



# City of San Antonio

## Agenda Memorandum

**File Number:**

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**Agenda Item Number:** 27

**Agenda Date:** March 21, 2024

**In Control:** City Council A Session

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**DEPARTMENT:** Neighborhood and Housing Services

**DEPARTMENT HEAD:** Veronica Garcia, Director

**COUNCIL DISTRICTS IMPACTED:** District 4

**SUBJECT:**

Consideration of a Resolution of No Objection for Palladium San Antonio, Ltd.'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 multifamily rental housing development named Palladium San Antonio.

**SUMMARY:**

Palladium San Antonio, Ltd. 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 288-unit affordable multi-family rental housing development named Palladium San Antonio, located at 4770 Military Drive West in City Council District 4. This project previously received a Resolution of No Objection in May 2023. It needs a new Resolution because a development was awarded HTC that is within one linear mile of its site by TDHCA after City Council provided its Resolution. The new Resolution will allow for the construction of the development to be located within one linear mile or less from another development and acknowledge that more than 20% of the total housing in the census tract is supported by HTC.

**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 HTC Policy for the issuance of Resolutions of Support and Resolutions of No Objection. The 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 HTCs.

#### **ISSUE:**

Palladium San Antonio, Ltd. applied for 2023 Non-Competitive 4% Housing Tax Credits (HTC) from the Texas Department of Housing and Community Affairs (TDHCA) for the construction of a 288-unit affordable multi-family rental housing development named Palladium San Antonio, located at 4770 Military Drive West in City Council District 4.

City Council issued a Resolution of No Objection on May 18, 2023. TDHCA approved a project, Ellison Apartments, after the Resolution was issued within one linear mile of Palladium San Antonio's site. Since the projects will both serve families, TDHCA is requiring a new Resolution from City Council. The approval of Ellison Apartments also resulted in the census tract having more than 20% of the total housing in the tract supported by HTCs. Therefore, the amended Resolution must include an acknowledgment that more than 20% of the total housing in the census tract is supported by HTCs.

The applicant has provided the City Council District 4 Office with all pertinent information per the HTC Policy.

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 85 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 Palladium San Antonio would be approximately \$29.5 million over a ten-year period. The total cost for this development will be approximately

\$72.5 million. The deal will have units for families between 30% and 80% of the area median income. Two hundred thirty-one of the units will be rent restricted to 60% and below of area median income (AMI) as defined by TDHCA's Rent and Income Limit tool using the U.S. Department of Housing and Urban Development (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 June 2024 and the estimated completion is March 2026.

This development would help achieve the Strategic Housing Implementation Plan (SHIP)'s production goals for families with incomes at 30% AMI and 60% AMI. Palladium San Antonio 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	54	\$421	26 units at 30% and below
		\$750	4 units at 50% and below
		\$915	17 units at 60% and below
		\$1,245	7 units at 80% and below
Two Bedroom	144	\$497	16 units at 30% and below
		\$892	11 units at 50% and below
		\$1,090	92 units at 60% and below
		\$1,288	13 units at 70% and below
		\$1,486	12 units at 80% and below
Three Bedroom	90	\$566	2 units at 30% and below
		\$1,251	63 units at 60% and below
		\$1,479	15 units at 70% and below
		\$1,708	10 units at 80% and below

## ALTERNATIVES:

City Council may elect not to provide the 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 Palladium San Antonio, Ltd.'s application for Non-Competitive 4% HTC's from the TDHCA. There is no fiscal impact to the FY 2024 Adopted Budget.

**RECOMMENDATION:**

Staff recommends City Council approval of a Resolution of No Objection for Palladium San Antonio, Ltd.'s application for 2023 Non-Competitive 4% Housing Tax Credits (HTC) from the Texas Department of Housing and Community Affairs (TDHCA) for the construction of a 288-unit affordable multi-family rental housing development named Palladium San Antonio, located at 4770 Military Drive West in Council District 4, allowing the construction of the development to be located within one linear mile or less from another development, and acknowledgment that more than 20% of the total housing in the Census Tract is supported by HTC's.