50.0	38.3	4,412	80.4	51.6	11	61.1	39.5	2,901	66.3	51.7	42.0
Unknown	1	6.3	13.4	155	2.8	20.0	1	5.6	20.2	240	5.5	25.7	0.0
Total	16	100.0	100.0	5,487	100.0	100.0	18	100.0	100.0	4,376	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.3	0	0.0	2.8	1	5.9	5.1	10	0.3	2.2	20.4
Moderate	2	9.5	14.0	328	8.5	6.5	4	23.5	16.4	437	14.8	8.3	16.8
Middle	5	23.8	20.6	646	16.8	11.8	0	0.0	18.9	0	0.0	11.9	20.8
Upper	14	66.7	57.5	2,876	74.7	72.7	12	70.6	56.0	2,508	84.9	70.7	42.0
Unknown	0	0.0	1.7	0	0.0	6.2	0	0.0	3.7	0	0.0	6.9	0.0
Total	21	100.0	100.0	3,850	100.0	100.0	17	100.0	100.0	2,955	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	6.9	3.3	289	1.7	1.3	2	4.0	3.6	43	0.4	1.6	20.4
Moderate	8	13.8	12.1	1,019	5.9	7.4	8	16.0	12.8	768	7.6	7.9	16.8
Middle	9	15.5	20.2	3,749	21.6	16.1	8	16.0	19.3	1,361	13.5	15.4	20.8
Upper	36	62.1	40.2	12,166	70.0	49.9	30	60.0	38.8	7,437	73.7	48.4	42.0
Unknown	1	1.7	24.2	155	0.9	25.3	2	4.0	25.4	486	4.8	26.7	0.0
Total	58	100.0	100.0	17,378	100.0	100.0	50	100.0	100.0	10,095	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-57B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Austin TX Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	7.1	6.1	31	1.0	4.3	0	0.0	5.6	0	0.0	3.7	20.4
Moderate	3	21.4	11.1	416	13.9	5.2	2	22.2	11.6	92	6.6	4.8	16.8
Middle	1	7.1	18.7	200	6.7	10.4	3	33.3	21.2	315	22.5	11.5	20.8
Upper	9	64.3	62.5	2,351	78.4	78.5	4	44.4	57.6	994	70.9	75.3	42.0
Unknown	0	0.0	1.6	0	0.0	1.7	0	0.0	4.0	0	0.0	4.7	0.0
Total	14	100.0	100.0	2,998	100.0	100.0	9	100.0	100.0	1,401	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	7.1	0	0.0	1.9	0	0.0	10.5	0	0.0	4.6	20.4
Moderate	0	0.0	16.1	0	0.0	4.6	0	0.0	21.3	0	0.0	10.5	16.8
Middle	0	0.0	25.2	0	0.0	8.3	0	0.0	23.4	0	0.0	11.6	20.8
Upper	0	0.0	43.2	0	0.0	51.0	0	0.0	36.9	0	0.0	53.6	42.0
Unknown	0	0.0	8.4	0	0.0	34.1	0	0.0	7.9	0	0.0	19.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	4.7	0	0.0	1.4	0	0.0	2.1	0	0.0	1.0	20.4
Moderate	0	0.0	1.3	0	0.0	0.9	0	0.0	0.0	0	0.0	0.0	16.8
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.8
Upper	0	0.0	0.9	0	0.0	1.4	0	0.0	0.7	0	0.0	0.8	42.0
Unknown	0	0.0	93.2	0	0.0	96.3	0	0.0	97.2	0	0.0	98.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-58

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Austin TX Metropolitan													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	63	40.9	52.3	8,500	25.9	35.0	47	33.6	52.3	6,116	21.8	35.1	92.6
Over $1 Million	70	45.5		20,813	63.4		65	46.4		18,082	64.3		6.0
Revenue Unknown	21	13.6		3,490	10.6		28	20.0		3,911	13.9		1.4
Total	154	100.0		32,803	100.0		140	100.0		28,109	100.0		100.0
By Loan Size													
$100,000 or Less	85	55.2	95.3	5,136	15.7	45.9	76	54.3	95.6	4,705	16.7	49.1	
$100,001 - $250,000	32	20.8	2.6	6,205	18.9	14.9	33	23.6	2.5	6,145	21.9	14.5	
$250,001 - $1 Million	37	24.0	2.1	21,462	65.4	39.2	31	22.1	1.9	17,259	61.4	36.3	
Total	154	100.0	100.0	32,803	100.0	100.0	140	100.0	100.0	28,109	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	40	63.5		1,916	22.5		31	66.0		1,769	28.9		
$100,001 - $250,000	14	22.2		2,545	29.9		9	19.1		1,470	24.0		
$250,001 - $1 Million	9	14.3		4,039	47.5		7	14.9		2,877	47.0		
Total	63	100.0		8,500	100.0		47	100.0		6,116	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

San Antonio Metropolitan Assessment Area

Table C-59

2024 San Antonio TX Metropolitan AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%
Low	35	9.1	28,772	6.6	9,445	32.8	101,893	23.5
Moderate	137	35.7	140,036	32.4	25,471	18.2	76,516	17.7
Middle	103	26.8	124,152	28.7	10,430	8.4	84,401	19.5
Upper	105	27.3	139,762	32.3	4,957	3.5	169,912	39.3
Unknown	4	1.0	0	0.0	0	0.0	0	0.0
Total AA	**384**	**100.0**	**432,722**	**100.0**	**50,303**	**11.6**	**432,722**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	52,666	18,604	4.8	35.3	28,356	53.8	5,706	10.8
Moderate	249,019	112,263	28.9	45.1	114,098	45.8	22,658	9.1
Middle	200,364	116,544	30.0	58.2	71,184	35.5	12,636	6.3
Upper	214,085	140,883	36.3	65.8	57,418	26.8	15,784	7.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**716,134**	**388,294**	**100.0**	**54.2**	**271,056**	**37.8**	**56,784**	**7.9**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5,127	6.3	4,532	6.0	553	11.1	42	5.3
Moderate	22,285	27.3	20,588	27.1	1,568	31.5	129	16.2
Middle	21,009	25.7	19,658	25.9	1,179	23.7	172	21.6
Upper	33,124	40.5	31,030	40.9	1,642	33.0	452	56.6
Unknown	172	0.2	131	0.2	38	0.8	3	0.4
Total AA	**81,717**	**100.0**	**75,939**	**100.0**	**4,980**	**100.0**	**798**	**100.0**
Percentage of Total Businesses:				**92.9**		**6.1**		**1.0**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	12	1.4	12	1.4	0	0.0	0	0.0
Moderate	140	16.7	138	16.6	2	20.0	0	0.0
Middle	173	20.6	171	20.6	2	20.0	0	0.0
Upper	515	61.3	509	61.3	6	60.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**840**	**100.0**	**830**	**100.0**	**10**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.8**		**1.2**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-60

2023 San Antonio TX Metropolitan AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	35	9.1	28,772	6.6	9,445	32.8	101,893	23.5	
Moderate	137	35.7	140,036	32.4	25,471	18.2	76,516	17.7	
Middle	103	26.8	124,152	28.7	10,430	8.4	84,401	19.5	
Upper	105	27.3	139,762	32.3	4,957	3.5	169,912	39.3	
Unknown	4	1.0	0	0.0	0	0.0	0	0.0	
Total AA	**384**	**100.0**	**432,722**	**100.0**	**50,303**	**11.6**	**432,722**	**100.0**	
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	52,666	18,604	4.8	35.3	28,356	53.8	5,706	10.8	
Moderate	249,019	112,263	28.9	45.1	114,098	45.8	22,658	9.1	
Middle	200,364	116,544	30.0	58.2	71,184	35.5	12,636	6.3	
Upper	214,085	140,883	36.3	65.8	57,418	26.8	15,784	7.4	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	**716,134**	**388,294**	**100.0**	**54.2**	**271,056**	**37.8**	**56,784**	**7.9**	
	Total Businesses by Tract		Businesses by Tract & Revenue Size						
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	5,271	6.2	4,662	5.9	567	10.9	42	5.1	
Moderate	22,765	26.7	21,011	26.5	1,621	31.2	133	16.2	
Middle	21,876	25.7	20,481	25.9	1,225	23.6	170	20.7	
Upper	35,129	41.2	32,924	41.6	1,733	33.4	472	57.5	
Unknown	179	0.2	133	0.2	42	0.8	4	0.5	
Total AA	**85,220**	**100.0**	**79,211**	**100.0**	**5,188**	**100.0**	**821**	**100.0**	
Percentage of Total Businesses:				**92.9**		**6.1**		**1.0**	
	Total Farms by Tract		Farms by Tract & Revenue Size						
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	13	1.5	13	1.5	0	0.0	0	0.0	
Moderate	143	16.0	141	16.0	2	20.0	0	0.0	
Middle	181	20.3	179	20.3	2	20.0	0	0.0	
Upper	554	62.2	548	62.2	6	60.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	**891**	**100.0**	**881**	**100.0**	**10**	**100.0**	**0**	**0.0**	
Percentage of Total Farms:				**98.9**		**1.1**		**0.0**	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-61A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: San Antonio TX Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.0	0	0.0	1.2	0	0.0	1.5	0	0.0	0.9	4.8
Moderate	1	100.0	20.2	220	100.0	14.2	0	0.0	20.3	0	0.0	13.9	28.9
Middle	0	0.0	31.5	0	0.0	26.1	0	0.0	31.8	0	0.0	28.3	30.0
Upper	0	0.0	46.3	0	0.0	58.4	0	0.0	46.4	0	0.0	56.9	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	220	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.6	0	0.0	2.8	1	33.3	3.3	65	7.6	2.3	4.8
Moderate	1	33.3	25.4	78	1.8	18.5	0	0.0	22.9	0	0.0	16.1	28.9
Middle	1	33.3	31.2	180	4.3	24.8	0	0.0	30.4	0	0.0	23.1	30.0
Upper	1	33.3	39.9	3,960	93.9	53.8	2	66.7	43.5	785	92.4	58.6	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	4,218	100.0	100.0	3	100.0	100.0	850	100.0	100.0	100.0
Home Improvement Loans													
Low	1	25.0	2.1	64	27.7	2.0	0	0.0	2.9	0	0.0	2.0	4.8
Moderate	2	50.0	20.0	115	49.8	15.8	2	50.0	18.5	65	13.5	12.9	28.9
Middle	1	25.0	24.8	52	22.5	19.4	0	0.0	23.8	0	0.0	18.1	30.0
Upper	0	0.0	53.1	0	0.0	62.9	2	50.0	54.8	416	86.5	67.0	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	231	100.0	100.0	4	100.0	100.0	481	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	9.3	0	0.0	11.3	0	0.0	11.4	0	0.0	4.0	10.0
Moderate	0	0.0	45.3	0	0.0	28.0	0	0.0	42.9	0	0.0	30.5	40.7
Middle	0	0.0	23.3	0	0.0	22.8	0	0.0	24.3	0	0.0	39.6	24.1
Upper	0	0.0	22.1	0	0.0	38.0	0	0.0	21.4	0	0.0	25.8	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	8.3	2.3	64	1.3	2.2	1	11.1	1.8	65	3.2	1.2	4.8
Moderate	6	50.0	20.9	477	9.5	15.7	2	22.2	20.9	65	3.2	15.2	28.9
Middle	3	25.0	31.1	312	6.2	25.7	0	0.0	31.2	0	0.0	28.3	30.0
Upper	2	16.7	45.7	4,168	83.0	56.5	6	66.7	46.1	1,899	93.6	55.3	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	12	100.0	100.0	5,021	100.0	100.0	9	100.0	100.0	2,029	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-61B

Geographic Income Level	2023 Bank #	2023 Bank #%	2023 Agg #%	2023 Bank $(000)	2023 Bank $%	2023 Agg $%	2024 Bank #	2024 Bank #%	2024 Agg #%	2024 Bank $(000)	2024 Bank $%	2024 Agg $%	Owner Occupied Units %
Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography													
Assessment Area: San Antonio TX Metropolitan													
Other Purpose LOC													
Low	0	0.0	1.5	0	0.0	1.0	0	0.0	1.3	0	0.0	0.9	4.8
Moderate	2	50.0	15.1	64	18.2	11.2	0	0.0	12.6	0	0.0	9.4	28.9
Middle	1	25.0	21.6	80	22.7	16.9	0	0.0	22.7	0	0.0	17.6	30.0
Upper	1	25.0	61.8	208	59.1	71.0	2	100.0	63.5	698	100.0	72.2	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	352	100.0	100.0	2	100.0	100.0	698	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.8	0	0.0	2.9	0	0.0	3.9	0	0.0	3.0	4.8
Moderate	0	0.0	21.6	0	0.0	18.5	0	0.0	22.5	0	0.0	18.5	28.9
Middle	0	0.0	25.0	0	0.0	23.9	0	0.0	27.0	0	0.0	22.0	30.0
Upper	0	0.0	49.5	0	0.0	54.7	0	0.0	46.7	0	0.0	56.6	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.7	0	0.0	1.6	0	0.0	1.1	0	0.0	0.4	4.8
Moderate	0	0.0	34.9	0	0.0	23.4	0	0.0	49.3	0	0.0	12.7	28.9
Middle	0	0.0	40.2	0	0.0	32.5	0	0.0	29.9	0	0.0	69.7	30.0
Upper	0	0.0	21.2	0	0.0	42.6	0	0.0	19.8	0	0.0	17.2	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-62

Geographic Income Level	2023 Bank #	2023 Bank #%	2023 Agg #%	2023 Bank $(000)	2023 Bank $%	2023 Agg $%	2024 Bank #	2024 Bank #%	2024 Agg #%	2024 Bank $(000)	2024 Bank $%	2024 Agg $%	Total Businesses %
Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography													
Assessment Area: San Antonio TX Metropolitan													
Low	14	11.3	5.3	4,303	19.4	7.4	17	25.8	5.0	5,730	29.4	7.1	6.3
Moderate	37	29.8	23.2	5,848	26.3	23.3	18	27.3	22.4	5,284	27.1	23.6	27.3
Middle	24	19.4	23.5	4,055	18.3	21.5	8	12.1	23.3	2,293	11.8	22.4	25.7
Upper	49	39.5	47.7	8,012	36.1	47.5	23	34.8	48.7	6,194	31.8	46.3	40.5
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	0	0.0	0.4	0.2
Total	124	100.0	100.0	22,218	100.0	100.0	66	100.0	100.0	19,501	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-63A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: San Antonio TX Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.0	0	0.0	0.9	0	0.0	2.1	0	0.0	1.1	23.5
Moderate	0	0.0	14.3	0	0.0	10.0	0	0.0	14.3	0	0.0	9.8	17.7
Middle	0	0.0	20.9	0	0.0	18.1	0	0.0	20.2	0	0.0	17.1	19.5
Upper	1	100.0	32.8	220	100.0	42.1	0	0.0	30.9	0	0.0	38.9	39.3
Unknown	0	0.0	30.1	0	0.0	28.9	0	0.0	32.6	0	0.0	33.1	0.0
Total	1	100.0	100.0	220	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	1	33.3	7.7	78	1.8	3.9	0	0.0	6.2	0	0.0	2.7	23.5
Moderate	0	0.0	17.4	0	0.0	11.1	0	0.0	13.1	0	0.0	6.6	17.7
Middle	0	0.0	21.3	0	0.0	16.9	0	0.0	16.4	0	0.0	10.3	19.5
Upper	2	66.7	36.9	4,140	98.2	47.9	3	100.0	32.7	850	100.0	35.6	39.3
Unknown	0	0.0	16.7	0	0.0	20.2	0	0.0	31.6	0	0.0	44.8	0.0
Total	3	100.0	100.0	4,218	100.0	100.0	3	100.0	100.0	850	100.0	100.0	100.0
Home Improvement Loans													
Low	4	100.0	8.6	231	100.0	5.1	1	25.0	7.3	15	3.1	4.2	23.5
Moderate	0	0.0	15.7	0	0.0	11.1	0	0.0	14.9	0	0.0	8.7	17.7
Middle	0	0.0	20.2	0	0.0	15.1	1	25.0	17.3	50	10.4	11.9	19.5
Upper	0	0.0	53.1	0	0.0	64.6	1	25.0	55.6	297	61.7	63.8	39.3
Unknown	0	0.0	2.3	0	0.0	4.1	1	25.0	5.0	119	24.7	11.4	0.0
Total	4	100.0	100.0	231	100.0	100.0	4	100.0	100.0	481	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	58.3	3.1	414	8.2	1.3	1	11.1	3.1	15	0.7	1.4	23.5
Moderate	1	8.3	14.7	208	4.1	10.1	0	0.0	14.1	0	0.0	9.4	17.7
Middle	0	0.0	20.9	0	0.0	17.9	1	11.1	19.5	50	2.5	16.1	19.5
Upper	4	33.3	34.1	4,399	87.6	42.9	6	66.7	32.2	1,845	90.9	38.8	39.3
Unknown	0	0.0	27.2	0	0.0	27.9	1	11.1	31.1	119	5.9	34.3	0.0
Total	12	100.0	100.0	5,021	100.0	100.0	9	100.0	100.0	2,029	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-63B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: San Antonio TX Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	2	50.0	6.9	105	29.8	5.7	0	0.0	5.1	0	0.0	3.5	23.5
Moderate	1	25.0	15.9	208	59.1	10.9	0	0.0	13.2	0	0.0	8.7	17.7
Middle	0	0.0	22.5	0	0.0	15.8	0	0.0	19.4	0	0.0	15.7	19.5
Upper	1	25.0	53.8	39	11.1	67.1	2	100.0	56.3	698	100.0	67.8	39.3
Unknown	0	0.0	0.8	0	0.0	0.5	0	0.0	6.0	0	0.0	4.3	0.0
Total	4	100.0	100.0	352	100.0	100.0	2	100.0	100.0	698	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.6	0	0.0	5.7	0	0.0	10.3	0	0.0	7.1	23.5
Moderate	0	0.0	17.7	0	0.0	11.6	0	0.0	19.4	0	0.0	14.4	17.7
Middle	0	0.0	24.3	0	0.0	17.8	0	0.0	22.9	0	0.0	18.4	19.5
Upper	0	0.0	43.8	0	0.0	53.3	0	0.0	42.5	0	0.0	52.5	39.3
Unknown	0	0.0	5.5	0	0.0	11.6	0	0.0	4.9	0	0.0	7.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.4	0	0.0	1.3	0	0.0	0.4	0	0.0	0.1	23.5
Moderate	0	0.0	1.7	0	0.0	0.9	0	0.0	0.0	0	0.0	0.0	17.7
Middle	0	0.0	0.2	0	0.0	0.3	0	0.0	0.4	0	0.0	0.4	19.5
Upper	0	0.0	0.2	0	0.0	0.6	0	0.0	0.4	0	0.0	0.7	39.3
Unknown	0	0.0	95.4	0	0.0	97.0	0	0.0	98.9	0	0.0	98.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-64

