

PUBLIC DISCLOSURE

December 6, 2010

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Alden State Bank
RSSD No. 414102**

**13216 Broadway
Alden, New York 14004**

FEDERAL RESERVE BANK OF NEW YORK

**33 LIBERTY STREET
NEW YORK, N.Y. 10045**

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 CRA RATING: Alden State Bank (“Alden”) is rated **Satisfactory**.

Alden’s “Satisfactory” Community Reinvestment Act (“CRA”) performance is based on the following conclusions:

- The bank’s loan-to-deposit ratio was reasonable.
- A majority of the bank’s loans were made in the assessment area.
- Lending to borrowers of different income levels, including low- and moderate-income (“LMI”) individuals, and to businesses of different sizes showed reasonable distribution.
- The geographic distribution of loans was reasonable.

DESCRIPTION OF INSTITUTION

Alden, headquartered in Alden, New York, is a retail bank that operates two branches in the western portion of New York State. Alden offers a variety of consumer and business deposit and loan products, including residential, construction, home improvement, home equity, small business and farm loans. As of December 31, 2009, the bank had total assets of \$207 million, with net loans and leases of \$140 million and total deposits of \$179 million. Loans secured by one- to four-family residential properties represent 80% of all real estate loans and 72% of net loans and leases.

There are no financial or legal factors that would prevent Alden from meeting the credit needs of its assessment area. At the previous CRA examination, dated December 4, 2006, Alden received an overall rating of satisfactory.

DESCRIPTION OF ASSESSMENT AREA

Alden has one assessment area that consists of MSA 15380 (Buffalo-Niagara Falls, NY), a portion of Erie County, and non-MSA portions of Genesee and Wyoming Counties. Examiners reviewed the assessment area and determined that the non-MSA portions of Genesee and Wyoming Counties do not extend substantially beyond the boundaries of MSA 15380. Therefore, the areas were combined into one assessment area for analysis, in accordance with the Federal Financial Institutions Examination Council (“FFIEC”) CRA Interagency Examination Procedures for Small Banks (“Interagency CRA small bank procedures”).

The assessment area consists of 19 census tracts. One census tract in the assessment area is defined as moderate-income, 11 are middle-income, five are upper-income, and two have no income designation. There are no low-income census tracts in the assessment area. Since the last exam, five census tracts were added to the assessment area.

The assessment area is in compliance with the requirements of Section 228.41 of Regulation BB and does not arbitrarily exclude LMI geographies. A map illustrating Alden's assessment area is located in Appendix D.

SCOPE OF EXAMINATION

Procedures

Alden was examined using the Interagency CRA small bank procedures. The examination covered the period July 1, 2006 through December 31, 2009.

Products

All of the bank's HMDA-related loans (home purchase, refinance, and home improvement) and samples of its consumer and small business loans originated during the evaluation period were analyzed. The loan samples were selected using the Board of Governors' sampling procedures. 1,421 HMDA-related loans, 128 small business loans, and 192 consumer loans were analyzed. The integrity of the HMDA-related, small business, and consumer loan data was verified as part of the onsite examination.

Lending Analysis

In order to analyze the borrower characteristics of HMDA-related lending, the proportion of originations to LMI borrowers was compared with the proportion of LMI families residing in the assessment area. Income estimates from the U.S. Department of Housing and Urban Development ("HUD") were used to categorize borrower income. For consumer loans, the proportion of the bank's originations to LMI borrowers was compared to the proportion of LMI households located in the assessment area. For small business lending, Alden's percentage of loans to businesses with gross annual revenues ("GAR") of \$1 million or less was compared to the percentage of all such businesses located in the assessment area. The size of the small business loan was also used as a proxy to identify lending to businesses with GAR of \$1 million or less.

To evaluate geographic distribution of lending, the proportion of HMDA loan originations was compared to the proportion of owner-occupied housing units located in the moderate-income geography. For consumer loans, the proportion of Alden's originations in the moderate-income geography was compared to the proportion of households located in the moderate-income geography. For small business loans, the analysis compared the proportion of loan originations to the proportion of businesses located in the moderate-income geography.

