



## **PUBLIC DISCLOSURE**

October 29, 2018

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Seneca Savings  
Charter Number 703552

35 Oswego Street  
Baldwinsville, NY 13027

Office of the Comptroller of the Currency

5000 Brittonfield Parkway  
Suite 102B  
East Syracuse, NY 13057

**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, and should not 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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## Overall CRA Rating

The Lending Test is rated: **Satisfactory**.

The major factors supporting the CRA rating are as follows:

- The bank's loan-to-deposit (LTD) ratio is reasonable based on the institution's size, financial condition, and the assessment area's (AA) credit needs.
- The majority of home mortgage loans were originated inside the bank's AA.
- The bank's distribution of home mortgage loans is reasonable among borrowers of different income levels within the AA.
- The bank's distribution of home mortgage loans is reasonable among census tracts of different income designations.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** 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 areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. 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.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**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:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state 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) 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.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Description of Institution

Seneca Federal Savings and Loan Association (Seneca) is a federally chartered intrastate savings association headquartered in Onondaga County, in the village of Baldwinsville, New York (NY). Seneca is a wholly owned subsidiary of Seneca Financial Mutual Holding Company. Seneca operates three full service branches, all of which are located in Onondaga County. The bank's AA consists of all the CTs in Onondaga County, which is located within the Syracuse, NY Metropolitan Statistical Area (MSA).

The bank's main office is located in Baldwinsville, NY, which is 15 miles northwest of Syracuse, NY. The bank's other two branches are located in Liverpool, NY and North Syracuse, NY. In 2015-2016, all branches were located in middle-income CTs. In 2017, the CT where the Baldwinsville branch is located was changed to upper-income, and the CT where the North Syracuse branch is located was changed to moderate-income. There have been no branches opened or closed since the last evaluation, nor have there been any mergers or acquisitions. All branches offer lobby and drive-thru services, including automated teller machines (ATMs). Branch hours are 8:30 a.m. to 4:00 p.m. Monday through Thursday, and with lobby hours extended to 5:00 p.m. on Friday. Saturday hours vary by branch location. Drive-thru hours are 8:30 a.m. to 4:00 p.m. Monday through Wednesday, with extended hours on Friday until 5:00 p.m. and Saturday morning from 9:00 a.m. until 12:00 p.m. Seneca offers its customers surcharge-free access to their cash at over 55,000 ATMs as part of the bank's partnership with the Allpoint ATM network. For retail customers who like the option of electronic banking, the bank offers online and mobile banking with bill pay.

Seneca operates in a competitive financial services market with mortgage companies, large regional banks, large credit unions, savings banks, and community banks. Major competitors include M&T Bank, KeyBank N.A., JPMorgan Chase Bank, N.A. (Chase), and NBT Bank, N.A. Seneca's primary business strategy consists of investing local public deposits and funds generated from operations into one- to four- family residential real estate loans at a variety of conventional fixed and adjustable rate terms. To a lesser extent, the bank invests in commercial real estate loans, home equity lines of credit, commercial and industrial loans, residential construction loans, and consumer loans. Deposit products offered include personal and business checking, statement savings, NOW, money market, and Holiday Club accounts.

To assist first time home-buyers, Seneca is a participating lender with the Onondaga County Community Development (OCCD) organization and the Federal Home Loan Bank's (FHLB) First Home Club. These programs which originate loans and offer grants to qualified low-income borrowers who are first time homeowners. Grants are often issued to support closing costs associated with the purchase of a home.

As of December 31, 2017, Seneca reported total assets of \$176.3 million and tier one capital of \$18.9 million. At the same time, Seneca reported net loans of \$141.2 million, which comprised 80.1 percent of total assets, and deposits of \$135.1 million. Nearly 80

percent of the bank's loan portfolio is comprised of residential real estate loans, followed by non-farm/non-residential loans at 9.7 percent, commercial loans at 6.9 percent, and construction loans at 3.2 percent.

Seneca has no known legal or financial factors that would impede its ability to meet the credit needs of its AA. Seneca received a "Satisfactory" rating at the prior CRA examination dated January 4, 2013.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The Lending Test evaluation period covers the time period from January 1, 2015 through December 31, 2017. We determined that home mortgage loans are the bank's primary product. For purposes of this evaluation, home mortgage loans are loans originated for the purpose of home purchase, home refinance, and home improvement, including multifamily home loans, pursuant to HMDA. Lending performance for the 2015-2016 and 2017 time periods are analyzed separately due to changes in census information effective in 2017. The census changes were a result of the Census Bureau's 2015 American Community Survey (ACS).

