

ORDINANCE

2021-11-18-0880

AMENDING THE CITY'S HOUSING TAX CREDITS POLICY'S CRITERIA FOR THE ISSUANCE OF RESOLUTIONS OF SUPPORT AND RESOLUTIONS OF NO OBJECTION FOR APPLICANTS SEEKING HOUSING TAX CREDITS FROM THE TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS.

* * * * *

WHEREAS, Housing Tax Credits ("HTC"), also known as Low Income Housing Tax Credits or LIHTC, are federal tax subsidies for the construction, rehabilitation, reconstruction, and adaptive reuse of rental properties for vulnerable populations including families, elderly residents, and other special populations with low income; and

WHEREAS, the Texas Department of Housing and Community Affairs ("TDHCA") administers the HTC program, which is one of the primary means of directing private capital toward the development and preservation of affordable rental housing for low income households; and

WHEREAS, on December 10, 2015, in Ordinance No. 2015-12-10-1048, the City Council adopted the City's Affordable Housing Policy which included a written Low-Income Housing Tax Credit Policy ("Policy") concerning the issuance of Resolutions of Support and Resolutions No Objection for developers seeking Housing Tax Credits through TDHCA; and

WHEREAS, on December 14, 2017, the City Council adopted Ordinance No. 2017-12-14-1018 which, in part, modified the Policy by requiring additional information of the proposed development and adjusting the point scale, scoring criteria and scoring recommendation process concerning the issuance of the Resolutions of Support and Resolutions of No Objection for developers seeking Housing Tax Credits through TDHCA; and

WHEREAS, on October 31, 2019, the City council adopted Ordinance No. 2019-10-30-0887 which, in part, changed the name to the "Housing Tax Credit Policy" and modified the Policy by requiring additional information regarding proposed developments, adjusting scoring criteria, and adjusting the scoring recommendation process to ensure transparency and fairness in evaluating applications to align better with TDHCA's requirements and the City's priorities; and

WHEREAS, the Neighborhood and Housing Services Department updates the City's HTC Policy every two years to ensure the City's policy continues to align with other affordable housing related City plans, the state's rules, and to allow the policy to reflect the priorities of each new Council.

WHEREAS, City staff proposes to amend the existing Policy by incorporating two new scoring categories, adding additional options for developers to receive public engagement points, prioritizing the City's Housing Bond projects, and adjusting scoring categories to align better with TDHCA's requirements and the City's commitment to provide increased opportunities to create affordable housing for low income households; and

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WHEREAS, it is the desire of the City Council to approve staff's recommendation to amend the existing Policy. **NOW THEREFORE:**


BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF SAN ANTONIO:

SECTION 1. The amendments to the City's Housing Tax Credit Policy ("Policy") criteria concerning Resolutions of Support and Resolutions of No Objection, a copy of which is attached hereto and incorporated herein by reference as **Attachment I**, are hereby approved.

SECTION 2. The amended Policy shall take effect on December 1, 2021 and shall be applicable to all applications for Resolutions of Support and Resolutions of No Objection submitted thereafter. All applications that are currently pending or that are submitted before December 1, 2021 shall be considered under the existing policy that will remain in effect until December 1, 2021.

SECTION 3. This Ordinance is effective immediately upon the receipt of eight affirmative votes; otherwise, it is effective ten days after passage.

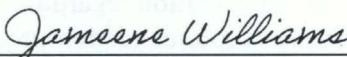
PASSED AND APPROVED this 18th day of November, 2021.


M A Y O R
Ron Nirenberg

ATTEST:

APPROVED AS TO FORM:


Debbie Racca-Sittre, Acting City Clerk

 for
Andrew Segovia, City Attorney



City of San Antonio

City Council Meeting November 18, 2021

35.

2021-11-18-0880

Ordinance amending a policy for the issuance of Resolutions of Support and Resolutions of No Objection for applicants seeking Housing Tax Credits from the Texas Department of Housing and Community Affairs. [Lori Houston, Assistant City Manager; Verónica R. Soto, Director, Neighborhood and Housing Services]

Councilmember Rocha Garcia moved to approve. Councilmember Castillo seconded the motion. The motion carried by the following vote:

Aye: Nirenberg, Bravo, McKee-Rodriguez, Viagran, Rocha Garcia, Castillo, Cabello
Havrda, Sandoval, Courage, Perry

Absent: Pelaez

JYW
11/18/2021
Item No. 35

ATTACHMENT I

Housing Tax Credits Policy

This policy outlines the City of San Antonio's process for issuing Resolutions to proposed Housing Tax Credit (HTC) developments. This policy aims to ensure developments that meet citywide goals receive the supporting documentation necessary for their Texas Department of Housing and Community Affairs (TDHCA) application. The City of San Antonio (the City) developed this policy as guidance for developers requesting HTCs from TDHCA for rental housing developments located in the city's limits or extraterritorial jurisdiction.

