

PUBLIC DISCLOSURE

July 31, 2006

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Valley Ridge Bank
RSSD# 268846

450 W. Muskegon
Kent City, Michigan 49330

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, IL 60604-1413

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'S COMMUNITY REINVESTMENT ACT (CRA) RATING: This institution's performance is rated **satisfactory**.

Valley Ridge Bank is satisfactorily meeting the credit needs of its community, based upon an analysis of the bank's lending activities and information provided by community contacts. The bank's loan-to-deposit ratio is reasonable given the characteristics of the bank, its local competitors, and the credit needs of its assessment area. A majority of the bank's loans are originated in the assessment area. The loan distribution across borrowers of different income levels, especially to low-to-moderate income families and small farms and businesses, shows excellent penetration. The geographic distribution of loans within the assessment area is reasonable. There were no CRA-related complaints received by the institution or this Reserve Bank since the previous examination.

The institution was rated **satisfactory** under the CRA at its previous evaluation conducted on June 3, 2002.

SCOPE OF EXAMINATION

The bank's CRA Performance was evaluated in the context of information about the institution and assessment area, such as asset size, financial condition, competition, and economic and demographic characteristics. Performance within the designated assessment area was evaluated using small bank, full-scope examination procedures based on the following performance standards.

- ***Loan-to-Deposit Ratio*** – An eight-quarter average loan-to-deposit ratio was calculated for the bank and compared to its peer group, as well as a sample of competitors.
- ***Lending in the Assessment Area*** – All direct and indirect installment loans, home equity loans and lines of credit, home improvement, home purchase, and business loans originated in 2004, 2005 and first quarter 2006, were reviewed to determine the percentage of loans originated in the assessment area.
- ***Geographic Distribution of Lending in the Assessment Area*** – All direct and indirect installment loans, home equity loans and lines of credit, home improvement, home purchase, and business loans originated in 2004, 2005 and first quarter 2006, were analyzed to evaluate the extent to which the bank is making loans in geographies of different income levels, particularly those designated as low- or moderate-income.
- ***Lending to Borrowers of Different Incomes and to Businesses and Farms of Different Sizes*** – All direct and indirect installment loans, home equity loans and lines of credit, home improvement, home purchase, and business loans originated in 2004, 2005 and first quarter 2006, were analyzed to assess the loan distribution among borrowers of different income levels and to businesses with different revenue levels.

- **Response to Substantiated Complaints** – Neither Valley Ridge Bank nor this Reserve Bank received any CRA-related complaints related to this institution since the previous examination.

In addition to the above criteria, information obtained through discussions with three community representatives was considered in the overall evaluation.

DESCRIPTION OF INSTITUTION

Valley Ridge Financial Corporation is a financial holding company (FHC), located in Kent City, Michigan. The FHC owns 100% of Valley Ridge Bank, Kent City, Michigan. The bank owns 100% of Valley Ridge Realty, an agency which lists and sells real estate; 100% of Valley Ridge Financial Services, and 100% of Valley Ridge Mortgage Company. The FHC also retains a 20% ownership interest in West Shore Computer Services, a data processing service center for six area banks including Valley Ridge.

The bank's main office is located at 450 W. Muskegon Street, in Kent City, Michigan. Valley Ridge Bank has eight full-service branches. All have an automated teller machine (ATM).

According to the Uniform Bank Performance Report, the bank had \$213 million in total assets as of March 31, 2006, and the bank offers standard loan and deposit products. The loan portfolio is primarily comprised of 37% commercial real estate secured loans; followed by 24% one to four family residential real estate (closed end) loans. The institution offers credit cards issued through Elan Financial Services.

The bank's peer group includes all commercial banks with assets between \$100 and \$300 million, with 3 or more full service offices, and located in metropolitan areas. Exhibit (1) lists the bank's local competitors for loans and deposits and the city where the competitor branches are located.

