

MONROE COUNTY HOUSING STUDY & NEEDS ANALYSIS

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INTRODUCTION

The County of Monroe Industrial Development Agency (COMIDA) engaged MRB Group to conduct a Housing Study and Needs Analysis with the aim of better understanding the needs of current and future residents of the County. COMIDA works to advance job opportunities, health, general prosperity, and the economic welfare of the people of Monroe County. Housing is an integral piece of that puzzle, and IDAs across the State have begun to integrate housing into policies and practices. COMIDA currently participates in housing development projects, and their current Housing Incentive Policy requires projects to “include an affordable set aside of at least 20% of the total number of units”. Affordable is defined as “units for households whose income is equal to or less than 60% to 80% of the Rochester, New York Metropolitan Statistical area median household income based upon HUD Home income limits.” In other words, housing projects receiving COMIDA benefits must rent at least 20% of their units to households earning below 80% of the area median income.

Study Purpose

The purpose of this Study is twofold: to examine Monroe County’s population and housing trends, and to provide recommendations and guidance for how COMIDA can support housing. Though COMIDA is currently limited to assisting rental housing projects, both rental and home ownership statistics were analyzed to build a full picture of the housing continuum and identify gaps in services for key populations. Insights from this Study can provide a foundation for COMIDA’s policy discussions and incentive offerings.

Study Process

The MRB team reviewed existing County and IDA planning documents, as well as a 2003 assessment from the Greater Rochester Association of Realtors, to establish an understanding of past and current conditions and compiled and analyzed demographic, economic, and housing data, which began to illuminate gaps and needs. This background information was then used to inform stakeholder engagement. Stakeholder engagement for this study included a retreat of the COMIDA board intended to clarify priorities, questions, and concerns held by the board

members. Additionally, MRB Group conducted a series of interviews with individuals involved on the ground in the housing development process. These interviews with development partners helped contextualize the data with first-hand experience in the challenges and barriers to housing development.

Findings

This quantitative and qualitative information paints a picture of the housing market in Monroe County, one that is common across New York State communities. The housing market is facing significant pressures due to a combination of factors that have culminated in increasing demand matched by limited supply. Some key aspects of this story include:

- There has been a decline in new housing construction over the last 20 years, particularly in terms of single-family homes.
- The cost to construct new housing units has increased substantially since 2020. As of 2003, it was nearly impossible to sell a newly constructed home for less than \$350,000 and that cost has likely continued to increase. Meanwhile, the market is primarily demanding homes in the \$160,000 to \$260,000 range, which are also likely the homes that are being converted into rentals.
- 15-20% of existing single-family homes have been sold to corporate ownership and converted to rentals.
- Newly constructed rental units are primarily regulated as affordable units with income restrictions or are being rented at rates above what the typical household can comfortably afford.
- Financing for multifamily housing construction has become less favorable to developers, requiring higher levels of equity.
- Seniors are staying in their homes for longer than in prior decades due to a lack of options for aging in place, higher pricing of units that would have previously been appropriate for downsizing, and adult children living at home for longer (likely in part due to challenges finding reasonable housing). That means that single-family homes are not being sold as frequently compared to the past. This in conjunction with fewer new-builds contributes to a supply shortage.
- Along the same lines, both young adults (aged 18-34) and seniors (aged 65+) in Monroe County are more likely to be living with a non-spouse than would be expected given regional averages. This is indicative of the lack of options for these groups noted above.

These factors have caused a shift in the dynamics of the housing markets. Unfortunately, the combination of high demand, low supply, and high construction costs have created upward pressure on housing prices and rental rates. Anecdotally, landlords have been able to increase rental rates without increasing quality and homeowners have been able to sell at higher prices, so many households are finding that they are getting lower quality and/or smaller units for a higher cost. This has led to the emergence of a new housing category within the housing spectrum. Whereas in the past we generally understood the market to include low-income/affordable units, market rate units, and luxury units, a new “missing middle” category has now emerged (also referred to as “workforce” housing). Households in this category, typically with household income of 80% to 120% of the area median income (AMI)¹, have household incomes above the eligibility threshold for regulated affordable housing but also cannot comfortably afford market rate units. In Monroe County, we were informed that there are even very few units being built in the 60% to 80% AMI range, and thus the missing middle includes households in that range as well. This shift in the market dynamics has resulted in a high level of cost burden for Monroe County residents, with almost half of residents spending more than 30% of their annual income on housing costs. Worse, over a quarter of renters spend over 50% of their annual income on housing costs.

It is unlikely that these market dynamics are going to ease in the coming years, especially considering demographic and employment trends. Decreasing household sizes will mean that more units are needed to house even the same number of people, underhoused populations will likely continue to look for other options, and economic development efforts will result in the need to attract new workforce. Addressing the supply of housing, among other interventions, will be necessary to avoid further market distortions and support the workforce/missing middle population. New units of all kinds will help to reduce pressure across the housing continuum by better meeting market demand and thus bringing pricing for sales and rents back into alignment. For instance, more supply of market rate units will allow those who can afford market rate to move into units that are better aligned to their quality expectations or desires. This will free up the units they are in now and landlords may be forced to reduce rents to the missing middle range. Further, a more robust and diverse market for seniors will provide more opportunities for seniors to downsize into a unit that meets their needs and introduce more family-size, single-family homes to the market. Ultimately, luxury projects are able to move

¹ AMI for a two-person household in Monroe County is \$83,200 for 2025. For a four-person household, AMI is \$103,000.

forward on their own, but housing development at all other levels has become a challenge. The greatest challenge is for missing middle market housing, which does not have the same grant and loan programs available as regulated affordable housing, and cannot charge the same rents as market rate units while being affordable to workforce households.

Recommendations

After reviewing findings and possible approaches with the COMIDA board, the following recommendations were finalized:

Recommendation #1: Define Eligible Housing Types

To set clear expectations for all involved, COMIDA should define the types of rental housing it is willing to support (or not) with tax abatements. Definitions for a range of housing types – regulated affordable, affordable, middle-market, market rate, special population, and luxury.

Recommendation #2: PILOT Schedules

COMIDA should use its existing standard PILOT along with two enhancements to address the financial needs of different housing types. This recommendation also addresses methods of monitoring compliance over time, as well as how to handle projects that stray from their qualifying housing types during the course of the PILOT.

Recommendation #3: Sales and Use Tax Only

Some projects that do not need the long-term support of a PILOT should be able to access sales and use tax and/or mortgage recording tax to help with upfront financing needs.

HOUSING ANALYSIS SUMMARY

The following is a summary of the full Housing Analysis presented as Attachment A of this Study. The Housing Analysis presents information on the current and future conditions of Monroe County in terms of population and housing trends. Though the County of Monroe IDA (COMIDA) is currently limited assisting rental housing projects, both rental and home ownership statistics are included throughout this assessment to provide a full picture of the housing continuum, identify gaps in services, and identify populations that may make different housing choices if a broader array of housing types and price points were available. The data displayed throughout the assessment was collected from numerous sources, including the American Community Survey, the U.S. Census Bureau, NYSAR, and Esri, that collectively depict current conditions. This assessment includes the geographies of Monroe County, Onondaga County, Erie County, and Upstate New York² to provide points of comparison.

Housing Analysis Findings

As in much of New York State, Monroe County's housing market and population trends indicate unmet demand for housing units, across both ages and geographies. Compared to similar counties, Monroe County's population is expected to decline the least, while increases in the number of households—especially family households—will be the greatest. This demand is met with a regional supply shortage of single-family homes, senior living option, and middle-market rental units³. There are also plenty of reasons for people to want to live in Monroe County, employment in the Rochester area, access to Lake Ontario, proximity to other metro areas, or various arts and cultural opportunities. Providing households with a wider array of housing options, from condominiums and apartments to single-family homes, is vital to Monroe County's ability to accommodate existing and new residents.