Staff will only recommend the City provide necessary Resolution(s) upon confirmation that the proposed development aligns with the City's housing goals and priorities as outlined in this policy. The main goal of the City is to ensure equitable and affordable housing opportunities are created for all residents, including individuals and families of all races/ethnicities, colors, religions, ages, abilities, gender and sexual identities, familial status, national origin, veteran status, and income levels, while preventing the direct displacement of any residents.

City Council may establish additional goals and priorities each fiscal year. When feasible, any additional goals and priorities will be released publicly prior to the City's Request for Applications (RFA) for Competitive 9% HTC projects.

The City may revisit and propose any needed policy updates every other year to ensure continued alignment with City and state priorities. However, staff may need to make adjustments administratively to remain in alignment with the current year QAP.

Background

Low Income Housing Tax Credits (LIHTC) are federal tax subsidies for the construction, rehabilitation, reconstruction, and adaptive reuse of rental properties for various populations including families, older adults, and other special populations with low incomes. They are one of the primary means of directing private capital toward the development and preservation of affordable rental housing by offsetting a portion of the developer's federal tax liability. The Texas Department of Housing and Community Affairs (TDHCA) distributes the credits allotted to the state by the federal government and refers to the credits as Housing Tax Credits (HTCs.) Each year, TDHCA is required to develop a Qualified Allocation Plan (QAP) to establish the procedures and requirements relating to the allocation of HTCs. The QAP is approved by the Office of the Governor in December and published in the Texas Register.

TDHCA administers two HTC programs, a Competitive 9% HTC Program and a Non-Competitive 4% HTC Program. The Competitive 9% HTC Program has a single, annual application period and covers approximately 70% of development costs. The Non-Competitive 4% HTC Program is available year-round and covers roughly 30% of development costs.

The Neighborhood and Housing Services Department updates this policy every two years to ensure continued alignment with both City goals and priorities as well as TDHCA's rules.

City Actions

In the administration of its HTC programs, the TDHCA determines eligibility and/or awards points based on actions taken by a municipality on behalf of a proposed development within the city's limits or extraterritorial jurisdiction. The City can impact an application to TDHCA's eligibility and score in the following ways:

- A Resolution from City Council expressly stating:

- The municipality supports the application or development (Competitive 9% HTC applicants only).
- The municipality has no objection to the application or development.
- The municipality objects to the application or development.
- The development contributes more than any other to a Concerted Revitalization Plan* (Competitive 9% HTC applicants only).
- The municipality is allowing the development to be within one linear mile of another HTC development awarded in the last three years that serves the same population.
- The municipality acknowledges and is allowing the development to be built in a census tract with 20% or more of its total housing units supported by HTCs.
- The municipality acknowledges and is allowing the development to be built in a census tract with a poverty rate of 40% or more.

*For several years, the City has provided Resolutions stating a development contributes more than any other to a Concreted Revitalization Plan for Competitive 9% HTC projects. TDHCA may remove this option as part of the 2022 QAP. The adoption of the QAP by the governor is scheduled to take place after the City's adoption of this policy. If these Resolutions continue to be allowed, the City will issue them in the manner described in this policy.

One Resolution will be issued per applicant whenever possible. TDHCA will accept a single Resolution addressing several of the provisions and waivers listed above.

- For Competitive 9% HTC applicants, a letter from an appropriate City official:
 - Expressing how the development contributes to the concerted revitalization efforts of the municipality. TDHCA may remove this option as part of the 2022 QAP. The adoption of the QAP by the governor is scheduled to take place after the City's adoption of this policy. If these letters continue to be allowed, the City will issue them in the manner described in this policy.
 - If City Council has initiated or awarded Housing Bond project(s) *before the City's annual 9% application opens*, staff may recommend only providing those project(s) with a letter, if the letter will help the bond project(s) score competitively. If City Council has *not* initiated or awarded a Housing Bond project *before the City's annual 9% application opens* staff will provide the appropriate Concerted Revitalization Plan letters to all applicable projects.
 - Confirming the City's contribution of \$500 to the development in the form of a loan, grant, or fee waiver.