Exhibit (1) – Competitors in the Assessment Area

Bank Name, Headquarter location	Location of branches within Valley Ridge Bank's Assessment Area
Chemical Bank, Midland, MI	Fremont
Choice One, Sparta, MI	Sparta
Fifth Third, Grand Rapids, MI	Ravenna, Fremont
Huntington Bank, Columbus, OH	Regional bank competing with virtually every VRB office.
Independent Bank, Bay City, MI	Sparta, Newaygo, White Cloud
National City Bank, Cleveland, OH	Regional bank competing with virtually every VRB office.

As of June 30, 2005, Valley Ridge Bank is ranked 19th of FDIC insured institutions in deposit market share (1.00%) in the four-county area of Kent, Muskegon, Newaygo, and Ottawa.

DESCRIPTION OF ASSESSMENT AREA

An institution's assessment area(s) will include the towns, counties, or other political subdivisions where its branches are located and a substantial portion of its loans are made. Assessment area(s) must consist of one or more geographies defined by block numbering areas (BNAs) or census tracts, which are statistical subdivisions of a county. Census tracts are primarily used in metropolitan areas, while BNAs are used in non-metropolitan areas. 2000 U.S. Bureau of Census data is used in this evaluation, unless stated otherwise.

Valley Ridge Bank's assessment area, as shown in Appendix A, consists of portions of Kent, Muskegon, Newaygo and Ottawa Counties located in the western portion of the lower peninsula of Michigan. The bank's market share by deposits, across the entire assessment area is 1.0%. The bank has the largest presence in Newaygo County where it has four offices.

The assessment area has not changed since the 2002 CRA examination. However, the designation of the geography within the assessment area changed when the Office of Management and Budget updated the Metropolitan Statistical Areas (MSA) based on 2000 United States Census Data in OMB Bulletin 03-04 released in June 2003. This update divided the assessment area into three MSAs: Grand Rapids County MSA, Holland County MSA and the Muskegon County MSA. The bank's assessment area is contiguous, and the three MSAs are included in a combined statistical area (CSA). A CSA represents multiple metropolitan or micropolitan areas that have a high degree of employment interchange. CSAs often represent regions with common labor and media markets. This CSA is the Grand Rapids-Muskegon-Holland, MI Combined Statistical Area. Therefore, this evaluation will assess the bank's performance as one assessment area.

The assessment area includes 23 census tracts of middle-income geographies, and 2 of which are moderate-income geographies. The bank's White Cloud branch is located in one of the moderate-income geographies.

Income Characteristics

Exhibit 2 compares the income levels for the assessment area to the three MSAs in which the bank operates and to the State of Michigan based on 2000 U.S. Bureau of Census data. The median family income for the State of Michigan is slightly higher than the assessment area.

Exhibit #2						
Distribution of Families by Income Level						
Location	Median Family Income(\$)	Percent of Families				
		Low	Moderate	Middle	Upper	Below Poverty Level
Combined Assessment Area	48,924	19.15	21.96	26.78	32.11	6.21
Grand Rapids County MSA	52,945	17.93	18.75	24.49	38.84	6.33
Holland County MSA	59,880	14.28	19.84	29.76	36.12	3.06
Muskegon County MSA	45,652	19.59	18.72	22.85	38.85	8.78
State of Michigan	53,457	19.28	18.32	22.76	39.64	7.42

Low-income is defined as less than 50% of median family income; moderate-income as 50% to less than 80% of median family income; middle-income as 80% to less than 120% of median family income; and upper-income as 120% or more of median family income.

Housing Characteristics and Affordability

The bank's assessment area has a total of 43,013 housing units. Of the housing units in the assessment area, 77.39% are owner-occupied, 12.58% are rental units and 10% of the units are vacant. These percentages of owner-occupied units are slightly higher than those of the Grand Rapids County MSA, the Holland County MSA, the Muskegon county MSA and the State of Michigan. Please refer to Exhibit #3. However, these numbers are based on 2000 United States Census Data and do not account for the recent downturn in the Michigan economy. According to the Federal Deposit Insurance Corporation's (FDIC) Spring 2006 Banking Profile for the State of Michigan, the state's foreclosure rate reached 2.6% in 2005 compared to 1.5% for the nation. In addition, during 2005, the state's home price appreciation rate was the lowest in the nation at 3.5%. This rate was significantly below the national average of 13.0% for the same time period. Low appreciation rates in turn, affect the ability of homeowners to take equity out of their homes. In addition, it may result in slower growth in the housing market.

