



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

January 07, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of The Rockies
Charter Number 7435

2452 Highway 6 and 50 Grand Junction, CO 81505

Office of the Comptroller of the Currency

1225 17th Street Suite 450 Denver, CO 80202-5534

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.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that contribute to First National Bank of the Rockies' CRA rating are as follows.

- Lending in the bank's assessment areas (AAs) is excellent; a substantial majority of the home mortgage and small business loans were originated in the bank's AAs.
- Lending to borrowers of different incomes and businesses of different sizes is excellent in the Moffat, Rio Blanco, and Routt Counties Non-MSA and reasonable in the Grand Junction MSA.
- The geographic distribution of home mortgage and small business loans in Moffat, Rio Blanco, and Routt Counties Non-MSAs and Grand Junction MSA is reasonable.
- There were no complaints regarding the bank's performance in meeting the credit needs of the AAs.
- The bank adequately responds to community development needs by providing an adequate level of community development loans, investments, and services in its AAs.

Scope of Examination

First National Bank of the Rockies (FNBR) qualifies as an Intermediate Small Bank under the CRA regulation and is therefore evaluated under the lending and community development (CD) tests.

The scope of this examination included a full scope review of both of the bank's AAs. These include the Grand Junction MSA and the Moffat, Rio Blanco, and Routt Counties Non-MSAs. This examination focused on a review of the 2011 and 2012 Home Mortgage Disclosure Act (HMDA) reportable data and a sample of commercial loans originated between January 1, 2011 and April 30, 2013.

The scope of the CD evaluation included all activity that meets the definition of CD loans, investments, and services. The evaluation period for the CD activity was August 10, 2010 to April 30, 2013.

Description of Institution

FNBR is a full-service financial institution headquartered in Grand Junction, Colorado. As of September 30, 2012, FNBR had total assets of \$334 million and net tier 1 capital of \$31.5 million.

FNBR is a subsidiary of FNBR Holding Corporation located in Grand Junction, Colorado. FNBR's assets represent all of the holding company assets.

FNBR operates as an intrastate bank in Colorado with four offices in Grand Junction and one in each of the following locations: Craig, Hayden, Meeker, Oak Creek, Rangely, and Steamboat Springs. Each branch operates a drive-up facility. The bank also owns and operates one cash-dispensing automated teller machine (ATM) at each location. During the review period, the bank did not close or open any branches.

The bank's assessment areas are as follows:

- Grand Junction (Mesa County) MSA, and
- Moffat, Rio Blanco, and Routt Counties Non-MSAs.

FNBR offers a full range of credit products within its AAs including commercial, real estate, consumer, and agricultural loan products. By dollar amount, FNBR's loan portfolio consists of the following types of credit: 39 percent commercial real estate; 23 percent 1-4 family; 19 percent commercial and industrial; 12 percent construction and development; 2 percent consumer loans; 2 percent agricultural loans; and 2 percent municipal loans. While the bank's portfolio remains concentrated in loans secured by commercial real estate, the bank's lending activity since the prior CRA examination has focused on commercial lending. Since the last CRA examination, the bank has originated 621 commercial loans totaling \$56.3 million. The bank originated 167 loans (27 percent of total number of loans) totaling \$20.9 million (37 percent by dollar) in the Grand Junction MSA. FNBR originated 418 loans (67 percent) or \$23.5MM (42 percent) in the Moffat, Rio Blanco, and Routt Counties Non-MSAs.

The bank refers customers to a third party mortgage lender who has a presence in three of the bank's branches. However, the third party mortgage lender has changed three times during our evaluation period. Loan demand for residential mortgage loans declined significantly during the rating period. In 2011 and 2012, the decline was largely due to reduced real estate prices and job uncertainty, particularly in the Grand Junction area, where the energy sector was last to feel the effects of the downturn. Given the renewed emphasis on commercial lending, we placed more weight on the bank's commercial lending activities in the bank's AAs.

