

PUBLIC DISCLOSURE

August 10, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Crawford County Trust and Savings Bank
Certificate Number: 8511

21 North Main Street
Denison, Iowa 51442

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Kansas City Regional Office

1100 Walnut Street, Suite 2100
Kansas City, Missouri 64106

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 CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Satisfactory performance under the Lending Test is the basis for the rating. The following points summarize the bank's performance.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.
- A majority of the small farm, small business, and home mortgage loans reviewed were located inside the assessment area.
- The distribution of borrowers reflects reasonable penetration among farms and businesses of different sizes and individuals of different income levels.
- The assessment area does not include any low- or moderate-income census tracts. Therefore, examiners did not evaluate the geographic distribution of loans.
- The institution did not receive any complaints regarding its Community Reinvestment Act (CRA) performance since the previous evaluation. As a result, examiners did not evaluate the bank's record of responding to CRA-related complaints.

DESCRIPTION OF INSTITUTION

Background

Crawford County Trust and Savings Bank (CCTSB) is a community bank headquartered in Denison, Iowa. The Viking Corporation, a one-bank holding company located in Omaha, Nebraska owns the institution. The bank received a Satisfactory rating at its previous FDIC Performance Evaluation dated November 17, 2014, based on Interagency Small Institution Examination Procedures.

Operations

CCTSB operates three full-service facilities in Denison, Audubon, and Kimballton, Iowa. The bank offers a variety of credit products including agricultural, home mortgage, commercial, and consumer loans. In addition, the institution offers several deposit products including checking, savings, and certificate of deposit accounts. Alternative banking services include internet banking, mobile banking, and three bank-owned automated teller machines (ATMs). On December 31, 2017, CCTSB acquired the affiliated Landmands Bank, Audubon, Iowa. This resulted in CCTSB gaining its Audubon and Kimballton offices.

Ability and Capacity

Assets totaled approximately \$200.6 million as of March 31, 2020, and included total loans of \$153.6 million. Deposits totaled approximately \$180.6 million as of the same date. Agricultural loans, including loans secured by farmland, represent the largest portion of the loan portfolio. The following table reflects CCTSB's loan portfolio.

Loan Portfolio Distribution as of 3/31/2020		
Loan Category	\$(000s)	%
Construction and Land Development	352	0.2
Secured by Farmland	24,280	15.8
Secured by 1-4 Family Residential Properties	19,170	12.5
Secured by Nonfarm Nonresidential Properties	4,979	3.2
Total Real Estate Loans	48,781	31.7
Commercial and Industrial Loans	11,775	7.7
Agricultural Loans	85,253	55.5
Consumer Loans	6,985	4.5
Obligations of States and Political Subdivisions in the United States	547	0.4
Other Loans	302	0.2
Total Loans	153,643	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet the assessment area's credit needs.

DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more assessment areas within which its performance will be evaluated. CCTSB designated a single assessment area consisting of Audubon, Carroll, Crawford, and Shelby counties and the western half of Guthrie County (census tract 9502), all in Iowa. The bank’s Denison office is located in Crawford County census tract 704, while its Audubon and Kimballton offices are located in Audubon County census tracts 702 and 701, respectively. Audubon, Carroll, Crawford, and Shelby counties are not within a metropolitan statistical area (MSA), while Guthrie County is part of the Des Moines-West Des Moines, Iowa MSA. CCTSB added Audubon, Carroll, and Shelby counties as well as Guthrie County census tract 704 to its assessment area after acquiring Landmands Bank in December 31, 2017.

Economic and Demographic Data

The bank’s assessment area contains 19 census tracts. According to the 2015 American Community Survey (ACS), the census tracts are all middle-income geographies. The following table provides select demographic characteristics for the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	0.0	0.0	100.0	0.0	0.0
Population by Geography	57,935	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	26,003	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	18,079	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	5,460	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	2,464	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	4,978	0.0	0.0	100.0	0.0	0.0
Farms by Geography	1,178	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	15,485	20.1	17.5	22.0	40.4	0.0
Household Distribution by Income Level	23,539	24.7	16.1	17.9	41.3	0.0
Median Family Income MSA - 19780 Des Moines-West Des Moines, IA MSA		\$75,653	Median Housing Value			\$100,152
Median Family Income Non-MSAs - IA		\$61,681	Median Gross Rent			\$550
			Families Below Poverty Level			9.1%

*Source: 2015 ACS and 2019 D&B Data. Due to rounding, totals may not equal 100.0 percent.
(*) The NA category consists of geographies that have not been assigned an income classification.*

Carroll, Denison, Harlan, and Audubon are the assessment area’s largest communities with populations of 10,103, 8,298, 5,106, and 2,176, respectively. Outside of these communities, the assessment area is predominately rural in nature.

2019 D&B data indicates that services represent the largest portion of businesses and farms at 32.0 percent, followed by agriculture at 19.1 percent, and retail trade at 10.8 percent. In addition, 73.3 percent of area farms and businesses have four or fewer employees, and 88.6 percent operate from a single location.