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: San Antonio TX Metropolitan													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	66	53.2	49.8	4,122	18.6	30.8	23	34.8	48.7	3,461	17.7	29.9	92.9
Over $1 Million	53	42.7		17,255	77.7		37	56.1		13,030	66.8		6.1
Revenue Unknown	5	4.0		841	3.8		6	9.1		3,010	15.4		1.0
Total	124	100.0		22,218	100.0		66	100.0		19,501	100.0		100.0
By Loan Size													
$100,000 or Less	82	66.1	93.6	3,481	15.7	37.0	28	42.4	93.2	1,877	9.6	37.3	
$100,001 - $250,000	13	10.5	3.4	2,545	11.5	16.3	11	16.7	3.8	2,195	11.3	17.3	
$250,001 - $1 Million	29	23.4	3.0	16,192	72.9	46.8	27	40.9	3.0	15,429	79.1	45.4	
Total	124	100.0	100.0	22,218	100.0	100.0	66	100.0	100.0	19,501	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	61	92.4		2,356	57.2		17	73.9		938	27.1		
$100,001 - $250,000	2	3.0		350	8.5		1	4.3		250	7.2		
$250,001 - $1 Million	3	4.5		1,416	34.4		5	21.7		2,273	65.7		
Total	66	100.0		4,122	100.0		23	100.0		3,461	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

INLAND EMPIRE MSA ASSESSMENT AREA

TABLE C-65

2024 Inland Empire CA MSA AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%
Low	48	4.9	36,200	3.5	10,864	30.0	224,678	21.8
Moderate	282	28.7	266,208	25.9	45,478	17.1	180,300	17.5
Middle	362	36.8	386,945	37.6	36,382	9.4	198,334	19.3
Upper	279	28.4	334,365	32.5	14,766	4.4	425,997	41.4
Unknown	13	1.3	5,591	0.5	754	13.5	0	0.0
Total AA	**984**	**100.0**	**1,029,309**	**100.0**	**108,244**	**10.5**	**1,029,309**	**100.0**
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	65,594	19,792	2.2	30.2	36,968	56.4	8,834	13.5
Moderate	428,240	189,178	21.4	44.2	183,228	42.8	55,834	13.0
Middle	592,595	338,093	38.3	57.1	183,422	31.0	71,080	12.0
Upper	468,619	330,059	37.4	70.4	87,479	18.7	51,081	10.9
Unknown	11,394	4,911	0.6	43.1	3,373	29.6	3,110	27.3
Total AA	**1,566,442**	**882,033**	**100.0**	**56.3**	**494,470**	**31.6**	**189,939**	**12.1**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,082	2.7	3,799	2.7	257	2.7	26	3.4
Moderate	38,081	24.8	35,076	24.5	2,790	29.1	215	28.3
Middle	58,709	38.3	54,590	38.2	3,865	40.4	254	33.4
Upper	51,571	33.6	48,735	34.1	2,578	26.9	258	33.9
Unknown	815	0.5	722	0.5	85	0.9	8	1.1
Total AA	**153,258**	**100.0**	**142,922**	**100.0**	**9,575**	**100.0**	**761**	**100.0**
Percentage of Total Businesses:				**93.3**		**6.2**		**0.5**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	34	2.6	30	2.4	4	5.6	0	0.0
Moderate	219	16.7	203	16.3	16	22.5	0	0.0
Middle	482	36.7	451	36.3	31	43.7	0	0.0
Upper	565	43.0	548	44.1	16	22.5	1	100.0
Unknown	14	1.1	10	0.8	4	5.6	0	0.0
Total AA	**1,314**	**100.0**	**1,242**	**100.0**	**71**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**94.5**		**5.4**		**0.1**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-66

2023 Inland Empire CA MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	48	4.9	36,200	3.5	10,864	30.0	224,678	21.8
Moderate	282	28.7	266,208	25.9	45,478	17.1	180,300	17.5
Middle	362	36.8	386,945	37.6	36,382	9.4	198,334	19.3
Upper	279	28.4	334,365	32.5	14,766	4.4	425,997	41.4
Unknown	13	1.3	5,591	0.5	754	13.5	0	0.0
Total AA	**984**	**100.0**	**1,029,309**	**100.0**	**108,244**	**10.5**	**1,029,309**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	65,594	19,792	2.2	30.2	36,968	56.4	8,834	13.5
Moderate	428,240	189,178	21.4	44.2	183,228	42.8	55,834	13.0
Middle	592,595	338,093	38.3	57.1	183,422	31.0	71,080	12.0
Upper	468,619	330,059	37.4	70.4	87,479	18.7	51,081	10.9
Unknown	11,394	4,911	0.6	43.1	3,373	29.6	3,110	27.3
Total AA	**1,566,442**	**882,033**	**100.0**	**56.3**	**494,470**	**31.6**	**189,939**	**12.1**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,703	2.8	4,380	2.8	296	2.9	27	3.1
Moderate	40,919	24.2	37,683	23.9	2,996	28.9	240	27.4
Middle	63,925	37.8	59,463	37.7	4,168	40.2	294	33.5
Upper	58,252	34.5	55,135	35.0	2,810	27.1	307	35.0
Unknown	1,115	0.7	999	0.6	107	1.0	9	1.0
Total AA	**168,914**	**100.0**	**157,660**	**100.0**	**10,377**	**100.0**	**877**	**100.0**
Percentage of Total Businesses:				**93.3**		**6.1**		**0.5**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	51	3.5	43	3.1	7	8.6	1	33.3
Moderate	246	16.7	230	16.5	16	19.8	0	0.0
Middle	521	35.3	487	35.0	33	40.7	1	33.3
Upper	641	43.5	620	44.6	20	24.7	1	33.3
Unknown	16	1.1	11	0.8	5	6.2	0	0.0
Total AA	**1,475**	**100.0**	**1,391**	**100.0**	**81**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**94.3**		**5.5**		**0.2**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-67A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Inland Empire CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.6	0	0.0	1.8	0	0.0	2.3	0	0.0	1.6	2.2
Moderate	0	0.0	21.9	0	0.0	17.8	1	20.0	21.5	80	3.1	17.6	21.4
Middle	3	100.0	37.3	962	100.0	35.5	1	20.0	36.8	500	19.5	35.0	38.3
Upper	0	0.0	37.4	0	0.0	44.1	2	40.0	38.7	626	24.4	45.1	37.4
Unknown	0	0.0	0.7	0	0.0	0.7	1	20.0	0.7	1,360	53.0	0.7	0.6
Total	3	100.0	100.0	962	100.0	100.0	5	100.0	100.0	2,566	100.0	100.0	100.0
Refinance Loans													
Low	1	7.7	2.6	138	4.9	0.9	0	0.0	2.3	0	0.0	1.9	2.2
Moderate	0	0.0	20.7	0	0.0	16.0	2	11.1	20.6	750	12.1	17.6	21.4
Middle	3	23.1	37.9	601	21.3	25.5	7	38.9	37.3	1,302	21.0	35.0	38.3
Upper	9	69.2	38.1	2,086	73.8	57.2	9	50.0	39.1	4,150	66.9	44.6	37.4
Unknown	0	0.0	0.7	0	0.0	0.4	0	0.0	0.6	0	0.0	0.9	0.6
Total	13	100.0	100.0	2,825	100.0	100.0	18	100.0	100.0	6,202	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.9	0	0.0	0.9	0	0.0	1.1	0	0.0	1.0	2.2
Moderate	7	15.9	14.4	579	8.3	12.4	6	15.4	14.8	987	15.9	12.8	21.4
Middle	13	29.5	35.7	2,253	32.3	32.0	13	33.3	36.6	2,077	33.5	33.4	38.3
Upper	24	54.5	48.2	4,133	59.3	54.0	20	51.3	47.0	3,145	50.7	52.2	37.4
Unknown	0	0.0	0.7	0	0.0	0.7	0	0.0	0.5	0	0.0	0.5	0.6
Total	44	100.0	100.0	6,965	100.0	100.0	39	100.0	100.0	6,209	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	8.8	0	0.0	1.7	0	0.0	13.8	0	0.0	2.5	7.9
Moderate	0	0.0	49.1	0	0.0	25.6	0	0.0	46.3	0	0.0	31.4	37.2
Middle	0	0.0	26.4	0	0.0	22.4	0	0.0	30.0	0	0.0	33.7	38.7
Upper	0	0.0	14.5	0	0.0	47.7	0	0.0	10.0	0	0.0	32.3	15.1
Unknown	0	0.0	1.3	0	0.0	2.5	0	0.0	0.0	0	0.0	0.0	1.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	1.3	2.4	138	1.1	1.6	0	0.0	2.1	0	0.0	1.7	2.2
Moderate	11	14.1	20.4	1,037	7.9	17.4	11	12.5	20.2	1,988	9.5	17.8	21.4
Middle	27	34.6	37.0	4,883	37.3	32.0	30	34.1	36.9	6,038	29.0	34.8	38.3
Upper	39	50.0	39.4	7,044	53.8	48.4	46	52.3	40.1	11,442	54.9	45.0	37.4
Unknown	0	0.0	0.7	0	0.0	0.7	1	1.1	0.7	1,360	6.5	0.7	0.6
Total	78	100.0	100.0	13,102	100.0	100.0	88	100.0	100.0	20,828	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-67B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Inland Empire CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.9	0	0.0	0.6	0	0.0	1.2	0	0.0	0.8	2.2
Moderate	4	22.2	13.6	458	19.5	10.5	2	7.7	13.4	171	2.9	10.4	21.4
Middle	8	44.4	34.9	1,067	45.4	30.2	9	34.6	35.6	2,159	36.9	31.1	38.3
Upper	6	33.3	50.0	825	35.1	58.0	15	57.7	49.2	3,521	60.2	57.1	37.4
Unknown	0	0.0	0.6	0	0.0	0.8	0	0.0	0.6	0	0.0	0.6	0.6
Total	18	100.0	100.0	2,350	100.0	100.0	26	100.0	100.0	5,851	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.6	0	0.0	1.8	0	0.0	1.4	0	0.0	0.9	2.2
Moderate	0	0.0	16.1	0	0.0	13.0	0	0.0	16.2	0	0.0	12.9	21.4
Middle	0	0.0	34.2	0	0.0	27.0	0	0.0	37.3	0	0.0	31.4	38.3
Upper	0	0.0	47.3	0	0.0	56.4	0	0.0	44.7	0	0.0	53.9	37.4
Unknown	0	0.0	0.9	0	0.0	1.8	0	0.0	0.4	0	0.0	1.0	0.6
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	4.8	0	0.0	3.6	0	0.0	8.0	0	0.0	4.7	2.2
Moderate	0	0.0	25.5	0	0.0	18.1	0	0.0	19.5	0	0.0	19.1	21.4
Middle	0	0.0	33.3	0	0.0	25.5	0	0.0	42.0	0	0.0	41.8	38.3
Upper	0	0.0	34.9	0	0.0	50.1	0	0.0	28.7	0	0.0	33.0	37.4
Unknown	0	0.0	1.5	0	0.0	2.7	0	0.0	1.7	0	0.0	1.3	0.6
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-68

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Inland Empire CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	4	4.5	2.1	978	5.6	1.9	1	1.8	2.1	60	0.3	1.9	2.7
Moderate	22	25.0	20.8	3,626	20.9	23.9	13	22.8	20.3	2,840	16.3	23.6	24.8
Middle	30	34.1	37.3	6,436	37.0	39.5	26	45.6	36.5	8,266	47.3	39.1	38.3
Upper	31	35.2	38.9	5,942	34.2	33.7	16	28.1	40.2	5,910	33.8	34.5	33.6
Unknown	1	1.1	0.6	400	2.3	0.8	1	1.8	0.5	400	2.3	0.8	0.5
Total	88	100.0	100.0	17,382	100.0	100.0	57	100.0	100.0	17,476	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-69A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Inland Empire CA MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.6	0	0.0	1.0	0	0.0	1.9	0	0.0	1.5	21.8
Moderate	1	33.3	5.7	125	13.0	2.9	0	0.0	4.8	0	0.0	2.4	17.5
Middle	1	33.3	18.6	111	11.5	14.8	0	0.0	16.8	0	0.0	13.0	19.3
Upper	0	0.0	48.8	0	0.0	55.7	5	100.0	50.0	2,566	100.0	56.4	41.4
Unknown	1	33.3	25.3	726	75.5	25.5	0	0.0	26.5	0	0.0	26.7	0.0
Total	3	100.0	100.0	962	100.0	100.0	5	100.0	100.0	2,566	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	6.4	0	0.0	1.8	0	0.0	5.1	0	0.0	3.4	21.8
Moderate	1	7.7	12.5	275	9.7	3.8	0	0.0	10.2	0	0.0	6.0	17.5
Middle	2	15.4	21.8	314	11.1	7.9	3	16.7	18.7	737	11.9	13.8	19.3
Upper	10	76.9	40.0	2,236	79.2	18.9	15	83.3	40.2	5,465	88.1	42.1	41.4
Unknown	0	0.0	19.4	0	0.0	67.6	0	0.0	25.8	0	0.0	34.7	0.0
Total	13	100.0	100.0	2,825	100.0	100.0	18	100.0	100.0	6,202	100.0	100.0	100.0
Home Improvement Loans													
Low	1	2.3	3.4	37	0.5	2.4	1	2.6	2.8	51	0.8	1.9	21.8
Moderate	3	6.8	10.9	182	2.6	7.4	2	5.1	10.4	78	1.3	7.1	17.5
Middle	9	20.5	23.2	733	10.5	18.2	8	20.5	22.2	999	16.1	17.5	19.3
Upper	30	68.2	53.7	5,855	84.1	60.9	27	69.2	55.5	4,815	77.5	60.8	41.4
Unknown	1	2.3	8.8	158	2.3	11.1	1	2.6	9.0	266	4.3	12.7	0.0
Total	44	100.0	100.0	6,965	100.0	100.0	39	100.0	100.0	6,209	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	1.3	2.8	37	0.3	1.3	1	1.1	2.9	51	0.2	2.0	21.8
Moderate	7	9.0	7.8	779	5.9	3.3	2	2.3	7.1	78	0.4	3.4	17.5
Middle	17	21.8	19.7	1,617	12.3	12.8	14	15.9	18.2	1,879	9.0	13.3	19.3
Upper	50	64.1	47.2	9,723	74.2	44.9	70	79.5	48.2	18,554	89.1	53.5	41.4
Unknown	3	3.8	22.5	946	7.2	37.6	1	1.1	23.6	266	1.3	27.8	0.0
Total	78	100.0	100.0	13,102	100.0	100.0	88	100.0	100.0	20,828	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-69B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Inland Empire CA MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	3.7	0	0.0	4.1	0	0.0	2.7	0	0.0	2.9	21.8
Moderate	2	11.1	9.0	197	8.4	5.4	0	0.0	8.9	0	0.0	5.4	17.5
Middle	5	27.8	19.6	459	19.5	14.2	3	11.5	21.5	143	2.4	16.1	19.3
Upper	10	55.6	50.0	1,632	69.4	57.4	23	88.5	54.9	5,708	97.6	63.0	41.4
Unknown	1	5.6	17.7	62	2.6	18.8	0	0.0	12.0	0	0.0	12.5	0.0
Total	18	100.0	100.0	2,350	100.0	100.0	26	100.0	100.0	5,851	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.5	0	0.0	2.3	0	0.0	3.8	0	0.0	2.4	21.8
Moderate	0	0.0	12.5	0	0.0	6.9	0	0.0	12.3	0	0.0	6.8	17.5
Middle	0	0.0	24.2	0	0.0	13.6	0	0.0	24.3	0	0.0	14.9	19.3
Upper	0	0.0	46.0	0	0.0	43.5	0	0.0	50.1	0	0.0	59.9	41.4
Unknown	0	0.0	12.9	0	0.0	33.8	0	0.0	9.5	0	0.0	16.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.8
Moderate	0	0.0	0.3	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	17.5
Middle	0	0.0	0.1	0	0.0	0.2	0	0.0	1.1	0	0.0	1.4	19.3
Upper	0	0.0	0.5	0	0.0	0.7	0	0.0	8.6	0	0.0	21.2	41.4
Unknown	0	0.0	98.9	0	0.0	99.0	0	0.0	90.2	0	0.0	77.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-70

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Inland Empire CA MSA													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	39	44.3	55.3	4,088	23.5	32.4	12	21.1	55.6	1,885	10.8	34.0	93.3
Over $1 Million	43	48.9		12,946	74.5		42	73.7		13,820	79.1		6.2
Revenue Unknown	6	6.8		348	2.0		3	5.3		1,771	10.1		0.5
Total	88	100.0		17,382	100.0		57	100.0		17,476	100.0		100.0
By Loan Size													
$100,000 or Less	35	39.8	96.5	1,895	10.9	53.7	22	38.6	96.7	1,860	10.6	55.7	
$100,001 - $250,000	31	35.2	2.2	4,411	25.4	15.2	11	19.3	2.1	1,845	10.6	14.2	
$250,001 - $1 Million	22	25.0	1.3	11,076	63.7	31.0	24	42.1	1.3	13,771	78.8	30.1	
Total	88	100.0	100.0	17,382	100.0	100.0	57	100.0	100.0	17,476	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	17	43.6		867	21.2		7	58.3		550	29.2		
$100,001 - $250,000	21	53.8		2,821	69.0		2	16.7		285	15.1		
$250,001 - $1 Million	1	2.6		400	9.8		3	25.0		1,050	55.7		
Total	39	100.0		4,088	100.0		12	100.0		1,885	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

SALINAS MSA ASSESSMENT AREA

TABLE C-71

2024 Salinas CA MSA AA Demographics

Income Categories	Tract Distribution #	Tract Distribution %	Families by Tract Income #	Families by Tract Income %	Families < Poverty Level as % of Families by Tract #	Families < Poverty Level as % of Families by Tract %	Families by Family Income #	Families by Family Income %
Low	4	3.8	4,381	4.7	880	20.1	20,244	21.8
Moderate	26	25.0	24,191	26.0	3,520	14.6	16,285	17.5
Middle	34	32.7	34,272	36.9	2,669	7.8	19,082	20.5
Upper	36	34.6	30,100	32.4	1,127	3.7	37,337	40.2
Unknown	4	3.8	4	0.0	0	0.0	0	0.0
Total AA	**104**	**100.0**	**92,948**	**100.0**	**8,196**	**8.8**	**92,948**	**100.0**