The market share and peer comparisons are based on information contained in the aggregate HMDA Loan Application Register (LAR). The aggregate HMDA LAR is available for public view. The peer comparisons in this evaluation include only lenders who were required to file HMDA data for 2016 and 2017.

### **Data Integrity**

A data integrity review was performed prior to the evaluation of the loan information discussed in the Evaluation Period/Products Evaluated section above. The quality of the bank's HMDA reporting was determined to be satisfactory based on the results of the sample of HMDA loans tested. No significant issues were identified.

### **Selection of Areas for Full-Scope Review**

We completed a full-scope evaluation on Seneca's only AA, Onondaga County. Onondaga County is one of three counties located in the Syracuse, NY MSA and contains 140 census tracts. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income census tracts or reflect illegal discrimination. Please refer to Appendix A for more information regarding the evaluation scope and Appendix B for additional information on the AA.

### **Ratings**

The bank's overall rating is based exclusively on a full-scope evaluation of the bank's one AA. All factors were weighted evenly in this evaluation.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Conclusions with Respect to Performance Tests

### LENDING TEST

The bank's performance under the Lending Test is satisfactory. The assessment reflects that a majority of loans originated are within the bank's AA, and a reasonable LTD ratio. Loans within the AA are reasonably distributed among individuals of different income levels and among census tracts of different income designations.

#### Loan-to-Deposit Ratio

Seneca's quarterly average net LTD ratio is reasonable given the bank's size, financial condition, and the credit needs of the AA. The bank's quarterly average net LTD ratio over the 21 quarters since the last evaluation, ending December 31, 2017, was 88.97 percent. During this time, the ratio ranged from a quarterly low of 70.60 percent to a quarterly high of 108.39 percent. The bank's quarterly average net LTD ratio is within a reasonable range of the quarterly average net LTD ratio of five similarly sized and geographically situated banks and thrifts operating in the state of NY. The quarterly average net LTD ratio for this custom peer group was 96.76 percent over the same 21 quarters. The ratios ranged from a quarterly low of 92.61 percent to a quarterly high of 103.5 percent during that time period. During the most recent 12 quarters which coincide with the HMDA loan evaluation period, the Seneca's LTD ratio averaged 99.18 percent compared to the custom peer group average of 98.10 percent.

#### Lending in Assessment Area

A majority of Seneca's home mortgage loans originated during the evaluation period were within the AA. During the evaluation period, 68.3 percent of the total number and 72.9 percent of the total dollar amount of home mortgage loans were made inside the bank's AA. Refer to the following table which illustrates the bank's lending during the evaluation period within the AA and the dollar amount of loans.

Lending Inside and Outside of the Onondaga County AA										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	409	68.3%	190	31.7%	599	67,099	72.9%	24,882	27.1%	91,981
<b>Total</b>	<b>409</b>	<b>68.3%</b>	<b>190</b>	<b>31.7%</b>	<b>599</b>	<b>67,099</b>	<b>72.9%</b>	<b>24,882</b>	<b>27.1%</b>	<b>91,981</b>

Source: 1/1/2015- 12/31/2017 Bank Data reported under HMDA  
Due to rounding, totals may not equal 100.0

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

Seneca had a reasonable distribution of home mortgages to borrowers of different incomes during the evaluation period.

We considered the location of Seneca's offices in the AA in our evaluation of loan distribution to borrowers of different incomes and to CTs of different income levels (discussed later in the evaluation). The bank's office are not located near the majority of low- and-moderate income CTs in the AA, and hence where the majority of people of low- and-moderate income reside. The vast majority of low- and moderate-income CTs are concentrated in the AA's principal city of Syracuse, NY. Seneca's three offices are located in the suburbs of Syracuse, the closest being situated approximately 10 miles from downtown. The distance of Seneca's offices, along with strong competition from more than 10 Federal Deposit Insurance Corporation (FDIC) insured institutions and numerous credit unions who have a physical presence in the city, places Seneca at a disadvantage in originating loans to people of low- and-moderate-income and to residents of low- and moderate-income CTs in the AA.