City Timelines

For Competitive 9% HTC applicants, the City will issue a Request for Applications (RFA) for Resolutions and other supporting documents in either late November or early December and will close the RFA in January. Staff will score complete applications and bring recommendations to a Council Subcommittee (as appropriate) and City Council for consideration by mid-February. This schedule aligns with the TDHCA program calendar and is intended to provide applicants with supporting documentation by TDHCA's deadline.

For Non-Competitive 4% HTC applications, the City will accept applications on a rolling basis. Non-Competitive applications are subject to the same evaluation criteria as competitive applications. Staff recommendations will be brought to a Council Subcommittee (as appropriate) and City Council for consideration following confirmation that all application requirements have been met. Applicants should

anticipate requests for a Resolution being presented to City Council approximately 55 business days after a complete application is received.

Applicants should be aware, City Council does not meet the 4th Thursday each month including June and generally does not meet in July or mid-late December. Applicants should keep these constraints in mind when submitting applications and understand processing may take longer during certain times of the year.

Applicants should also be aware that it may take two weeks for the signed Resolution to become available and plan their submission accordingly.

Criteria for Resolutions of Support and No Objection

The City has developed a self-scoring application in order to conduct a comprehensive, fair, and impartial evaluation of all applications received. Staff will analyze each application to determine overall responsiveness and qualifications under this policy. General eligibility and evaluation criteria used by staff as the foundation for recommending Resolutions are outlined below:

Eligibility for Resolution of Support:

- Application received is complete and includes all required supporting documentation;
- Application received by the deadline announced by staff; and,
- Application is for a 9% Competitive HTC project and scores at least 75 points.

Eligibility for Resolution of No Objection:

- Application received is complete and includes all required supporting documentation;
- Applicant earns at least 4 of the 7 points available in the *Owner/General Partner/Property Management Experience* section; and,
- Application scores at least 60 points.

Up to 100 Total Points May be Awarded for the Following:

The exact specifications of how points will be awarded are detailed in the applications issued by the City. Small changes to scoring items within the categories below and their definitions may vary slightly from year to year. Applicants should use the most recent applications published on the Neighborhood and Housing Department [webpage](#) for scoring details.

- **Owner/General Partner/Property Management Experience (up to 7 points)** – Points are awarded to applicants demonstrating past experience owning, developing, and/or managing affordable multifamily housing developments for a minimum of three years.
- **Nonprofit Organization or SBEDA/HUB Participation (5 points)** – Points are awarded to applications demonstrating participation in the project by a qualified nonprofit organization, City of San Antonio certified Small Business Economic Development Advocacy (SBEDA) Program business, or state-certified Historically Underutilized Business (HUB), including either ownership of the development or other controlling interest.
- **Local Business and Contractor Participation (2 points)** – Points are awarded to applicants who agree to work with businesses and contractors based in the City of San Antonio's city limits in the construction of the development or in the administration of resident services.

- **Targeted Areas (up to 10 points)** – Points are awarded to developments located in City-designated reinvestment areas. Examples include but are not limited to, SA Tomorrow Regional Centers and Tax Increment Reinvestment Zones. Eligible areas may change annually based on City goals and priorities. See current application for current scoring.
- **Access to Transportation (up to 10 points)** – Points are awarded to developments within ½ a mile of VIA bus stops based on the frequency of service or to a development in a VIA Link zone. VIA will help update the scoring areas annually to ensure accurate and current route information.
- **Proximity to Jobs (up to 5 points)** – Points are awarded based on the number of jobs within a specific radius of the proposed development. The radius will align with the current year QAP' guidance. The data referenced is available through [US Census OnTheMap tool](#). Qualifying jobs are limited to those based on the work area for all workers, and all primary jobs.
- **Project Feasibility & Readiness (up to 11 points)** – Points are awarded to applications demonstrating that the project will meet the TDHCA requirements for the HTC program such as site control and appropriate zoning for the proposed development type and density.
- **Project Amenities & Resident Services (up to 20 points)** – Points are awarded based on the amenities that will be provided and the development's proximity to desired amenities. Amenities will be selected from a menu of qualifying amenities on the application. Points are also awarded based on the developer's agreement to provide resident services on-site and free of charge. Resident services will be selected from a menu of resident services provided on the application. The menu for both amenities and resident services are specified in the application and may vary annually based on City goals and priorities. See current application for current scoring.
- **Deeper Affordability (up to 20 points)** – Points are awarded to applications based on the percent of total units reserved for households at or below 50% of area median income with priority given to developments that reserve at least 20% of their units for households with less than or equal to 30% area median income.
- **Public Engagement (up to 10 points)** – Points are awarded to applications demonstrating evidence that the applicant took appropriate actions to inform the surrounding community of the proposed development, in the form of a project information package (letter), developer-initiated public meeting, the submission of letters of support from appropriate neighborhood or community organizations and/or evidence of two-way communication with neighbors.