The average of Alden's loan-to-deposit ratios during the evaluation period was compared to the loan-to-deposit ratios of local peer banks. Similarly-sized local peer banks were selected based on their similarity to Alden with regard to deposit totals and number of branches, and their location within Alden's assessment area. Local peer banks included the Bank of Akron, Bank of Holland, Lake Shore Savings Bank, and Evans Bank N.A.

Community Contacts

In order to learn more about community development credit needs, examiners consulted with a local community development organization and a local town official in Alden's assessment area.

PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include U.S. Department of Commerce's Bureau of Census (2000), the New York State Department of Labor, Dun and Bradstreet, HUD, and the New York State Association of Realtors.

Demographic Characteristics

According to the 2000 Census, the assessment area has a population of 85,495. The Census reports that only 3% of the assessment area's population lives in the moderate-income tract, while 53% and 42% lives in middle-income and upper-income tracts, respectively. 2% of the population resides in the census tracts that have no income designation. 82% of the assessment area's population resides in Erie County.

Income Characteristics

According to the 2000 Census, the assessment area has 23,162 families, of which 10% are low-income and 17% are moderate-income. Only 3% of all families residing in the assessment area have incomes below the poverty level. The 2009 HUD-adjusted median family income ("MFI") was \$63,500 for Erie County, \$59,200 for Genesee County, and \$59,300 for Wyoming County, compared to an MFI of \$67,900 for the State of New York.

Housing Characteristics

According to the 2000 Census, the assessment area has 33,021 housing units, of which 77% are owner-occupied, 18% are rental, and 4% are vacant. Of the owner-occupied housing units, 2% or 533 units are located in the moderate-income tract. Most of the housing stock in the assessment area (94%) represents one-to four-family residential dwellings, and the median age of the housing stock is 36 years.

The New York Association of Realtors reports that the median annual sales price of an existing single-family home was \$119,000 in Erie County, \$90,000 in Genesee County, and \$82,250 in Wyoming County in 2009, compared to \$195,000 for the State of New York. During the evaluation period, housing prices in the assessment area steadily increased, although nationwide, housing prices experienced declines. Between 2008 and 2009, the sales price of a single-family home increased by 4% in Erie County, by 1% in Genesee County, and by 8% in Wyoming County. Housing costs in the area nonetheless remain relatively affordable for LMI individuals. The price of a single-family home is about two to four times the income of a low-income borrower and about two times the income of a moderate-income borrower.

Labor, Employment and Economic Characteristics

Alden's assessment area has 3,316 business establishments, of which 89% had gross annual revenues ("GAR") of less than or equal to \$1 million. Of the total businesses, 161 (5%) operate in the moderate-income census tract. According to a community contact, most of Alden's residents are commuters within the greater Buffalo-Niagara Falls region. Over the course of the review period unemployment within the Buffalo-Niagara Falls region steadily increased, with the unemployment rate for the region reported at 4.9% in 2006 and rising to 8.5% in 2009. The region's unemployment rate is comparable to the average for the State of New York, which had an unemployment rate of 8.9% at the end of 2009.

The recent recession has magnified the decline in the labor market in the Buffalo-Niagara Falls region. The manufacturing and construction industries, which have historically thrived in the area, have significantly declined. Large retailers such as Target and Wal-Mart were scheduled for expansion in the area, but canceled their projects. In addition, sales of new and existing homes were down as a result of the economic crisis.

The automobile industry, which traditionally has been a source of high-paying jobs in the area, has declined. General Motors, which has a large engine plant in the Buffalo area, filed for bankruptcy in 2009 and shut down production to reduce costs. Ford Motor Company, which has a stamping plant in the region, also offered buyouts to their employees in 2009 in an effort to save costs. The decline in the automobile industry extended further to businesses in the area, such as Delphi Corp. and Cummins Engines, which make and transport automotive parts to the local factories.

See Exhibit I for additional assessment area demographics.