In 2015-2016, Seneca's percentage of home mortgages made to low-income borrowers in the AA was 8.2 percent, which was significantly below the percentage of low-income families at 21.0 percent, and near to the aggregate industry distribution at 8.43 percent. In 2017, the percentage of home mortgages made to low-income borrowers was 4.7 percent, which was significantly below the percentage of low-income families at 20.9 percent, and the aggregate industry distribution of 7.1 percent, but is reasonable when considering the location and competitive factors noted earlier. Lending to low-income borrowers was also impacted by demographic factors in the AA. The median housing value was \$122,970 per the 2010 census data and \$130,362 per the 2015 ACS. The median family income was \$63,463 (2010) and \$68,468 (2015) for the AA, which means the maximum income for low-income families (as defined as less than 50.00 percent of the area median family income) was \$31,731 (2010) and \$34,234 (2015). Additionally, approximately 10 percent of families in the AA live below poverty level. Therefore, low-income borrowers would likely experience difficulty qualifying for home mortgages.

In 2015-2016, the percentage of home mortgages made to moderate-income borrowers was 13.8 percent, near to the percentage of moderate-income families at 15.9 percent. While below the aggregate industry distribution at 20.6 percent, it is considered reasonable based on the location and competitive factors noted earlier. In 2017, the percentage of home mortgages made to moderate-income borrowers was 18.1 percent, exceeding the percentage of moderate-income families at 16.2 percent and near to the aggregate industry distribution at 20.2 percent.

Please refer to Tables 1 and 2 in Appendix C for further information.

## **Geographic Distribution of Loans**

Seneca had a reasonable distribution of home mortgages among CTs of different income designations during the evaluation period.

In 2015-2016, the percentage of home mortgages made in low-income CTs in the AA was 1.4 percent, significantly below both the percentage of owner-occupied housing in low-income CTs of 4.4 percent and the aggregate industry distribution of 2.7 percent. However, we believe the penetration is reasonable, when considering the location and competitive factors discussed earlier. The percentage of home mortgages made to borrowers in moderate-income geographies was 12.1 percent, which was near to both the percentage of owner-occupied housing in the moderate-income geographies of 13.1 percent and the aggregate industry distribution of 12.5 percent.

In 2017, the percentage of home mortgages made in low-income CTs in the AA was 2.4 percent, below the 3.8 percent of owner-occupied housing located in the low-income CTs and near to the aggregate industry distribution of 2.9 percent. The percentage of home mortgages made in moderate-income CTs was 6.3 percent, which was below both the 8.7 percent of owner-occupied housing located in moderate-income CTs and the aggregate industry distribution of 9.3 percent.

Please refer to Tables 3 and 4 in Appendix C for further information.

### **Responses to Complaints**

During the evaluation period there were no complaints related to the bank's performance in meeting the credit needs of the AA.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/2015 to 12/31/2017 Investment and Service Tests and CD Loans: N/A	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Seneca Federal Savings and Loan Association (Seneca) Baldwinsville, NY	Home Mortgage Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Onondaga County	Full-scope	The AA lies within the Syracuse MSA, and consists of all census tracts in Onondaga County. See appendix B for more information.

## Appendix B: Community Profiles for Full-Scope Areas

### Seneca AA

Demographic Information of the Assessment Area						
Assessment Area: Onondaga County 2015 and 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	140	17.9	18.6	30.0	32.9	0.7
Population by Geography	467,026	14.0	16.2	31.3	38.4	0.1
Housing Units by Geography	201,871	14.4	17.9	31.8	35.9	0.1
Owner-Occupied Units by Geography	121,046	4.4	13.1	36.5	46.1	0.0
Occupied Rental Units by Geography	62,496	28.5	26.6	25.6	19.4	0.0
Vacant Units by Geography	18,329	32.6	19.9	22.1	24.9	0.6
Businesses by Geography	27,295	17.1	12.6	35.5	34.8	0.0
Farms by Geography	778	2.7	8.6	44.5	44.2	0.0
Family Distribution by Income Level	113,910	21.0	15.9	20.7	42.4	0.0
Household Distribution by Income Level	183,542	24.5	16.0	17.1	42.4	0.0
Median Family Income MSA - 45060 Syracuse, NY MSA		\$63,453	Median Housing Value			\$122,971
Unemployment Rate = 4.5% <i>December 2016 Bureau of Labor and Statistics</i>			Median Gross Rent			\$700
			Families Below Poverty Level			9.6%
<p><i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i>  <i>Due to rounding, totals may not equal 100.0</i>            (*) The NA category consists of geographies that have not been assigned an income classification.</p>						