² Upstate New York covers all counties but those in the Empire State Development defined regions of Mid-Hudon, New York City, and Long Island.

³ Reimagine ROC Housing. Greater Rochester Association of Realtors. April 1, 2023.

Despite increases in housing costs in recent years, Monroe County still has a relatively low median home price compared to other areas of the State and nation. The County has the third-lowest median home price of comparison geographies, and the median sale price in 2024 was \$251,000. This, however, is a 48% increase since 2020, which represents surging demand for homes in the County, but also indicates decreasing affordability for the current population. Additionally, there is a very small inventory for homes for sale (0.6 months supply), homes sell at 16% over asking price, and the number of closed sales has decreased. This data indicates an in-demand housing market without the supply to meet it. Available housing stock is limited and drives up the cost of housing. According to the Greater Rochester Association of Realtors, this is in part due to the dearth of new construction of single-family homes in the region since 2006.

While median home price is comparatively low in the County, so are median household incomes. Many households, especially those who rent, are cost-burdened by housing. Ownership of a median priced home without being cost-burdened requires an annual household of \$75,280 in the County. In 2023, it was near impossible to sell a newly constructed home for less than \$350,000 without subsidies, but the greatest demand was for homes in the \$120,000 to \$260,000 range.⁴ Moreover, Monroe County has the highest median gross rent of comparison geographies, and about a quarter (26.7%) of renter households in the County spend over 50% of their household income on rent. Nearly half (45.9%) spend over 30% and as such are considered cost-burdened. In 2023, newly-constructed rental units in the region were renting for between \$1,800 and \$3,000 per month, but this was well above what a household at the median household income level could afford without being cost burdened.³

In Monroe County, both young adults and senior populations are underhoused, meaning that more individuals within these age groups live with others that are not a spouse/partner than would be expected. Should these populations be given access to more affordable housing and/or a wider array of housing options, it is reasonable to assume they may make different housing choices, including living alone or with a partner. The market dynamics of aging in place have shifted over the years, with people staying in their homes for longer. This is in part due to increasing housing costs that make it harder to downsize or delay adult children (young adults, who are also underhoused) from leaving the family home. This puts

⁴ Reimagine ROC Housing. Greater Rochester Association of Realtors. April 1, 2023.

pressure on the middle market as these existing homes are not being put on the market.⁵ This could include accessory dwelling units, senior housing developments, ADA accessible housing, and multi-family or mixed-generation housing developments. Monroe County is expected to see the highest percentage increase in the senior population compared to similar counties, which highlights the dire need for additional senior housing options.

In addition to underhoused populations, Monroe County has a significant and growing homeless population. From 2022 to 2024, the number of unhoused individuals increased 41% to 1,056. Following trends over the past decade, the current high in the homeless population indicates that more factors are contributing to homelessness than the reinstatement of evictions and foreclosures in the post-COVID-19 pandemic era. Monroe County has the highest proportion of cost-burdened households at 30.7%. Renter households tend to be more cost-burdened than households that own their own homes. Housing costs, poor housing quality, and a simple lack of housing supply may all contribute to homelessness in the County.

⁵ Reimagine ROC Housing. Greater Rochester Association of Realtors. April 1, 2023.

Developments and Policies

Housing conditions within Monroe County are subject to the various economic development projects occurring, as well as the changing regulatory landscape in New York State. Some recent, ongoing, and expected changes that will impact housing by creating more demand or increasing development costs include:

- **DEC Wetland Regulations** - New wetland regulations went into effect January 1, 2025, expanding the definition of areas subject to DEC oversight and regulation, as well as changing the process to obtain a jurisdictional determination.
- **Building Codes** - In 2025, the NYS Fire Prevention and Building Code Council will consider a policy to require automatic fire sprinklers in new townhomes throughout the State that are connected to public water mains.⁶ The proposal has been heavily opposed by professionals in the housing industry because of the increased cost that would be associated with the measure. Considering that COMIDA is functionally limited to multi-family rentals (which are unaffected by the policy) for assistance, the changes to mandating automatic fire sprinklers may incentivize developers away from townhomes and towards multi-family rentals.
- **Electrical Infrastructure** - In January 2025, Monroe County received a \$4.7 million grant for electrical infrastructure upgrades in the Town of Henrietta, which is just south of the City of Rochester. The grant will facilitate upgrades to an electrical substation in the Town, allowing for more development that could increase housing demand through job creation.
- **NY SMART I-Corridor Tech Hub** - Announced in 2024, the NY SMART I-Corridor Tech Hub is a \$40 million federal award that aims to attract and support new semiconductor businesses and private investments. With this, employment in the region is expected to increase, bringing new demands for housing.

⁶ <https://www.syracuse.com/politics/cny/2025/02/new-york-moves-to-require-fire-sprinklers-in-new-townhouses-but-not-single-family-homes.html>

CURRENT CONDITIONS

Housing Units

Monroe County has 336,324 housing units, the majority of which (62.4%) are single-family detached homes. About 17.5% of housing structures have five or more units, and Monroe County has the highest share of large (50+ unit) apartment complexes compared to comparison geographies.

Housing Tenure

The majority of homes in Monroe County, 57.2%, are owner-occupied.⁷ About 37.2% of housing units are renter-occupied and 5.7% of housing units are vacant. This is the largest share of renter-occupied housing units and the lowest share of vacant units compared to other geographies. Vacant units in Monroe County primarily fall into one of two categories: for rent (32.9%) and other (40.3%).⁸ There are higher rates of seasonal/occasional homes along Lake Ontario shoreline.

HOUSING TENURE, 2024				
	Monroe County	Onondaga County	Erie County	Upstate New York
Total Vacant Units	21,597	18,527	32,083	377,724
For rent	32.9%	26.4%	18.1%	11.6%
Rented, not occupied	7.9%	5.3%	3.3%	2.9%
For sale only	6.5%	8.6%	5.9%	5.1%
Sold, not occupied	4.7%	4.2%	5.2%	3.1%
Seasonal/occasional	7.6%	15.2%	8.4%	42.1%
For migrant workers	0.1%	0.1%	0.2%	0.2%
Other	40.3%	40.1%	58.9%	35.1%

Source: Esri

⁷ Note that the number of total housing units in this table differs from the Housing Units by Units in Structure, 2023 table because the two tables use different data sources, and thus they report slightly different numbers due to differing methodologies.

⁸ The "other" category is a catch-all group that includes units that are vacant due to foreclosure, the owner living elsewhere (like assisted living) but still owns and has stuff there, estate proceedings, condemned units, and more.

Housing Age

Over half (57.4%) of Monroe County’s housing units were built prior to 1970, meaning that they have a higher likelihood of containing hazards like lead and asbestos. Housing units built prior to 1939 are concentrated in the City of Rochester and outlying villages, including the Village of Brockport, Village of East Rochester, Village of Fairport, and the Village of Honeoye Falls.