Examiners used information from the Federal Financial Institutions Examination Council (FFIEC) to analyze home mortgage loans under the Borrower Profile criterion. The following table shows the FFIEC’s estimated median family incomes for the Des Moines-West Des Moines, Iowa MSA and nonmetropolitan Iowa for 2019.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Des Moines-West Des Moines, Iowa MSA				
2019 (\$82,000)	<\$41,000	\$41,000 to <\$65,600	\$65,600 to <\$98,400	≥\$98,400
Nonmetropolitan Iowa				
2019 (\$66,900)	<\$33,450	\$33,450 to <\$53,520	\$53,520 to <\$80,280	≥\$80,280

Source: FFIEC

The assessment area’s economy was generally healthy throughout the evaluation period. Annual unemployment rates for the counties in CCTSB’s assessment area ranged from 2.5 percent to 3.0 percent between 2017 and 2019. In early 2020, the COVID-19 pandemic began to spread across the country. As a result, nation’s unemployment rate increased to 11.1 percent in June of 2020, while the State of Iowa unemployment rate increased to 8.0 percent. Meanwhile, unemployment in CCTSB’s assessment area averaged around 7.2 percent from April to June 2020. Although economic conditions have declined since the start of the COVID-19 pandemic, the decline has not impacted the bank’s ability to meet the assessment area’s credit needs. The full effect of the pandemic will not be known for several more months.

Competition

The assessment area is moderately competitive for financial services. According to the 2019 FDIC Deposit Market Share report, 24 financial institutions operate 59 offices in the assessment area. Of these institutions, CCTSB ranked 4th in deposit market share at 7.0 percent. Additionally, the bank competes against auto dealers, credit unions, mortgage companies, and other lenders for agricultural, commercial, home, and consumer loans.

Community Contacts

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available.

Examiners interviewed a member of a community-based development organization who was knowledgeable of the area’s economic conditions. According to the contact, the local economy is largely supported by farming-related jobs and industries. In recent years, the agricultural economy has suffered due to lower commodity prices. However, the contact stated that Denison’s economy

has been strong based on business expansion and population growth. Many local businesses were profitable during the pandemic due since they were “essential businesses” and allowed to stay open. Reportedly, agricultural and business loans are vital to the assessment area. The contact stated that home loans as well as additional affordable housing are needed as well.

Credit Needs

Considering information from the community contact, bank management, demographic, and economic data, examiners determined that small farm loans, followed by small business and home mortgage loans, are the assessment area’s primary credit needs.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated November 17, 2014, to the current evaluation dated August 10, 2020. Examiners used Interagency Small Institution Examination Procedures to conduct the evaluation, which includes a Lending Test. Refer to the Appendices for the description of this test.

Activities Reviewed

Examiners reviewed small farm, small business, and home mortgage loans to conduct the Lending Test. They selected these products based on the bank’s business strategy and the number and dollar volume of loans originated during the evaluation period.

Examiners reviewed all small farm, small business, and home mortgage loans originated or purchased in 2019 to conduct the Assessment Area Concentration analysis. This consisted of 811 small farm loans totaling approximately \$60.6 million, 257 small business loans totaling approximately \$17.0 million, and 103 home mortgage loans totaling approximately \$7.1 million. For the Borrower Profile analysis, examiners sampled small farm, small business, and home mortgage loans from inside the assessment area. Specifically, they reviewed 60 small farm loans totaling approximately \$4.6 million, 55 small business loans totaling approximately \$1.7 million and 41 home mortgage loans totaling \$3.4 million. 2019 D&B data provided a standard of comparison for the small farm and small business loans reviewed, while 2015 ACS data provided a standard of comparison for the home mortgage loans. Bank management indicated that the loans reviewed were representative of the institution’s performance during the entire evaluation period. As a result, the evaluation does not contain any additional years of data.

Small farm loans received the most weight when drawing conclusions since agricultural loans represent the largest segment of CCTSB’s portfolio. When conducting the Assessment Area Concentration analysis, examiners placed equal weight on the number and dollar volume of loans. When conducting the Borrower Profile analysis, examiners placed greater weight on the number of loans than the dollar volume of loans. This is because the number of loans is a better indicator of the farms, businesses, and individuals served.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

CCTSB demonstrates reasonable performance under the Lending Test. The bank’s Loan-to-Deposit, Assessment Area Concentration, and Borrower Profile performance supports this conclusion.

Loan-to-Deposit Ratio

CCTSB’s loan-to-deposit (LTD) ratio is reasonable given the bank’s size, financial condition, and assessment area credit needs. This ratio, calculated from Reports of Condition and Income, averaged 86.9 percent over the past 22 quarters from December 31, 2014, to March 31, 2020. During the review period, the institution’s net LTD ratio ranged from 83.0 percent to 92.9 percent.