Applicants may earn five points for providing a project information package (letter) in both English and Spanish, which includes the general scope of the development in accordance with the RFA, to Neighborhood or Homeowners' Associations and Community Organizations, located within one-half mile of the project site (as registered with the City) as well as all property owners within 200 linear feet of the development site.

Applicants may also earn five points for holding a public meeting the following minimum requirements specified in the RFA relating to proper notifications, accessibility, timing, distance from the development site.

Applicants may earn up to four points for submitting with their application, letter(s) from Neighborhood Organizations, Homeowners' Associations, and or Community Organizations (as defined in the current year QAP) serving the area the development is in. The letters can be signed

on behalf of the organization by an appropriate representative. Up to two letters may be submitted. One point will be awarded per letter and an additional point will be awarded for a letter of support.

Applicants may earn 1 point for providing evidence of two-way communication with neighbors. The communication should show the applicant's responses to concerns or questions from neighbors or community members about the proposed project. To earn points the communication must be documented in writing and occur without Council Office facilitation.

The specific requirements for the project information packet, developer-initiated public meeting, organization letters, and two-way communication are outlined in the application.

Public engagement letters must be sent no more than 3 months prior to the application submission date unless an exception is made by staff. Unless stated otherwise in the application or in writing by staff, public meetings must be scheduled to occur within one week following the application's submission, but no more than 3 months prior to the application date.

The exact specifications for what supporting documentation must be attached to complete applications will be detailed in the applications issued by the City.

Application Instructions

This policy is not intended to provide the exact instructions and program details for applicants, as they may change slightly from year to year. The exact criteria and instructions are found on the corresponding Competitive 9% HTC and Non-Competitive 4% HTC applications.

The respondent is expected to examine the applications carefully, understand the terms and conditions for providing the information, and respond completely. Failure to complete and provide any application requirements may result in the respondent's application being deemed non-responsive and therefore disqualified from consideration.

Criteria for Additional Resolution Provisions

An applicant can have the provisions in this section added to their Resolution of Support or No Objection as long as the following conditions are met:

- The applicant met the requirements for a Resolution of Support or No Objection.
- The applicant requested the provision(s) be included in their Resolution at the time of submission.
- Provides information/evidence specified below.
- The provision is relevant under the current year's QAP.

Contributing More to a Concerted Revitalization Plan

If allowable under the current year's QAP, Competitive 9% HTC applicants can earn points if the City specifically identifies the development as contributing more than any other proposed developments within a Concerted Revitalization Plan to the efforts of the plan.

If City Council has initiated or awarded a Housing Bond project *before the City's annual 9% application opens*, it will be the only project to receive Concerted Revitalization plan language in their Resolution of Support or Resolution of No Objection. If there is more than one project meeting the above criteria, all qualifying projects will receive the appropriate language in their Resolution of Support or Resolution of No Objection. If more than one qualifying project is seeking points under the same Concerted Revitalization Plan, staff will recommend the development with the highest score on their City application have the

appropriate verbiage included in their Resolution of Support or Resolution of No Objection. If the applications receive the same score on their City application, the applicant with public housing or project-based vouchers will be recommended to receive a Resolution with the appropriate verbiage. If neither or both developments provide public housing or have a project-based voucher, the applicant with a greater proportion of total units below 60% AMI will be recommended to receive a resolution with the appropriate verbiage. If the applications have the same percent of units below 60% AMI, the development located the greatest linear distance from the nearest HTC development serving the same population and awarded in the last 15 years will have the verbiage included in the Resolution.