For our examination, we relied on Home Mortgage Disclosure Act (HMDA) data submitted by the bank for the years 2011 and 2012. In those two years, the bank made 34 home mortgage loans. We also selected a sample of commercial loans made since the last CRA examination to assess lending to small businesses in the bank's AAs.

The bank's last CRA examination was as of August 10, 2010, and at that time the bank received a rating of "Outstanding" under the intermediate small bank CRA examination procedures.

The bank has the financial capital to meet the needs of its community, including retail and community development loans, qualified investments, and community development service needs. However, the weak economy coupled with the bank's concentrations in commercial real estate secured loans and construction and development loans did restrict the bank's ability to originate additional loans of these types during the evaluation period. The bank's total loan portfolio declined 20 percent during this time. The bank's new loans since the last CRA examination have focused more on commercial lending.

Description of Assessment Areas

The bank has two AAs, the Moffat, Rio Blanco, and Routt Counties Non-MSA and the Grand Junction MSA. The AAs meet the requirements of the regulation. They are comprised of whole political subdivisions and do not arbitrarily exclude any low- or moderate-income areas. A description of the AAs follows:

Moffat, Rio Blanco, and Routt Counties – Non-MSAs

Moffat, Rio Blanco, and Routt Counties are contiguous. However, the economy of Moffat and Rio Blanco Counties is substantially different from that of Routt County.

The bank operates six branches in the Moffat, Rio Blanco, and Routt Counties. The branches are located in the cities of Craig, Hayden, Meeker, Oak Creek, Rangely, and Steamboat Springs, Colorado.

For loans originated prior to January 1, 2012, we used 2000 Census Data. The 2000 census showed that the AA consisted of 15 census tracts (CTs). There were no low-income CTs in the county; 7 percent (1 CT) are moderate-income; 53 percent (8 CTs) were middle-income; and 40 percent (6 CTs) were upper-income.

For loans originated in 2012 and 2013, we used 2010 Census Data. The updated AA demographics consist of 14 census tracts (CTs). There are no low- or moderate-income CTs in the AA; 43 percent (6 CTs) are middle-income; and 57 percent (8 CTs) are upper income.

The average median family income in the AA for recent years was \$56,400 in 2010, \$60,200 in 2011, and \$61,000 in 2012.

Demographics particular to each county are as follows:

2010 Demographic Information Moffat-Rio Blanco-Routt Counties			
	Moffatt	Rio Blanco	Routt
Population	13,795	6,666	23,509
Below Poverty Level	14%	7%	7%
Urban/Rural	73/27%	0/100%	51/49%
Median House or condo value	\$170,975	\$205,516	\$495,760
Median Family Income	\$61,552	\$68,640	\$74,770

Moffat County is located in the northwestern corner of Colorado, along the Wyoming and Utah borders. The county seat is Craig, Colorado. Moffatt County includes the towns of Craig, Dinosaur, and Maybell-Powder Wash. Seventy-three percent of the residents live in town, and 27 percent are rural. Industries providing employment are agriculture, forestry, fishing and hunting (16.2 percent), educational, health and social services (15.1 percent), construction (13.1 percent), retail trade (12.9 percent) and transportation and utilities (10.3 percent).

Rio Blanco County is located immediately south of Moffat County. It consists of the small towns of Meeker and Rangely and 100 percent of the population lives in rural areas. Over half of the land in these two counties is public land used for various recreational activities, including hunting, fishing, and cross-country skiing. Industries providing employment are agriculture, forestry, fishing and hunting, and mining (22.7 percent), educational, health and social services (21.4 percent), and retail trade (11.0 percent).

Routt County is immediately east of Moffat County. Steamboat Springs is the county seat and drives the economy within the county. Other towns are Hayden, Oak Creek, and Yampa. The population is 51 percent urban and 49 percent rural. The median family income and median house value are significantly higher than the other counties in the AA. Industries providing employment are arts, entertainment, recreation, accommodation and food services (16.8 percent), construction (15.6 percent), educational, health and social services (13.7 percent), and retail trade (11.6 percent). The largest area employer is Steamboat Ski and Resort Corporation, followed by the school district and city and county governments.