	Housing Units by Tract	Housing Type by Tract: Owner-occupied #	Owner-occupied % by tract	Owner-occupied % by unit	Rental #	Rental % by unit	Vacant #	Vacant % by unit
Low	5,375	1,109	1.7	20.6	3,962	73.7	304	5.7
Moderate	33,035	12,410	18.7	37.6	18,714	56.6	1,911	5.8
Middle	48,998	22,718	34.2	46.4	23,138	47.2	3,142	6.4
Upper	54,498	30,105	45.4	55.2	15,843	29.1	8,550	15.7
Unknown	4	4	0.0	100.0	0	0.0	0	0.0
Total AA	**141,910**	**66,346**	**100.0**	**46.8**	**61,657**	**43.4**	**13,907**	**9.8**

	Total Businesses by Tract #	Total Businesses by Tract %	Businesses by Tract & Revenue Size: Less Than or = $1 Million #	Less Than or = $1 Million %	Over $1 Million #	Over $1 Million %	Revenue Not Reported #	Revenue Not Reported %
Low	411	2.6	394	2.7	15	1.4	2	2.2
Moderate	2,906	18.1	2,692	18.1	198	18.6	16	17.2
Middle	4,993	31.2	4,581	30.8	376	35.2	36	38.7
Upper	7,645	47.7	7,145	48.1	462	43.3	38	40.9
Unknown	68	0.4	51	0.3	16	1.5	1	1.1
Total AA	**16,023**	**100.0**	**14,863**	**100.0**	**1,067**	**100.0**	**93**	**100.0**
Percentage of Total Businesses:				**92.8**		**6.7**		**0.6**

	Total Farms by Tract #	Total Farms by Tract %	Farms by Tract & Revenue Size: Less Than or = $1 Million #	Less Than or = $1 Million %	Over $1 Million #	Over $1 Million %	Revenue Not Reported #	Revenue Not Reported %
Low	15	2.7	8	1.8	7	6.2	0	0.0
Moderate	116	21.2	83	19.1	33	29.2	0	0.0
Middle	254	46.4	201	46.3	53	46.9	0	0.0
Upper	159	29.1	141	32.5	18	15.9	0	0.0
Unknown	3	0.5	1	0.2	2	1.8	0	0.0
Total AA	**547**	**100.0**	**434**	**100.0**	**113**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**79.3**		**20.7**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-72

2023 Salinas CA MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	3.8	4,381	4.7	880	20.1	20,244	21.8
Moderate	26	25.0	24,191	26.0	3,520	14.6	16,285	17.5
Middle	34	32.7	34,272	36.9	2,669	7.8	19,082	20.5
Upper	36	34.6	30,100	32.4	1,127	3.7	37,337	40.2
Unknown	4	3.8	4	0.0	0	0.0	0	0.0
Total AA	**104**	**100.0**	**92,948**	**100.0**	**8,196**	**8.8**	**92,948**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,375	1,109	1.7	20.6	3,962	73.7	304	5.7
Moderate	33,035	12,410	18.7	37.6	18,714	56.6	1,911	5.8
Middle	48,998	22,718	34.2	46.4	23,138	47.2	3,142	6.4
Upper	54,498	30,105	45.4	55.2	15,843	29.1	8,550	15.7
Unknown	4	4	0.0	100.0	0	0.0	0	0.0
Total AA	**141,910**	**66,346**	**100.0**	**46.8**	**61,657**	**43.4**	**13,907**	**9.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	407	2.5	392	2.6	14	1.3	1	1.0
Moderate	2,941	17.7	2,725	17.7	200	18.0	16	16.3
Middle	5,158	31.1	4,730	30.8	391	35.1	37	37.8
Upper	7,996	48.2	7,463	48.6	491	44.1	42	42.9
Unknown	72	0.4	53	0.3	17	1.5	2	2.0
Total AA	**16,574**	**100.0**	**15,363**	**100.0**	**1,113**	**100.0**	**98**	**100.0**
Percentage of Total Businesses:				**92.7**		**6.7**		**0.6**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	14	2.4	8	1.8	6	4.8	0	0.0
Moderate	120	20.8	83	18.4	37	29.8	0	0.0
Middle	267	46.4	209	46.2	58	46.8	0	0.0
Upper	171	29.7	151	33.4	20	16.1	0	0.0
Unknown	4	0.7	1	0.2	3	2.4	0	0.0
Total AA	**576**	**100.0**	**452**	**100.0**	**124**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**78.5**		**21.5**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-73A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Salinas CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.4	0	0.0	0.9	0	0.0	1.2	0	0.0	1.0	1.7
Moderate	0	0.0	28.3	0	0.0	21.6	0	0.0	26.1	0	0.0	20.9	18.7
Middle	0	0.0	28.7	0	0.0	22.9	0	0.0	32.5	0	0.0	29.1	34.2
Upper	1	100.0	41.4	226	100.0	54.5	0	0.0	40.2	0	0.0	49.0	45.4
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	226	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.9	0	0.0	0.9	0	0.0	1.8	0	0.0	1.1	1.7
Moderate	1	20.0	16.3	484	40.9	3.9	2	15.4	19.5	493	18.0	15.3	18.7
Middle	2	40.0	29.1	227	19.2	20.4	4	30.8	34.3	829	30.3	26.4	34.2
Upper	2	40.0	50.7	473	39.9	74.8	7	53.8	44.2	1,417	51.7	57.1	45.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.0
Total	5	100.0	100.0	1,184	100.0	100.0	13	100.0	100.0	2,739	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.8	0	0.0	0.4	0	0.0	2.1	0	0.0	1.3	1.7
Moderate	1	9.1	14.2	36	1.4	13.6	2	12.5	14.0	342	13.1	7.3	18.7
Middle	5	45.5	36.5	1,339	50.9	26.4	5	31.3	33.9	427	16.3	25.7	34.2
Upper	5	45.5	48.4	1,255	47.7	59.6	9	56.3	50.1	1,848	70.6	65.7	45.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	11	100.0	100.0	2,630	100.0	100.0	16	100.0	100.0	2,617	100.0	100.0	100.0
Multifamily Loans													Multi- family Units %
Low	0	0.0	7.7	0	0.0	3.7	0	0.0	3.8	0	0.0	1.2	7.3
Moderate	0	0.0	30.8	0	0.0	59.3	0	0.0	30.8	0	0.0	31.7	31.3
Middle	0	0.0	38.5	0	0.0	25.8	0	0.0	38.5	0	0.0	37.2	32.5
Upper	0	0.0	23.1	0	0.0	11.2	0	0.0	26.9	0	0.0	29.9	28.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	1.9	0	0.0	0.9	0	0.0	1.4	0	0.0	1.0	1.7
Moderate	5	20.0	22.6	876	15.9	14.1	6	16.7	22.5	1,340	18.8	19.5	18.7
Middle	9	36.0	29.1	1,798	32.6	20.6	11	30.6	33.4	2,006	28.2	28.1	34.2
Upper	11	44.0	46.3	2,833	51.4	64.3	19	52.8	42.7	3,775	53.0	51.4	45.4
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.0
Total	25	100.0	100.0	5,507	100.0	100.0	36	100.0	100.0	7,121	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-73B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Salinas CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.7
Moderate	3	42.9	14.3	356	33.4	4.4	2	28.6	17.3	505	28.6	9.0	18.7
Middle	2	28.6	28.6	232	21.7	12.4	2	28.6	38.2	750	42.5	28.2	34.2
Upper	2	28.6	56.7	479	44.9	83.2	3	42.9	44.5	510	28.9	62.8	45.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	1,067	100.0	100.0	7	100.0	100.0	1,765	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.3	0	0.0	0.3	0	0.0	0.0	0	0.0	0.0	1.7
Moderate	0	0.0	13.1	0	0.0	5.9	0	0.0	22.6	0	0.0	23.3	18.7
Middle	0	0.0	30.9	0	0.0	9.3	0	0.0	27.4	0	0.0	8.3	34.2
Upper	1	100.0	53.7	400	100.0	84.5	0	0.0	50.0	0	0.0	68.4	45.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	400	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.7
Moderate	0	0.0	10.9	0	0.0	10.8	0	0.0	21.4	0	0.0	6.1	18.7
Middle	0	0.0	7.9	0	0.0	2.3	0	0.0	50.0	0	0.0	33.6	34.2
Upper	0	0.0	81.2	0	0.0	86.9	0	0.0	28.6	0	0.0	60.3	45.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-74

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Salinas CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	2.2	0	0.0	2.6	0	0.0	2.0	0	0.0	1.4	2.6
Moderate	2	16.7	18.8	170	14.0	18.3	6	27.3	19.0	1,645	35.1	20.2	18.1
Middle	2	16.7	34.4	170	14.0	37.1	6	27.3	32.3	850	18.2	32.1	31.2
Upper	8	66.7	42.8	870	71.9	40.1	10	45.5	44.7	2,185	46.7	45.0	47.7
Unknown	0	0.0	0.3	0	0.0	1.2	0	0.0	0.2	0	0.0	0.8	0.4
Total	12	100.0	100.0	1,210	100.0	100.0	22	100.0	100.0	4,680	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-75A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Salinas CA MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.8	0	0.0	0.4	0	0.0	0.4	0	0.0	0.3	21.8
Moderate	0	0.0	2.3	0	0.0	0.8	0	0.0	3.2	0	0.0	1.3	17.5
Middle	0	0.0	12.7	0	0.0	7.1	0	0.0	13.1	0	0.0	7.6	20.5
Upper	1	100.0	57.7	226	100.0	61.6	0	0.0	60.9	0	0.0	67.8	40.2
Unknown	0	0.0	26.5	0	0.0	30.1	0	0.0	22.4	0	0.0	23.0	0.0
Total	1	100.0	100.0	226	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	5.4	0	0.0	1.1	0	0.0	5.5	0	0.0	3.2	21.8
Moderate	1	20.0	9.0	77	6.5	1.6	2	15.4	8.8	287	10.5	5.0	17.5
Middle	1	20.0	15.6	100	8.4	3.2	5	38.5	15.7	917	33.5	8.7	20.5
Upper	3	60.0	42.8	1,007	85.1	14.5	6	46.2	49.2	1,535	56.0	57.1	40.2
Unknown	0	0.0	27.2	0	0.0	79.6	0	0.0	20.8	0	0.0	26.1	0.0
Total	5	100.0	100.0	1,184	100.0	100.0	13	100.0	100.0	2,739	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.1	0	0.0	2.5	0	0.0	3.9	0	0.0	2.9	21.8
Moderate	0	0.0	9.3	0	0.0	4.9	0	0.0	9.6	0	0.0	4.8	17.5
Middle	3	27.3	19.7	125	4.8	12.1	6	37.5	20.9	781	29.8	13.9	20.5
Upper	8	72.7	58.0	2,505	95.2	61.2	9	56.3	58.1	1,786	68.2	62.0	40.2
Unknown	0	0.0	9.8	0	0.0	19.3	1	6.3	7.5	50	1.9	16.4	0.0
Total	11	100.0	100.0	2,630	100.0	100.0	16	100.0	100.0	2,617	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	2.3	0	0.0	0.8	0	0.0	2.3	0	0.0	1.2	21.8
Moderate	1	4.0	4.9	77	1.4	1.2	3	8.3	6.0	413	5.8	2.4	17.5
Middle	8	32.0	14.0	760	13.8	5.3	12	33.3	15.1	1,832	25.7	8.0	20.5
Upper	16	64.0	52.3	4,670	84.8	41.2	20	55.6	57.0	4,826	67.8	65.2	40.2
Unknown	0	0.0	26.6	0	0.0	51.6	1	2.8	19.6	50	0.7	23.2	0.0
Total	25	100.0	100.0	5,507	100.0	100.0	36	100.0	100.0	7,121	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-75B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Salinas CA MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	2.0	0	0.0	2.3	0	0.0	2.8	0	0.0	4.3	21.8
Moderate	0	0.0	6.4	0	0.0	1.4	1	14.3	10.6	126	7.1	6.2	17.5
Middle	4	57.1	16.3	535	50.1	5.4	1	14.3	20.5	134	7.6	10.9	20.5
Upper	3	42.9	55.2	532	49.9	56.6	5	71.4	57.1	1,505	85.3	67.2	40.2
Unknown	0	0.0	20.2	0	0.0	34.3	0	0.0	9.1	0	0.0	11.3	0.0
Total	7	100.0	100.0	1,067	100.0	100.0	7	100.0	100.0	1,765	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	5.7	0	0.0	1.2	0	0.0	1.8	0	0.0	0.4	21.8
Moderate	0	0.0	9.7	0	0.0	1.2	0	0.0	7.7	0	0.0	1.3	17.5
Middle	0	0.0	15.4	0	0.0	2.0	0	0.0	19.0	0	0.0	4.5	20.5
Upper	1	100.0	42.3	400	100.0	30.3	0	0.0	60.7	0	0.0	78.2	40.2
Unknown	0	0.0	26.9	0	0.0	65.2	0	0.0	10.7	0	0.0	15.6	0.0
Total	1	100.0	100.0	400	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.8
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.5
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.5
Upper	0	0.0	1.0	0	0.0	0.0	0	0.0	14.3	0	0.0	55.5	40.2
Unknown	0	0.0	99.0	0	0.0	100.0	0	0.0	85.7	0	0.0	44.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-76

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Salinas CA MSA													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	4	33.3	54.0	370	30.6	32.1	11	50.0	55.8	2,300	49.1	37.3	92.8
Over $1 Million	3	25.0		180	14.9		10	45.5		2,230	47.6		6.7
Revenue Unknown	5	41.7		660	54.5		1	4.5		150	3.2		0.6
Total	12	100.0		1,210	100.0		22	100.0		4,680	100.0		100.0
By Loan Size													
$100,000 or Less	9	75.0	96.7	510	42.1	55.4	14	63.6	96.5	1,135	24.3	55.5	
$100,001 - $250,000	2	16.7	1.9	400	33.1	12.6	4	18.2	2.1	745	15.9	13.4	
$250,001 - $1 Million	1	8.3	1.4	300	24.8	32.0	4	18.2	1.4	2,800	59.8	31.1	
Total	12	100.0	100.0	1,210	100.0	100.0	22	100.0	100.0	4,680	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	3	75.0		120	32.4		7	63.6		555	24.1		
$100,001 - $250,000	1	25.0		250	67.6		2	18.2		445	19.3		
$250,001 - $1 Million	0	0.0		0	0.0		2	18.2		1,300	56.5		
Total	4	100.0		370	100.0		11	100.0		2,300	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

San Diego MSA Assessment Area

Table C-77

2024 San Diego CA MSA AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%
Low	46	6.2	43,837	5.8	10,530	24.0	172,988	22.8
Moderate	167	22.7	173,346	22.8	20,063	11.6	131,098	17.3
Middle	262	35.5	260,157	34.3	15,032	5.8	142,293	18.7
Upper	248	33.6	279,925	36.9	9,275	3.3	313,039	41.2
Unknown	14	1.9	2,153	0.3	144	6.7	0	0.0
Total AA	**737**	**100.0**	**759,418**	**100.0**	**55,044**	**7.2**	**759,418**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	69,718	14,897	2.4	21.4	51,057	73.2	3,764	5.4
Moderate	279,122	96,116	15.8	34.4	164,465	58.9	18,541	6.6
Middle	437,896	226,716	37.2	51.8	180,673	41.3	30,507	7.0
Upper	423,636	270,251	44.4	63.8	121,644	28.7	31,741	7.5
Unknown	5,156	1,370	0.2	26.6	3,514	68.2	272	5.3
Total AA	**1,215,528**	**609,350**	**100.0**	**50.1**	**521,353**	**42.9**	**84,825**	**7.0**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6,652	4.2	6,179	4.2	445	4.3	28	3.5
Moderate	29,189	18.5	27,259	18.6	1,826	17.8	104	13.0
Middle	55,098	35.0	51,231	35.0	3,596	35.0	271	34.0
Upper	65,524	41.6	60,847	41.5	4,288	41.8	389	48.8
Unknown	1,152	0.7	1,039	0.7	108	1.1	5	0.6
Total AA	**157,615**	**100.0**	**146,555**	**100.0**	**10,263**	**100.0**	**797**	**100.0**
Percentage of Total Businesses:				**93.0**		**6.5**		**0.5**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	21	1.6	20	1.6	1	1.8	0	0.0
Moderate	131	10.3	127	10.4	4	7.3	0	0.0
Middle	555	43.6	536	44.0	18	32.7	1	100.0
Upper	564	44.3	532	43.7	32	58.2	0	0.0
Unknown	2	0.2	2	0.2	0	0.0	0	0.0
Total AA	**1,273**	**100.0**	**1,217**	**100.0**	**55**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**95.6**		**4.3**		**0.1**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-78

