

Date: April 14, 2020

To: Mark Israelson, City Manager

From: Lori Schwarz, Director of Neighborhood Services

Subject: **2021 City of Plano Housing Tax Credit Process**

During the April 13, 2020 Preliminary Open Meeting, staff presented an overview of the City of Plano Housing Tax Credit (HTC) process and discussed potential changes for the 2021 HTC Program.

This memorandum summarizes the information discussed and the suggestions provided by Council during the meeting. Later this year, after the Texas Department of Housing and Community Affairs (TDHCA) finalizes the 2021 HTC program, the TDHCA updates and the Plano changes will be consolidated into a draft City of Plano 2021 HTC Program and submitted to Council for consideration and approval.

Council discussed the following suggestions for changes to the application process:

- Offer training for potential applicants in an effort to improve the quality of the information submitted by the applicants
- Contact TDHCA to confirm the Collin County population that will be used during the evaluation of the applications for the 2021 HTC program
- Modify the application to explicitly ask the applicant to consider and, if necessary, request a waiver of the one mile three year rule. (The one mile three year rule considers proximity and timing of past and proposed projects, looking at the project types, distance between developments and the time period between developments) and, if necessary, request additional information (e.g. housing market study) to evaluate the request for the waiver.
- Consider a requirement for applicants to submit a community support element for review by the evaluation committee and/or City Council in determining type of resolution to recommend, especially in situations where only one application may be chosen either by TDHCA or City Council (i.e. de-concentration factor for one per census tract or Concerted Revitalization Plan points).
- Evaluate a process change where if more than one development is proposed within the same census tract, Council will approve only one resolution of support (and the other applications may receive resolutions of no objection/objection).

Council discussed the following suggestions for changes to the Evaluation Committee:

- The evaluation committee to consist of eight members as follows:
 - Two members from the Planning Department
 - One member from Special Projects
 - Two members from the Neighborhood Services Department

- Three citizen members as follows:
 - One citizen from the Community Relations Commission (CRC)
 - One citizen from the Concerted Revitalization Plan (CRP) area
 - One at-large citizen
- Legal staff to be present during the deliberation of the committee to ensure discussion during evaluation is focused on appropriate elements
- The evaluation committee offers recommendations to Council regarding resolutions (support, no objection and objection).

Council discussed the following suggestions for the Concerted Revitalization Plan (CRP) points:

- The Evaluation Committee will neither review nor offer recommendations to Council regarding the selection of the development project that contributes the most to the revitalization of the CRP.
- The applications for projects that appear to be eligible for the CRP Points are to be submitted to the Council for their consideration.
- This revised process would allow applicants to present their information during the Council meeting. After the Council has received necessary information, they will vote for the applicant to receive the CRP points.

City Council questions:

- During the discussion related to letters of support from the community, Council asked for a definition of “community”. The [Qualified Allocation Plan](#) (QAP) establishes the procedures and requirements relating the award and allocation of Housing Tax Credits. Section 11.9(d)(6) of the QAP says an application may receive up to four points for letters of support. These are allocated as two points for each letter of support submitted from: a qualified community or civic organization that serves the community in which the Development Site is located; a property owners association created for a master planned community whose boundaries include the Development Site; and/or, a Special Management District whose boundaries include the Development Site.
- Council asked for information related to the population of the county that is used during the evaluation of the applications. Specifically, Council wanted to know how to advocate for a particular data source for the county population used by the TDHCA. The following is from the TDHCA website providing the process for public comment during the 9% HTC process and Board meetings:

Every TDHCA program follows the citizen participation and public hearing requirements as outlined in the Texas Government Code and applicable federal laws. Participation and comments are encouraged and can be submitted either at a public hearing or in writing via letters, faxes, email (info@tdhca.state.tx.us), and in some cases directly on the TDHCA web site.