TDHCA releases a Pre-Application Log in early January with anticipated project scores in San Antonio's Region. The log shows projects seeking Concerted Revitalization Plan points. If a project outside city limits is claiming Concerted Revitalization Plan points and is anticipated to score higher than the Housing Bond project(s) meeting the requirements above, staff may recommend additional projects within city limits receive the appropriate Concerted Revitalization Plan appropriate language in their Resolutions.

If City Council has *not* initiated or awarded a Housing Bond project *before the City's annual 9% application opens* staff will include the appropriate Concerted Revitalization Plan language in all applicable Resolutions. If more than one proposed development is seeking points under the same Concerted Revitalization Plan, staff will recommend the development with the highest score on their City application have the appropriate verbiage included in their Resolution of Support or Resolution of No Objection. If the applications receive the same score on their City application, the applicant with public housing or project-based vouchers will be recommended to receive a Resolution with the appropriate verbiage. If neither or both developments provide public housing or have a project-based voucher, the applicant with a greater proportion of total units below 60% AMI will be recommended to receive a resolution with the appropriate verbiage. If the applications have the same percent of units below 60% AMI, the development located the greatest linear distance from the nearest HTC development serving the same population and awarded in the last 15 years will have the verbiage included in the Resolution.

The inclusion of the appropriate verbiage in a Resolution of Support or Resolution of No Objection is subject to Council approval.

One Mile Three Year Rule Waiver

The TDHCA prohibits New Construction or Adaptive Reuse developments being one linear mile or less from another development that:

- Serves the same target population (families, older adults, etc.).
- Received HTCs or federal private activity bonds within the previous three years.
- Has not been withdrawn or terminated from the HTC program.

City Council can waive the rule via Resolution.

The applicant will provide a narrative identifying how the proposed development will address the unmet housing needs of the surrounding neighborhoods. In the narrative the applicant provides should include an explanation about how the proposed development will address the area's needs.

This waiver's inclusion in a Resolution of Support or No Objection is subject to Council approval.

20% of Housing Units Supported by Housing Tax Credits Waiver

TDHCA requires an applicant proposing a New Construction or Adaptive Reuse development in a census tract with more than 20% of its total housing units supported by HTCs to submit a Resolution specifically

allowing the development and stating the proposed development is consistent with the jurisdiction's obligation to affirmatively further fair housing.

The applicant will provide a narrative identifying how the proposed development will address the unmet housing needs of the census tract. In the narrative the applicant should include information about the number and types of housing units in the census tract along with what percent of housing units are currently supported by HTC's and what percent would be supported by HTC's upon completion of the project.

This waiver's inclusion in a Resolution of Support or No Objection is subject to council approval.

High Poverty Census Tract Waiver

If the development is in a census tract with a poverty rate of 40% or more, TDHCA allows the City Council to issue a Resolution acknowledging the high poverty rate and authorizing the development to move forward.

The applicant will provide a narrative describing the mitigation underway to address the high poverty rate. The narrative should include evidence of decreasing poverty trends, sustained job growth and employment opportunities, career training opportunities or job placement services, and evidence of gentrification in the area (including an increase in poverty values).

This waiver's inclusion in a Resolution of Support or No Objection is subject to Council approval.

Additional Information

Decisions by the City will comply with federal Fair Housing laws that prohibit discrimination which could result in different or unequal treatment in housing programs because of race, color, sex, religion, national origin, familial status or disability. The City also prohibits discrimination based on an individual's veteran status, sexual orientation, or gender identity.

By submitting an application for a Resolution of Support or No Objection, the applicant agrees to accept, when practicable, Persons with Special Housing Needs. Persons with Special Housing Needs include households where one or more individuals have alcohol and/or drug additions, is a Colonia resident, a person with a disability, has Violence Against Women Act protections (domestic violence, dating violence, sexual assault, and stalking), HIV/AIDS, is experiencing homeless, is a veteran, or farmworker.

Resolutions and other documentation assisting in the application of either Competitive 9% HTC's or Non-Competitive 4% HTC's to TDHCA will be issued only to developers certifying they will not directly permanently displace residents without adequate relocation assistance, such as a housing choice voucher, and that they have read, understood, and agree to the provisions in:

- the City's Non-Discrimination Ordinance;
- the City's Notice of Tenants' Rights Ordinance;
- the Housing Choice Voucher Policy; and
- the Housing Tax Credit Policy.