The recession had a significant impact on this AA with a dramatic increase in the unemployment rate since 2007. Unemployment rates hit their high point in 2010 and are now gradually declining. As of December 2012, the Bureau of Labor Statistics local area unemployment statistics ([www:bls.gov/lau/tables.htm](http://www.bls.gov/lau/tables.htm)) report the unemployment rate in Moffat County of 7.1 percent; in Rio Blanco County 6.6 percent; and in Routt County 6.2 percent, up from 2007 levels of 3.2 percent, 2.3 percent, and 2.5 percent, respectively.

Banking competition is strong in this AA from other financial institutions including large and regional banks. These include Wells Fargo, N.A.; Vectra Bank, N.A.; Yampa Valley Bank; Mountain Valley Bank; Bank of the West; Alpine Bank; Bank of Colorado; and Millennium Bank.

Grand Junction MSA

The bank operates four branches in the Grand Junction MSA.

For loans originated prior to January 1, 2012, we used 2000 Census Data. The 2000 census showed that the MSA consisted of 28 census tracts (CTs) in Mesa County. There were no low-income CTs in the county; 18 percent (5 CTs) were moderate-income; 57 percent (16 CTs) were middle-income; and 25 percent (7 CTs) were upper-income.

For loans originated in 2012 and 2013, we used the updated 2010 Census Data. The MSA now consists of 29 census tracts (CTs) in Mesa County. There are no low-income CTs in the county; 21 percent (6 CTs) are moderate-income; 55 percent (16 CTs) are middle income; and 24 percent (7 CTs) are upper income.

Grand Junction, the county seat, is the largest city in the MSA, followed by Fruita and Palisade. Other towns and unincorporated subdivisions include Clifton, Fruitvale, DeBeque, Collbran, Mesa, Mack, Loma, Gateway, Glade Park, and Whitewater. Due to the area's mild climate, the county has become a popular place for relocation and recreation.

Leading industries include state and local government, energy/mining, and construction. Major employers in Mesa County are the Mesa County School District (2,392 jobs), St. Mary's Hospital (1,500 jobs), and Mesa State College (980 jobs) according to the Mesa County Colorado Economic Development website update for fall 2012.

The local economy experienced a prolonged recession in recent years, but has begun a slow recovery in 2012. According to Moody's Analytics, when energy prices collapsed, the local energy and mining industry experienced substantial job losses. This MSA experienced the largest employment decline among all major metro areas in Colorado. Home prices dropped significantly and residential construction activity came to a halt. Foreclosures in Grand Junction exceeded Colorado and National foreclosure rates during 2011 and 2012. While construction has traditionally been a key strength in this MSA, relatively weak demographics continues to slow homebuilding. Housing prices started to rebound in 2012 following dramatic declines, which hit bottom in mid-2011. From 2000 to 2010, Mesa County's population grew by 26 percent, or 30,468. Since 2010, population growth remains far short of state and regional rates and Grand Junction was the only metro area to experience negative net migration in 2012.

Because of the recession, Mesa County saw unemployment rates increase from 3.2 percent in 2007 to a high of 10.7 percent in 2010. As of December 2012, the unemployment rate has dropped to 9.0 percent, but remains above both Colorado's unemployment rate of 7.6 percent and the national unemployment rate of 7.8 percent.

The average median family income has shown gradual increases over the past few years and was \$60,100 in 2010, \$64,300 in 2011, and \$65,200 in 2012. Census data shows that 11.7 percent of the population has income below poverty level. The 2012 median price of a single family home is \$233,592.

We performed one community contact in this AA. The community contact indicated in general, current underwriting standards are strict and pose a barrier to obtaining credit for low- and moderate-income families in the community. The contact stated there is also a need for credit counseling in the area. The contact stated community development opportunities for local financial institutions include providing funding for grants to offset special needs programs and assisting the United Way of Mesa County.