2023 San Diego CA MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	46	6.2	43,837	5.8	10,530	24.0	172,988	22.8
Moderate	167	22.7	173,346	22.8	20,063	11.6	131,098	17.3
Middle	262	35.5	260,157	34.3	15,032	5.8	142,293	18.7
Upper	248	33.6	279,925	36.9	9,275	3.3	313,039	41.2
Unknown	14	1.9	2,153	0.3	144	6.7	0	0.0
Total AA	**737**	**100.0**	**759,418**	**100.0**	**55,044**	**7.2**	**759,418**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	69,718	14,897	2.4	21.4	51,057	73.2	3,764	5.4
Moderate	279,122	96,116	15.8	34.4	164,465	58.9	18,541	6.6
Middle	437,896	226,716	37.2	51.8	180,673	41.3	30,507	7.0
Upper	423,636	270,251	44.4	63.8	121,644	28.7	31,741	7.5
Unknown	5,156	1,370	0.2	26.6	3,514	68.2	272	5.3
Total AA	**1,215,528**	**609,350**	**100.0**	**50.1**	**521,353**	**42.9**	**84,825**	**7.0**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6,933	4.0	6,430	4.0	472	4.1	31	3.4
Moderate	30,515	17.5	28,537	17.6	1,869	16.3	109	11.9
Middle	60,606	34.7	56,389	34.7	3,915	34.2	302	32.9
Upper	75,277	43.1	69,736	43.0	5,073	44.3	468	50.9
Unknown	1,356	0.8	1,218	0.8	129	1.1	9	1.0
Total AA	**174,687**	**100.0**	**162,310**	**100.0**	**11,458**	**100.0**	**919**	**100.0**
Percentage of Total Businesses:				**92.9**		**6.6**		**0.5**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	23	1.6	22	1.6	1	1.7	0	0.0
Moderate	147	10.5	143	10.7	4	6.8	0	0.0
Middle	598	42.9	578	43.3	19	32.2	1	100.0
Upper	625	44.8	590	44.2	35	59.3	0	0.0
Unknown	2	0.1	2	0.1	0	0.0	0	0.0
Total AA	**1,395**	**100.0**	**1,335**	**100.0**	**59**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**95.7**		**4.2**		**0.1**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-79A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: San Diego CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.9	0	0.0	1.9	0	0.0	2.6	0	0.0	1.8	2.4
Moderate	2	28.6	17.0	198	5.3	12.7	5	35.7	18.4	2,553	21.7	14.2	15.8
Middle	3	42.9	38.2	602	16.0	34.3	3	21.4	38.4	925	7.8	34.9	37.2
Upper	2	28.6	41.8	2,953	78.7	51.0	6	42.9	40.5	8,310	70.5	48.9	44.4
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0.2
Total	7	100.0	100.0	3,753	100.0	100.0	14	100.0	100.0	11,788	100.0	100.0	100.0
Refinance Loans													
Low	1	1.5	3.3	250	1.1	1.2	0	0.0	2.5	0	0.0	1.9	2.4
Moderate	2	2.9	17.9	616	2.6	20.6	3	7.5	17.0	893	5.2	14.1	15.8
Middle	19	27.9	35.6	5,260	22.5	28.2	12	30.0	39.0	4,503	26.5	34.4	37.2
Upper	46	67.6	42.8	17,229	73.8	49.9	25	62.5	41.3	11,614	68.3	49.3	44.4
Unknown	0	0.0	0.4	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0.2
Total	68	100.0	100.0	23,355	100.0	100.0	40	100.0	100.0	17,010	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.0	0	0.0	1.5	1	1.8	1.7	300	2.3	1.4	2.4
Moderate	9	7.5	14.5	1,084	4.5	10.7	6	10.7	14.8	717	5.6	11.3	15.8
Middle	42	35.0	36.6	5,911	24.5	30.1	17	30.4	40.1	4,340	33.7	36.4	37.2
Upper	69	57.5	46.7	17,098	71.0	57.4	32	57.1	43.0	7,539	58.5	50.6	44.4
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	0.2
Total	120	100.0	100.0	24,093	100.0	100.0	56	100.0	100.0	12,896	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	14.3	0	0.0	3.9	0	0.0	12.5	0	0.0	2.5	10.1
Moderate	0	0.0	39.5	0	0.0	33.3	0	0.0	38.0	0	0.0	9.2	29.1
Middle	1	100.0	26.4	1,144	100.0	24.9	0	0.0	32.8	0	0.0	16.4	35.0
Upper	0	0.0	17.6	0	0.0	37.4	0	0.0	16.0	0	0.0	71.8	25.0
Unknown	0	0.0	2.1	0	0.0	0.4	0	0.0	0.7	0	0.0	0.0	0.9
Total	1	100.0	100.0	1,144	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	0.4	2.9	250	0.4	1.8	1	0.8	2.4	300	0.6	1.9	2.4
Moderate	15	6.7	16.7	2,074	3.2	15.8	15	11.4	17.2	4,243	8.9	13.3	15.8
Middle	74	33.2	36.9	14,254	22.1	31.2	39	29.5	38.8	11,369	23.8	32.3	37.2
Upper	133	59.6	43.2	48,010	74.3	51.0	77	58.3	41.2	31,945	66.8	52.3	44.4
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0.2
Total	223	100.0	100.0	64,588	100.0	100.0	132	100.0	100.0	47,857	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-79B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: San Diego CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	2.4	0	0.0	1.1	0	0.0	1.5	0	0.0	0.8	2.4
Moderate	2	7.7	13.0	176	2.9	8.1	0	0.0	13.3	0	0.0	9.6	15.8
Middle	9	34.6	36.6	1,337	21.8	27.7	7	35.0	38.8	1,601	26.9	31.3	37.2
Upper	15	57.7	47.8	4,630	75.4	62.9	13	65.0	45.8	4,356	73.1	57.8	44.4
Unknown	0	0.0	0.3	0	0.0	0.3	0	0.0	0.5	0	0.0	0.6	0.2
Total	26	100.0	100.0	6,143	100.0	100.0	20	100.0	100.0	5,957	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.6	0	0.0	0.6	0	0.0	1.8	0	0.0	1.1	2.4
Moderate	0	0.0	14.6	0	0.0	5.8	1	50.0	14.4	80	38.8	8.7	15.8
Middle	0	0.0	36.8	0	0.0	17.1	0	0.0	40.8	0	0.0	28.0	37.2
Upper	1	100.0	46.7	6,100	100.0	76.4	1	50.0	42.9	126	61.2	62.1	44.4
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0.2
Total	1	100.0	100.0	6,100	100.0	100.0	2	100.0	100.0	206	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.7	0	0.0	1.0	0	0.0	6.6	0	0.0	6.3	2.4
Moderate	0	0.0	19.9	0	0.0	8.2	0	0.0	20.9	0	0.0	15.4	15.8
Middle	0	0.0	20.6	0	0.0	10.5	0	0.0	41.8	0	0.0	33.9	37.2
Upper	0	0.0	55.3	0	0.0	80.1	0	0.0	30.8	0	0.0	44.4	44.4
Unknown	0	0.0	0.5	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	0.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-80

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: San Diego CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	8	5.2	3.4	2,435	6.5	3.2	8	6.7	3.2	956	2.6	3.4	4.2
Moderate	29	19.0	16.1	8,389	22.5	15.5	21	17.5	15.9	8,682	24.0	15.8	18.5
Middle	62	40.5	33.8	14,641	39.2	34.7	44	36.7	33.8	12,730	35.2	33.5	35.0
Upper	52	34.0	45.6	11,740	31.5	45.5	46	38.3	46.0	13,719	37.9	46.2	41.6
Unknown	2	1.3	0.6	100	0.3	1.0	1	0.8	0.7	90	0.2	1.0	0.7
Total	153	100.0	100.0	37,305	100.0	100.0	120	100.0	100.0	36,177	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-81A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: San Diego CA MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.9	0	0.0	0.4	0	0.0	1.2	0	0.0	0.8	22.8
Moderate	1	14.3	4.9	98	2.6	2.1	1	7.1	4.5	60	0.5	1.8	17.3
Middle	3	42.9	15.8	283	7.5	10.6	1	7.1	15.0	539	4.6	9.7	18.7
Upper	3	42.9	54.5	3,372	89.8	61.1	12	85.7	59.5	11,189	94.9	67.9	41.2
Unknown	0	0.0	23.9	0	0.0	25.8	0	0.0	19.8	0	0.0	19.8	0.0
Total	7	100.0	100.0	3,753	100.0	100.0	14	100.0	100.0	11,788	100.0	100.0	100.0
Refinance Loans													
Low	1	1.5	6.7	90	0.4	2.5	0	0.0	5.1	0	0.0	3.4	22.8
Moderate	4	5.9	9.4	879	3.8	2.7	1	2.5	7.7	243	1.4	3.5	17.3
Middle	7	10.3	16.9	1,255	5.4	6.1	3	7.5	15.6	805	4.7	9.1	18.7
Upper	56	82.4	38.1	21,131	90.5	20.9	34	85.0	48.5	14,791	87.0	52.7	41.2
Unknown	0	0.0	28.9	0	0.0	67.7	2	5.0	23.2	1,171	6.9	31.4	0.0
Total	68	100.0	100.0	23,355	100.0	100.0	40	100.0	100.0	17,010	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.0	0	0.0	1.7	0	0.0	3.6	0	0.0	2.6	22.8
Moderate	6	5.0	10.1	528	2.2	5.5	3	5.4	10.2	334	2.6	5.7	17.3
Middle	25	20.8	22.0	3,575	14.8	15.1	9	16.1	22.0	1,501	11.6	15.0	18.7
Upper	89	74.2	53.9	19,990	83.0	63.0	44	78.6	57.6	11,061	85.8	65.3	41.2
Unknown	0	0.0	11.0	0	0.0	14.6	0	0.0	6.6	0	0.0	11.4	0.0
Total	120	100.0	100.0	24,093	100.0	100.0	56	100.0	100.0	12,896	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	0.9	2.6	146	0.2	1.1	2	1.5	2.9	251	0.5	1.6	22.8
Moderate	13	5.9	6.9	1,726	2.7	2.5	5	3.8	6.6	637	1.3	2.5	17.3
Middle	38	17.1	17.2	5,508	8.7	9.4	17	12.9	16.6	3,394	7.1	9.8	18.7
Upper	169	76.1	49.6	56,064	88.4	49.1	106	80.3	55.4	42,404	88.6	63.6	41.2
Unknown	0	0.0	23.7	0	0.0	38.0	2	1.5	18.5	1,171	2.4	22.5	0.0
Total	222	100.0	100.0	63,444	100.0	100.0	132	100.0	100.0	47,857	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-81B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level
Assessment Area: San Diego CA MSA

Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	3.8	3.4	56	0.9	3.7	1	5.0	4.1	125	2.1	4.8	22.8
Moderate	2	7.7	7.3	221	3.6	3.1	0	0.0	9.4	0	0.0	5.2	17.3
Middle	3	11.5	19.4	395	6.4	11.1	3	15.0	20.1	469	7.9	12.3	18.7
Upper	20	76.9	49.6	5,471	89.1	56.0	16	80.0	53.5	5,363	90.0	64.5	41.2
Unknown	0	0.0	20.3	0	0.0	26.2	0	0.0	12.8	0	0.0	13.3	0.0
Total	26	100.0	100.0	6,143	100.0	100.0	20	100.0	100.0	5,957	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.9	0	0.0	1.2	1	50.0	3.7	126	61.2	2.1	22.8
Moderate	0	0.0	11.9	0	0.0	3.6	0	0.0	11.0	0	0.0	4.5	17.3
Middle	0	0.0	24.2	0	0.0	6.8	1	50.0	23.8	80	38.8	10.9	18.7
Upper	1	100.0	45.9	6,100	100.0	49.0	0	0.0	50.4	0	0.0	64.1	41.2
Unknown	0	0.0	14.1	0	0.0	39.5	0	0.0	11.0	0	0.0	18.3	0.0
Total	1	100.0	100.0	6,100	100.0	100.0	2	100.0	100.0	206	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	1.1	0	0.0	0.3	22.8
Moderate	0	0.0	0.3	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	17.3
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	1.1	0	0.0	1.9	18.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	16.5	0	0.0	31.8	41.2
Unknown	0	0.0	99.7	0	0.0	99.9	0	0.0	81.3	0	0.0	66.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-82

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: San Diego CA MSA													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	71	46.4	54.7	8,931	23.9	31.6	46	38.3	54.7	11,950	33.0	33.6	93.0
Over $1 Million	71	46.4		26,358	70.7		72	60.0		23,892	66.0		6.5
Revenue Unknown	11	7.2		2,016	5.4		2	1.7		335	0.9		0.5
Total	153	100.0		37,305	100.0		120	100.0		36,177	100.0		100.0
By Loan Size													
$100,000 or Less	75	49.0	96.3	4,681	12.5	52.2	53	44.2	96.4	4,266	11.8	54.8	
$100,001 - $250,000	35	22.9	2.2	6,862	18.4	14.6	26	21.7	2.2	5,300	14.7	14.7	
$250,001 - $1 Million	43	28.1	1.5	25,762	69.1	33.3	41	34.2	1.4	26,611	73.6	30.4	
Total	153	100.0	100.0	37,305	100.0	100.0	120	100.0	100.0	36,177	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	47	66.2		2,606	29.2		22	47.8		1,569	13.1		
$100,001 - $250,000	17	23.9		3,175	35.6		12	26.1		2,600	21.8		
$250,001 - $1 Million	7	9.9		3,150	35.3		12	26.1		7,781	65.1		
Total	71	100.0		8,931	100.0		46	100.0		11,950	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

SAN JOSE METROPOLITAN ASSESSMENT AREA

TABLE C-83

2024 San Jose CA Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	29	7.1	23,164	5.1	2,811	12.1	104,187	22.9
Moderate	89	21.8	86,385	19.0	6,015	7.0	73,264	16.1
Middle	165	40.4	192,933	42.5	6,893	3.6	84,970	18.7
Upper	124	30.4	151,198	33.3	3,914	2.6	191,728	42.2
Unknown	1	0.2	469	0.1	35	7.5	0	0.0
Total AA	**408**	**100.0**	**454,149**	**100.0**	**19,668**	**4.3**	**454,149**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	36,159	10,896	3.0	30.1	23,941	66.2	1,322	3.7
Moderate	126,678	56,817	15.9	44.9	64,237	50.7	5,624	4.4
Middle	290,650	149,262	41.7	51.4	126,184	43.4	15,204	5.2
Upper	214,379	140,898	39.3	65.7	62,130	29.0	11,351	5.3
Unknown	1,030	355	0.1	34.5	594	57.7	81	7.9
Total AA	**668,896**	**358,228**	**100.0**	**53.6**	**277,086**	**41.4**	**33,582**	**5.0**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,224	4.9	3,862	4.9	347	5.0	15	3.8
Moderate	16,140	18.6	14,238	17.9	1,856	26.9	46	11.8
Middle	33,795	38.9	31,212	39.3	2,424	35.2	159	40.7
Upper	32,520	37.5	30,097	37.9	2,253	32.7	170	43.5
Unknown	95	0.1	84	0.1	10	0.1	1	0.3
Total AA	**86,774**	**100.0**	**79,493**	**100.0**	**6,890**	**100.0**	**391**	**100.0**
Percentage of Total Businesses:				**91.6**		**7.9**		**0.5**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	13	2.8	10	2.2	3	13.0	0	0.0
Moderate	87	18.6	79	17.8	8	34.8	0	0.0
Middle	204	43.6	197	44.3	7	30.4	0	0.0
Upper	164	35.0	159	35.7	5	21.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**468**	**100.0**	**445**	**100.0**	**23**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**95.1**		**4.9**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-84

2023 San Jose CA Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	29	7.1	23,164	5.1	2,811	12.1	104,187	22.9
Moderate	89	21.8	86,385	19.0	6,015	7.0	73,264	16.1
Middle	165	40.4	192,933	42.5	6,893	3.6	84,970	18.7
Upper	124	30.4	151,198	33.3	3,914	2.6	191,728	42.2
Unknown	1	0.2	469	0.1	35	7.5	0	0.0
Total AA	**408**	**100.0**	**454,149**	**100.0**	**19,668**	**4.3**	**454,149**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	36,159	10,896	3.0	30.1	23,941	66.2	1,322	3.7
Moderate	126,678	56,817	15.9	44.9	64,237	50.7	5,624	4.4
Middle	290,650	149,262	41.7	51.4	126,184	43.4	15,204	5.2
Upper	214,379	140,898	39.3	65.7	62,130	29.0	11,351	5.3
Unknown	1,030	355	0.1	34.5	594	57.7	81	7.9
Total AA	**668,896**	**358,228**	**100.0**	**53.6**	**277,086**	**41.4**	**33,582**	**5.0**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,563	4.9	4,151	4.9	394	5.4	18	4.1
Moderate	17,021	18.3	15,069	17.7	1,894	25.8	58	13.2
Middle	36,253	38.9	33,432	39.2	2,646	36.0	175	39.8
Upper	35,108	37.7	32,516	38.1	2,404	32.7	188	42.7
Unknown	150	0.2	136	0.2	13	0.2	1	0.2
Total AA	**93,095**	**100.0**	**85,304**	**100.0**	**7,351**	**100.0**	**440**	**100.0**
Percentage of Total Businesses:				**91.6**		**7.9**		**0.5**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	16	3.1	12	2.5	4	16.0	0	0.0
Moderate	97	18.9	88	18.1	9	36.0	0	0.0
Middle	226	44.1	220	45.2	6	24.0	0	0.0
Upper	173	33.8	167	34.3	6	24.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**512**	**100.0**	**487**	**100.0**	**25**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**95.1**		**4.9**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-85A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: San Jose CA Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	3.4	0	0.0	1.8	0	0.0	3.4	0	0.0	1.8	3.0
Moderate	0	0.0	15.8	0	0.0	10.8	0	0.0	16.8	0	0.0	11.3	15.9
Middle	2	40.0	44.0	567	8.9	36.8	0	0.0	45.2	0	0.0	39.2	41.7
Upper	3	60.0	36.7	5,813	91.1	50.6	2	100.0	34.5	5,234	100.0	47.7	39.3
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0.1
Total	5	100.0	100.0	6,380	100.0	100.0	2	100.0	100.0	5,234	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.8	0	0.0	1.1	1	2.0	2.7	39	0.2	1.7	3.0
Moderate	1	4.0	13.6	111	1.3	18.0	4	8.2	17.1	1,791	7.0	12.1	15.9
Middle	15	60.0	34.5	5,247	60.5	26.6	22	44.9	43.9	8,419	33.0	38.7	41.7
Upper	9	36.0	49.1	3,321	38.3	54.3	22	44.9	36.1	15,259	59.8	47.4	39.3
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.1
Total	25	100.0	100.0	8,679	100.0	100.0	49	100.0	100.0	25,508	100.0	100.0	100.0
Home Improvement Loans													
Low	1	1.9	1.9	31	0.2	1.5	2	5.1	1.9	628	5.9	1.5	3.0
Moderate	5	9.3	15.0	1,091	7.0	9.1	2	5.1	15.2	260	2.5	11.2	15.9
Middle	32	59.3	41.3	8,680	56.0	34.9	17	43.6	45.9	3,944	37.3	40.6	41.7
Upper	16	29.6	41.7	5,705	36.8	54.5	18	46.2	37.0	5,731	54.3	46.7	39.3
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Total	54	100.0	100.0	15,507	100.0	100.0	39	100.0	100.0	10,563	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	10.3	0	0.0	4.2	0	0.0	12.9	0	0.0	2.3	8.7
Moderate	0	0.0	19.6	0	0.0	14.6	0	0.0	22.6	0	0.0	16.1	20.9
Middle	0	0.0	43.0	0	0.0	37.9	0	0.0	41.9	0	0.0	49.2	48.1
Upper	0	0.0	26.2	0	0.0	43.2	0	0.0	22.6	0	0.0	32.4	22.0
Unknown	0	0.0	0.9	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.3
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	0.9	3.0	31	0.1	1.8	3	2.6	3.1	667	1.3	1.8	3.0
Moderate	10	9.3	14.9	1,866	4.9	12.3	8	6.9	16.9	2,342	4.7	11.9	15.9
Middle	59	54.6	39.7	16,956	44.8	33.3	49	42.2	44.9	15,526	30.8	39.8	41.7
Upper	38	35.2	42.2	18,959	50.1	52.5	56	48.3	35.0	31,828	63.2	46.5	39.3
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.1
Total	108	100.0	100.0	37,812	100.0	100.0	116	100.0	100.0	50,363	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-85B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: San Jose CA Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	2.1	0	0.0	1.1	0	0.0	2.5	0	0.0	1.7	3.0
Moderate	4	16.7	14.4	664	9.2	7.6	2	8.0	18.3	291	3.4	11.0	15.9
Middle	10	41.7	36.1	2,462	34.0	27.2	10	40.0	45.1	3,163	37.2	36.1	41.7
Upper	10	41.7	47.3	4,120	56.9	64.1	13	52.0	34.1	5,044	59.4	51.2	39.3
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1
Total	24	100.0	100.0	7,246	100.0	100.0	25	100.0	100.0	8,498	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.6	0	0.0	0.3	0	0.0	4.3	0	0.0	2.2	3.0
Moderate	0	0.0	14.1	0	0.0	4.4	0	0.0	18.3	0	0.0	9.8	15.9
Middle	0	0.0	39.0	0	0.0	16.2	0	0.0	44.9	0	0.0	28.9	41.7
Upper	0	0.0	45.1	0	0.0	79.0	1	100.0	32.5	560	100.0	59.0	39.3
Unknown	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	560	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.7	0	0.0	1.9	0	0.0	2.1	0	0.0	0.7	3.0
Moderate	0	0.0	12.6	0	0.0	7.3	0	0.0	16.7	0	0.0	15.1	15.9
Middle	0	0.0	21.1	0	0.0	13.6	0	0.0	52.1	0	0.0	37.6	41.7
Upper	0	0.0	62.4	0	0.0	77.1	0	0.0	29.2	0	0.0	46.5	39.3
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-86