Exhibit (3) - Housing Summary

Location	Total Housing Units	Percent			Median Housing Value (\$)	Median Gross Rent(\$)	Affordability Ratio*
		Owner-Occupied Units	Rental Units	Vacant Units			
Combined Assessment Area	43,013	77.39	12.58	10.02	97,165	474	44.3
Grand Rapids County MSA	293,084	67.95	24.90	7.15	107,614	544	42.0
Holland County MSA	86,856	75.95	18.07	5.98	128,839	579	40.7
Muskegon County MSA	68,556	71.82	20.56	7.62	84,354	452	45.2
State of Michigan	4,234,279	65.97	23.44	10.59	110,300	546	40.4

Home ownership in the assessment area (77.39%) is higher than in the State of Michigan (65.97%). The affordability ratios for the assessment area and for the State of Michigan are 44 and 40 respectively, indicating that housing is generally more affordable in the assessment area.

**Affordability ratios, developed by dividing the median household income by the median household value for a given area or groups of geographies, are helpful in comparing costs for different areas. An area with a high ratio generally has more affordable housing than an area with a low ratio.*

Labor and Employment

The unemployment rates for Grand Rapids, Holland and Muskegon MSAs have remained approximately equal to the State of Michigan and higher than the national average. According to the State of Michigan’s Department of Labor and Economic Growth, the average unemployment rate for the MSAs in the assessment area are as follows: Grand Rapids MSA = 5.7%; Holland MSA = 5.0%; Muskegon MSA = 6.5%. The State of Michigan = 6.5%. The average national unemployment rate remained lower at 4.8%. This shows an increasing strain on the Michigan economy.

University of Michigan’s Economic Outlook, Forecast Update, 2004–2007

Periodically the University of Michigan’s forecasting group, Research Seminar in Quantitative Economics (RSQE), prepares projections for the development of the state’s economy. In May 2006 an updated forecast was published projecting Michigan’s economic growth for 2006 through 2007. According to the RSQE, economists suggest that the impact of the automotive industry’s restructuring process will continue to affect the state’s economy beyond 2007. Job losses which declined by 1.8 percent in the first quarter of 2006, will be corrected in the second quarter to an increase of 1.2 percent. However, these gains are not viewed as the initial stages of a positive trend in the state’s economy, but a corrective response in the labor market, following unusually heavy losses at the beginning of the year. Job losses are estimated to persist for the next year and a half, but at a modest pace of 0.3 percent over the second half of 2006 and 0.2 percent during 2007. The RSQE anticipates that in 2006 there will be an employment decline of 19,100 workers, and a decrease of 8,700 workers in 2007, and potentially extending the duration of job losses a total of

seven years. The RSQE group forecasts that the manufacturing sector will continue to struggle. During 2005, manufacturing lost 15,200 jobs and is expected to lose 30,800 in 2006, before moderating slightly to 26,100 job reductions in 2007. This results in a combined loss of 56,900 workers between the end of 2005 and the end of 2007. About 85 percent of the decline is expected to be in the automotive industry. On the other hand, the private nonmanufacturing sector is expected to continue its moderate growth, due primarily to the service industries. The service sector will likely be led by health services and is anticipated to continue to provide the fuel for sustained growth.

The impact of these conditions may be slightly less severe in the assessment area because the major employers are more diversified as shown below.

Major employers in the assessment area are listed in Exhibit (4).