Banking competition is strong with several competing banks within the Grand Junction MSA including large and regional commercial banks. These include Wells Fargo, N.A.; U.S. Bank, N.A.; Vectra Bank; Alpine Bank; ANB Bank; Grand Valley Bank; Bank of the West; Bank of Colorado; Timberline Bank; Palisades National Bank; Home Loan State Bank; Community Banks of Colorado; and Academy Bank, N.A.

Conclusions with Respect to Performance Tests

LENDING TEST

Loan-to-Deposit Ratio

The loan-to-deposit (LTD) ratio is reasonable. As of September 30, 2012, the 10-quarter average LTD ratio, calculated since the previous CRA examination, was 42 percent. The LTD ratios for the same period for six similarly situated banks range between 36 percent and 100 percent. Similarly situated banks are those banks of comparable asset size and operating in the same geographies. The LTD ratio is low compared to the average 64 percent LTD of similarly situated banks due to loan portfolio restrictions and minimal loan demand.

Lending in Assessment Area

The bank has extended a substantial majority of its loans inside its AAs. The bank originated 86 percent of the loans based on number and 91 percent based on dollar inside the bank's AAs. Our loan sample included loans originated between January 1, 2011 and April 30, 2013.

Table 1 - Lending in Grand Junction MSA and Moffat, Rio Blanco, and Routt Counties										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home mortgage	34	82.93	7	17.07	41	1,260	70.43	529	29.57	\$1,789
Commercial	39	88.64	5	11.36	44	17,395	94.40	1,032	5.60	\$18,427
Totals	73	85.88	12	14.12	85	18,427	91.15	1,561	7.72	\$20,216

Source: 2011 and 2012 HMDA data; Loan Sample.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Overall lending to borrowers of different incomes is reasonable. We placed more weight on lending in the Moffat, Rio Blanco, and Routt Counties non-MSA given that 71 percent of the bank's deposits come from this AA. In addition, 67 percent of commercial loan originations since the last CRA examination were made in this AA. In reaching our conclusions, we also considered the downturn in the Grand Junction economy, which in turn affected consumers and local small businesses and the demand for loans. While conditions have improved, Grand Junction continues to lag in its economic recovery.

Moffat, Rio Blanco, and Routt Counties AA

The bank's home mortgage lending in the non-MSA AA was limited. The bank made only 11 home mortgage loans in 2011 (two home purchase, seven home improvement, and two refinancing); and 15 mortgage loans in 2012 (two home purchase, eleven home improvement, and two refinancing). In aggregate, the bank originated 19.23 percent of its loans to low- and moderate-income borrowers.

2011 mortgage lending to low-income borrowers exceeded the demographic comparator but was slightly below demographics for lending to moderate-income borrowers.

In 2012, the bank made no loans to low-income borrowers and lending to moderate-income borrowers was slightly below area demographics. Reduced real estate values and job uncertainty in the energy sector were the major contributors of the decline in loan volume. Given these factors, the overall lending to low- and moderate-income borrowers is reasonable.

Table 2 - Borrower Distribution of Residential Real Estate Loans in Moffat, Rio Blanco, and Routt Counties								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
2011 Home Mortgage loans*	13.06%	18.18%	15.43%	9.09%	23.83%	9.09%	47.68%	54.55%
2012 Home Mortgage Loans**	12.94%	0%	15.42%	13.33%	21.77%	53.33%	49.87%	33.33%
Total by number		7.69% (2 of 26)		11.54% (3 of 26)		34.62% (9 of 26)		42.31% (11 of 26)

Source: *2011 HMDA with 2000 U.S. Census data; and **2012 HMDA with 2010 U.S. Census data:

Grand Junction MSA

The bank's mortgage lending within the Grand Junction MSA is limited. The bank made only five mortgage loans in 2011 (all home improvement) and three in 2012 (two home improvement and one refinancing). Lending to low-income borrowers is satisfactory, with two out of eight of these loans (or 25 percent by number) exceeding 2011 and 2012 demographics. The bank's mortgage lending to moderate-income individuals does not meet demographics. Reduced real estate values and job uncertainty in the energy sector were the major contributors of the limited loan volume. Also, decreases in lendable equity reduced motivation for home owners to finance improvements.