Examiners compared the bank’s average net LTD ratio to five other institutions. The comparable institutions were selected based on their asset size, lending focus, and geographic location. CCTSB’s average net LTD ratio compares reasonably to these institutions. The following table provides details.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 3/31/2020 (\$000s)	Average Net LTD Ratio (%)
Crawford County Trust and Savings Bank, Denison, IA	200,608	86.9
Audubon State Bank, Audubon, IA	121,784	87.7
Farmers Trust & Savings Bank, Earling, IA	98,262	87.6
Iowa Savings Bank, Carroll, IA	207,363	73.6
Rolling Hills Bank and Trust, Atlantic, IA	319,652	100.9
The Shelby County State Bank, Harlan, IA	271,405	75.9
<i>Source: Reports of Condition and Income (Call Report) 12/31/2014 through 3/31/2020</i>		

Assessment Area Concentration

A majority of the small farm, small business, and home mortgage loans reviewed were located inside the assessment area, reflecting satisfactory performance. The following table provides details.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans					Dollar Amount of Loans \$(000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Small Farm	422	52.0	389	48.0	811	30,480	50.3	30,113	49.7	60,593
Small Business	235	91.4	22	8.6	257	15,077	88.5	1,968	11.5	17,045
Home Mortgage	91	88.4	12	11.7	103	6,256	88.3	825	11.7	7,081
Total	748	63.9	423	36.1	1,171	51,813	61.2	32,906	38.8	84,719
<i>Source: Bank Data. Due to rounding, totals may not equal 100.0 percent</i>										

Borrower Profile

The distribution of borrowers reflects reasonable penetration among farms and businesses of different sizes as well as individuals of different income levels. Examiners focused on the bank's record of lending to farms and businesses with gross annual revenues of \$1 million or less as well as its record of lending to low- and moderate-income borrowers.

Small Farm Lending

The distribution of small farm loans reflects reasonable penetration among farms of different sizes. Specifically, 85.0 percent of the small farm loans reviewed from inside the assessment area, by number, were to farmers with revenues of \$1 million or less. This compares reasonably to the 2019 D&B data, which indicated that 98.6 percent of assessment area's farms have revenues of \$1 million or less. The following table provides details.

Distribution of Small Farm Loans by Gross Annual Revenues					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<=\$1,000,000	98.6	51	85.0	2,959	64.1
>1,000,000	0.8	9	15.0	1,657	35.9
Revenue Not Available	0.5	0	0.0	0	0.0
Total	100.0	60	100.0	4,616	100.0

*Source: 2019 D&B Data; Bank Data.
Due to rounding, totals may not equal 100.0 percent.*

Small Business Lending

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. Specifically, 90.9 percent of the small business loans reviewed from inside the assessment area, by number, were to businesses with revenues of \$1 million or less. This compares reasonably to the 2019 D&B data, which indicated that 80.9 percent of assessment area's businesses have revenues of \$1 million or less. The following table provides details.

Distribution of Small Business Loans by Gross Annual Revenue					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	80.9	50	90.9	894	53.7
>1,000,000	5.9	5	9.1	770	46.3
Revenue Not Available	13.3	0	0.0	0	0.0
Total	100.0	55	100.0	1,664	100.0

*Source: 2019 D&B Data; Bank Data.
Due to rounding, totals may not equal 100.0 percent.*

Home Mortgage Lending

The distribution of home mortgage loans reflects reasonable penetration among individuals of all income levels. Specifically, 17.1 percent of the home mortgage loans reviewed from inside the assessment area, by number, were to low-income borrowers and 19.5 percent were to moderate-income borrowers. This compares reasonably to the demographic data, which indicate that 20.1

percent of the assessment area’s families are low-income and 17.5 percent are moderate-income. The following table provides details.

Distribution of Home Mortgage Loans by Borrower Income Level					
Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	20.1	7	17.1	333	9.7
Moderate	17.5	8	19.5	363	10.6
Middle	22.0	7	17.1	464	13.5
Upper	40.4	19	46.3	2,267	66.2
Not Available	0.0	0	0.0	0	0.0
Total	100.0	41	100.0	3,427	100.0
<i>Source: 2015 ACS; Bank Data. Due to rounding, totals may not equal 100.0%</i>					

Geographic Distribution

The assessment area does not contain any low- or moderate-income census tracts. Therefore, examiners did not evaluate the geographic distribution of loans.

Response to Complaints

The institution did not receive any complaints regarding its CRA performance since the previous evaluation. As a result, examiners did not evaluate the bank’s record of responding to CRA-related complaints.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices. Therefore, this consideration did not affect the institution’s rating.

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes;
- 4) The geographic distribution of the bank's loans; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

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.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

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.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in

information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that 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 the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

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

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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.

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.

Rural Area: Territories, populations, and housing units that are not classified as urban.

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

Small Farm Loan: A loan included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, including farm residential and other improvements, 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.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.