Exhibit #4 – Major Employers in the Assessment Area

Exhibit #4			
Major Employers in the Assessment Area			
Company	Location	Employees	Description
Name of company	City	#	Major product (eg. Truck equipment)
Spectrum Health-Blodgett Cmps	Grand Rapids Kent Co.	15000	General Medical & Surgical Hospitals
Kiefer International Products	Grand Rapids Kent Co.	8333	Industrial Supplies Merchant Whols
Access Business Group Llc	Ada Kent Co.	5000	Marketing Consulting Svcs
Alticor Inc	Ada Kent Co.	5000	Misc General Purpose Machinery Mfg
Haworth Inc	Holland Ottawa Co.	8100	Furniture Merchant Whols
Herman Miller Inc	Zeeland Ottawa Co.	3000	Office Furniture, Except Wood, Mfg
Mercy General Hospital	Muskegon Muskegon Co.	2040	General Medical & Surgical Hospitals
Gerber Products CO	Fremont Newaygo Co.	750	Other Grocery Prod Merchant Whols
Magna Donnelly	Newaygo Newaygo Co.	500	All Other Motor Vehicle Parts Mfg

Source: Michigan Bureau of Labor Market Information

Community representatives, contacted during the examination to determine the credit needs of the assessment area, indicated that local financial institutions are actively involved in the community and are adequately meeting the credit needs of the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Performance standards for small banks consist of the following, as applicable: the bank's loan-to-deposit (LTD) ratio, the percentage of loans and other lending-related activities located in the bank's assessment area, the record of lending to borrowers of different income levels and farms and businesses of different sizes, the geographic distribution of loans, and the record of taking action in response to written complaints. To determine CRA performance, the preceding standards are analyzed and evaluated within the assessment area context, which includes, but is not limited to, comparative analyses of the assessment area and the state and the non-metropolitan portions of the state demographic data on median income, nature of housing stock, housing costs, and other relevant data pertaining to the bank's assessment area.

Loan-to-Deposit (LTD) Ratio

The bank's average loan-to-deposit ratio, calculated from data contained in the Consolidated Reports of Condition, was evaluated giving consideration to the bank's capacity to lend, competitor and peers' loan-to-deposit ratios, as well as demographic factors, economic conditions and lending opportunities present in the assessment area.

Based on the bank's reasonable LTD ratios relative to its peer group and a sample of competitors, the bank meets the standards for satisfactory performance under this criterion. Exhibit (5) shows the comparison for the eight-quarters ending March 31, 2006.

Valley Ridge Bank's LTD ratio approaches 90%. It is meeting the needs of its assessment area by returning its deposits to the community as loans. The bank performs slightly better than its peer group. The regional banks seen in this exhibit are the banks that Valley Ridge considers its competitors. These regional banks have much broader markets and funding sources. Therefore, comparison to the regional banks is not as meaningful as the comparison to the banks in the Valley Ridge peer group.

Exhibit #5 – LTD Ratios

Exhibit #5									
LTD Ratios									
Bank Name, City, 3/06 Assets \$(Millions)	6/04 (%)	9/04 (%)	12/04 (%)	3/05 (%)	6/05 (%)	9/05 (%)	12/05 (%)	3/06 (%)	Avg.
Valley Ridge Bank, Kent City, \$ 213,820	85.15	85.54	86.72	88.64	89.71	90.93	90.06	88.21	88.12
Peer Group	80.13	81.29	81.61	80.78	81.76	81.77	81.65	81.97	81.37
Chemical Bank, Midland, MI, \$3,724,745	75.77	75.79	75.29	71.79	75.69	75.38	76.75	92.92	77.42
Choice One, Sparta, MI, \$246,759	107.09	104.47	102.76	104.00	104.81	102.88	100.89	95.37	102.78
Fifth Third, Grand Rapids, MI, \$47,875,754	92.29	87.52	89.80	92.42	94.45	92.56	93.22	92.61	91.85

Huntington Bank, Columbus, OH, \$35,241,416	106.92	107.55	108.12	106.55	107.16	107.47	107.22	103.77	106.84
Independent Bank, Bay City, MI, \$1,460,192	104.27	102.51	104.79	101.84	108.67	99.98	100.95	104.10	103.38
National City Bank, Cleveland, OH, \$72,949,011	139.83	167.86	149.42	149.49	145.09	150.87	144.90	145.94	149.17

Lending in the Assessment Area

To assess the extent of lending within the assessment area, the following were reviewed: direct installment loans, home equity loans and lines of credit, Home Mortgage Disclosure Act (HMDA) data, and small business loans. The sample period for each loan product was loan production for the calendar years 2004, 2005, and first quarter, 2006. Information from the performance context, such as economic conditions present within the assessment area, loan demand, bank size, financial condition, branching network, and business strategies, were considered when evaluating the bank's performance.