Table 2 - Borrower Distribution of Residential Real Estate Loans in Grand Junction MSA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
2011 Home Mortgage loans*	17.40%	20.00%	19.63%	0%	23.69%	60.00%	39.28%	20.00%
2012 Home Mortgage Loans**	19.34%	33.33%	17.84%	0%	24.11%	0%	38.71%	66.67%
Total by number	25% (2 of 8)		0%		37.5% (3 of 8)		37.5% (3 of 8)	

Source: *2011 HMDA with 2000 U.S. Census data; and **2012 HMDA with 2010 U.S. Census data.

Moffat, Rio Blanco, and Routt Counties AA

Distribution of loans to small businesses in the Moffat, Rio Blanco, and Routt Counties Non-MSAs is reasonable. Based on number, the portion of loans to small businesses exceeds the demographic comparator.

Table 2A - Borrower Distribution of Loans to Businesses/Farms in the Moffat, Rio Blanco, and Routt Counties Non-MSA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	73.91	2.82	23.27	100%
% of Bank Loans in AA by #	78.95	21.05	0	100%
% of Bank Loans in AA by \$	24.87	75.13	0	100%

Source: Loan sample; 2010 Census Data

Grand Junction MSA

Distribution of loans to small businesses (businesses with less than \$1 million in gross annual revenues) in the Grand Junction MSA is significantly lower than the demographic comparator. Based on number of loans in our sample, the bank originated 55 percent of its total business loans to small businesses. Based on dollar volume, it contributed 9 percent of its total business loans to small businesses.

The downturn in the economy coupled with the bank’s more conservative underwriting standards have contributed to the low volume of loans made to small businesses. Many small businesses do not have the cash flow to qualify for a loan.

Table 2A - Borrower Distribution of Loans to Businesses in the Grand Junction MSA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	77.00%	2.81%	20.19%	100%
% of Bank Loans in AA by #	55.00%	45.00%	0%	100%
% of Bank Loans in AA by \$	8.84%	91.16%	0%	100%

Source: Loan sample; 2010 Census Data

Geographic Distribution of Loans

Moffatt, Rio Blanco, and Routt Counties AA

Since 2010 census data shows no low- or moderate-income census tracts in this AA, our analysis focused on loans made in 2011, comparing their distribution to 2000 census data. This AA had no low-income CTs and one moderate-income CT according to 2000 census information.

In 2011, the bank originated 11 mortgage loans in the Moffatt, Rio Blanco, and Routt Counties AA. There were two home purchase, seven home improvement, and two refinancing loans. None of the loans was in low- or moderate-income tracts. However, this is reasonable given there is only one moderate-income CT and this CT has very limited owner-occupied housing at 2.45 percent. The bank had very limited opportunity to make home purchase, home improvement, or refinancing to borrower-secured homes in low- and moderate-income tracts within the AA.

Table 3 - Geographic Distribution of Residential Real Estate Loans in Moffat, Rio Blanco, and Routt Counties								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
2011 Home Mortgage loans*	0%	0%	2.45%	0%	48.93%	81.82%	48.62%	18.18%

Source: 2011 HMDA with 2000 U.S. Census data.

Grand Junction MSA

During 2011 and 2012, the bank made eight home mortgage loans within the Grand Junction MSA (seven home improvement and one refinancing). None of the loans was made to borrowers in low- or moderate-income tracts. However, the bank’s lending performance is reasonable because demographic information indicates there is no owner-occupied housing in low-income tracts; therefore, there are no mortgage lending opportunities. Weak economic conditions with high unemployment, high foreclosures, and declining housing prices further limited the opportunity to lend in moderate-income CTs.