A rehabilitation project that temporarily displaces residents may receive a Resolution from the City only if a satisfactory plan is provided at the time an application. A satisfactory plan will include, at minimum:

- Certification that impacted residents will be informed of the temporary displacement and anticipated timeline for relocation at least 90 days before it begins.
- A budget including any necessary storage, moving, and boarding costs.
- The timeline for relocation.
- Certification that no affordable units will be lost as a result of the rehabilitation.

Restrictions on Communication

Respondents to the Competitive 9% HTC Request for Application (RFA) agree to observe the following restrictions on communication with 1) elected City officials and their staff and 2) City employees from the time the RFA is released until the agenda for the City Council meeting in which Resolutions will be issued is posted.

1. This restriction on communications does not apply to the project notification requirement under this Policy or to communications with City staff regarding zoning or re-zoning of property in connection with the project.
2. Respondents are permitted to answer questions about their project asked by elected City officials and their staff or City staff so long as Respondent's responses do not constitute or include advocacy or lobbying in support of the project.
3. Respondents may not discuss applications for projects submitted by other applicants with elected City officials and their staff or City staff or ask City officials and their staff or City staff to oppose another applicant's project.
4. Restrictions on communications prohibited by this Policy include "thank you" letters, phone calls, emails, or additional discussion about the project beyond the permissible communications set forth in this section.

Respondents may submit questions concerning this RFA to the Staff Contact Person listed below until 2:00pm, Central Standard Time, the specified date found on the current year's application. Questions received after the stated deadline may not be answered. All questions shall be sent by e-mail to:

Allison Beaver
Housing Policy Manager, Neighborhood and Housing Services Department
HousingPolicy@sanantonio.gov and Allison.Beaver@sanantonio.gov

The City reserves the right to contact any Respondent to obtain additional information. Such contact initiated by City staff, shall not be considered a violation by Respondent of this section.

Violation of this provision by the Respondent may lead to disqualification of the application from consideration.

Irregularities

City staff will evaluate all the items submitted with the signed application to formalize its recommendation to the City Council regarding the issuance of Resolutions. Regardless of points scored using the evaluation criteria herein, the City Council reserves the right to issue a Resolution of Support, a Resolution of No Objection, a Resolution of Objection, other Resolutions associated HTC's, or to not issue any Resolutions.

The city staff may waive informalities and irregularities in the applications received. The City staff also reserve the right to terminate an RFA and reissue a subsequent solicitation, and/or remedy technical errors in the RFA process.



CITY OF SAN ANTONIO
**NEIGHBORHOOD & HOUSING
SERVICES DEPARTMENT**

November 18, 2021

City Council: Housing Tax Credits Policy

Verónica R. Soto, FAICP, Director

Staff Recommendation: Deeper Affordability Category



Affordability Level	Points
20% Units at $\leq 30\%$ AMI	20 points
15% Units at $\leq 30\%$ AMI	18 points
10% Units at $\leq 30\%$ AMI or	15 points
15% Units at 40% AMI or	
40% Units at 50% AMI	
5% Units at $\leq 30\%$ AMI or	10 points
10% Units at 40% AMI or	
30% Units at 50% AMI	
5% Units at 40% AMI or	5 points
20% Units at 50% AMI	

Staff Recommendation: Scoring Changes



Category	2020 Points	Recommendation
Owner/General Partner/Property Management Experience	15	7
Nonprofit Organization Participation, HUB, SBEDA	5	5
Use local businesses and contractors	-	2
Targeted Areas	10	10
Transportation	-	10
Proximity to Jobs	5	5
Project Feasibility & Readiness	15	11
Project Amenities & Resident Services	20	20
Deeper Affordability	20	20
Public Engagement	10	10
Total	100	100



Council Feedback

- Encourage more $\leq 30\%$ AMI.
- Encourage green buildings/ sustainability; reserve points for sustainable amenities; encourage green space within properties
- Encourage developments to be compatible with existing neighborhood.
- Ask about additional infrastructure needs beyond footprint; points for including infrastructure for electric vehicles.
- Encourage meaningful public participation; add option for developers who respond to questions without Council involvement; keep at 10 points.
- Ask if they will voluntarily follow SAHT or SAHA tenant protections.
- Transportation points should be 10 points not 12 points.
- Add scoring for working with local businesses.
- Explore Public Improvement Districts as Target Areas.
- Show overlap with SHIP and HTC Policy.
- The timeline for 9% projects is too short.