Despite Monroe County having the largest share of homes built since 2010, at 4.7%, the table shows that there has been a drastic slowdown of housing construction since the 1980s. The Greater Rochester Association of Realtors reports that there has been insufficient construction of single-family homes for the past 20 years.⁹

HOUSING UNITS BY YEAR STRUCTURE BUILT, 2023				
	Monroe County	Onondaga County	Erie County	Upstate New York
Built 2020 or later	0.2%	0.2%	0.2%	0.2%
Built 2010 to 2019	4.5%	4.2%	4.1%	4.4%
Built 2000 to 2009	6.0%	5.9%	4.6%	6.7%
Built 1990 to 1999	8.2%	7.0%	6.5%	8.7%
Built 1980 to 1989	10.8%	10.4%	6.6%	10.0%
Built 1970 to 1979	12.8%	12.8%	10.1%	11.7%
Built 1960 to 1969	13.6%	13.1%	11.6%	10.4%
Built 1950 to 1959	13.0%	17.0%	18.4%	12.5%
Built 1940 to 1949	5.9%	7.0%	8.1%	6.2%
Built 1939 or earlier	24.9%	22.5%	29.8%	29.3%

Source: Esri

Home Sales

In Monroe County, the median sale price was \$251,000 in 2024 and has increased 48% since 2020. In comparison, the median sale price in the State has increased 36% since 2020.¹⁰ The largest increase in median sale prices for Monroe County happened between 2022 and 2023, when price increased from \$210,000 to \$235,000. There were fewer sales closed in 2024 than in 2023, and a 19.3% decline in the number of closed sales since 2020. Monroe County had 0.6 months supply of inventory in 2024, which is considerably less inventory than in other areas. Additionally, Monroe County saw homes sold at 16% over asking price, the most of any region. This indicates that the available housing stock is limited and driving prices up more than in other regions.

⁹ Reimagine ROC Housing. Greater Rochester Association of Realtors. April 1, 2023.

¹⁰ Note that the whole state is used here rather than the Upstate New York region to due availability of data.

Housing Affordability

Across the nation, the cost of housing has increased beyond affordable levels for the typical family. “Market rate” housing had previously been financially accessible for middle-class families, and “affordable” housing has been a term reserved for lower-income households. Rising housing costs, shortages of adequate housing, and an increasing cost of living have led to “affordable” housing becoming a concern for a growing segment of the population, including those who would traditionally be considered to have a “comfortable” income level.

Owner-Occupied Housing

The median home sale price in Monroe County in 2024 was \$251,000. To afford the median home without being cost-burdened, a household in the County must earn \$75,280 annually. For the purposes of this analysis, cost-burden is defined as spending 30% or more of the annual household income on housing. Other counties have similar income thresholds and median sale prices. The current market conditions related to the costs of construction mean that new homes are being sold for over \$350,000, well above what is affordable for the typical household. In fact, the greatest demand for single family homes has been in the range of \$120,000 to \$260,000. Further, 15-20% of single-family homes in the GRAR region end up going to corporate ownership for rental purposes. The single-family market is being impacted by the ability of seniors to downsize, which has become more difficult as housing prices increase and adult children remain in their family homes for longer.¹¹

HOUSING AFFORDABILITY - OWNER-OCCUPIED HOUSING, 2024				
	Monroe County	Onondaga County	Erie County	NYS
Median Sale Price - 2024	\$251,000	\$247,000	\$270,000	\$415,000
10% Down Payment	\$25,100	\$24,700	\$27,000	\$41,500
Remaining Balance	\$225,900	\$222,300	\$243,000	\$373,500
Average Mortgage @7% for 30 Years	\$1,503	\$1,479	\$1,617	\$2,485
Estimated Additional Costs*	\$379	\$379	\$378	\$379
Estimated Monthly Mortgage Costs	\$1,882	\$1,858	\$1,995	\$2,864
Household Income Threshold	\$75,280	\$74,320	\$79,800	\$114,560

*Includes Zillow estimated insurance, PMI, and taxes

Source: Esri; NYSAR 2024 Annual Report; Zillow Mortgage Calculator; MRB Group

¹¹ Reimagine ROC Housing. Greater Rochester Association of Realtors. April 1, 2023.

Renter-Occupied Housing

For rental units, the median gross rent is \$1,085 in Monroe County, which requires a household income of \$43,400 to avoid being cost-burdened. About a quarter (26.7%) of households in the County spend over 50% of their household income on rent, and nearly half (49.8%) spend over 30%. Construction of multifamily units in the region has been more robust than that of single-family homes, but even families at median income levels are cost-burdened by monthly rent of these new units, which tend to rent at \$1,800 to \$3,000 per month.¹⁰

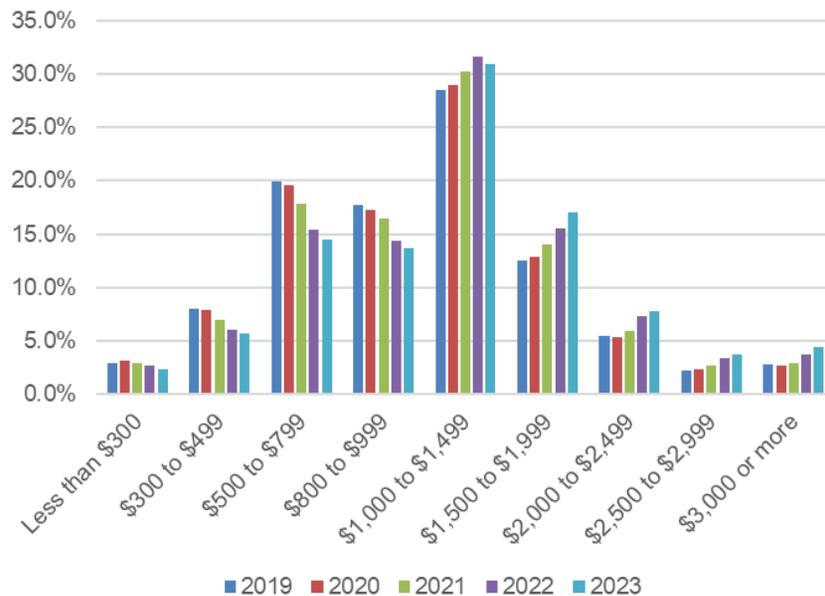
HOUSING AFFORDABILITY - RENTER-OCCUPIED HOUSING, 2023				
	Monroe County	Onondaga County	Erie County	Upstate New York
Median Gross Rent	\$1,085	\$1,002	\$984	\$992
Household Income Threshold	\$43,400	\$40,080	\$39,360	\$39,680

Source: Esri; MRB Group

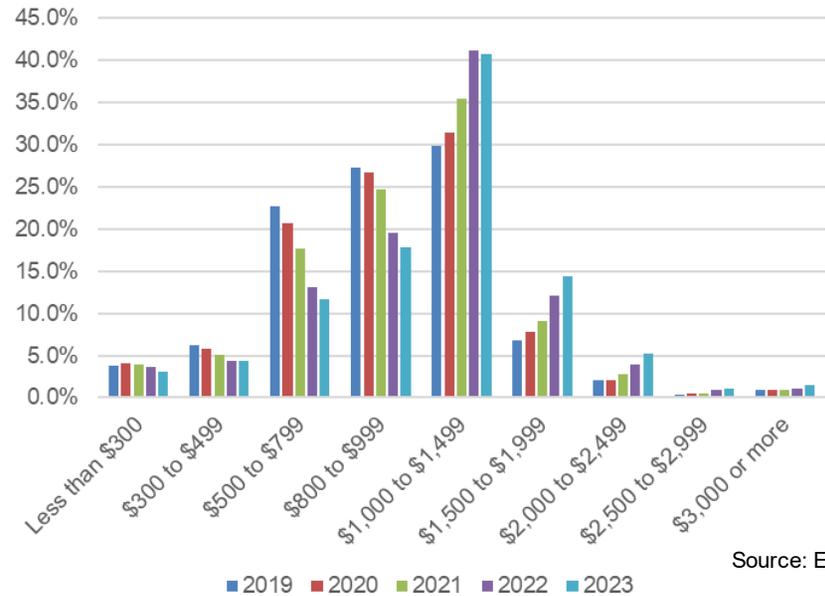
Median Housing Costs

The highest proportion of owner-occupied households pay \$1,000 to \$1,499 each month on housing, at just over 31% of owner-occupied households. This is an increase from 29% of owner-occupied households in 2019. Importantly, the share of households paying under \$1,000 each month for housing has decreased each year, while the share paying over \$1,500 for housing (particularly the \$1,500 to \$1,900 range) has increased each year. These trends are the same for renter-occupied households, but to a more extreme level: from 2019 to 2023, the share of renter households paying \$1,000 to \$1,499 increased from 29.9% to 40.8%.