Demographic Information of the Assessment Area						
Assessment Area: Onondaga County 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	140	16.4	14.3	35.7	30.0	3.6
Population by Geography	468,304	13.2	11.8	37.9	35.3	1.8
Housing Units by Geography	203,956	12.7	13.6	38.9	33.5	1.3
Owner-Occupied Units by Geography	120,529	3.8	8.7	44.8	42.6	0.2
Occupied Rental Units by Geography	64,112	24.8	21.8	30.8	19.0	3.5
Vacant Units by Geography	19,315	28.5	16.5	29.1	24.7	1.1
Businesses by Geography	27,440	10.6	9.8	39.8	36.8	3.0
Farms by Geography	757	2.8	5.4	44.8	46.2	0.8
Family Distribution by Income Level	112,623	20.9	16.2	19.9	43.1	0.0
Household Distribution by Income Level	184,641	24.9	14.9	16.8	43.4	0.0
Median Family Income MSA - 45060 Syracuse, NY MSA		\$68,468	Median Housing Value			\$130,362
Unemployment Rate = 4.7% <i>December 2017 Bureau of Labor and Statistics</i>			Median Gross Rent			\$781
			Families Below Poverty Level			10.5%
<p><i>Source: 2015 ACS Census and 2017 D&amp;B Data</i>  <i>Due to rounding, totals may not equal 100.0</i>            (*) The NA category consists of geographies that have not been assigned an income classification.</p>						

Seneca's single AA is located in the Syracuse, NY MSA, and includes all 140 CTs in Onondaga County, NY. In 2015 and 2016, the AA had 25 low-income tracts, 26 moderate-income tracts, 42 middle-income tracts, 46 upper-income tracts, and one unclassified income tract. The 2015 ACS updated the 2010 census and changed the classification of several CTs effective in 2017. After the update, the AA had 23 low-income tracts, 20 moderate-income tracts, 50 middle-income tracts, 42 upper-income tracts, and 5 unclassified income tracts. For both periods, the vast majority of low- and moderate-income tracts were located in and around the city of Syracuse, NY. The bank's North Syracuse, NY branch is located in a CT that was changed from middle-income in 2015 and 2016, to moderate-income in 2017. According to the FFIEC's list of Distressed and Underserved Tracts, there were no CTs in the AA classified as distressed or underserved in 2015, 2016, or 2017.

According to the June 30, 2017 FDIC Summary of Deposits Market Share Report, Seneca was ranked 10 out of 15 institutions within their AA with 1.29 percent of total deposits. M&T Bank is ranked first with 28 offices and 29.0 percent of deposits. Other top competitors include KeyBank, N.A. with 24 offices and 20.4 percent of deposits, Bank of America, N.A. with 11 offices and 15.7 percent of deposits, and JPMorgan Chase Bank, N.A. with 11 offices and 9.6 percent of deposits.

As of 2010, the AA had 467,026 persons and included 201,871 total housing units. Approximately 91 percent of the housing units were occupied, with 60.0 percent of the total housing units owner-occupied and 31.0 percent rentals. Approximately 9.1 percent of housing units were vacant. The weighted average median housing value was \$122,971. Based on the 2010 census data, the AA has 183,542 households with 9.6 percent of families reportedly living below the poverty line.

Based on the changes made by the ACS, as of 2017, the AA had 468,304 persons and included 203,956 total housing units. Approximately 90 percent of the housing units were occupied, with 59.1 percent of the total housing units owner-occupied and 31.4 percent rentals. Approximately 9.5 percent of housing units were vacant. The weighted average median housing value was \$130,362. Based on the 2015 ACS, the AA includes 184,641 households with 10.5 percent of families reportedly living below the poverty line.

Competition for home mortgage loans in the AA is significant. On average during 2015, 2016 and 2017, there were approximately 206 HMDA reporting institutions in the market, of which the top 10 lenders typically accounted for just over 50 percent of the loans originated. The top lenders remained relatively unchanged during the three years. Empower Federal Credit Union, Wells Fargo, and Syracuse Securities, Inc. were in the top five all three years of the evaluation period. M&T Bank, Paragon Home Loans, Inc., and AmeriCu Credit Union were in the top five for two of the three years.