Overall, consumer/commercial/agricultural/residential real estate lending within the bank's assessment area meets the standards for satisfactory performance under this criterion.

The majority of Valley Ridge Bank loans are originated within the assessment area. The distribution of a sample of the bank's primary loan products, originated during the years of 2004, 2005 and first quarter 2006, is illustrated in Exhibit (6).

Exhibit #6			
Distribution of Loans in/out of Assessment Area (AA)			
Loan Type	Number of Loans		
	# in Sample	# in AA	% in AA
Residential Real Estate	425	325	76.5
Agricultural/ Commercial	738	455	61.7
Consumer	2,130	1,624	76.2
Totals	3,293	2,404	73.0

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

The distribution of loans among borrowers of different income levels was determined by reviewing Home Mortgage Disclosure Act (HMDA) data, and small business loans. The sample period for the HMDA data was calendar years 2004, 2005, and first quarter, 2006. Information from the performance context, such as economic conditions present within the assessment area, demographics, loan demand, bank size, financial condition, branching network, and business strategies, were considered when evaluating the bank's performance.

Given the demographics of the bank’s assessment area, the loan distribution across borrowers of different income levels, and farms and businesses of different sizes exceeds the standards for satisfactory performance under this criterion.

The distribution of Valley Ridge Bank loans reflects an excellent penetration among borrowers of different income and revenue levels, as supported by a review of residential real estate/ agricultural/commercial loan data.

Residential Real Estate Loans

Exhibit (7) shows the distribution of residential real estate loans, originated during the years 2004, 2005, and first quarter 2006 by income level. As shown, the percent of loans to low- and moderate-income borrowers is 53.2%. Valley Ridge Bank out-performs the aggregate of lenders within the assessment area whose lending to low-income and moderate-income borrowers is 10.4% and 25.9%, respectively.

Exhibit #7 – Loan Distribution of Residential Real Estate Loans by Income Level

Exhibit #7			
Loan Distribution of Residential Real Estate Loans by Income Level			
Income Level	Total Number of Loans	Percent of Total Loans*	Percent of Families by Income Level
Low	70	21.5	19.15
Moderate	103	31.6	21.96
Middle	73	22.4	26.78
Upper	72	22.1	32.11
Unknown	7	2.1	--
Totals	325	100.0	100.0

* HUD’s estimated 2002 median family income was used to determine the income level of the applicants.

Agricultural and Commercial Loans

The distribution of commercial and agricultural loans reflects a reasonable penetration among small businesses and small farms. The distribution, based on information from the Consolidated Report of Condition as of June 30, 2006, is shown in Exhibits (8) and (9).

Exhibit #8		
Distribution of Small Farm Loans		
Original Dollar Amount	Outstanding Number	Outstanding Dollar Amount (000's)
Loans Secured by Farmland		
Less than or equal to \$100,000	15	516
Greater than \$100,000 through \$250,000	11	1,587
Greater than \$250,000 through \$500,000	4	1,112
Total	30	3,215
Loans to Finance Agricultural Production and Other Loans to Farmers		
Less than or equal to \$100,000	43	824
Greater than \$100,000 through \$250,000	5	432
Greater than \$250,000 through \$500,000	0	0
Total	48	1,256
Loans Secured by Farmland and Loans to Finance Agricultural Production and Other Loans to Farmers		
Grand totals	78	4,471

As Exhibit (8) shows, originations in the \$100,000 or less category represent 74.3% of the number and 29.9% of the dollar amount of small farm loans.