Housing Costs for Owner-Occupied Units, 2019-2023, Monroe County



Housing Costs for Renter-Occupied Units, 2019-2023, Monroe County



Source: Esri;

Cost-burdened households

A household is considered cost burdened if its housing expenditures are more than 30% of the annual household income. Monroe County has the highest proportion of cost-burdened households at 30.7% compared to the other geographies. In Monroe County, 45.9% of renters and 21.7% of owner-occupied households are burdened by housing costs.

Cost Burdened Households					
	Monroe County	Erie County	Onondaga County	Upstate NY	NYS
Total occupied households	317,369	410,430	198,699	2,127,107	7,530,150
Cost-burdened households (all occupied)	97,522	115,558	52,890	607,669	2,774,969
Percent of occupied households that are cost-burdened	30.7%	28.2%	26.6%	28.6%	36.9%
Total owner-occupied households	199,548	268,344	130,708	1,466,486	4,095,636
Cost-burdened owner-occupied households	43,394	50,033	23,980	266,081	1,099,006
Percent of owner-occupied households that are cost burdened	21.7%	18.6%	18.3%	18.1%	26.8%
Total renter-occupied households	117,821	142,086	67,991	761,467	3,434,514
Cost-burdened renter-occupied households	54,128	65,525	28,910	312,553	1,675,963
Percent of renter-occupied households that are cost-burdened	45.9%	46.1%	42.5%	41.0%	48.8%

Source: Esri;

Underhoused Populations

Not every household looks the same. Some individuals live alone or with a spouse or partner, while others live with roommates, friends, or other family. Underhoused individuals are those who would be expected to be living alone or with a spouse/partner, but instead are living with others. To identify underhoused populations, this analysis compares the proportion of young adults (aged 18-34) and seniors (aged 65+) in Monroe County living with others that are not a spouse/partner to the proportions for the Upstate NY region. By applying the regional proportion to county populations, we can then estimate the number of individuals in these age groups expected to be living with others and compare that to the actual number of individuals. This analysis estimates that there are 3,754 underhoused seniors and 1,288 young adults in Monroe County.¹²

Some underhoused young adults may be living with their parents due to difficulty finding a reasonably priced housing unit themselves. This could, in turn, be delaying the parents from downsizing and putting a home on the market.¹³

Homelessness

In Monroe County, the number of unhoused individuals in 2024 was 1,056, a decade high level. This is a 41% increase from 2022 and includes a 51% increase in the number of unhoused individuals under the age of 18.¹⁴

Homelessness in Monroe County					
	2024	2023	2022	2021	2020
Total homeless and at risk	1,056	803	748	521	815
Adult Male	607	453	449	318	530
Adult Female	440	344	294	198	283
Under 18	268	244	178	115	152

Source: HUD PIT Counts by COC

¹² Esri; MRB Group

¹³ Reimagine ROC Housing. Greater Rochester Association of Realtors. April 1, 2023.

¹⁴ New Yorkers in Need: Homelessness in New York State (January 2025), New York State Comptroller.

Multi-Family Residential (CoStar)

INVENTORY UNITS	UNDER CONSTRUCTION UNITS	12 MO ABSORPTION UNITS	VACANCY RATE	MARKET RENT/UNIT	MARKET SALE PRICE/UNIT	MARKET CAP RATE
74,154 +0.6%	363 -45.5%	285 -13.0%	4.3% +0.1%	\$1,351 +3.7%	\$114K -1.2%	8.6% +0.4%
<small>Prior Period 73,721</small>	<small>Prior Period 666</small>	<small>Prior Period 328</small>	<small>Prior Period 4.2%</small>	<small>Prior Period \$1,303</small>	<small>Prior Period \$115K</small>	<small>Prior Period 8.2%</small>

There are approximately 74,154 multi-family units in the CoStar¹⁵ database across Monroe County. Of these, 79% are one- and two-bedroom units. There have been steady deliveries to the market throughout the past decade, and very few negative absorption events. These deliveries were quickly absorbed by the market. The current vacancy rate is 4.3%, which is lower than the ten-year high of 5.5% in 2017. The current market rent per unit is \$1,351.

¹⁵ CoStar is a well-regarded commercial real estate data company that offers information about office, industrial, retail, multifamily, and hotel properties in its database. This includes data about rents, vacancy, new deliveries, absorption, and more over time. While the database does not capture every commercial property, it is helpful to identify trends and market shifts.

FUTURE NEEDS

Population and Household Projections

In addition to current housing gaps and needs, projected demographic information was considered to determine what types of housing might be needed to address different populations. These projections do not include anticipated population increases from any proposed, significant economic development projects. However, they are still useful for understanding household distributions and calculating anticipated housing needs for new residents.

All geographies are projected to experience population decline over the next five years, but the number of households and family households are expected to increase or remain relatively stable due to decreasing household sizes. In Monroe County, the population is expected to decline the least of the geographies, while increases in households will be the greatest. Areas within Monroe County that are expected to see population growth, including the northwest corner of the County and the southern portion of the County near the Rochester Institute of Technology.

Population & Household Projections									
		Population		Family Households		Households		Avg. Household Size	
Monroe County	2024	751,095		185,258		322,584		2.25	
	2029	750,055		189,860		332,021		2.18	
	Change	(1,040)	-0.1%	4,602	2.5%	9,437	2.9%	(0.07)	-3.1%
Erie County	2024	957,257		232,069		408,045		2.28	
	2029	955,028		233,414		412,064		2.25	
	Change	(2,229)	-0.2%	1,345	0.6%	4,019	1.0%	(0.03)	-1.3%
Onondaga County	2024	469,542		113,592		196,329		2.30	
	2029	461,374		113,651		197,206		2.25	
	Change	(8,168)	-1.7%	59	0.1%	877	0.4%	(0.05)	-2.2%
Upstate NY	2024	6,022,066		1,483,932		2,534,707		2.27	
	2029	5,963,035		1,498,147		2,569,044		2.22	
	Change	(59,031)	-1.0%	14,215	1.0%	34,337	1.4%	(0.05)	-2.2%

Source: Esri, MRB Group

Aging Population

While the population is projected to decline overall, the County's senior population is projected to increase 12.2% over the next 5 years. By 2029, it is anticipated that there will be more than 18,325 additional seniors in the County as compared to current levels. This suggests a dire need to expand senior housing options. Assuming current trends among seniors in Monroe County, this additional senior population would require 8,678 single-family units and 3,248 rental units. However, not all of this will be new demand, as many of these future seniors are likely to remain in homes they already occupy. Areas just outside of villages and southern portions of the County are anticipated to see the largest increases in the senior population. In contrast, block groups closer to the center of the City of Rochester are expected to see the smallest increases or even declines.

According to the Greater Rochester Association of Realtors, residents are staying in their homes longer (an average of 12.3 years in 2022 versus 6.5 years in 2005). This is partially due to limited options for downsizing, increasing housing costs, and young adults living at home for longer. Whereas seniors used to be able to cash in on the equity in the homes by moving into a smaller house, many now find that they have to pay more for a smaller house. As such, they end up staying in their current homes even as they become more difficult to maintain. So both rental and ownership options at affordable costs are needed for this demographic. Ultimately, there must be options and support for seniors to transition through all of the housing stages, from independent living to nursing care.¹⁶

¹⁶ Reimagine ROC Housing. Greater Rochester Association of Realtors. April 1, 2023.