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: San Jose CA Metropolitan													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	16	7.2	4.8	2,544	4.7	5.7	14	6.8	4.3	2,824	5.2	5.9	4.9
Moderate	52	23.4	17.4	10,000	18.6	20.0	53	25.7	16.8	11,615	21.4	19.7	18.6
Middle	80	36.0	40.5	24,468	45.4	39.2	68	33.0	41.2	22,847	42.1	39.4	38.9
Upper	74	33.3	36.8	16,842	31.3	34.9	71	34.5	37.3	16,919	31.2	34.8	37.5
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.1
Total	222	100.0	100.0	53,854	100.0	100.0	206	100.0	100.0	54,205	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-87A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: San Jose CA Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.6	0	0.0	0.5	0	0.0	1.7	0	0.0	0.7	22.9
Moderate	0	0.0	6.0	0	0.0	2.2	0	0.0	6.0	0	0.0	2.1	16.1
Middle	0	0.0	13.8	0	0.0	8.2	0	0.0	14.2	0	0.0	8.1	18.7
Upper	5	100.0	57.0	6,380	100.0	67.7	2	100.0	67.5	5,234	100.0	80.2	42.2
Unknown	0	0.0	21.6	0	0.0	21.3	0	0.0	10.6	0	0.0	8.8	0.0
Total	5	100.0	100.0	6,380	100.0	100.0	2	100.0	100.0	5,234	100.0	100.0	100.0
Refinance Loans													
Low	2	8.0	6.6	261	3.0	2.4	2	4.1	6.6	302	1.2	3.5	22.9
Moderate	4	16.0	7.6	839	9.7	2.6	3	6.1	8.6	618	2.4	3.4	16.1
Middle	6	24.0	12.0	2,134	24.6	4.8	9	18.4	16.0	2,468	9.7	8.9	18.7
Upper	13	52.0	26.6	5,445	62.7	20.7	32	65.3	55.9	16,050	62.9	71.1	42.2
Unknown	0	0.0	47.3	0	0.0	69.5	3	6.1	13.0	6,070	23.8	13.1	0.0
Total	25	100.0	100.0	8,679	100.0	100.0	49	100.0	100.0	25,508	100.0	100.0	100.0
Home Improvement Loans													
Low	1	1.9	5.6	168	1.1	2.9	1	2.6	6.0	37	0.4	3.2	22.9
Moderate	11	20.4	12.2	1,660	10.7	6.7	3	7.7	14.8	200	1.9	9.0	16.1
Middle	8	14.8	21.6	2,016	13.0	15.3	13	33.3	24.0	2,491	23.6	18.0	18.7
Upper	33	61.1	47.4	11,513	74.2	56.5	22	56.4	50.2	7,835	74.2	62.7	42.2
Unknown	1	1.9	13.2	150	1.0	18.7	0	0.0	5.1	0	0.0	7.1	0.0
Total	54	100.0	100.0	15,507	100.0	100.0	39	100.0	100.0	10,563	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	5	4.6	3.4	679	1.8	1.2	6	5.2	3.8	627	1.2	1.6	22.9
Moderate	18	16.7	7.0	2,737	7.2	2.4	9	7.8	8.1	1,802	3.6	2.7	16.1
Middle	18	16.7	13.5	4,985	13.2	7.2	26	22.4	16.3	5,600	11.1	8.7	18.7
Upper	66	61.1	44.1	29,261	77.4	52.5	72	62.1	60.9	36,264	72.0	76.8	42.2
Unknown	1	0.9	32.0	150	0.4	36.6	3	2.6	10.9	6,070	12.1	10.1	0.0
Total	108	100.0	100.0	37,812	100.0	100.0	116	100.0	100.0	50,363	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-87B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: San Jose CA Metropolitan													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	2	8.3	5.4	250	3.5	3.8	3	12.0	7.1	288	3.4	6.1	22.9
Moderate	3	12.5	10.0	238	3.3	4.4	2	8.0	13.2	424	5.0	7.1	16.1
Middle	4	16.7	16.5	835	11.5	9.2	4	16.0	23.0	641	7.5	15.0	18.7
Upper	15	62.5	36.1	5,923	81.7	38.7	16	64.0	46.8	7,145	84.1	56.5	42.2
Unknown	0	0.0	32.0	0	0.0	43.8	0	0.0	9.9	0	0.0	15.4	0.0
Total	24	100.0	100.0	7,246	100.0	100.0	25	100.0	100.0	8,498	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.0	0	0.0	3.0	0	0.0	7.3	0	0.0	1.7	22.9
Moderate	0	0.0	12.4	0	0.0	3.0	1	100.0	16.9	560	100.0	5.7	16.1
Middle	0	0.0	17.1	0	0.0	5.0	0	0.0	27.6	0	0.0	12.2	18.7
Upper	0	0.0	34.5	0	0.0	34.3	0	0.0	39.6	0	0.0	59.3	42.2
Unknown	0	0.0	28.0	0	0.0	54.8	0	0.0	8.7	0	0.0	21.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	560	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.9
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.1
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	2.1	0	0.0	2.7	18.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	16.7	0	0.0	41.6	42.2
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	81.3	0	0.0	55.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-88

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: San Jose CA Metropolitan													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	62	27.9	59.3	7,340	13.6	35.5	63	30.6	58.8	9,567	17.6	39.4	91.6
Over $1 Million	135	60.8		41,677	77.4		125	60.7		38,343	70.7		7.9
Revenue Unknown	25	11.3		4,837	9.0		18	8.7		6,295	11.6		0.5
Total	222	100.0		53,854	100.0		206	100.0		54,205	100.0		100.0
By Loan Size													
$100,000 or Less	112	50.5	97.3	6,870	12.8	58.2	109	52.9	97.5	7,458	13.8	61.4	
$100,001 - $250,000	49	22.1	1.6	9,794	18.2	12.1	36	17.5	1.5	7,724	14.2	11.7	
$250,001 - $1 Million	61	27.5	1.2	37,190	69.1	29.7	61	29.6	1.0	39,023	72.0	26.9	
Total	222	100.0	100.0	53,854	100.0	100.0	206	100.0	100.0	54,205	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	47	75.8		2,575	35.1		45	71.4		2,881	30.1		
$100,001 - $250,000	9	14.5		1,490	20.3		10	15.9		2,125	22.2		
$250,001 - $1 Million	6	9.7		3,275	44.6		8	12.7		4,561	47.7		
Total	62	100.0		7,340	100.0		63	100.0		9,567	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

SANTA CRUZ MSA ASSESSMENT AREA

TABLE C-89

2024 Santa Cruz CA MSA AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	5	7.1	3,139	5.2	850	27.1	13,427	22.1	
Moderate	12	17.1	8,937	14.7	1,070	12.0	10,155	16.7	
Middle	29	41.4	24,718	40.6	1,446	5.8	11,749	19.3	
Upper	23	32.9	24,076	39.6	640	2.7	25,539	42.0	
Unknown	1	1.4	0	0.0	0	0.0	0	0.0	
Total AA	**70**	**100.0**	**60,870**	**100.0**	**4,006**	**6.6**	**60,870**	**100.0**	
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	6,049	1,326	2.3	21.9	4,325	71.5	398	6.6	
Moderate	14,524	5,641	9.7	38.8	8,021	55.2	862	5.9	
Middle	43,612	24,362	41.9	55.9	15,197	34.8	4,053	9.3	
Upper	41,634	26,765	46.1	64.3	10,638	25.6	4,231	10.2	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	**105,819**	**58,094**	**100.0**	**54.9**	**38,181**	**36.1**	**9,544**	**9.0**	
	Total Businesses by Tract		Businesses by Tract & Revenue Size						
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	594	4.9	514	4.5	77	10.8	3	6.0	
Moderate	1,215	10.0	1,141	10.0	69	9.7	5	10.0	
Middle	5,708	47.0	5,344	46.9	335	47.2	29	58.0	
Upper	4,639	38.2	4,397	38.6	229	32.3	13	26.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	**12,156**	**100.0**	**11,396**	**100.0**	**710**	**100.0**	**50**	**100.0**	
Percentage of Total Businesses:				**93.7**		**5.8**		**0.4**	
	Total Farms by Tract		Farms by Tract & Revenue Size						
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	21	6.9	16	5.8	5	17.9	0	0.0	
Moderate	29	9.5	26	9.4	3	10.7	0	0.0	
Middle	114	37.5	102	37.0	12	42.9	0	0.0	
Upper	140	46.1	132	47.8	8	28.6	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	**304**	**100.0**	**276**	**100.0**	**28**	**100.0**	**0**	**0.0**	
Percentage of Total Farms:				**90.8**		**9.2**		**0.0**	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-90

2023 Santa Cruz CA MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	7.1	3,139	5.2	850	27.1	13,427	22.1
Moderate	12	17.1	8,937	14.7	1,070	12.0	10,155	16.7
Middle	29	41.4	24,718	40.6	1,446	5.8	11,749	19.3
Upper	23	32.9	24,076	39.6	640	2.7	25,539	42.0
Unknown	1	1.4	0	0.0	0	0.0	0	0.0
Total AA	**70**	**100.0**	**60,870**	**100.0**	**4,006**	**6.6**	**60,870**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,049	1,326	2.3	21.9	4,325	71.5	398	6.6
Moderate	14,524	5,641	9.7	38.8	8,021	55.2	862	5.9
Middle	43,612	24,362	41.9	55.9	15,197	34.8	4,053	9.3
Upper	41,634	26,765	46.1	64.3	10,638	25.6	4,231	10.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**105,819**	**58,094**	**100.0**	**54.9**	**38,181**	**36.1**	**9,544**	**9.0**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	749	5.4	642	4.9	103	12.5	4	6.3
Moderate	1,532	11.0	1,434	11.0	90	10.9	8	12.7
Middle	6,458	46.3	6,042	46.3	382	46.2	34	54.0
Upper	5,198	37.3	4,930	37.8	251	30.4	17	27.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**13,937**	**100.0**	**13,048**	**100.0**	**826**	**100.0**	**63**	**100.0**
Percentage of Total Businesses:				**93.6**		**5.9**		**0.5**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	25	7.1	18	5.6	7	22.6	0	0.0
Moderate	35	10.0	31	9.7	4	12.9	0	0.0
Middle	133	37.9	121	37.8	12	38.7	0	0.0
Upper	158	45.0	150	46.9	8	25.8	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**351**	**100.0**	**320**	**100.0**	**31**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**91.2**		**8.8**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-91A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Santa Cruz CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.4	0	0.0	0.8	0	0.0	3.1	0	0.0	2.3	2.3
Moderate	1	50.0	11.0	221	38.7	8.5	0	0.0	9.1	0	0.0	7.6	9.7
Middle	1	50.0	43.8	350	61.3	41.1	0	0.0	46.4	0	0.0	42.5	41.9
Upper	0	0.0	43.8	0	0.0	49.6	0	0.0	41.4	0	0.0	47.6	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	571	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.9	0	0.0	1.4	0	0.0	2.7	0	0.0	1.9	2.3
Moderate	2	8.3	8.2	273	3.4	8.2	0	0.0	9.2	0	0.0	7.7	9.7
Middle	5	20.8	40.6	1,286	16.1	40.0	2	25.0	39.8	1,266	44.9	37.7	41.9
Upper	17	70.8	49.3	6,421	80.5	50.4	6	75.0	48.3	1,555	55.1	52.7	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	24	100.0	100.0	7,980	100.0	100.0	8	100.0	100.0	2,821	100.0	100.0	100.0
Home Improvement Loans													
Low	2	4.9	1.3	134	1.5	1.4	0	0.0	2.6	0	0.0	1.4	2.3
Moderate	2	4.9	7.2	402	4.6	5.5	4	26.7	9.8	395	21.7	6.7	9.7
Middle	18	43.9	44.2	3,600	41.3	41.3	8	53.3	38.9	697	38.3	38.4	41.9
Upper	19	46.3	47.3	4,584	52.6	51.9	3	20.0	48.7	730	40.1	53.5	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	41	100.0	100.0	8,720	100.0	100.0	15	100.0	100.0	1,822	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	100.0	10.0	5,000	100.0	0.5	0	0.0	9.1	0	0.0	0.5	16.4
Moderate	0	0.0	20.0	0	0.0	3.6	0	0.0	36.4	0	0.0	1.6	24.4
Middle	0	0.0	20.0	0	0.0	1.2	0	0.0	18.2	0	0.0	8.8	36.5
Upper	0	0.0	50.0	0	0.0	94.7	0	0.0	36.4	0	0.0	89.1	22.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	5,000	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	4	4.8	1.4	5,234	20.2	0.9	0	0.0	2.7	0	0.0	1.8	2.3
Moderate	5	6.0	9.3	896	3.5	7.6	4	13.3	9.3	395	6.1	6.4	9.7
Middle	34	40.5	43.4	7,031	27.2	36.3	13	43.3	42.6	2,546	39.4	35.3	41.9
Upper	41	48.8	45.9	12,705	49.1	55.2	13	43.3	45.3	3,520	54.5	56.5	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	84	100.0	100.0	25,866	100.0	100.0	30	100.0	100.0	6,461	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-91B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Santa Cruz CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	6.3	1.1	100	2.8	0.2	0	0.0	1.6	0	0.0	0.6	2.3
Moderate	0	0.0	7.0	0	0.0	4.2	0	0.0	7.0	0	0.0	4.6	9.7
Middle	10	62.5	44.1	1,795	49.9	39.9	3	42.9	39.1	583	32.1	34.7	41.9
Upper	5	31.3	47.8	1,700	47.3	55.7	4	57.1	52.3	1,235	67.9	60.1	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	16	100.0	100.0	3,595	100.0	100.0	7	100.0	100.0	1,818	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	2.3
Moderate	0	0.0	4.4	0	0.0	2.2	0	0.0	12.3	0	0.0	6.5	9.7
Middle	0	0.0	55.3	0	0.0	50.2	0	0.0	32.8	0	0.0	49.6	41.9
Upper	0	0.0	40.4	0	0.0	47.6	0	0.0	54.9	0	0.0	43.9	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	2.3
Moderate	0	0.0	8.8	0	0.0	16.4	0	0.0	12.5	0	0.0	3.7	9.7
Middle	0	0.0	36.8	0	0.0	26.8	0	0.0	37.5	0	0.0	83.6	41.9
Upper	0	0.0	54.4	0	0.0	56.8	0	0.0	50.0	0	0.0	12.7	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-92

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Santa Cruz CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	6	9.5	5.5	687	7.2	7.0	6	10.3	5.0	650	6.5	8.5	4.9
Moderate	12	19.0	10.0	1,705	17.8	11.5	12	20.7	10.3	1,801	18.0	11.1	10.0
Middle	28	44.4	43.3	3,990	41.6	43.3	20	34.5	42.9	3,912	39.1	41.6	47.0
Upper	17	27.0	40.1	3,210	33.5	37.9	20	34.5	40.7	3,648	36.4	38.5	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	63	100.0	100.0	9,592	100.0	100.0	58	100.0	100.0	10,011	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-93A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Santa Cruz CA MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.9	0	0.0	0.7	0	0.0	1.1	0	0.0	0.4	22.1
Moderate	1	50.0	5.9	221	38.7	2.4	0	0.0	4.9	0	0.0	1.8	16.7
Middle	1	50.0	13.0	350	61.3	8.8	0	0.0	13.1	0	0.0	7.7	19.3
Upper	0	0.0	56.8	0	0.0	64.1	0	0.0	61.9	0	0.0	71.8	42.0
Unknown	0	0.0	22.3	0	0.0	24.0	0	0.0	19.0	0	0.0	18.3	0.0
Total	2	100.0	100.0	571	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	1	4.2	8.3	136	1.7	6.4	1	12.5	6.9	53	1.9	4.3	22.1
Moderate	3	12.5	8.3	533	6.7	4.0	2	25.0	8.7	301	10.7	3.5	16.7
Middle	3	12.5	14.7	683	8.6	9.2	1	12.5	16.5	452	16.0	9.8	19.3
Upper	17	70.8	36.9	6,628	83.1	36.9	4	50.0	53.6	2,015	71.4	61.5	42.0
Unknown	0	0.0	31.7	0	0.0	43.5	0	0.0	14.3	0	0.0	20.9	0.0
Total	24	100.0	100.0	7,980	100.0	100.0	8	100.0	100.0	2,821	100.0	100.0	100.0
Home Improvement Loans													
Low	2	4.9	4.5	261	3.0	3.6	1	6.7	5.1	40	2.2	4.9	22.1
Moderate	1	2.4	13.0	100	1.1	7.5	3	20.0	10.3	391	21.5	7.1	16.7
Middle	11	26.8	23.1	1,470	16.9	17.2	4	26.7	19.2	595	32.7	11.7	19.3
Upper	26	63.4	52.2	6,639	76.1	61.7	7	46.7	55.1	796	43.7	64.2	42.0
Unknown	1	2.4	7.2	250	2.9	9.9	0	0.0	10.3	0	0.0	12.2	0.0
Total	41	100.0	100.0	8,720	100.0	100.0	15	100.0	100.0	1,822	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	4.8	4.2	497	2.4	2.2	2	6.7	3.7	93	1.4	1.8	22.1
Moderate	5	6.0	7.8	854	4.1	3.1	6	20.0	7.0	775	12.0	2.5	16.7
Middle	21	25.3	14.7	3,117	14.9	9.0	6	20.0	15.0	1,085	16.8	8.3	19.3
Upper	52	62.7	49.7	16,148	77.4	56.2	16	53.3	58.0	4,508	69.8	68.3	42.0
Unknown	1	1.2	23.5	250	1.2	29.6	0	0.0	16.3	0	0.0	19.1	0.0
Total	83	100.0	100.0	20,866	100.0	100.0	30	100.0	100.0	6,461	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-93B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Santa Cruz CA MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	6.3	8.1	100	2.8	7.7	0	0.0	3.9	0	0.0	6.5	22.1
Moderate	0	0.0	9.7	0	0.0	4.5	1	14.3	7.0	83	4.6	2.5	16.7
Middle	6	37.5	10.8	614	17.1	6.4	1	14.3	14.1	38	2.1	8.7	19.3
Upper	9	56.3	53.8	2,881	80.1	57.9	5	71.4	61.7	1,697	93.3	65.1	42.0
Unknown	0	0.0	17.7	0	0.0	23.5	0	0.0	13.3	0	0.0	17.1	0.0
Total	16	100.0	100.0	3,595	100.0	100.0	7	100.0	100.0	1,818	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	5.3	0	0.0	1.7	0	0.0	7.4	0	0.0	2.2	22.1
Moderate	0	0.0	12.3	0	0.0	3.9	0	0.0	11.5	0	0.0	3.9	16.7
Middle	0	0.0	19.3	0	0.0	6.4	0	0.0	19.7	0	0.0	6.9	19.3
Upper	0	0.0	42.1	0	0.0	40.5	0	0.0	52.5	0	0.0	63.4	42.0
Unknown	0	0.0	21.1	0	0.0	47.6	0	0.0	9.0	0	0.0	23.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.1
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.7
Middle	0	0.0	1.5	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	12.5	0	0.0	54.3	42.0
Unknown	0	0.0	98.5	0	0.0	100.0	0	0.0	87.5	0	0.0	45.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-94