Public Meeting Feedback

September 30

Key Feedback:

- Encourage partnerships with local non-profits who can provide quality resident services.
- Highlight or incentivize innovation or novelty.
- Prioritize proximity to healthcare services.
- Keep the menu of options for amenities and resident services.

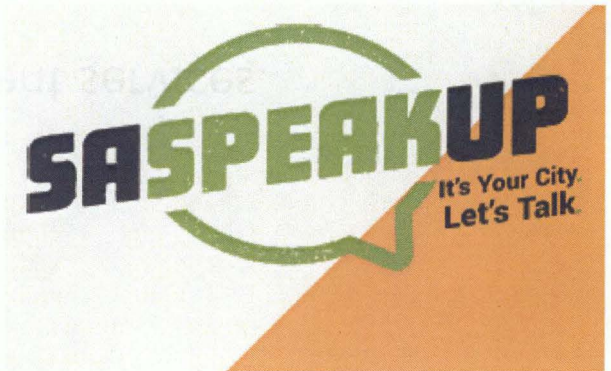
SA Speak Up Survey Feedback



Open: September 1- 20

95 Responses (94 English/1 Spanish)

- Clear preference for projects with mixed incomes & including $\leq 30\%$ AMI units.
- Want to know about projects' impact on traffic, construction timelines, alignment with neighborhood plans, and number of units
- Important to be near public transportation & grocery stores
- Important amenities:
 - Community: Community laundry room, security cameras, and learning/business center
 - In-Unit: Energy efficient appliances, high speed internet connections
 - Resident services: On-site after school programs & monthly skill training classes





Practitioner Meeting Feedback

Generally supportive of Transportation Point changes

For ETJ developments, have the same notification requirements as for Council

Supportive of update to public engagement points

Prioritizing 9% bond projects may push development outside city limits

Supportive of coordination with SAHA and SAHT

Push 9% application due date until after pre-applications are due to TDHCA

Make sure rehabilitation projects can meet thresholds



Practitioner Survey Feedback

Open: July 5-August 4
15 Responses

Key Feedback:

- Process is on par or better than other Texas cities.
- The process is largely clear and easy to complete. Staff are responsive.
- The 100-point scoring system is a good measurement tool.
- The process is largely fair and transparent.
- The City's timeline for issuing Resolution is adequate.

Policy Input Plan



July	August	September	October	November
<ul style="list-style-type: none">✓ Practitioner Survey	<ul style="list-style-type: none">✓ Practitioner Meeting #1✓ Housing Commission Briefing✓ PCDC Briefing	<ul style="list-style-type: none">✓ SA Speak Up survey✓ Practitioner Meetings #2 & #3✓ Housing Commission Briefing✓ PCDC Briefing✓ Public meeting✓ Councilmember Briefings	<ul style="list-style-type: none">✓ CHDO briefing✓ DPTF briefing✓ Housing Commission Briefing✓ Councilmember Briefings✓ Public comment on draft policy✓ PCDC Briefing	<ul style="list-style-type: none">✓ PCDC• City Council

City & TDHCA 9% Timeline



City Council updates
Policy (11/18/21)

Staff finalizes
application
(11/19/21-11/29/21)

City application
opens (12/1/21)

**Pre-Applications
due to TDHCA
(1/7/22)**

City application
closes (1/10/22)

NHSD staff score
applications
(1/10/22-1/19/22)