Exhibit I
Assessment Area Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	2,358	10.2	
Moderate-income	1	5.3	627	2.7	59	9.4	3,949	17.0	
Middle-income	11	57.9	12,461	53.8	395	3.2	5,721	24.7	
Upper-income	5	26.3	10,074	43.5	214	2.1	11,134	48.1	
Unknown-income	2	10.5	0	0.0	0	0.0	0	0.0	
Total Assessment Area	19	100.0	23,162	100.0	668	2.9	23,162	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate-income	1,259	533	2.1	42.3	616	48.9	110	8.7	
Middle-income	18,223	13,668	53.5	75.0	3,692	20.3	863	4.7	
Upper-income	13,524	11,351	44.4	83.9	1,760	13.0	413	3.1	
Unknown-income	15	5	0.0	33.3	10	66.7	0	0.0	
Total Assessment Area	33,021	25,557	100.0	77.4	6,078	18.4	1,386	4.2	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	161	4.9	146	5.0	9	4.3	6	3.7	
Middle-income	1,846	55.7	1,647	55.9	108	51.7	91	56.2	
Upper-income	1,308	39.4	1,151	39.1	92	44.0	65	40.1	
Unknown-income	1	0.0	1	0.0	0	0.0	0	0.0	
Total Assessment Area	3,316	100.0	2,945	100.0	209	100.0	162	100.0	
	Percentage of Total Businesses:			88.8		6.3		4.9	

Based on 2009 Dun and Bradstreet data and 2000 Census Information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

An assessment of Alden's core performance under the FFIEC's small bank performance test follows:

Loan-to-Deposit Ratio

Alden's loan-to-deposit ratio was reasonable given the bank's size, financial condition, and the credit needs of its assessment area. Alden's average loan-to-deposit ratio for the 14 most recent quarters ending December 31, 2009 was 73%, based on information contained in the *Consolidated Report of Condition and Income*. This ratio was below, but comparable to the average loan-to-deposit ratios of local peer banks of 83%. Alden's loan-to-deposit ratio was also

below but comparable to the national peer group's average loan-to-deposit ratio of 85% for similarly-situated banks.

Lending in the Assessment Area

Alden originated a majority of its loans in its assessment area. Overall, 76% of the loans evaluated for this examination, by number, were originated in the assessment area. Of the total HMDA-related loans, 76% by number were extended to individuals residing in the assessment area. Similarly, 76% of the sample of consumer loans by number went to assessment area residents. Of the sample of small business loans, 71% by number were extended to business establishments in the assessment area.

Exhibit II								
Lending Inside and Outside Assessment Area								
July 1, 2006 to December 31, 2009								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase	107	54.3	\$11,986	47.2	90	45.7	\$13,431	52.8
Refinancing	478	76.8	\$31,664	70.4	144	23.2	\$13,345	29.6
Home Improvement	492	83.1	\$11,332	84.4	100	16.9	\$2,094	15.6
Multifamily	4	40.0	\$702	37.2	6	60.0	\$1,185	62.8
Total HMDA	1,081	76.1	\$55,685	64.9	340	23.9	\$30,055	35.1
Consumer	146	76.0	\$1,830	64.6	46	24.0	\$1,002	35.4
Small Business	91	71.1	\$9,197	67.1	37	28.9	\$4,509	32.9
TOTAL LOANS	1,318	75.7	\$66,712	65.2	423	24.3	\$35,566	34.8

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

Alden demonstrated reasonable penetration among individuals of different income levels, including LMI individuals, and businesses of different sizes, given the performance context and demographics of the assessment area. The bank exhibited excellent levels of home purchase and consumer lending and reasonable levels of refinance and home improvement lending to individuals of different income levels. Alden's level of lending to businesses of different sizes was reasonable. See Appendix B for an analysis of the distribution of loans by borrower income within the assessment area. An analysis of the lending distribution, focusing on lending to LMI borrowers in each loan category follows:

Home Purchase Loans

Alden's distribution of home purchase loans to borrowers of all income levels, including LMI borrowers, was excellent. Distribution of lending among borrowers of all income levels is shown in Appendix B. Distribution of lending among LMI borrowers is shown in Exhibit III, below. With regard to lending to LMI borrowers, during the examination period, the bank originated