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Santa Cruz CA MSA													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	21	33.3	55.8	2,422	25.3	33.7	24	41.4	56.1	3,576	35.7	35.7	93.7
Over $1 Million	28	44.4		5,550	57.9		29	50.0		4,630	46.2		5.8
Revenue Unknown	14	22.2		1,620	16.9		5	8.6		1,805	18.0		0.4
Total	63	100.0		9,592	100.0		58	100.0		10,011	100.0		100.0
By Loan Size													
$100,000 or Less	38	60.3	95.4	2,500	26.1	45.5	32	55.2	95.8	2,551	25.5	48.8	
$100,001 - $250,000	17	27.0	2.5	3,352	34.9	14.6	17	29.3	2.4	3,405	34.0	14.5	
$250,001 - $1 Million	8	12.7	2.1	3,740	39.0	39.9	9	15.5	1.8	4,055	40.5	36.7	
Total	63	100.0	100.0	9,592	100.0	100.0	58	100.0	100.0	10,011	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	13	61.9		895	37.0		14	58.3		1,006	28.1		
$100,001 - $250,000	7	33.3		1,227	50.7		8	33.3		1,520	42.5		
$250,001 - $1 Million	1	4.8		300	12.4		2	8.3		1,050	29.4		
Total	21	100.0		2,422	100.0		24	100.0		3,576	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

VENTURA COUNTY MSA ASSESSMENT AREA

TABLE C-95

2024 Ventura County CA MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	4.7	7,584	3.9	1,635	21.6	43,215	22.0
Moderate	46	24.2	42,875	21.8	4,249	9.9	32,443	16.5
Middle	77	40.5	81,858	41.7	4,365	5.3	40,828	20.8
Upper	55	28.9	63,333	32.3	1,635	2.6	79,826	40.7
Unknown	3	1.6	662	0.3	34	5.1	0	0.0
Total AA	**190**	**100.0**	**196,312**	**100.0**	**11,918**	**6.1**	**196,312**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,697	3,038	1.8	31.3	5,976	61.6	683	7.0
Moderate	62,889	28,501	16.6	45.3	29,971	47.7	4,417	7.0
Middle	127,663	74,681	43.4	58.5	46,066	36.1	6,916	5.4
Upper	87,640	65,459	38.0	74.7	16,982	19.4	5,199	5.9
Unknown	1,536	358	0.2	23.3	607	39.5	571	37.2
Total AA	**289,425**	**172,037**	**100.0**	**59.4**	**99,602**	**34.4**	**17,786**	**6.1**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,269	3.3	1,109	3.1	152	5.9	8	4.9
Moderate	6,560	17.3	6,031	17.1	501	19.4	28	17.2
Middle	17,099	45.0	15,787	44.8	1,248	48.3	64	39.3
Upper	12,993	34.2	12,250	34.7	680	26.3	63	38.7
Unknown	100	0.3	97	0.3	3	0.1	0	0.0
Total AA	**38,021**	**100.0**	**35,274**	**100.0**	**2,584**	**100.0**	**163**	**100.0**
Percentage of Total Businesses:				**92.8**		**6.8**		**0.4**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	22	3.8	16	3.1	6	9.1	0	0.0
Moderate	157	27.1	127	24.7	30	45.5	0	0.0
Middle	218	37.6	201	39.1	17	25.8	0	0.0
Upper	182	31.4	169	32.9	13	19.7	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	**580**	**100.0**	**514**	**100.0**	**66**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**88.6**		**11.4**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-96

2023 Ventura County CA MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	4.7	7,584	3.9	1,635	21.6	43,215	22.0
Moderate	46	24.2	42,875	21.8	4,249	9.9	32,443	16.5
Middle	77	40.5	81,858	41.7	4,365	5.3	40,828	20.8
Upper	55	28.9	63,333	32.3	1,635	2.6	79,826	40.7
Unknown	3	1.6	662	0.3	34	5.1	0	0.0
Total AA	**190**	**100.0**	**196,312**	**100.0**	**11,918**	**6.1**	**196,312**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,697	3,038	1.8	31.3	5,976	61.6	683	7.0
Moderate	62,889	28,501	16.6	45.3	29,971	47.7	4,417	7.0
Middle	127,663	74,681	43.4	58.5	46,066	36.1	6,916	5.4
Upper	87,640	65,459	38.0	74.7	16,982	19.4	5,199	5.9
Unknown	1,536	358	0.2	23.3	607	39.5	571	37.2
Total AA	**289,425**	**172,037**	**100.0**	**59.4**	**99,602**	**34.4**	**17,786**	**6.1**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,321	3.2	1,140	3.0	173	6.0	8	4.3
Moderate	7,072	17.0	6,500	16.9	543	18.9	29	15.4
Middle	18,615	44.8	17,152	44.6	1,389	48.4	74	39.4
Upper	14,421	34.7	13,580	35.3	764	26.6	77	41.0
Unknown	119	0.3	116	0.3	3	0.1	0	0.0
Total AA	**41,548**	**100.0**	**38,488**	**100.0**	**2,872**	**100.0**	**188**	**100.0**
Percentage of Total Businesses:				**92.6**		**6.9**		**0.5**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	22	3.5	16	2.9	6	7.9	0	0.0
Moderate	164	25.8	132	23.6	32	42.1	0	0.0
Middle	242	38.1	219	39.2	23	30.3	0	0.0
Upper	206	32.4	191	34.2	15	19.7	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	**635**	**100.0**	**559**	**100.0**	**76**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**88.0**		**12.0**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-97A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Ventura County CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.3	0	0.0	0.9	1	12.5	1.8	617	19.0	1.4	1.8
Moderate	3	75.0	22.4	1,406	89.7	16.4	5	62.5	22.1	2,481	76.6	17.9	16.6
Middle	1	25.0	42.7	162	10.3	36.7	2	25.0	44.4	142	4.4	40.7	43.4
Upper	0	0.0	33.2	0	0.0	45.5	0	0.0	31.3	0	0.0	39.4	38.0
Unknown	0	0.0	0.4	0	0.0	0.4	0	0.0	0.5	0	0.0	0.6	0.2
Total	4	100.0	100.0	1,568	100.0	100.0	8	100.0	100.0	3,240	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.0	0	0.0	0.7	0	0.0	1.7	0	0.0	1.4	1.8
Moderate	0	0.0	15.7	0	0.0	5.4	0	0.0	18.5	0	0.0	15.8	16.6
Middle	2	22.2	42.8	400	9.4	25.7	1	33.3	41.8	100	6.3	37.4	43.4
Upper	7	77.8	38.9	3,878	90.6	67.9	2	66.7	37.6	1,500	93.8	44.9	38.0
Unknown	0	0.0	0.7	0	0.0	0.4	0	0.0	0.4	0	0.0	0.5	0.2
Total	9	100.0	100.0	4,278	100.0	100.0	3	100.0	100.0	1,600	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.6	0	0.0	0.7	0	0.0	1.3	0	0.0	1.1	1.8
Moderate	0	0.0	12.6	0	0.0	10.0	0	0.0	14.0	0	0.0	10.3	16.6
Middle	8	36.4	43.2	1,163	27.7	40.0	2	33.3	43.6	270	28.2	40.2	43.4
Upper	14	63.6	43.5	3,029	72.3	49.0	4	66.7	40.6	689	71.8	48.1	38.0
Unknown	0	0.0	0.1	0	0.0	0.3	0	0.0	0.5	0	0.0	0.3	0.2
Total	22	100.0	100.0	4,192	100.0	100.0	6	100.0	100.0	959	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	11.1	0	0.0	1.3	0	0.0	7.3	0	0.0	0.5	4.7
Moderate	0	0.0	48.1	0	0.0	50.5	0	0.0	43.9	0	0.0	12.2	32.6
Middle	0	0.0	22.2	0	0.0	12.6	0	0.0	43.9	0	0.0	75.4	49.2
Upper	0	0.0	18.5	0	0.0	35.5	0	0.0	4.9	0	0.0	11.9	13.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	1.4	0	0.0	0.9	1	4.5	1.6	617	9.1	1.3	1.8
Moderate	6	13.6	18.8	1,731	13.5	14.3	8	36.4	19.4	2,855	42.2	16.4	16.6
Middle	13	29.5	42.6	2,182	17.0	32.4	6	27.3	43.9	1,012	14.9	43.5	43.4
Upper	24	54.5	36.8	7,687	60.1	52.1	7	31.8	34.7	2,289	33.8	38.4	38.0
Unknown	1	2.3	0.4	1,200	9.4	0.4	0	0.0	0.4	0	0.0	0.5	0.2
Total	44	100.0	100.0	12,800	100.0	100.0	22	100.0	100.0	6,773	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-97B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Ventura County CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	1.8	0	0.0	1.6	0	0.0	0.9	0	0.0	0.8	1.8
Moderate	3	33.3	12.7	325	11.8	9.3	0	0.0	14.5	0	0.0	11.7	16.6
Middle	2	22.2	41.9	457	16.5	34.1	1	50.0	46.5	500	83.3	38.7	43.4
Upper	3	33.3	43.0	780	28.2	54.2	1	50.0	38.1	100	16.7	48.6	38.0
Unknown	1	11.1	0.6	1,200	43.4	0.7	0	0.0	0.1	0	0.0	0.1	0.2
Total	9	100.0	100.0	2,762	100.0	100.0	2	100.0	100.0	600	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.3	0	0.0	1.1	0	0.0	0.7	0	0.0	1.0	1.8
Moderate	0	0.0	15.1	0	0.0	10.1	3	100.0	16.9	374	100.0	11.9	16.6
Middle	0	0.0	44.8	0	0.0	37.2	0	0.0	46.3	0	0.0	40.8	43.4
Upper	0	0.0	38.6	0	0.0	51.4	0	0.0	35.9	0	0.0	46.1	38.0
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0.2
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	374	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	11.1	0	0.0	8.9	1.8
Moderate	0	0.0	35.4	0	0.0	19.1	0	0.0	16.7	0	0.0	11.9	16.6
Middle	0	0.0	28.0	0	0.0	29.3	0	0.0	55.6	0	0.0	49.6	43.4
Upper	0	0.0	36.6	0	0.0	51.6	0	0.0	16.7	0	0.0	29.7	38.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-98

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Ventura County CA MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	2.9	0	0.0	5.1	0	0.0	2.9	0	0.0	5.0	3.3
Moderate	4	23.5	16.5	892	26.8	16.4	1	5.9	15.6	400	8.0	15.8	17.3
Middle	7	41.2	44.0	1,617	48.6	45.9	12	70.6	43.7	3,607	72.0	45.5	45.0
Upper	6	35.3	36.0	820	24.6	32.3	4	23.5	37.2	1,000	20.0	33.5	34.2
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0.3
Total	17	100.0	100.0	3,329	100.0	100.0	17	100.0	100.0	5,007	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-99A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Ventura County CA MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.4	0	0.0	0.6	1	12.5	1.3	66	2.0	0.7	22.0
Moderate	0	0.0	6.3	0	0.0	2.7	0	0.0	4.9	0	0.0	2.2	16.5
Middle	0	0.0	19.4	0	0.0	13.6	1	12.5	18.5	603	18.6	13.5	20.8
Upper	4	100.0	52.6	1,568	100.0	57.5	6	75.0	55.0	2,571	79.4	63.6	40.7
Unknown	0	0.0	20.4	0	0.0	25.7	0	0.0	20.3	0	0.0	20.0	0.0
Total	4	100.0	100.0	1,568	100.0	100.0	8	100.0	100.0	3,240	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	8.4	0	0.0	2.4	0	0.0	5.7	0	0.0	4.0	22.0
Moderate	0	0.0	12.7	0	0.0	3.0	0	0.0	11.0	0	0.0	5.8	16.5
Middle	3	33.3	20.0	356	8.3	5.8	1	33.3	18.4	100	6.3	12.3	20.8
Upper	5	55.6	40.2	1,922	44.9	18.8	2	66.7	46.1	1,500	93.8	52.1	40.7
Unknown	1	11.1	18.7	2,000	46.8	69.9	0	0.0	18.8	0	0.0	26.0	0.0
Total	9	100.0	100.0	4,278	100.0	100.0	3	100.0	100.0	1,600	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.2	0	0.0	2.6	0	0.0	4.0	0	0.0	3.0	22.0
Moderate	1	4.5	12.0	65	1.6	7.6	1	16.7	11.0	52	5.4	7.1	16.5
Middle	4	18.2	25.1	506	12.1	20.5	0	0.0	22.1	0	0.0	16.2	20.8
Upper	17	77.3	51.0	3,621	86.4	60.1	5	83.3	55.7	907	94.6	59.8	40.7
Unknown	0	0.0	7.6	0	0.0	9.2	0	0.0	7.2	0	0.0	13.9	0.0
Total	22	100.0	100.0	4,192	100.0	100.0	6	100.0	100.0	959	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	4.5	3.5	213	1.7	1.3	3	13.6	3.2	166	2.5	1.8	22.0
Moderate	2	4.5	9.3	136	1.1	3.2	2	9.1	8.5	152	2.2	3.5	16.5
Middle	9	20.5	20.8	2,168	16.9	11.4	3	13.6	19.8	977	14.4	13.5	20.8
Upper	30	68.2	48.6	8,283	64.7	45.2	14	63.6	51.7	5,478	80.9	60.4	40.7
Unknown	1	2.3	17.7	2,000	15.6	39.0	0	0.0	16.8	0	0.0	20.9	0.0
Total	44	100.0	100.0	12,800	100.0	100.0	22	100.0	100.0	6,773	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-99B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Ventura County CA MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	2	22.2	3.8	213	7.7	3.5	0	0.0	3.3	0	0.0	3.1	22.0
Moderate	1	11.1	13.3	71	2.6	8.9	1	50.0	15.1	100	16.7	9.4	16.5
Middle	2	22.2	24.8	1,306	47.3	17.7	0	0.0	25.2	0	0.0	20.7	20.8
Upper	4	44.4	47.9	1,172	42.4	59.4	1	50.0	49.4	500	83.3	56.9	40.7
Unknown	0	0.0	10.3	0	0.0	10.6	0	0.0	7.0	0	0.0	9.9	0.0
Total	9	100.0	100.0	2,762	100.0	100.0	2	100.0	100.0	600	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.7	0	0.0	2.2	2	66.7	6.7	100	26.7	7.2	22.0
Moderate	0	0.0	15.9	0	0.0	8.7	0	0.0	13.7	0	0.0	8.5	16.5
Middle	0	0.0	25.7	0	0.0	14.7	1	33.3	25.5	274	73.3	13.0	20.8
Upper	0	0.0	43.1	0	0.0	48.5	0	0.0	45.4	0	0.0	54.1	40.7
Unknown	0	0.0	10.6	0	0.0	25.9	0	0.0	8.6	0	0.0	17.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	374	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.2	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.5
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	16.7	0	0.0	36.5	40.7
Unknown	0	0.0	98.8	0	0.0	100.0	0	0.0	83.3	0	0.0	63.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-100

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Ventura County CA MSA													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	8	47.1	53.2	787	23.6	32.1	4	23.5	54.7	475	9.5	34.5	92.8
Over $1 Million	7	41.2		2,132	64.0		12	70.6		4,132	82.5		6.8
Revenue Unknown	2	11.8		410	12.3		1	5.9		400	8.0		0.4
Total	17	100.0		3,329	100.0		17	100.0		5,007	100.0		100.0
By Loan Size													
$100,000 or Less	10	58.8	96.0	780	23.4	51.4	6	35.3	96.2	480	9.6	54.7	
$100,001 - $250,000	3	17.6	2.4	517	15.5	15.5	4	23.5	2.5	645	12.9	16.8	
$250,001 - $1 Million	4	23.5	1.6	2,032	61.0	33.1	7	41.2	1.3	3,882	77.5	28.5	
Total	17	100.0	100.0	3,329	100.0	100.0	17	100.0	100.0	5,007	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	6	75.0		520	66.1		1	25.0		30	6.3		
$100,001 - $250,000	2	25.0		267	33.9		3	75.0		445	93.7		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	8	100.0		787	100.0		4	100.0		475	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