According to the Bureau of Labor and Statistics, the unemployment rate in Onondaga County was 4.7 percent as of December 31, 2017, the same as the New York State unemployment rate. Major employers in the county include Upstate University Health

System, Syracuse University, St. Joseph's Hospital Health Center, Wegmans, Crouse Hospital, Loretto, and Lockheed Martin. The largest industries are healthcare and social assistance, retail trade, and educational services.

We contacted a local community development organization that provides home ownership products and services to assist low- and moderate-income individuals with the purchase of a home. The organization is located in the city of Syracuse and serves the Central New York area. The contact mentioned that Syracuse has a high childhood poverty rate and there is a high level of generational poverty in the area. The contact believes that the Syracuse housing market is currently challenged and noted that due to the old housing stock, there are high concentrations of lead and asbestos in homes. The contact specifically mentioned opportunities for financial institutions to support home ownership education and counseling, investment opportunities in CD lending programs and CD organizations. The contact noted financial institutions in the area are generally responsive to community needs.

## Appendix C: Tables of Performance Data

AA	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Onondaga County 2015-2016	282	46,816	100.0	11,340	21.0	8.2	8.4	15.9	13.8	20.6	20.7	19.9	22.7	42.4	48.9	33.3	0.0	9.2	15.0
<b>Total</b>	<b>282</b>	<b>46,816</b>	<b>100.0</b>	<b>11,340</b>	<b>21.0</b>	<b>8.2</b>	<b>8.4</b>	<b>15.9</b>	<b>13.8</b>	<b>20.6</b>	<b>20.7</b>	<b>19.9</b>	<b>22.7</b>	<b>42.4</b>	<b>48.9</b>	<b>33.3</b>	<b>0.0</b>	<b>9.2</b>	<b>15.0</b>

*Source: 2010 U.S. Census ; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0*

AA	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Onondaga County 2017	127	20,283	100.0	11,045	20.9	4.7	7.1	16.2	18.1	20.2	19.9	20.5	22.8	43.1	52.0	35.8	0.0	4.7	14.1
<b>Total</b>	<b>127</b>	<b>20,283</b>	<b>100.0</b>	<b>11,045</b>	<b>20.9</b>	<b>4.7</b>	<b>7.1</b>	<b>16.2</b>	<b>18.1</b>	<b>20.2</b>	<b>19.9</b>	<b>20.5</b>	<b>22.8</b>	<b>43.1</b>	<b>52.0</b>	<b>35.8</b>	<b>0.0</b>	<b>4.7</b>	<b>14.1</b>

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0*

**Table 3: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2015-2016**

AA	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Onondaga County 2015-2016	282	46,816	100.0	11,340	4.4	1.4	2.7	13.1	12.1	12.5	36.5	40.1	35.7	46.1	46.5	49.0	0.0	0.0	0.0
<b>Total</b>	<b>282</b>	<b>46,816</b>	<b>100.0</b>	<b>11,340</b>	<b>4.4</b>	<b>1.4</b>	<b>2.7</b>	<b>13.1</b>	<b>12.1</b>	<b>12.5</b>	<b>36.5</b>	<b>40.1</b>	<b>35.7</b>	<b>46.1</b>	<b>46.5</b>	<b>49.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2010 US Census ; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data.  
 Due to rounding, totals may not equal 100.0

**Table 4: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2017**

AA	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Onondaga County 2017	127	20,283	100.0	11,045	3.8	2.4	2.9	8.7	6.3	9.3	44.8	41.7	44.4	42.6	49.6	43.3	0.2	0.0	0.2
<b>Total</b>	<b>127</b>	<b>20,283</b>	<b>100.0</b>	<b>11,045</b>	<b>3.8</b>	<b>2.4</b>	<b>2.9</b>	<b>8.7</b>	<b>6.3</b>	<b>9.3</b>	<b>44.8</b>	<b>41.7</b>	<b>44.4</b>	<b>42.6</b>	<b>49.6</b>	<b>43.3</b>	<b>0.2</b>	<b>0.0</b>	<b>0.2</b>

Source: 2015 ASC Census ; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data.  
 Due to rounding, totals may not equal 100.0