EXHIBIT III Distribution of Loans in Assessment Area <i>By Borrower Income Level</i> July 1, 2006 – December 31, 2009 HMDA and Consumer Loans				
	Number of Loans	Percentage	Number of Loans	Percentage
Loan Products	Low-Income Borrowers		Moderate-Income Borrowers	
Home Purchase	11	10%	18	17%
Refinance	27	6%	40	8%
Home Improvement	84	17%	65	13%
Consumer	56	38%	35	24%

10% of its home purchase loans to low-income borrowers, compared to 10% of low-income families residing in the assessment area. The bank originated 17% of its home purchase loans to moderate-income borrowers, compared to 17% of moderate-income families residing in the assessment area.

Refinance Loans

Alden’s distribution of refinance loans to borrowers of all income levels, including LMI borrowers was reasonable. The bank originated 6% of its refinance loans to low-income borrowers, compared to 10% of low-income families residing in the assessment area. The bank made 8% of its refinance loans to moderate-income borrowers, compared to 17% of moderate-income families residing in the assessment area.

Home Improvement Loans

Alden’s distribution of home improvement loans to borrowers of all income levels, including LMI borrowers was reasonable. The bank originated 17% of its home improvement loans to low-income borrowers, compared to 10% of low-income families residing in the assessment area. The bank made 13% of its home improvement loans to moderate-income borrowers, compared to 17% of moderate-income families residing in the assessment area.

Consumer Loans

Alden’s distribution of consumer loans to borrowers of all income levels, including LMI borrowers, was excellent. The bank originated 38% of its consumer loans to low-income borrowers, compared to 15% of households in the assessment area that are low-income. The bank also made 24% of its consumer loans to moderate-income borrowers, compared to 14% of households in the area that are moderate-income.

Lending to Businesses of Different Sizes

The distribution of loans to businesses of different sizes was reasonable. The bank made 79% of its small business loans to businesses with GAR of \$1 million or less, compared to 89% of such businesses located in the assessment area. Of the bank’s small business loans, 69% were in amounts of \$100,000 or less, an amount which is particularly responsive to the credit needs of small businesses.

EXHIBIT IV Distribution of Loans in Assessment Area <i>By Size of Business</i> July 1, 2006 – December 31, 2009 Small Business Loans				
	Number of Loans	Percentage	Loans in Amounts less than \$100m	Average Small Business Loan Size (000s)
GAR \$1 million or less	72	79%	69%	\$101

Geographic Distribution of Loans

Alden’s geographic distribution of loans reflects reasonable dispersion in geographies of all income levels throughout the assessment area in light of the performance context and demographics of the assessment area. There are no low-income census tracts in the assessment area, so the geographic distribution analysis was based on an evaluation of the bank’s performance in the one moderate-income census tract in the assessment area, as well as an evaluation of overall distribution in middle- and upper-income areas.

Opportunities to lend in the moderate-income area are limited, as there are only 533, or 2% of the owner-occupied housing units, and 161, or 5% of businesses located in the moderate income tract. See Appendix C for an analysis of the distribution of loans by geography within the assessment area. An analysis of the lending distribution, focusing on lending in moderate income tracts follows:

Home Purchase Loans

Alden’s distribution of home purchase loans among geographies of all income levels, including moderate income census tracts, was reasonable. The bank originated 4% of its home purchase loans in the moderate-income census tract, compared to 2% of owner-occupied housing units located in the moderate-income area.

Refinance Loans

Alden’s distribution of refinance loans among geographies of all income levels, including moderate income levels, was reasonable. The bank originated less than 1% of its refinance loans in the moderate-income tract, compared to 2% of owner-occupied housing units located in the moderate-income area.

Home Improvement Loans

The bank’s distribution of home improvement loans among geographies of all income levels, including moderate income levels, was reasonable. The bank originated less than 1% of its home improvement loans in the moderate-income tract, compared to 2% of owner-occupied housing units located in the moderate-income area.

Consumer Loans

Alden’s distribution of consumer loans in the moderate-income area was poor. The bank originated most of its consumer loans in middle-income geographies and did not originate any consumer loans in the moderate-income tract, compared to 4% of households located in the moderate-income area.