NAPLES MSA ASSESSMENT AREA

TABLE C-101

2024 Naples FL MSA AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%
Low	8	7.3	5,236	5.3	1,381	26.4	21,523	21.9
Moderate	21	19.3	20,029	20.4	2,325	11.6	17,688	18.0
Middle	44	40.4	39,169	39.9	2,069	5.3	19,185	19.6
Upper	33	30.3	32,351	33.0	975	3.0	39,725	40.5
Unknown	3	2.8	1,336	1.4	179	13.4	0	0.0
Total AA	**109**	**100.0**	**98,121**	**100.0**	**6,929**	**7.1**	**98,121**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	8,244	2,479	2.3	30.1	4,636	56.2	1,129	13.7
Moderate	35,637	19,187	17.4	53.8	9,046	25.4	7,404	20.8
Middle	90,531	44,798	40.7	49.5	15,939	17.6	29,794	32.9
Upper	81,352	42,257	38.4	51.9	7,977	9.8	31,118	38.3
Unknown	2,584	1,362	1.2	52.7	296	11.5	926	35.8
Total AA	**218,348**	**110,083**	**100.0**	**50.4**	**37,894**	**17.4**	**70,371**	**32.2**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	728	2.7	675	2.7	46	3.4	7	2.3
Moderate	3,546	13.2	3,434	13.6	87	6.5	25	8.2
Middle	11,250	41.7	10,526	41.6	606	45.3	118	38.6
Upper	11,133	41.3	10,389	41.1	591	44.2	153	50.0
Unknown	294	1.1	284	1.1	7	0.5	3	1.0
Total AA	**26,951**	**100.0**	**25,308**	**100.0**	**1,337**	**100.0**	**306**	**100.0**
Percentage of Total Businesses:				**93.9**		**5.0**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	44	24.2	35	21.0	9	60.0	0	0.0
Moderate	23	12.6	22	13.2	1	6.7	0	0.0
Middle	71	39.0	68	40.7	3	20.0	0	0.0
Upper	43	23.6	41	24.6	2	13.3	0	0.0
Unknown	1	0.5	1	0.6	0	0.0	0	0.0
Total AA	**182**	**100.0**	**167**	**100.0**	**15**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**91.8**		**8.2**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-102

2023 Naples FL MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	8	7.3	5,236	5.3	1,381	26.4	21,523	21.9
Moderate	21	19.3	20,029	20.4	2,325	11.6	17,688	18.0
Middle	44	40.4	39,169	39.9	2,069	5.3	19,185	19.6
Upper	33	30.3	32,351	33.0	975	3.0	39,725	40.5
Unknown	3	2.8	1,336	1.4	179	13.4	0	0.0
Total AA	**109**	**100.0**	**98,121**	**100.0**	**6,929**	**7.1**	**98,121**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	8,244	2,479	2.3	30.1	4,636	56.2	1,129	13.7
Moderate	35,637	19,187	17.4	53.8	9,046	25.4	7,404	20.8
Middle	90,531	44,798	40.7	49.5	15,939	17.6	29,794	32.9
Upper	81,352	42,257	38.4	51.9	7,977	9.8	31,118	38.3
Unknown	2,584	1,362	1.2	52.7	296	11.5	926	35.8
Total AA	**218,348**	**110,083**	**100.0**	**50.4**	**37,894**	**17.4**	**70,371**	**32.2**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	845	2.6	789	2.6	49	3.3	7	2.0
Moderate	4,932	15.3	4,777	15.7	125	8.3	30	8.4
Middle	14,053	43.6	13,205	43.4	694	46.1	154	43.1
Upper	12,083	37.5	11,290	37.1	630	41.9	163	45.7
Unknown	345	1.1	335	1.1	7	0.5	3	0.8
Total AA	**32,258**	**100.0**	**30,396**	**100.0**	**1,505**	**100.0**	**357**	**100.0**
Percentage of Total Businesses:				**94.2**		**4.7**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	43	18.1	33	14.9	10	62.5	0	0.0
Moderate	40	16.9	39	17.6	1	6.3	0	0.0
Middle	105	44.3	102	46.2	3	18.8	0	0.0
Upper	48	20.3	46	20.8	2	12.5	0	0.0
Unknown	1	0.4	1	0.5	0	0.0	0	0.0
Total AA	**237**	**100.0**	**221**	**100.0**	**16**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**93.2**		**6.8**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-103A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Naples FL MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	10.0	1.3	448	11.1	1.4	0	0.0	1.1	0	0.0	0.9	2.3
Moderate	5	50.0	21.6	1,829	45.4	15.4	7	87.5	22.0	3,137	85.1	16.0	17.4
Middle	2	20.0	44.1	1,018	25.2	39.3	0	0.0	43.5	0	0.0	39.7	40.7
Upper	2	20.0	32.4	738	18.3	43.0	1	12.5	32.5	550	14.9	42.2	38.4
Unknown	0	0.0	0.6	0	0.0	0.9	0	0.0	0.8	0	0.0	1.1	1.2
Total	10	100.0	100.0	4,033	100.0	100.0	8	100.0	100.0	3,687	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.2	0	0.0	0.4	0	0.0	0.9	0	0.0	0.8	2.3
Moderate	1	100.0	18.6	270	100.0	14.1	3	75.0	23.0	675	57.4	15.3	17.4
Middle	0	0.0	43.0	0	0.0	47.5	0	0.0	44.3	0	0.0	40.4	40.7
Upper	0	0.0	35.7	0	0.0	37.4	1	25.0	30.9	500	42.6	42.7	38.4
Unknown	0	0.0	1.6	0	0.0	0.6	0	0.0	0.8	0	0.0	0.7	1.2
Total	1	100.0	100.0	270	100.0	100.0	4	100.0	100.0	1,175	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.4	0	0.0	0.8	0	0.0	0.6	0	0.0	0.4	2.3
Moderate	0	0.0	18.6	0	0.0	9.2	0	0.0	18.9	0	0.0	11.6	17.4
Middle	1	100.0	44.9	433	100.0	39.2	2	100.0	45.8	433	100.0	41.6	40.7
Upper	0	0.0	33.9	0	0.0	49.8	0	0.0	32.9	0	0.0	44.5	38.4
Unknown	0	0.0	1.1	0	0.0	1.0	0	0.0	1.9	0	0.0	1.9	1.2
Total	1	100.0	100.0	433	100.0	100.0	2	100.0	100.0	433	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	10.0	0	0.0	12.4	0	0.0	12.5	0	0.0	1.3	3.2
Moderate	0	0.0	40.0	0	0.0	22.8	0	0.0	75.0	0	0.0	58.0	10.6
Middle	0	0.0	50.0	0	0.0	64.8	0	0.0	12.5	0	0.0	40.7	42.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	43.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.7
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	6.7	1.3	448	3.1	1.4	0	0.0	1.1	0	0.0	0.9	2.3
Moderate	6	40.0	20.4	2,099	14.3	14.6	11	68.8	21.6	4,072	72.0	16.6	17.4
Middle	3	20.0	43.9	1,451	9.9	40.9	2	12.5	44.0	433	7.7	39.5	40.7
Upper	5	33.3	33.6	10,688	72.8	42.3	3	18.8	32.4	1,150	20.3	41.9	38.4
Unknown	0	0.0	0.8	0	0.0	0.8	0	0.0	0.9	0	0.0	1.1	1.2
Total	15	100.0	100.0	14,686	100.0	100.0	16	100.0	100.0	5,655	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-103B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Naples FL MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.8	0	0.0	0.9	0	0.0	0.9	0	0.0	1.1	2.3
Moderate	0	0.0	17.7	0	0.0	10.9	0	0.0	20.1	0	0.0	11.3	17.4
Middle	0	0.0	44.1	0	0.0	32.2	0	0.0	46.0	0	0.0	40.2	40.7
Upper	2	100.0	36.0	1,150	100.0	54.2	1	100.0	31.6	100	100.0	46.1	38.4
Unknown	0	0.0	1.3	0	0.0	1.7	0	0.0	1.4	0	0.0	1.3	1.2
Total	2	100.0	100.0	1,150	100.0	100.0	1	100.0	100.0	100	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.3	0	0.0	0.4	0	0.0	1.1	0	0.0	2.4	2.3
Moderate	0	0.0	12.3	0	0.0	5.7	1	100.0	15.0	260	100.0	5.3	17.4
Middle	0	0.0	41.6	0	0.0	25.0	0	0.0	44.5	0	0.0	27.7	40.7
Upper	1	100.0	45.0	8,800	100.0	68.4	0	0.0	38.8	0	0.0	64.3	38.4
Unknown	0	0.0	0.8	0	0.0	0.5	0	0.0	0.6	0	0.0	0.3	1.2
Total	1	100.0	100.0	8,800	100.0	100.0	1	100.0	100.0	260	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.3	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	2.3
Moderate	0	0.0	18.6	0	0.0	5.3	0	0.0	40.0	0	0.0	42.9	17.4
Middle	0	0.0	25.6	0	0.0	15.4	0	0.0	40.0	0	0.0	37.9	40.7
Upper	0	0.0	48.8	0	0.0	78.7	0	0.0	20.0	0	0.0	19.2	38.4
Unknown	0	0.0	4.7	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	1.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-104

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Naples FL MSA													
Geographic Income Level	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	2.3	0	0.0	2.6	0	0.0	1.9	0	0.0	2.5	2.7
Moderate	3	75.0	17.3	292	74.5	11.2	1	33.3	17.3	10	2.8	11.2	13.2
Middle	1	25.0	45.1	100	25.5	45.3	1	33.3	45.2	100	27.8	44.2	41.7
Upper	0	0.0	34.3	0	0.0	40.2	1	33.3	34.5	250	69.4	41.3	41.3
Unknown	0	0.0	0.8	0	0.0	0.5	0	0.0	0.8	0	0.0	0.7	1.1
Total	4	100.0	100.0	392	100.0	100.0	3	100.0	100.0	360	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-105A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Naples FL MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.2	0	0.0	0.6	0	0.0	1.3	0	0.0	0.7	21.9
Moderate	1	10.0	6.8	403	10.0	3.1	0	0.0	6.8	0	0.0	3.2	18.0
Middle	3	30.0	15.5	983	24.4	9.9	1	12.5	15.8	420	11.4	10.4	19.6
Upper	4	40.0	56.2	1,881	46.6	65.3	7	87.5	55.8	3,267	88.6	68.2	40.5
Unknown	2	20.0	20.2	766	19.0	21.0	0	0.0	20.2	0	0.0	17.6	0.0
Total	10	100.0	100.0	4,033	100.0	100.0	8	100.0	100.0	3,687	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	6.2	0	0.0	1.9	0	0.0	5.2	0	0.0	3.0	21.9
Moderate	1	100.0	13.8	270	100.0	2.6	0	0.0	12.4	0	0.0	5.8	18.0
Middle	0	0.0	17.8	0	0.0	4.3	1	25.0	18.6	119	10.1	10.4	19.6
Upper	0	0.0	43.4	0	0.0	20.7	3	75.0	44.0	1,056	89.9	56.1	40.5
Unknown	0	0.0	18.8	0	0.0	70.6	0	0.0	19.8	0	0.0	24.7	0.0
Total	1	100.0	100.0	270	100.0	100.0	4	100.0	100.0	1,175	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.6	0	0.0	1.0	1	50.0	4.9	33	7.6	3.0	21.9
Moderate	0	0.0	14.5	0	0.0	6.7	0	0.0	13.7	0	0.0	7.8	18.0
Middle	0	0.0	21.5	0	0.0	11.1	0	0.0	21.9	0	0.0	13.4	19.6
Upper	1	100.0	55.6	433	100.0	72.4	1	50.0	54.3	400	92.4	67.1	40.5
Unknown	0	0.0	4.8	0	0.0	8.8	0	0.0	5.2	0	0.0	8.7	0.0
Total	1	100.0	100.0	433	100.0	100.0	2	100.0	100.0	433	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	2.5	0	0.0	1.0	1	6.3	2.6	33	0.6	1.1	21.9
Moderate	2	13.3	8.8	673	4.6	3.1	1	6.3	9.1	260	4.6	3.9	18.0
Middle	3	20.0	16.6	983	6.7	8.4	2	12.5	17.4	539	9.5	10.3	19.6
Upper	7	46.7	54.0	11,264	76.7	55.0	12	75.0	53.2	4,823	85.3	66.3	40.5
Unknown	3	20.0	18.0	1,766	12.0	32.4	0	0.0	17.8	0	0.0	18.3	0.0
Total	15	100.0	100.0	14,686	100.0	100.0	16	100.0	100.0	5,655	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-105B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Naples FL MSA													
Borrower Income Level	Bank And Aggregate Loans by Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	5.7	0	0.0	4.8	0	0.0	4.9	0	0.0	3.4	21.9
Moderate	0	0.0	13.3	0	0.0	5.5	0	0.0	16.3	0	0.0	7.2	18.0
Middle	0	0.0	20.6	0	0.0	11.3	0	0.0	24.6	0	0.0	13.7	19.6
Upper	1	50.0	52.8	150	13.0	68.2	1	100.0	46.8	100	100.0	67.5	40.5
Unknown	1	50.0	7.7	1,000	87.0	10.2	0	0.0	7.5	0	0.0	8.1	0.0
Total	2	100.0	100.0	1,150	100.0	100.0	1	100.0	100.0	100	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	5.3	0	0.0	1.4	0	0.0	5.1	0	0.0	0.8	21.9
Moderate	0	0.0	9.2	0	0.0	1.9	1	100.0	11.9	260	100.0	4.9	18.0
Middle	0	0.0	14.2	0	0.0	3.6	0	0.0	17.3	0	0.0	4.1	19.6
Upper	1	100.0	52.8	8,800	100.0	58.6	0	0.0	56.7	0	0.0	66.9	40.5
Unknown	0	0.0	18.4	0	0.0	34.5	0	0.0	9.1	0	0.0	23.3	0.0
Total	1	100.0	100.0	8,800	100.0	100.0	1	100.0	100.0	260	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.9
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	40.5
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-106

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Naples FL MSA													
	Bank And Aggregate Loans by Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	3	75.0	53.9	292	74.5	35.7	1	33.3	51.6	10	2.8	34.9	93.9
Over $1 Million	1	25.0		100	25.5		2	66.7		350	97.2		5.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.1
Total	4	100.0		392	100.0		3	100.0		360	100.0		100.0
By Loan Size													
$100,000 or Less	3	75.0	95.7	132	33.7	52.3	2	66.7	95.6	110	30.6	51.7	
$100,001 - $250,000	0	0.0	2.5	0	0.0	15.4	1	33.3	2.8	250	69.4	16.4	
$250,001 - $1 Million	1	25.0	1.8	260	66.3	32.3	0	0.0	1.6	0	0.0	31.8	
Total	4	100.0	100.0	392	100.0	100.0	3	100.0	100.0	360	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	2	66.7		32	11.0		1	100.0		10	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	1	33.3		260	89.0		0	0.0		0	0.0		
Total	3	100.0		292	100.0		1	100.0		10	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX D – NONMETROPOLITAN LIMITED-SCOPE ASSESSMENT AREAS

LENAWEE COUNTY NONMETROPOLITAN ASSESSMENT AREA

TABLE D-1

2024 Lenawee County Nonmetropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,830	14.8
Moderate	5	20.0	4,184	16.2	894	21.4	4,762	18.4
Middle	12	48.0	10,562	40.9	778	7.4	5,512	21.3
Upper	8	32.0	11,105	43.0	371	3.3	11,747	45.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**25**	**100.0**	**25,851**	**100.0**	**2,043**	**7.9**	**25,851**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	8,883	4,407	14.6	49.6	3,443	38.8	1,033	11.6
Middle	18,507	12,629	41.9	68.2	3,407	18.4	2,471	13.4
Upper	16,504	13,080	43.4	79.3	1,727	10.5	1,697	10.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**43,894**	**30,116**	**100.0**	**68.6**	**8,577**	**19.5**	**5,201**	**11.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	775	22.9	699	22.4	72	32.3	4	8.3
Middle	1,388	40.9	1,281	41.1	87	39.0	20	41.7
Upper	1,228	36.2	1,140	36.5	64	28.7	24	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3,391**	**100.0**	**3,120**	**100.0**	**223**	**100.0**	**48**	**100.0**
Percentage of Total Businesses:				**92.0**		**6.6**		**1.4**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2	0.6	2	0.7	0	0.0	0	0.0
Middle	169	54.3	165	54.5	4	50.0	0	0.0
Upper	140	45.0	136	44.9	4	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**311**	**100.0**	**303**	**100.0**	**8**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.4**		**2.6**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-2

2023 Lenawee County Nonmetropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,048	15.7
Moderate	5	20.0	4,184	16.2	894	21.4	4,905	19.0
Middle	14	56.0	13,669	52.9	873	6.4	5,581	21.6
Upper	6	24.0	7,998	30.9	276	3.5	11,317	43.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**25**	**100.0**	**25,851**	**100.0**	**2,043**	**7.9**	**25,851**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	8,883	4,407	14.6	49.6	3,443	38.8	1,033	11.6
Middle	22,886	16,101	53.5	70.4	4,135	18.1	2,650	11.6
Upper	12,125	9,608	31.9	79.2	999	8.2	1,518	12.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**43,894**	**30,116**	**100.0**	**68.6**	**8,577**	**19.5**	**5,201**	**11.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	811	22.2	733	21.7	73	31.2	5	9.8
Middle	1,893	51.8	1,755	52.1	114	48.7	24	47.1
Upper	952	26.0	883	26.2	47	20.1	22	43.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3,656**	**100.0**	**3,371**	**100.0**	**234**	**100.0**	**51**	**100.0**
Percentage of Total Businesses:				**92.2**		**6.4**		**1.4**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2	0.6	2	0.6	0	0.0	0	0.0
Middle	184	58.0	180	58.3	4	50.0	0	0.0
Upper	131	41.3	127	41.1	4	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**317**	**100.0**	**309**	**100.0**	**8**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.5**		**2.5**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-3A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Lenawee County Nonmetropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	19.6	0	0.0	15.0	0	0.0	20.6	0	0.0	14.8	14.6
Middle	0	0.0	50.0	0	0.0	48.0	0	0.0	39.8	0	0.0	38.7	41.9
Upper	1	100.0	30.4	51	100.0	37.0	1	100.0	39.6	493	100.0	46.5	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	51	100.0	100.0	1	100.0	100.0	493	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	7.7	13.9	60	4.4	12.0	0	0.0	11.6	0	0.0	8.8	14.6
Middle	5	38.5	55.3	487	35.6	54.0	3	50.0	38.0	296	50.8	37.8	41.9
Upper	7	53.8	30.8	821	60.0	34.0	3	50.0	50.4	287	49.2	53.4	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	13	100.0	100.0	1,368	100.0	100.0	6	100.0	100.0	583	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	11.2	0	0.0	8.5	1	50.0	12.7	100	84.0	8.1	14.6
Middle	1	100.0	52.2	44	100.0	50.8	0	0.0	34.8	0	0.0	36.4	41.9
Upper	0	0.0	36.6	0	0.0	40.7	1	50.0	52.5	19	16.0	55.5	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	44	100.0	100.0	2	100.0	100.0	119	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	33.3	0	0.0	9.5	0	0.0	0.0	0	0.0	0.0	52.3
Middle	0	0.0	66.7	0	0.0	90.5	0	0.0	100.0	0	0.0	100.0	32.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	14.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	6.7	16.7	60	4.1	13.9	1	10.0	17.0	100	7.7	12.9	14.6
Middle	6	40.0	51.7	531	36.3	49.7	3	30.0	39.2	296	22.7	39.9	41.9
Upper	8	53.3	31.7	872	59.6	36.4	6	60.0	43.8	909	69.7	47.2	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	15	100.0	100.0	1,463	100.0	100.0	10	100.0	100.0	1,305	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-3B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Lenawee County Nonmetropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	7.2	0	0.0	4.4	0	0.0	14.4	0	0.0	9.4	14.6
Middle	0	0.0	51.5	0	0.0	48.5	0	0.0	37.8	0	0.0	43.1	41.9
Upper	0	0.0	41.2	0	0.0	47.1	1	100.0	47.8	110	100.0	47.5	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	110	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.8	0	0.0	11.4	0	0.0	5.3	0	0.0	3.6	14.6
Middle	0	0.0	49.2	0	0.0	46.1	0	0.0	49.1	0	0.0	54.6	41.9
Upper	0	0.0	40.0	0	0.0	42.5	0	0.0	45.6	0	0.0	41.7	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	16.7	0	0.0	15.6	0	0.0	50.0	0	0.0	45.1	14.6
Middle	0	0.0	58.3	0	0.0	60.0	0	0.0	37.5	0	0.0	27.2	41.9
Upper	0	0.0	25.0	0	0.0	24.5	0	0.0	12.5	0	0.0	27.6	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-4