Exhibit #9		
Distribution of Small Business Loans		
Original Dollar Amount	Outstanding Number	Outstanding Dollar Amount (000's)
Loans Secured by Non-Farm Nonresidential Properties		
Less than or equal to \$100,000	86	3,982
Greater than \$100,000 through \$250,000	67	9,349
Greater than \$250,000 through \$1 million	58	24,146
Total	211	37,477
Commercial and Industrial Loans		
Less than or equal to \$100,000	182	5,045
Greater than \$100,000 through \$250,000	39	4,388
Greater than \$250,000 through \$1 million	19	8,238
Total	240	17,641
Loans Secured by Non-Farm Nonresidential Properties and Commercial and Industrial Loans		
Grand totals	451	55,148

As Exhibit 9 shows, small business loan originations in the \$100,000 or less category represent

59.4% of the number and 16.3% of the dollar amount of small business loans.

According to community contacts, area financial institutions are meeting the needs of the farmers and business owners in the area.

Geographic Distribution of Loans

The distribution of lending among geographies of different income levels within the assessment area, particularly those defined as low- and moderate-income, was reviewed. To assess the bank’s performance, the following were reviewed: direct installment loans, home equity loans and lines of credit, Home Mortgage Disclosure Act (HMDA) data, and commercial loans. The sample period for each loan product was loan production for calendar years 2004, 2005, and first quarter, 2006. Demographic characteristics of census tracts, such as housing types and income level, were considered in the evaluation.

The geographic distribution of loans meets the standards for satisfactory performance under this criterion.

Exhibit 13 shows the bank’s residential real estate lending for the period of review. Valley Ridge Bank’s performance is very comparable to the distribution of owner-occupied housing units in the assessment area. Note that the bank’s penetration of loans in moderate-income tracts compared favorably to that of the aggregate of all lenders in the assessment area and is approximately equal to the percentage of owner-occupied units.

Exhibit 13 – Geographic Distribution of Residential Real Estate Loans

Income Level	Census Tracts		Owner-Occupied Units		Housing Loan Data			
					Valley Ridge Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0	0	0	0	0	0	0
Moderate	2	8.0	2,377	7.1	111	6.8	451	5.3
Middle	23	92.0	30,911	92.8	1513	93.1	8,034	94.7
Upper	0	0	0	0	0	0	0	0
Total	25	100.0	33,288	100.0	1624	100.0	8,485	100.0

Valley Ridge Bank originated the majority of its consumer loans to households located in middle-income geographies, which is consistent with the number of households located in those geographies. The bank’s percentage of loans in moderate-income geographies is approximately the same as the percentage of households located in those geographies. See Exhibit 14.

Exhibit 14 – Geographic Distribution of Consumer Loans

Income Level	Geographies		Households		Valley Ridge Bank Loans	
	#	%	#	%	#	%
Low	0	0	0	0	0	0
Moderate	2	8.0	2,959	7.59	111	6.8
Middle	23	92.0	36,013	92.41	1513	93.1
Upper	0	0	0	0	0	0
Total	25	100.0	38,972	100.0	1624	100.0

Valley Ridge Bank originated the majority of its commercial and agricultural loans to businesses and farms located in middle-income geographies, which is consistent with the number of businesses located in those geographies. The bank’s percentage of loans in the moderate-income geographies is slightly less than the percentage of businesses located in those geographies. This indicates a potential opportunity for improvement in the penetration of moderate-income geographies.

Exhibit 15 – Geographic Distribution of Commercial Loans

Income Level	Geographies		Businesses		Valley Ridge Bank Loans	
	#	%	#	%	#	%
Low	0	0	0	0	0	0
Moderate	2	8.0	227	5.8	10	2.2
Middle	23	92.0	3,669	94.2	445	97.8
Upper	0	0	0	0	0	0
Total	25	100.0	3,896	100.0	455	100.0

Complaints

Neither the bank nor this Reserve Bank has received any CRA-related complaints since the previous examination.

Fair Lending

The bank is in compliance with the substantive provisions of the anti-discrimination laws and regulations, including the Equal Credit Opportunity and Fair Housing Acts. A sample of the banks’ lending activity was reviewed to determine whether loan policies and lending standards were in compliance with the fair lending laws and regulations, and that these are being consistently applied to all applicants. No evidence of prohibited discriminatory or other illegal credit practices was detected.

Appendix A

Exam Name: Valley Ridge Bank (268846)
Assessment Area: Combined Assessment Area
Assessment Area with Tracts and Branches