Table 3 - Geographic Distribution of Residential Real Estate Loans in Grand Junction MSA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
2011 Home Mortgage Loans*	0%	0%	18.21%	0%	59.74%	100%	22.06%	0%
2012 Home Mortgage Loans**	0%	0%	16.88%	0%	59.66%	66.67%	23.45%	33.33%

Source: 2011 HMDA with 2000 U.S. Census data; and 2012 HMDA with 2010 U.S. Census data.

Moffat, Rio Blanco, and Routt Counties AA

There are no low- or moderate-income CTs in this AA; therefore, we did not perform a geographic analysis of small business loans for this AA.

Grand Junction MSA

The geographic distribution of loans to businesses in the Grand Junction MSA is reasonable. The portion of business loans in moderate-income CTs is near the geographic comparator. There are no low-income CTs in this AA.

Table 3A - Geographic Distribution of Loans to Businesses in Grand Junction MSA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses/ Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans
Commercial	0.00%	0.00%	12.18%	5.00%	61.16%	70.00%	26.66%	25.00%

Source: Loan Sample, 2010 Census data

Responses to Complaints

The bank has not received any CRA-related complaints since the previous CRA examination.

COMMUNITY DEVELOPMENT TEST

The bank’s performance under the community development test is satisfactory considering the bank’s capacity and opportunities in the AAs.

Number and Amount of Community Development Loans

FNBR demonstrated adequate responsiveness by providing a moderate level of community development (CD) loans in the Grand Junction MSA AA and in the Moffat, Rio Blanco, and Routt Counties Non-MSA AA.

The bank provided three CD loans totaling \$400 thousand in the Grand Junction MSA AA. This accounts for 1.3 percent of tier 1 capital. Two of the loans provided funding to purchase land to build a shelter for teens and recovering alcoholics transitioning out of homelessness. The third loan was to provide funding to a developer to construct affordable housing to low-income individuals.

The bank also provided two CD loans totaling \$2 million in the Moffat, Rio Blanco, and Routt Counties Non-MSA AA, which represents 6.4 percent of tier 1 capital. One loan

was to an organization which provides affordable housing for low-income individuals in the AA. The second loan provides funding to a program providing free lunches for students during the summer in the AA.

Number and Amount of Qualified Investments

FNBR's level of qualified community development investments in the bank's AA is adequate.

In the Grand Junction MSA AA, the bank invested in eight GNMA mortgage pools, which helped provide affordable housing for LMI households. The bank also invested in a program focused on providing affordable mortgages to LMI families. The bank provided a small donation to an organization that provides transitional housing for teens and recovering alcoholics who were previously homeless, and another organization that provides services for migrant workers and their children. Qualified investments in this AA total \$1.84 million or 5.85 percent of tier 1 capital.

In the Moffat, Rio Blanco, and Routt Counties Non-MSA, FNBR made one investment totaling \$280 thousand to provide funding to the school district. In addition, the bank invested in three qualified municipal bonds totaling \$1.1 million. Qualified investments in this AA total \$1.4 million and represent 4.50 percent of tier 1 capital.

Extent to Which the Bank Provides Community Development Services

FNBR operates 10 branches in its assessment areas. Three of its branches are located in underserved/distressed middle-income, non-metropolitan census tracts. The bank also offers telephone banking and online banking.

Qualified community development services total 469 hours from 2010 through 2013. Qualified CD services include volunteer work at local food banks, the chamber of commerce, and serving on the site selection committee for an organization constructing homes for LMI families.

Responsiveness to Community Development Needs

The bank demonstrated satisfactory efforts and responsiveness to the community development needs in its AAs. The bank responded to the need to support affordable housing for low- and moderate-income individuals in its AAs, as well as the need to provide services for low-income migrant farm workers and their families.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.