Anticipated Unit Need per 100 New Residents

Population projections are subject to a number of circumstances. A new major employer or investment could lead to an influx (or exodus) of population that is not fully accounted for in current data. As such, it is worth assessing the housing need for potential new residents that are not captured in the current projections. To accomplish this, we applied the current housing tenure trends of young adults, other working age, and senior age cohorts to an increase of 100 residents for each. Specifically, we applied the percentage that are householders (head of households), followed by the percentage of householders that are homeowners and renters. This yielded the estimated number of single-family and rental units required to accommodate 100 new residents in each cohort, as shown in the table below.

Anticipated Housing Need per 100 New Residents in Monroe County Given Current Tenure Trends, by Age					
	% anticipated householders	% Owners	% Renters	Single Family units per 100	Rental units per 100
Young Adult	39.8%	31.9%	68.1%	13	27
Working Age	59.9%	69.1%	30.9%	41	19
Senior	65.1%	72.8%	27.2%	47	18

Source: American Community Survey 5-year Estimates, MRB Group

MARKET ANALYSIS SUMMARY

The following is a summary of the full Market Analysis presented as Attachment B of this Study. The Market Analysis information on the current conditions of Monroe County in terms of demographic, industry, and real estate trends. The data displayed throughout the market profile was collected from numerous sources, including the American Community Survey, the U.S. Census Bureau, Esri, Lightcast, and CoStar, that collectively depict current market conditions. This assessment includes the geographies of Monroe County, Onondaga County, Erie County, and Upstate New York¹⁷ to provide points of comparison.

Market Analysis Findings

Monroe County is a burgeoning hub of economic activity. The large urban area of Rochester and multiple quality higher education institutions attract a younger population, such that Monroe County has the youngest population of comparison geographies after Onondaga County. The many renowned universities in Monroe County likely also contribute to the County's impressive educational attainment statistics: nearly half of the population (42.4%) has earned a bachelor's degree or higher, the highest of any geography in this analysis. Monroe County's population grew slightly since 2010 and is expected to remain relatively stable in the next five years.

The City of Rochester's employment opportunities, as well as those in the immediate surrounding areas, draw a net in-commuting population. Over the past decade, the number of jobs in Monroe County has remained stable, having increased slightly to 406,555 in 2024. In the next decade, the occupations of Healthcare Support, Healthcare Practitioners and Technical Occupations, and Transportation and Material Moving are expected to grow the most. These occupations speak to Monroe County's growing prevalence in the health care industry, which benefits residents

¹⁷ Upstate New York covers all counties but those in the Empire State Development defined regions of Mid-Hudon, New York City, and Long Island.



by providing high-quality care and may contribute to decisions to reside in the County. Overall, jobs in Monroe County are expected to increase by 3% or 12,922 jobs in the next decade.

Monroe County has immense potential and has made progress in recent years by creating new job opportunities, attracting residents, and supporting the construction of new homes. However, many households are still cost-burdened and the supply of housing remains outpaced by demand, further inflating costs. As significant investments in the region continue to arrive, it is imperative that Monroe County ramp up existing housing initiatives to support new and existing businesses in talent attraction and retention, an aging population, and cost-burdened households.

DEMOGRAPHICS

Overview

The table to the right is a comparison of demographic trends for each of the four geographies defined in the Market Area section.

From 2010 to 2024, Monroe County’s population increased by 0.9% or 6,751 individuals and there was a 7.4% increase in the number of households. In contrast, the population of Upstate New York as a whole decreased by 57,170 individuals or 0.9% over the same period. Monroe County’s population is projected to decrease slightly by 1,040 or 0.1% over the next five years. This projection does not necessarily account for anticipated regional development, particularly the NY SMART I-Corridor Tech Hub.

Other fundamentals:

- Median age – 40.1 in 2024, projected to be 41.3 in 2029
- Median home value - \$234,608 in 2024, projected to be \$258,960 in 2029
- Median household income - \$71,064 in 2024, \$80,614 in 2029

Demographic Fundamentals

POPULATION				
	2010	2024	Change	% Change
Monroe County	744,344	751,095	6,751	0.9%
Onondaga County	467,026	469,542	2,516	0.5%
Erie County	919,040	957,257	38,217	4.2%
Upstate New York	6,079,236	6,022,066	(57,170)	(0.9%)
PROJECTED POPULATION				
	2024	2029	Change	% Change
Monroe County	751,095	750,055	(1,040)	(0.1%)
Onondaga County	469,542	461,374	(8,168)	(1.7%)
Erie County	957,257	955,028	(2,229)	(0.2%)
Upstate New York	6,022,066	5,963,035	(59,031)	(1.0%)
HOUSEHOLDS				
	2010	2024	Change	% Change
Monroe County	300,422	322,584	22,162	7.4%
Onondaga County	187,686	196,329	8,643	4.6%
Erie County	383,164	408,045	24,881	6.5%
Upstate New York	2,442,928	2,534,707	91,779	3.8%

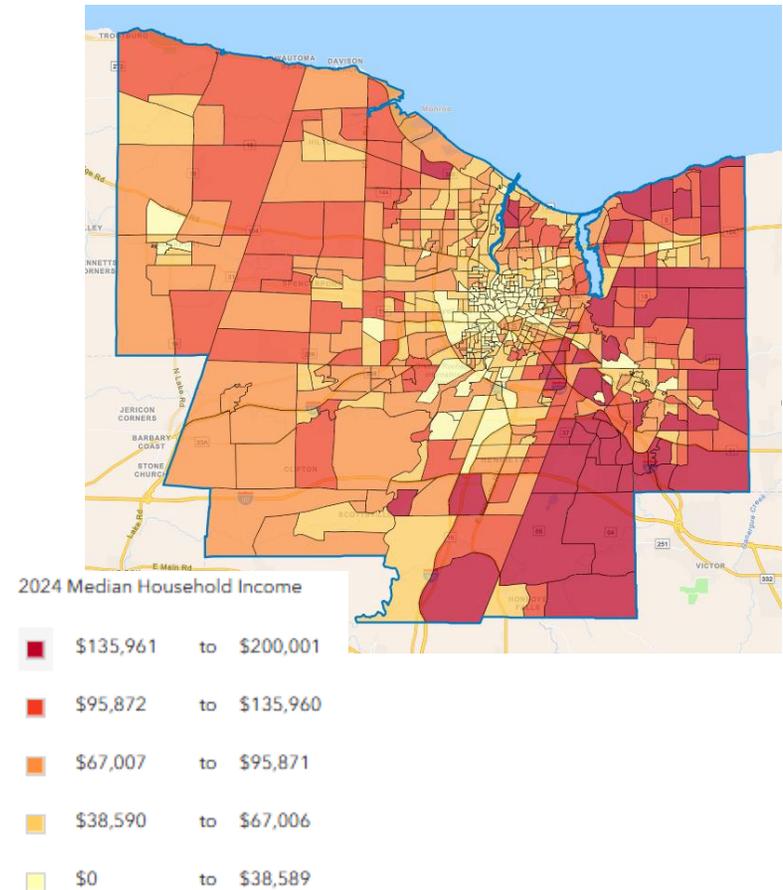
Source: Esri

Household Income Distribution

In Monroe County, over a third of households (36.2%) earn less than \$50,000 annually and another third (35.4%) earn over \$100,000 annually. Of the lower-income households, 10.1% earn below \$15,000 annually. The map to the right shows median housing income by Census block group. Higher income households are primarily concentrated in the eastern portion of the County and lower income households are concentrated in the City of Rochester and villages.

Educational Attainment

Monroe County is well-educated with nearly half of the population (42.4%) having a bachelor's degree or higher. About 92.4% of the population has earned at least a high school diploma or equivalent.