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Lenawee County Nonmetropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	17.5	0	0.0	15.7	0	0.0	17.7	0	0.0	17.4	22.9
Middle	7	87.5	51.4	1,257	84.7	49.7	4	44.4	41.0	935	47.7	37.2	40.9
Upper	1	12.5	31.0	227	15.3	34.6	5	55.6	41.3	1,025	52.3	45.4	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	8	100.0	100.0	1,484	100.0	100.0	9	100.0	100.0	1,960	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-5A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Lenawee County Nonmetropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	9.0	0	0.0	4.6	0	0.0	6.0	0	0.0	2.9	14.8
Moderate	0	0.0	23.1	0	0.0	17.4	0	0.0	19.4	0	0.0	12.6	18.4
Middle	1	100.0	24.4	51	100.0	24.1	0	0.0	26.4	0	0.0	23.2	21.3
Upper	0	0.0	25.2	0	0.0	36.5	1	100.0	29.3	493	100.0	41.7	45.4
Unknown	0	0.0	18.3	0	0.0	17.5	0	0.0	19.0	0	0.0	19.6	0.0
Total	1	100.0	100.0	51	100.0	100.0	1	100.0	100.0	493	100.0	100.0	100.0
Refinance Loans													
Low	3	23.1	9.5	243	17.8	6.1	2	33.3	7.7	96	16.5	4.6	14.8
Moderate	2	15.4	23.4	150	11.0	20.3	1	16.7	22.5	137	23.5	18.5	18.4
Middle	5	38.5	23.1	460	33.6	21.6	1	16.7	26.1	50	8.6	22.4	21.3
Upper	3	23.1	35.0	515	37.6	38.6	2	33.3	29.6	300	51.5	32.3	45.4
Unknown	0	0.0	9.0	0	0.0	13.5	0	0.0	14.1	0	0.0	22.2	0.0
Total	13	100.0	100.0	1,368	100.0	100.0	6	100.0	100.0	583	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	9.9	0	0.0	4.9	0	0.0	5.5	0	0.0	2.8	14.8
Moderate	0	0.0	24.8	0	0.0	23.4	1	50.0	18.2	100	84.0	10.7	18.4
Middle	1	100.0	28.6	44	100.0	23.8	1	50.0	22.1	19	16.0	18.5	21.3
Upper	0	0.0	35.4	0	0.0	46.5	0	0.0	50.8	0	0.0	66.5	45.4
Unknown	0	0.0	1.2	0	0.0	1.4	0	0.0	3.3	0	0.0	1.6	0.0
Total	1	100.0	100.0	44	100.0	100.0	2	100.0	100.0	119	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	20.0	9.1	243	16.6	5.0	2	20.0	6.3	96	7.4	3.4	14.8
Moderate	2	13.3	22.7	150	10.3	17.9	2	20.0	20.1	237	18.2	13.8	18.4
Middle	7	46.7	24.1	555	37.9	23.3	2	20.0	26.2	69	5.3	23.0	21.3
Upper	3	20.0	30.1	515	35.2	37.7	4	40.0	31.8	903	69.2	40.8	45.4
Unknown	0	0.0	14.0	0	0.0	16.1	0	0.0	15.5	0	0.0	19.0	0.0
Total	15	100.0	100.0	1,463	100.0	100.0	10	100.0	100.0	1,305	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE D-5B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Lenawee County Nonmetropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	5.2	0	0.0	2.8	0	0.0	5.6	0	0.0	9.9	14.8
Moderate	0	0.0	18.6	0	0.0	14.2	0	0.0	17.8	0	0.0	11.2	18.4
Middle	0	0.0	22.7	0	0.0	21.4	0	0.0	31.1	0	0.0	23.8	21.3
Upper	0	0.0	48.5	0	0.0	54.6	1	100.0	43.3	110	100.0	53.2	45.4
Unknown	0	0.0	5.2	0	0.0	7.0	0	0.0	2.2	0	0.0	1.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	110	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	12.3	0	0.0	12.2	0	0.0	3.5	0	0.0	2.0	14.8
Moderate	0	0.0	13.8	0	0.0	10.1	0	0.0	21.1	0	0.0	19.7	18.4
Middle	0	0.0	24.6	0	0.0	18.1	0	0.0	33.3	0	0.0	34.9	21.3
Upper	0	0.0	44.6	0	0.0	52.5	0	0.0	40.4	0	0.0	41.3	45.4
Unknown	0	0.0	4.6	0	0.0	7.0	0	0.0	1.8	0	0.0	2.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	14.8
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	25.0	0	0.0	37.8	18.4
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	45.4
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	75.0	0	0.0	62.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-6

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Lenawee County Nonmetropolitan													
	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	2	25.0	60.8	280	18.9	36.8	3	33.3	59.6	725	37.0	37.2	92.0
Over $1 Million	5	62.5		812	54.7		6	66.7		1,235	63.0		6.6
Revenue Unknown	1	12.5		392	26.4		0	0.0		0	0.0		1.4
Total	8	100.0		1,484	100.0		9	100.0		1,960	100.0		100.0
By Loan Size													
$100,000 or Less	3	37.5	94.5	190	12.8	38.0	3	33.3	95.3	235	12.0	46.5	
$100,001 - $250,000	4	50.0	2.8	902	60.8	17.2	4	44.4	2.8	925	47.2	17.5	
$250,001 - $1 Million	1	12.5	2.7	392	26.4	44.8	2	22.2	1.9	800	40.8	35.9	
Total	8	100.0	100.0	1,484	100.0	100.0	9	100.0	100.0	1,960	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	50.0		55	19.6		1	33.3		100	13.8		
$100,001 - $250,000	1	50.0		225	80.4		1	33.3		225	31.0		
$250,001 - $1 Million	0	0.0		0	0.0		1	33.3		400	55.2		
Total	2	100.0		280	100.0		3	100.0		725	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Bank of the Hills Nonmetropolitan Assessment Area

Table D-7

2024 Bank of the Hills TX Nonmetropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,595	17.6
Moderate	2	14.3	1,825	12.4	457	25.0	2,621	17.8
Middle	6	42.9	5,997	40.8	545	9.1	2,790	19.0
Upper	6	42.9	6,890	46.8	296	4.3	6,706	45.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**14**	**100.0**	**14,712**	**100.0**	**1,298**	**8.8**	**14,712**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,146	1,358	9.3	43.2	1,651	52.5	137	4.4
Middle	10,100	5,788	39.8	57.3	3,041	30.1	1,271	12.6
Upper	11,550	7,415	50.9	64.2	2,025	17.5	2,110	18.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**24,796**	**14,561**	**100.0**	**58.7**	**6,717**	**27.1**	**3,518**	**14.2**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	402	15.3	376	15.3	21	15.0	5	13.5
Middle	1,016	38.6	935	38.1	66	47.1	15	40.5
Upper	1,214	46.1	1,144	46.6	53	37.9	17	45.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,632**	**100.0**	**2,455**	**100.0**	**140**	**100.0**	**37**	**100.0**
Percentage of Total Businesses:				**93.3**		**5.3**		**1.4**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	5	4.8	5	4.9	0	0.0	0	0.0
Middle	31	29.8	31	30.1	0	0.0	0	0.0
Upper	68	65.4	67	65.0	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**104**	**100.0**	**103**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.0**		**1.0**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-8

2023 Bank of the Hills TX Nonmetropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,595	17.6
Moderate	2	14.3	1,825	12.4	457	25.0	2,620	17.8
Middle	6	42.9	5,997	40.8	545	9.1	2,789	19.0
Upper	6	42.9	6,890	46.8	296	4.3	6,708	45.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**14**	**100.0**	**14,712**	**100.0**	**1,298**	**8.8**	**14,712**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,146	1,358	9.3	43.2	1,651	52.5	137	4.4
Middle	10,100	5,788	39.8	57.3	3,041	30.1	1,271	12.6
Upper	11,550	7,415	50.9	64.2	2,025	17.5	2,110	18.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**24,796**	**14,561**	**100.0**	**58.7**	**6,717**	**27.1**	**3,518**	**14.2**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	487	16.9	445	16.6	35	21.6	7	18.9
Middle	1,096	38.1	1,011	37.8	71	43.8	14	37.8
Upper	1,293	45.0	1,221	45.6	56	34.6	16	43.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,876**	**100.0**	**2,677**	**100.0**	**162**	**100.0**	**37**	**100.0**
Percentage of Total Businesses:				**93.1**		**5.6**		**1.3**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	6	5.4	6	5.5	0	0.0	0	0.0
Middle	31	27.9	31	28.2	0	0.0	0	0.0
Upper	74	66.7	73	66.4	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**111**	**100.0**	**110**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.1**		**0.9**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-9A

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Bank of the Hills TX Nonmetropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.3	0	0.0	9.5	0	0.0	10.5	0	0.0	8.7	9.3
Middle	0	0.0	41.9	0	0.0	37.3	0	0.0	45.6	0	0.0	40.7	39.8
Upper	0	0.0	47.8	0	0.0	53.2	0	0.0	43.9	0	0.0	50.6	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	11.0	0	0.0	7.8	1	50.0	8.1	137	61.7	5.7	9.3
Middle	1	25.0	39.0	200	22.4	37.0	1	50.0	35.0	85	38.3	30.7	39.8
Upper	3	75.0	50.0	692	77.6	55.2	0	0.0	56.9	0	0.0	63.6	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	892	100.0	100.0	2	100.0	100.0	222	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	5.0	0	0.0	0.8	0	0.0	16.7	0	0.0	15.8	9.3
Middle	2	50.0	30.0	400	77.2	57.5	1	25.0	37.5	120	31.1	47.0	39.8
Upper	2	50.0	65.0	118	22.8	41.7	3	75.0	45.8	266	68.9	37.2	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	518	100.0	100.0	4	100.0	100.0	386	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	41.6
Middle	0	0.0	33.3	0	0.0	50.5	0	0.0	0.0	0	0.0	0.0	34.6
Upper	0	0.0	66.7	0	0.0	49.5	0	0.0	0.0	0	0.0	0.0	23.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	9.9	0	0.0	8.3	2	20.0	10.1	197	20.2	10.6	9.3
Middle	3	37.5	40.7	600	42.6	38.3	4	40.0	42.9	389	39.8	37.6	39.8
Upper	5	62.5	49.4	810	57.4	53.3	4	40.0	47.0	391	40.0	51.8	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	8	100.0	100.0	1,410	100.0	100.0	10	100.0	100.0	977	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-9B

Distribution of 2023 and 2024 Home Mortgage Lending by Income Level of Geography Assessment Area: Bank of the Hills TX Nonmetropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	1	25.0	0.0	60	16.3	0.0	9.3
Middle	0	0.0	33.3	0	0.0	19.0	2	50.0	50.0	184	49.9	27.1	39.8
Upper	0	0.0	66.7	0	0.0	81.0	1	25.0	50.0	125	33.9	72.9	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	4	100.0	100.0	369	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.3	0	0.0	2.8	0	0.0	12.5	0	0.0	9.7	9.3
Middle	0	0.0	39.1	0	0.0	45.3	0	0.0	37.5	0	0.0	27.7	39.8
Upper	0	0.0	56.5	0	0.0	51.9	0	0.0	50.0	0	0.0	62.7	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	9.3
Middle	0	0.0	33.3	0	0.0	8.8	0	0.0	50.0	0	0.0	42.9	39.8
Upper	0	0.0	66.7	0	0.0	91.2	0	0.0	50.0	0	0.0	57.1	50.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-10

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Bank of the Hills TX Nonmetropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	17.2	0	0.0	15.4	1	20.0	17.3	50	4.3	17.4	15.3
Middle	3	75.0	39.6	500	83.3	48.6	1	20.0	37.3	50	4.3	36.4	38.6
Upper	1	25.0	41.8	100	16.7	35.7	3	60.0	43.9	1,068	91.4	45.8	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	600	100.0	100.0	5	100.0	100.0	1,168	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-11A

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Bank of the Hills TX Nonmetropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.6	0	0.0	0.5	0	0.0	1.3	0	0.0	0.5	17.6
Moderate	0	0.0	8.2	0	0.0	4.2	0	0.0	7.6	0	0.0	4.0	17.8
Middle	0	0.0	21.7	0	0.0	15.0	0	0.0	21.4	0	0.0	15.0	19.0
Upper	0	0.0	46.9	0	0.0	59.4	0	0.0	46.4	0	0.0	58.1	45.6
Unknown	0	0.0	21.7	0	0.0	21.0	0	0.0	23.3	0	0.0	22.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.9	0	0.0	2.0	0	0.0	3.6	0	0.0	2.3	17.6
Moderate	0	0.0	13.0	0	0.0	8.1	1	50.0	13.2	137	61.7	6.4	17.8
Middle	3	75.0	24.0	592	66.4	20.2	0	0.0	21.8	0	0.0	15.1	19.0
Upper	1	25.0	48.1	300	33.6	55.6	1	50.0	45.7	85	38.3	55.9	45.6
Unknown	0	0.0	11.0	0	0.0	14.1	0	0.0	15.7	0	0.0	20.3	0.0
Total	4	100.0	100.0	892	100.0	100.0	2	100.0	100.0	222	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.0	0	0.0	0.1	1	25.0	4.2	30	7.8	6.2	17.6
Moderate	1	25.0	15.0	100	19.3	5.1	0	0.0	20.8	0	0.0	13.5	17.8
Middle	0	0.0	10.0	0	0.0	1.5	0	0.0	8.3	0	0.0	7.4	19.0
Upper	3	75.0	65.0	418	80.7	64.9	3	75.0	62.5	356	92.2	70.1	45.6
Unknown	0	0.0	5.0	0	0.0	28.4	0	0.0	4.2	0	0.0	2.8	0.0
Total	4	100.0	100.0	518	100.0	100.0	4	100.0	100.0	386	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	2.5	0	0.0	0.8	1	10.0	2.1	30	3.1	1.0	17.6
Moderate	1	12.5	9.0	100	7.1	4.7	1	10.0	9.3	137	14.0	4.6	17.8
Middle	3	37.5	21.5	592	42.0	15.2	0	0.0	21.1	0	0.0	14.8	19.0
Upper	4	50.0	48.3	718	50.9	59.3	8	80.0	46.7	810	82.9	57.8	45.6
Unknown	0	0.0	18.7	0	0.0	20.0	0	0.0	20.8	0	0.0	21.8	0.0
Total	8	100.0	100.0	1,410	100.0	100.0	10	100.0	100.0	977	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE D-11B

Distribution of 2023 and 2024 Home Mortgage Lending by Borrower Income Level Assessment Area: Bank of the Hills TX Nonmetropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	22.2	0	0.0	21.6	0	0.0	0.0	0	0.0	0.0	17.6
Moderate	0	0.0	11.1	0	0.0	8.8	0	0.0	12.5	0	0.0	11.3	17.8
Middle	0	0.0	22.2	0	0.0	17.1	0	0.0	37.5	0	0.0	15.8	19.0
Upper	0	0.0	33.3	0	0.0	26.6	4	100.0	12.5	369	100.0	7.9	45.6
Unknown	0	0.0	11.1	0	0.0	25.9	0	0.0	37.5	0	0.0	65.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	4	100.0	100.0	369	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	12.5	0	0.0	7.1	17.6
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	12.5	0	0.0	6.2	17.8
Middle	0	0.0	17.4	0	0.0	7.8	0	0.0	12.5	0	0.0	3.0	19.0
Upper	0	0.0	82.6	0	0.0	92.2	0	0.0	62.5	0	0.0	83.7	45.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	16.7	0	0.0	2.6	0	0.0	0.0	0	0.0	0.0	17.6
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.8
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.0
Upper	0	0.0	16.7	0	0.0	6.2	0	0.0	50.0	0	0.0	57.1	45.6
Unknown	0	0.0	66.7	0	0.0	91.2	0	0.0	50.0	0	0.0	42.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-12

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses Assessment Area: Bank of the Hills TX Nonmetropolitan													
	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	1	25.0	54.5	100	16.7	37.8	2	40.0	53.5	150	12.8	43.5	93.3
Over $1 Million	2	50.0		450	75.0		1	20.0		50	4.3		5.3
Revenue Unknown	1	25.0		50	8.3		2	40.0		968	82.9		1.4
Total	4	100.0		600	100.0		5	100.0		1,168	100.0		100.0
By Loan Size													
$100,000 or Less	3	75.0	92.8	200	33.3	32.2	4	80.0	91.4	268	22.9	32.2	
$100,001 - $250,000	0	0.0	3.2	0	0.0	13.6	0	0.0	4.9	0	0.0	19.9	
$250,001 - $1 Million	1	25.0	4.0	400	66.7	54.2	1	20.0	3.7	900	77.1	47.9	
Total	4	100.0	100.0	600	100.0	100.0	5	100.0	100.0	1,168	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	100.0		100	100.0		2	100.0		150	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	1	100.0		100	100.0		2	100.0		150	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX E – GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small, relatively permanent statistical subdivision of a county. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts average about 4,000 inhabitants, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to the population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language:

1. Affordable housing (including multi-family rental housing) for low- or moderate-income individuals.
2. Community services targeted to low- or moderate-income individuals.
3. Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less.
4. Activities that revitalize or stabilize –
    a. Low- or moderate-income geographies.
    b. Designated disaster areas.
    c. Distressed or underserved nonmetropolitan middle-income geographies designated by the board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
        i. Rates of poverty, unemployment, and population loss.
        ii. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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

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

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

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

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

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

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

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

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

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of $1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the 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.

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