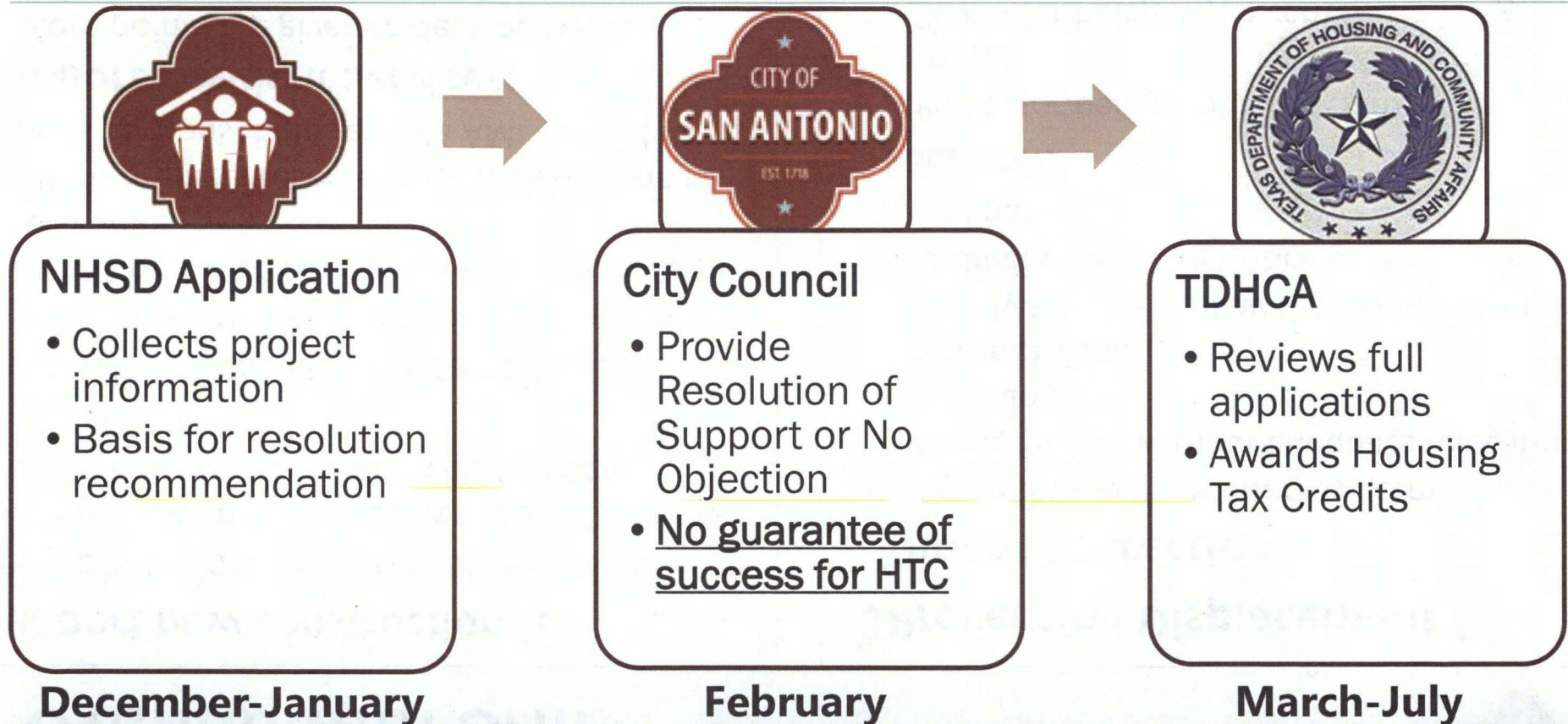
Recommendation to
PCDC (1/27/22)

City Council
Resolutions
(2/10/22)

Final documents to
applicants
(2/23/22)

**Full Applications
due to TDHCA
(3/1/22)**

HTC Application Process





Overlap with SHIP

☐ Support new construction & rehabilitation of affordable units:

- A typical 4% project includes 100-350 DUs. A typical 9% project includes 40-100 DUs.
- All $\leq 80\%$ AMI.

☐ Prioritizes deeper affordability:

- Encourages deeper affordability by income averaging with $\leq 30\%$ AMI, $\leq 40\%$ AMI, & $\leq 50\%$ AMI units.
- All 9% projects reserve at least 10% of their units for households at 30% AMI and below.

☐ Support Resident Services:

- More points are given to developments offering meaningful on-site services.

☐ Preventing Displacement & Tenant Protections:

- Agree they will not directly, permanently displace without adequate relocation assistance.
- Accept HCVs.
- Certify they will follow the Non-Discrimination Ordinance and the Notice of Tenants Rights Ordinance.

☐ Location:

- Points for being along key transportation routes
- Points for being in job centers and Regional Centers

What are Housing Tax Credits (HTCs)?



Museum Reach Lofts- 9% HTC in District 1

- Also known as Low Income Housing Tax Credits (LIHTC)
- Common funding source for affordable housing
- IRS program started in the 1980s
- Administered by the states
 - In Texas, the Texas Department of Housing and Community Affairs (TDHCA) administers the program
 - TDHCA writes the rules and oversees compliance
 - High development standards
 - Annual inspections
 - TDHCA calls them Housing Tax Credits
- Rehab & New Construction
- Two kinds: Competitive 9% & Non-Competitive 4%



CITY OF SAN ANTONIO
**NEIGHBORHOOD & HOUSING
SERVICES DEPARTMENT**

November 18, 2021 | Item #35

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