



# City of San Antonio

## Agenda Memorandum

**File Number:**

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**Agenda Item Number:** {{item.number}}

**Agenda Date:** November 30, 2023

**In Control:** City Council A Session

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**DEPARTMENT:** Neighborhood and Housing Services

**DEPARTMENT HEAD:** Veronica Garcia, Director

**COUNCIL DISTRICTS IMPACTED:** District 3

**SUBJECT:**

Brooks Senior - Resolution of No Objection

**SUMMARY:**

Brooks Senior Apartments, LP is seeking a Resolution of No Objection for its application to the Texas Department of Housing and Community Affairs (TDHCA) for the 2024 Non-Competitive 4% Housing Tax Credits (HTC) program for the construction of a 240-unit affordable multi-family rental housing development named Brooks Senior, located at the northwest corner of Research Plaza and Challenger Drive in Council District 3.

**BACKGROUND INFORMATION:**

The Texas Department of Housing and Community Affairs' (TDHCA) Housing Tax Credit (HTC) program is one of the primary means of directing private capital toward the development and preservation of affordable rental housing for low-income households in the state of Texas. HTC are awarded to eligible participants to offset a portion of their federal tax liability in exchange for the production or preservation of affordable rental housing.

The TDHCA administers two HTC programs: a Competitive 9% and a Non-Competitive 4%. This application is for the Non-Competitive 4% HTC program which is available year-round and

requires a Resolution of No Objection from the local governing body to satisfy requirements of the TDHCA’s Uniform Multifamily Rules.

On November 18, 2021, City Council updated the Housing Tax Credit (HTC) Policy for the issuance of Resolutions of Support and Resolutions of No Objection. The new policy included an increased focus on deeper affordability, proximity to transit, inclusion of sustainable or green features, and working with local businesses. Under the City’s application process, Developers submit applications for Resolutions of Support or Resolutions of No Objection to the City on behalf of their affiliated entity that will apply to TDHCA for HTC’s.

**ISSUE:**

Brooks Senior Apartments, LP is applying for 2024 Non-Competitive 4% Housing Tax Credits (HTC) from the Texas Department of Housing and Community Affairs (TDHCA).

The applicant has provided the Council Office with all pertinent information per the current HTC Policy, adopted November 2021.

Any 4% HTC application earning between 60 and 100 points shall be eligible to receive a staff recommendation for a Resolution of No Objection, provided the application receives at least 4 of 7 experience points under the ownership/management experience category. The application received 7 experience points, and 79 points in total and is eligible to receive a Resolution of No Objection.

The applicant received no public engagement points on their application.

The value of the TDHCA tax credit award to the Brooks Senior would be approximately \$21.3 million over a ten-year period. The total cost for this development will be approximately \$53.7 million. The deal will have units for families between 30% and 70% of the area median income. Of the 240 units, 204 will be rent restricted to 60% and below of area median income as defined by TDHCA’s Rent and Income Limit tool using HUD data (e.g., a family of three will have a maximum income of \$47,460).

The 4% HTC application is anticipated to be considered by the TDHCA Governing Board in May 2024. If approved, the estimated start date will be in July 2024 and the estimated completion is July 2026.

This development would help achieve the Strategic Housing Implementation Plan (SHIP)’s production goals for families with incomes at 30% area median income (AMI) and 60% AMI. Brooks Senior is being developed in partnership with the San Antonio Housing Trust.

The development is projected to contain the following unit mix:

Unit Mix	Number of Units	Monthly Rent	AMI Served
One Bedroom	108	\$426	17 units at 30% and below
		\$921	74 units at 60% and below
		\$1,085	17 units at 70% and below

Two Bedroom	132	\$499	19 units at 30% and below
		\$1,092	94 units at 60% and below
		\$1,289	19 units at 70% and below

**ALTERNATIVES:**

City Council may elect not to issue a Resolution of No Objection which would adversely impact the ability of the developer to proceed.

**FISCAL IMPACT:**

This application is for a Resolution of No Objection for Brooks Senior Apartments, LP’s application for 2024 Non-Competitive 4% Housing Tax Credits (HTC) from the Texas Department of Housing and Community Affairs (TDHCA) for the construction of a 240-unit affordable multi-family rental housing development named Brooks Senior, located at the northwest corner of Research Plaza and Challenger Drive in Council District 3. There is no fiscal impact to the General Fund FY 2024 Adopted Budget.

**RECOMMENDATION:**

Staff recommends City Council approval of a Resolution of No Objection for Brooks Senior Apartments, LP’s application for 2024 Non-Competitive 4% Housing Tax Credits (HTC) from the Texas Department of Housing and Community Affairs (TDHCA) for the construction of a 240-unit affordable multi-family rental housing development named Brooks Senior, located at the northwest corner of Research Plaza and Challenger Drive in Council District 3.