Small Business Loans

Alden’s distribution of small business loans among geographies of all income levels, including moderate income levels, was reasonable. The bank originated 3% of its small business loans in the moderate-income census tract, compared to 5% of businesses in the assessment area located in the moderate-income area.

Response to Complaints

Alden did not receive any complaints relating to its CRA performance during the examination period.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Substantive violations of the Equal Credit Opportunity Act involving one product were identified during the concurrent consumer compliance examination. However, the violations did not adversely affect the institution’s ability to extend credit within its designated assessment area. Due to the limited nature of the violations, the bank’s otherwise Satisfactory CRA rating was not adjusted downward.

EXHIBIT V Distribution of Loans in Assessment Area By Geographic Census Tract July 1, 2006 – December 31, 2009 HMDA, Consumer, and Small Business Loans		
	Number of Loans	Percentage
Loan Products	Moderate-Income Geographies	
Home Purchase	4	4%
Refinance	4	<1%
Home Improvement	3	<1%
Consumer	0	0%
Small Business	3	3%

CRA APPENDIX A

GLOSSARY

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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: A family is a group of two people or more related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

Geography: A census tract or a block numbering area 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and 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 refinancings of home improvement and home purchase loans.

Household: A household consists of all persons who occupy a housing unit. Persons not living in households are classified as living in group quarters.

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

Metropolitan Statistical Area (“MSA”): A geographic entity defined by the federal Office of Management and Budget for use by federal statistical agencies, based on the concept of a core area with a large population nucleus, plus adjacent communities having a high degree of economic and social integration with that core.

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

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

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

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

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.

Upper-income: Individual income that is more than 120% of the area median income, or a median family income that is more than 120%, in the case of a geography.

CRA APPENDIX B

Distribution of Loans in Assessment Area By Income Level of Borrower July 1, 2006 – December 31, 2009			
	HMDA-RELATED	CONSUMER	<u>TOTAL</u>
LOW-INCOME: Less than 50% of Median Income			
Number	122	56	178
Percentage	11%	38%	15%
Amount (\$000s)	\$2,117	\$192	\$2,309
Percentage	4%	11%	4%
MODERATE-INCOME: At least 50% & less than 80% of Median Income			
Number	123	35	158
Percentage	11%	24%	13%
Amount (\$000s)	\$4,088	\$172	\$4,260
Percentage	7%	9%	7%
MIDDLE-INCOME: At least 80% & less than 120% of Median Income			
Number	149	38	187
Percentage	14%	26%	15%
Amount (\$000s)	\$8,119	\$765	\$8,884
Percentage	15%	42%	15%
UPPER-INCOME: 120% or more of Median Income			
Number	179	17	196
Percentage	17%	12%	16%
Amount (\$000s)	\$16,877	\$701	\$17,578
Percentage	30%	38%	31%
INCOME UNKNOWN			
Number	508	0	508
Percentage	47%	0	41%
Amount (\$000s)	24,484	0	24,484
Percentage	44%	0	43%

CRA APPENDIX C

Distribution of Loans in Assessment Area By Geography July 1, 2006 – December 31, 2009			
	HMDA-RELATED	CONSUMER	<u>TOTAL</u>
LOW-INCOME:			
Number	0	0	0
Percentage	0%	0%	0%
Amount (\$000s)	\$0	\$0	\$0
Percentage	0%	0%	0%
MODERATE-INCOME:			
Number	12	0	12
Percentage	1%	0%	1%
Amount (\$000s)	\$520	\$0	\$520
Percentage	1%	0%	1%
MIDDLE-INCOME:			
Number	822	120	942
Percentage	76%	82%	77%
Amount (\$000s)	\$39,734	\$1,414	\$41,148
Percentage	71%	77%	72%
UPPER-INCOME:			
Number	247	26	273
Percentage	23%	18%	22%
Amount (\$000s)	\$15,431	\$416	\$15,847
Percentage	28%	23%	28%

CRA APPENDIX D

ASSESSMENT AREA MAP