Poverty and At-Risk Populations

In Monroe County, 13% of households—or 40,602—live below the poverty level. About a quarter of households (25.2%) have an individual with a disability.¹⁸ About 10.7% of households do not have access to a vehicle in Monroe County. Additionally, just over a fifth (20.1%) of the County’s population is over the age of 65.

POVERTY & AT-RISK POPULATION STATISTICS, 2024				
	Monroe County	Onondaga County	Erie County	Upstate New York
Households Below the Poverty Level (%)	13.0%	13.0%	14.0%	13.0%
Households Below the Poverty Level (#)	40,602	25,893	56,128	325,700
Households with Disability	25.2%	26.4%	25.6%	26.7%
Population 65+	20.1%	19.6%	20.2%	20.8%
Households without a Vehicle	10.7%	12.0%	12.0%	10.2%

Source: Esri

Commuting

Monroe County has a net in-commuting population of 41,348 individuals. The majority of residents who live in Monroe County but commute to a job outside of the County travel to Erie County (-12,683), Ontario County (-10,569), and Onondaga County (-5,966). Those who live outside of the County but commute to a job within Monroe County originate primarily from Ontario County (+16,397), Wayne County (+15,561), and Erie County (+12,357).

¹⁸ “Households with Disability” refers to households that have one or more persons with a disability, including: sensory disability, physical disability, mental disability, self-care disability, go-outside-home disability, and employment disability. <https://www.census.gov/topics/health/disability/guidance/data-collection-acs.html>

OCCUPATION ANALYSIS

Occupation Composition & Employment Trends

In total, Monroe County's occupations remained stable from 2014 to 2024, having increased by only 1,919 to 406,555.

Largest Occupation Groups in 2024:

1. Office and Administrative Support: 49,525 jobs in 2024, decreased 22% from 2014-2024. Low median annual earnings of \$44,581
2. Educational Instruction and Library: 36,011 jobs in 2024, increased 5% from 2014-2024. Good median annual earnings of \$63,574
3. Sales and Related: 33,039 jobs in 2024, decreased 18% from 2014-2024. Low median annual earnings of \$37,428

Fastest Growing Occupation Groups from 2014-2025:

- Business and Financial Operations: Increased 28% or 5,220 jobs from 2014-2025. High median annual earnings of \$78,560
- Management: Increased 22% or 1,131 from 2014-2025. Highest median annual earnings of \$115,105.

Projected Employment Trends

Overall, occupations in Monroe County are expected to increase by 3% or 12,922 jobs in the next decade. The largest occupation groups are anticipated to remain Office and Administrative Support and Educational Instruction and Library occupations, though Healthcare Practitioners and Technical Occupations will overtake Sales and Related Occupations as the third-largest occupation.

Occupations Projected to Grow the Most 2024-2034:

- Healthcare Support (+3,389)
- Healthcare Practitioners and Technical Occupations (+3,388)
- Transportation and Material Moving (+2,320)

Declining Occupation Groups from 2024-2034:

- Office and Administrative Support occupations (-3,251)
- Production occupations (-2,084)
- Sales and Related occupations (-1,224)
- Legal occupations (-64)

Occupations by Area Median Income

Area median income (AMI) is “the midpoint of a specific area’s income distribution.” Monroe County’s AMI for 2025 is \$83,200 and is based on the Rochester metropolitan area.¹⁹ Organizations and state and local governments use the AMI measure to dedicate funding for regulated “affordable housing” units—those units that are tied to federal and/or state funding and contractual agreements—and determine eligibility for unit occupancy.

Below, types of occupations are listed in terms of their median annual wages and how that compares to AMI for a 2-person household in Monroe County. This will help to demonstrate which workers may struggle to afford housing within each income bracket.

About 34.8% of jobs in the County pay under 50% of the two-person AMI of \$83,200, or less than \$41,600, with workers earning from about \$30,900 to \$40,200 annually. These jobs afford workers a maximum of \$1,040 per month for housing to avoid being cost-burdened and are concentrated in the following occupations:

- Transportation and Material Moving Occupations
- Military-only occupations

¹⁹ This is for a two-person household. For a four-person household, the AMI is \$103,900.

- Sales and Related Occupations
- Building and Grounds Cleaning and Maintenance Occupations
- Healthcare Support Occupations
- Food Preparation and Serving Related Occupations
- Personal Care and Service Occupations
- Farming, Fishing, and Forestry Occupations

More specifically, housing that is affordable to individuals making less than 50% AMI would support single-earner households who are dental and medical assistants; home health and personal care aides; sales associates and managers; realtors; agricultural workers and farmers; childcare workers; hairstylists; and more.

Jobs that pay between 50% and 80% (\$66,560) of the AMI make up 40.3% of jobs in the County and afford workers housing costs of about \$1,040 to \$1,664 each month. These include:

- Educational Instruction and Library Occupations
- Construction and Extraction Occupations
- Arts, Design, Entertainment, Sports, and Media Occupations
- Installation, Maintenance, and Repair Occupations
- Community and Social Service Occupations
- Protective Service Occupations
- Office and Administrative Support Occupations
- Production Occupations

Housing that is affordable to individuals making between 50% and 80% of the AMI would support journalists and communication workers; sports officials; social workers; school and career counselors and advisors; probation officers; family therapists; those employed in manufacturing, power generation, and factories; truck and bus drivers; postal service workers; clerks; receptionists; bank tellers; and more.

Jobs that pay, on average, between 80% and 120% (\$99,840) of the AMI make up 19.4% of jobs in the County and afford workers housing costs of about \$1,664 to \$2,496 per month. These occupations include:

- Legal Occupations
- Computer and Mathematical Occupations
- Architecture and Engineering Occupations
- Business and Financial Operations Occupations
- Healthcare Practitioners and Technical Occupations
- Life, Physical, and Social Science Occupations

Housing that is affordable to individuals in this income range would support single-earner paramedics; doctors and surgeons; medical technologists; therapists; insurance appraisers; accountants; teachers; financial advisors; architects; engineers; lawyers, and more.

Management Occupation jobs are the only category that have median annual earnings above 120% of the AMI. They constitute just 5.6% of jobs in the County and afford workers' housing costs of about \$2,496 and up.

STAKEHOLDER INPUT

Stakeholder engagement for this study included a retreat of the COMIDA board intended to clarify priorities, questions, and concerns held by the board members. MRB Group then conducted a series of interviews with individuals involved on the ground in the housing development process. These interviews provided perspective from those who have first-hand experience with the challenges and barriers to development in the current context.

COMIDA Board Retreat

On April 1, 2025, COMIDA held a board retreat as part of this Housing Study. At this meeting, MRB Group facilitated a discussion among the board members to better understand the board's priorities and goals related to utilizing IDA abatements as a mechanism for facilitating housing development in Monroe County. The purpose of this session was to narrow the scope of the housing study to just relevant typologies and help the board in developing a standard policy that could be applied to housing projects in the future. Some considerations discussed by the board were: housing type, income levels targeted, geography, and project size, as well as the policy approach and the impact the IDA would like to have in the housing market.

Key Takeaways

The key takeaways and related questions from this retreat are as follows:

1. Affordable housing is a need and is a top priority for the board, but only once project sponsors have exhausted all other means. The board would also like to support middle-market and market-rate housing, but not luxury units.
 - a. Question: How does the IDA define affordable, market-rate, and luxury and categorize a project accordingly?
 - b. Question: What is the most logical and helpful role for the IDA in the affordable housing ecosystem?