<https://www.tdhca.state.tx.us/public-comment.htm>

SCHEDULE FOR 2021 HTC PROGRAM

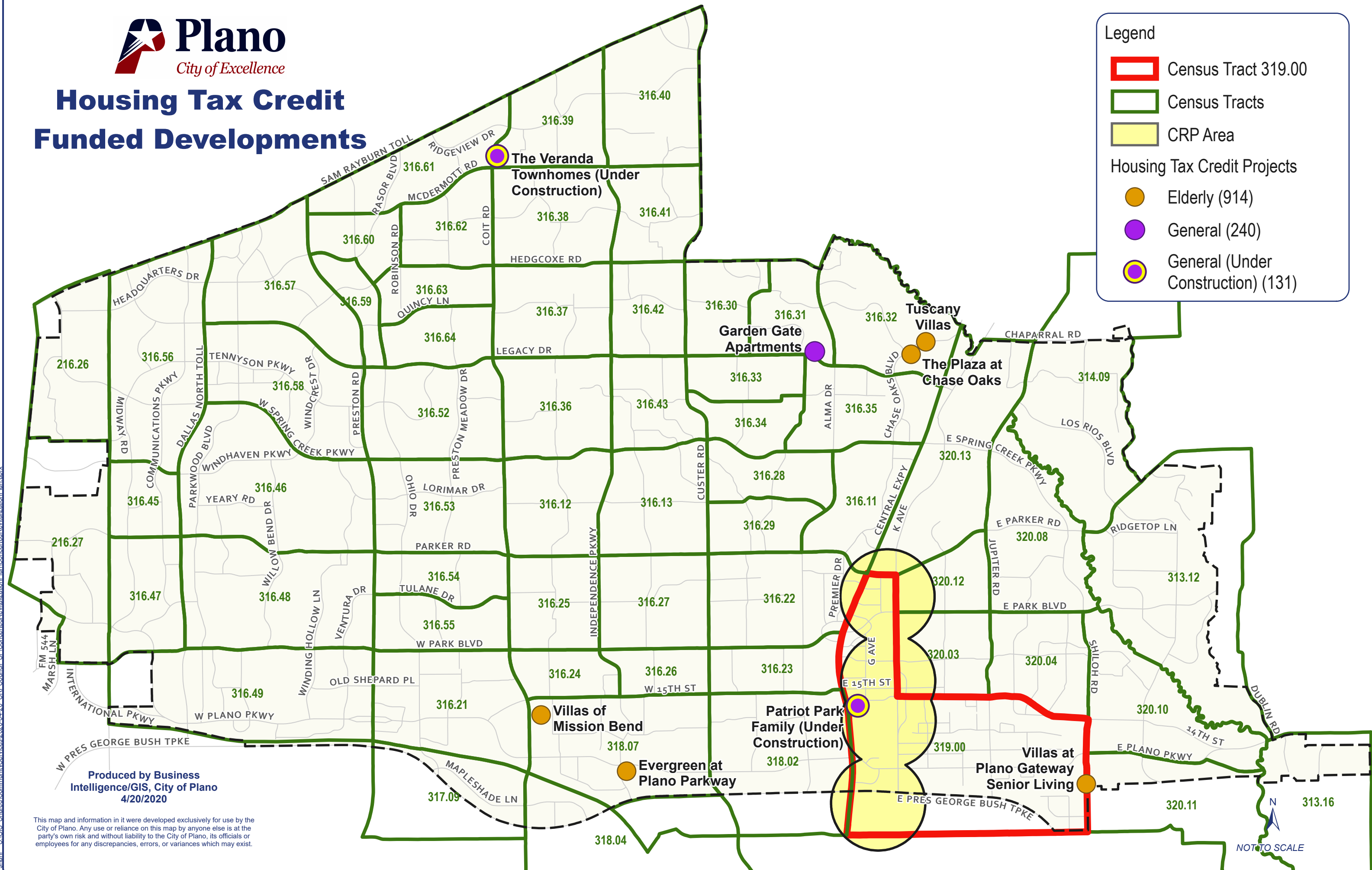
October	Council selects citizens for the evaluation committee (if they will be involved with the revisions to the HTC process)
November	TDHCA publishes proposed modifications to the QAP

Late November	POM presentation recommending the 2021 Plano HTC Program
Early January	Pre-application period begins/submitted to City
January	Evaluation Committee meets to develop recommendation for Council consideration
February	Council considers resolutions/CRP points
March	Full applications are due at TDHCA
June	TDHCA's deadline for public comment
Late June	TDHCA release of eligible applications for consideration for award
Mid-August	TDHCA issues HTC commitments

Attachment:

Housing Tax Credit Funded Developments Map

xc: Jack Carr, Deputy City Manager



This map and information in it were developed exclusively for use by the City of Plano. Any use or reliance on this map by anyone else is at the party's own risk and without liability to the City of Plano, its officials or employees for any discrepancies, errors, or variances which may exist.

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