2. The IDA can play a role in mitigating capital market constraints (e.g. high interest rates, increasing cost of materials and labor, shifting regulations, etc.) so that housing development is more feasible.
 - a. Question: What level of abatement is necessary to offset these constraints?
3. The IDA's housing policy should target projects that enhance economic growth and prosperity.
 - a. Question: What type of housing is needed to serve the workforce?
 - b. Question: What other outcomes/impacts would indicate economic growth and prosperity?
4. The board seeks to balance supporting project feasibility with creating community benefit very carefully and thus takes a conservative approach to housing projects. The board aims to support housing development while not unduly enriching developers. As such, they want to provide no greater than the level of abatement that is necessary to make projects happen.
 - a. Question: How does the board create a policy that is effective and consistent at simply filling the gap for a project, while also being flexible enough to take varying constraints and challenges into account?
 - b. Question: COMIDA currently requires a 20% set aside of affordable units. Are affordable unit set asides the most effective way to support the availability of affordable housing? If so, should there be an exception or buyout provision for this set aside?
5. The policy should be clear regarding the IDA's direction and constraints for housing development so that the board can make consistent and informed decisions about abatements. The policy should also be adaptable over time to ensure that it aligns with market needs.
 - a. Question: what type of monitoring is required for the implementation of the policy?

Interviews

Interviews were conducted with seven individuals involved in housing development to gain valuable local knowledge and feedback from the people who are doing this work in Monroe County. These developers and service providers were asked to provide a general overview of their housing development work, as well as discuss the challenges and opportunities they see for housing development in the County.

Several themes emerged during these interviews.

Firstly, the consensus across interviews was that there is a **critical lack of housing**, especially what is considered middle-market or workforce housing. A number of the interviewees also pointed to the need for **more diverse senior housing** options, particularly market-rate senior housing. The current housing supply does not match demand, but the market cannot produce units that are affordable to current residents under the current construction market conditions. There was general consensus that supporting housing development across unit types and rent levels would naturally lead to broader affordability due to increased supply.

The **cost of building housing has increased** significantly in recent years, a trend that is expected to continue. High development costs add to the lack of housing, with interviewees citing rising material and labor costs, interest rates, tariffs, and electric installations as major cost drivers. While affordable housing developers can access funding to support their work, other developers focus on units that can fetch a higher sale price or rental rate. Further, developers are now needing to come up with higher levels of equity, reported to be 45%, which makes larger projects harder to undertake without incentives or subsidies. Considering these factors, it is **no longer financially viable to build middle-market housing** units without some kind of support.

Overall, the interviewees also had a **positive view of COMIDA**, giving general praise to the staff as being helpful and professional. However, most noted that the **administrative and legal fees are too high** and sometimes drive developers away from seeking COMIDA assistance. There were multiple suggestions for how to address this, including tiered fees based on project outcomes, capping the fees in some way, or creating a special fee structure for housing projects specifically.

There was **less consensus about COMIDA's affordable unit set aside**, with some developers saying it was not a problem— primarily affordable housing developers—and others choosing not to pursue COMIDA benefits because of the set aside. One market-rate developer indicated that he was aware of developers that delayed projects instead of seeking COMIDA benefits because of the set aside.

Interviewees generally indicated openness to new development and working with COMIDA to address the lack of housing. Several agreed that more strategic, **mixed-income housing** could be a solution, but recognized that each community has different needs. The types of housing mentioned included modular homes, mixed-income apartment complexes, and market-rate senior housing. One interviewee also stressed the importance of creating safe housing for **individuals with disabilities**, including but not limited to ADA accessible facilities. That said, not everyone with a disability requires ADA accessibility. For instance, a unit appropriate for a person with an intellectual disability looks the same as any other unit. Another interviewee suggested that COMIDA could support housing development by **attracting a modular home manufacturer** (currently, the closest is in Pennsylvania), which would make it less costly and more efficient to build middle-market homes.

RECOMMENDATIONS

Based on the information collected during the course of this study and the direction and feedback of the COMIDA board members and staff, MRB Group makes the following recommendations regarding COMIDA's future support for housing development. Per the findings of the study, these recommendations are intended to create clarity; support the feasibility of housing development at a time of high capital and market constraints, particularly at the affordable, workforce, and middle-market levels; and provide flexibility to engage with projects that have varying financing structures and needs. Each of the recommendations below is explained in detail in the pages that follow.

Recommendation #1: Define Eligible Housing Types

To set clear expectations for all involved, COMIDA should define the types of rental housing it is willing to support (or not) with tax abatements. Definitions for a range of housing types – regulated affordable, affordable, middle-market, market rate, special population, and luxury – are provided below.

Recommendation #2: PILOT Schedules

COMIDA should use its existing standard PILOT along with two enhancements to address the financial needs of different housing types. This recommendation also addresses methods of monitoring compliance over time, as well as how to handle projects that stray from their qualifying housing types during the course of the PILOT.

Recommendation #3: Sales and Use Tax Only

Some projects that do not need the long-term support of a PILOT should be able to access sales and use tax and/or mortgage recording tax to help with upfront financing needs.

Definitions for purposes of these recommendations:

Affordability Threshold – the rent maximum allowed by HUD under “Other Programs” for the respective household size and Area Median Income (AMI) limit²⁰.

Household Size – For purposes of assessing the affordability threshold, household size is based on the number of bedrooms in a unit and assumes a 1 person household for efficiencies/studios and 1.5 people per bedroom for other units (e.g. household size of 1.5 for a 1-bedroom unit, 3 for a 2-bedroom, 3.5 for a 3 bedroom, etc.).

Recommendation #1: Define Eligible Housing Types and Projects

For all parties involved, it would be helpful to have clear definitions of the types of housing COMIDA is willing to support. Based on conversations with the board, it is recommended that eligible rental housing projects consist of the following:

- **Regulated Affordable Projects:** Projects leased to income eligible households and subject to a state or federal regulatory agreement.
- **Affordable Units:** Units with rental rates at or below the affordability threshold for households making between 40% and 80% of AMI based on household size.
 1. 2025 annual income range
 - one-person household: \$29,080 - \$58,160
 - two-person household: \$33,240 - \$66,480
 2. 2025 rent midpoint
 - one-bedroom: \$1,170
 - two-bedroom apartment: \$1,400
 3. Examples of occupations that pay less than 80% AMI and median annual earnings (~75% of jobs in Monroe County):

²⁰ <https://www.novoco.com/resource-centers/affordable-housing-tax-credits/rent-income-limit-calculator>

- Farming, Fishing, and Forestry Occupations - \$30,909
 - Personal Care and Service Occupations - \$32,808
 - Food Preparation and Serving Related Occupations – \$34,428
 - Healthcare Support Occupations - \$35,849
 - Building and Grounds Cleaning and Maintenance Occupations - \$36,090
 - Sales and Related Occupations – \$37,518
 - Transportation and Material Moving Occupations - \$40,236
 - Production Occupations - \$42,807
 - Office and Administrative Support Occupations - \$44,581
 - Community and Social Service Occupations - \$53,703
 - Installation, Maintenance, and Repair Occupations - \$54,394
 - Educational Instruction and Library Occupations - \$63,574
- **Middle-Market Units:** Units with rental rates at or below the affordability threshold for households making between 80% and 100% of AMI based on household size.
 1. 2025 annual income range
 - one-person household: \$58,160 - \$72,700
 - two-person household: \$66,480 - \$83,100
 2. 2025 rent midpoint
 - one-bedroom: \$1,750
 - two-bedroom apartment: \$2,100
 3. 2025 rent range for a 2-bedroom apartment: \$1,870 - \$2,337
 4. Occupations that pay between 80% and 100% AMI and median annual earnings:
 - Life, Physical, and Social Science Occupations - \$72,609

- Healthcare Practitioners and Technical Occupations - \$76,835
- Business and Financial Operations Occupations - \$78,560
- **Market Rate Units:** Units with rental rates at or below the affordability threshold for households making between 100% and 150% of AMI based on household size.
 1. 2025 annual income range
 - one-person household: \$72,700 - \$109,050
 - two-person household: \$83,100 - \$124,650
 2. 2025 rent midpoint
 - one-bedroom: \$2,430
 - two-bedroom apartment: \$2,920
 3. 2025 rent range for a 2-bedroom apartment:
 4. Occupations that pay between 100% and 150% AMI:
 - Legal Occupations - \$91,309
 - Computer and Mathematical Occupations - \$88,640
 - Architecture and Engineering Occupations - \$83,687
 - Management Occupations - \$115,105
- **Special Population Projects**
 1. Senior Community Projects are entirely dedicated to individuals aged 55+ and must incorporate social, recreational, and/or support amenities.
 2. Supportive Projects have at least 50% of units dedicated to providing safe, accessible housing for people with disabilities, which must include supportive staffing, amenities, and/or programming.
- **Ineligible – Luxury Units:** Units with rental rates above the affordability threshold for households making 150% of AMI. Projects with luxury units would require a deviation from the UTEP, including projects that would otherwise be considered Special Population Projects.

Recommendation #2: PILOT Schedules

Stakeholders suggested that the current standard PILOT schedule is sufficient for projects that create solely market-rate units, and that the shelter rent model for Regulated Affordable Projects makes sense. However, they indicated that enhanced benefits could help make middle-market, senior housing, and housing for people with disabilities more feasible. The latter types of projects typically have higher construction and operating costs and/or lower rental revenue, and as such are harder to make financially feasible in the current environment.

It is recommended that COMIDA establish three PILOT schedules corresponding to the housing types defined above. In summary, the proposed scheme starts with a 10-year PILOT that follows the existing standard PILOT COMIDA utilizes for other project types. This standard schedule can be accessed by any housing project offering rents below the affordability threshold at 150% AMI. The first enhancement adds three years of 90% abatement on added value to the beginning of the PILOT, then follows the standard schedule for a total of 13 years of abatement. This schedule would be available to projects focused, as defined more thoroughly below, on middle market and senior housing projects. The second enhancement adds an additional three years of 95% abatement on added value to the beginning of the PILOT, for a total of 16 years of abatement. This schedule targets projects that face the greatest barriers to feasibility in current market conditions, specifically affordable and supportive housing. See the next page for a breakdown of the proposed PILOT schedules.

This set of schedules meets a baseline goal of increasing the housing stock first and foremost. It also addresses a secondary goal of diversifying the housing stock across rent/income levels by providing higher levels of abatement to projects that face greater financial barriers.

Ineligible Projects: Projects with Luxury Units renting above the affordability threshold for 150% AMI would require a UTEP deviation. This applies across the project types. In instances where qualifying units are only a portion of the project, all remaining units must be Market Rate below the 150% AMI affordability threshold.

Regulated Affordable Projects: Continue to use the shelter rent policy already in place.

Schedule	Year			Abt.	Eligibility
Second Enhancement	1			95%	1. At least 20% of units are Affordable Units with rents averaging 60% AMI, based on household size* 2. Supportive Projects with 50% of units dedicated to people with disabilities, plus supportive amenities
	2			95%	
	3			95%	
First Enhancement	1	4		90%	1. At least 20% of units are Middle-Market Units with rents averaging 90% AMI, based on household size** 2. Senior Community Projects with all units for individuals aged 55+, plus community-based amenities
	2	5		90%	
	3	6		90%	
Standard	1	4	7	90%	1. All units are Market Rate with rents up to 150% AMI, based on household size
	2	5	8	90%	
	3	6	9	80%	
	4	7	10	70%	
	5	8	11	60%	
	6	9	12	50%	
	7	10	13	40%	
	8	11	14	30%	
	9	12	15	20%	
	10	13	16	10%	

*Units may be affordable to households up to 80% AMI, provided that the mix of Affordable units averages 60% AMI. (Example, each 80% AMI unit would be paired with a 40% AMI unit, to average 60% AMI.)

**Units may be affordable to households up to 100% AMI, provided that the mix of units averages 90% AMI. (Example, each 100% AMI unit would be paired with a 80% AMI unit, to average 90% AMI.)

Monitoring: Projects will need to be monitored to ensure they are maintaining the required level of qualifying units. We recommend offering the following three options to streamline monitoring:

1. Annual verification that the project is in good standing with a state or federal regulatory agreement; OR
2. Annual submission of a qualifying units form – which would ideally be a spreadsheet that the developer/landlord fills out and automatically calculates the AMI affordability and qualifying unit average - and rent roll listing each qualifying unit, number of bedrooms, and rental rate; OR
3. Submission of verification by a third-party, non-profit housing agency.

For Special Population Projects, we recommend requiring a tenant certification of age or disability at the time of lease.

Default: Projects that exceed the qualifying maximum rent rates or fail to meet tenancy restrictions (“qualifying factors”) for the specific schedule during the course of a PILOT should be subject to termination, recapture, and/or schedule adjustment. COMIDA’s existing default process can be used to address defaults of housing projects, providing the board with discretion to decide how to address defaults on a case-by-case basis. That said, in doing so, the board should consider shifting market conditions, whether the project would still qualify for a PILOT under a different schedule, how long the project was compliant, and the continued need for the abatement in order to meet community housing goals. For example, a project shifting to luxury rental rates early in their schedule should be considered differently than a project that shifts from 80% AMI rents to 90% AMI rents midway through the schedule.

Recommendation #3: Sales and Use Tax and Mortgage Recording Tax Only

Not all projects will require and/or want a PILOT as part of their financing stack. For instance, projects receiving other forms of public benefits, like grants, low-interest loans, or a 581-A property tax exemption, may only need assistance with lowering upfront costs. It is recommended that COMIDA staff be empowered to qualify such housing projects for sales and use tax and/or mortgage recording tax abatements only (i.e. no PILOT). The anticipated amount of incentive for these types of benefits is much lower than that of a PILOT, and thus eligibility, monitoring, and implementation should be significantly streamlined. While projects that include luxury units, which rent at rates above the 150% AMI affordability threshold, should still be ineligible. However, there should otherwise be no specific income-based thresholds or set-asides.

Other Recommendations and Considerations:

Throughout the processes of this assessment, a few additional recommendations and considerations arose that did not necessarily fit within the original intent of this study, but are still worth noting:

- All developers interviewed indicated that COMIDA's fee structure was a barrier or a challenge to project development, primarily because of shifts on financing and the need to raise more cash capital at the start of the project. One way to address this is to provide an option for developers to pay the administrative fee over time. While a change to the fee policy may not be palatable, COMIDA should be aware of this and continue to consider project needs on a case-by-case basis.
- One interviewee suggested that COMIDA take proactive steps to attract a modular/manufactured home manufacturer. Developers interviewed indicated that they are sourcing these types of buildings from a company in Pennsylvania²¹. Attracting a manufacturer of this type could reduce costs and timelines for these types of homes and increase the opportunity to construct relatively affordable homes for ownership. In the current context, modular and manufactured homes are one of the only ways to build affordable and middle-market owned units. While these types of homes are not a suitable solution for all communities, this tactic could advance housing goals for some Monroe County municipalities, as well as create new jobs and support housing development regionally.
- There is a particular need for family-sized rental units with 3 or more bedrooms. It is a struggle for larger families to find appropriate and affordable housing that accommodates the needs of children, aging parents, and other dependents.
- Note that all IDA-imposed restrictions are lifted at the expiration of the Agent Agreement. At this time, the landlord will be able to price units however they choose based on market and property conditions.

²¹ One manufacturer of modular and manufactured homes, Champion Homes, is located outside of Utica, NY and is reported to have done work with landbanks in New York State. It is worth initiating a conversation with this firm to better understand the pricing of their product and opportunities for more partnership with them in Monroe County.