

City of San Antonio Center City Housing Incentive Policy Review & Assessment

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Introduction

The City of San Antonio Center City Housing Incentive Policy (CCHIP) is a housing incentive policy that focuses on housing redevelopment within the Greater Downtown Area. This area is well positioned for residential growth and for mixed-use developments based on an assessment of market momentum, physical capacity for growth, and proximity to areas with established neighborhood character.

CCHIP provides financial incentives for multifamily housing projects in the downtown area. This as of right incentive program offers eligible projects City and San Antonio Water System (SAWS) Impact Fee Waivers, up to a 15-year real property tax rebate (City ad valorem taxes only), up to \$7,500 per housing unit in a low-interest loan (2.0 percent interest rate, forgivable in the Central Business District) and a mixed-use forgivable loan of up to \$20 per square foot of commercial office space and up to \$25 per square foot of retail space.

The City of San Antonio created CCHIP in June 2012. In June 2016, City Council revised and extended the program through June 2018. Program changes included amending the program boundary, adjusting the incentives to prioritize the downtown core, and requiring that all projects receive design approval. In December 2017, a temporary moratorium was placed on administrative approvals of CCHIP agreements.

In 2018, TXP, Inc. (TXP) was retained by the City of San Antonio to examine trends related to the CCHIP program. TXP focused on three main tasks: 1) review existing CCHIP projects, 2) interview stakeholders to better understand how the CCHIP program impacted past projects, and 3) identify key findings or themes the City can use to modify the CCHIP program to better match needs for the next 5 years.

There are several existing studies and reports related to downtown San Antonio, urban core housing, and redevelopment issues that describe the need and rationale for the CCHIP program. TXP reviewed these reports as part of its assessment but was not tasked with updating these studies.

TXP's analysis and assessment considered market trends, land prices, rental rates, and input from the market rate and affordable development community. TXP interviewed a range of stakeholders, attended a SA Tomorrow public meeting focused on downtown, and discussed general issues with the SA Tomorrow consulting team. This report concludes with a series of key findings that combine the data research with stakeholder input. City staff can use these results to make recommendations to City Council on how to improve and enhance the CCHIP program.

Center City Housing Incentive Policy Trends

The initial step in the analysis was to review where CCHIP projects were built, the number of units, project costs, incentives offered, and level of affordable units. Because the CCHIP boundary has evolved since 2012, TXP's geographic focus was the following five subareas:

1. Midtown-Broadway Area
2. Central Business District
3. Near Westside
4. Southtown-King William-Lavaca
5. Lone Star-Roosevelt Park-Denver Heights

Existing CCHIP Project Statistics

- Since its adoption, and at the time of the CCHIP moratorium, 64 projects will ultimately add 6,543 housing units to downtown San Antonio and surrounding areas. Combined the projects also include 164,099 square feet of retail, 46,949 square feet of office space, and 166 hotel rooms.
- Over 6,000 units are rental. This represents over 92.0 percent of all housing units built. The remaining 500 units are for sale properties.
- The 64 CCHIP projects represent a total investment of \$1.3 billion. CCHIP provided \$97.5 million in incentives.
- The aggregate amount of CCHIP-related incentives offered (ex. property tax abatements and fee waivers) was approximately \$97.5 million or 7.6 percent of the total capital investment. This translates into \$14,902 in incentives per unit.
- Of total incentives offered to CCHIP projects, approximately 74.5 percent or \$72.9 million were in the form of City property tax reimbursement. City and SAWS Impact Fee Waivers were 16.0 percent or roughly \$19.2 million. These two incentives represent over 90.0 percent of total public support.
- **Nearly 20.0 percent or 1,272 units are classified as affordable housing units.** However, almost all of these projects are exempt from paying property taxes and have been built through a largely not-for-profit structure. The primary benefit of the CCHIP program for these projects were SAWS Impact Fee and City of San Antonio Fee waivers.

CCHIP Project Summary by Subarea

- Nearly half of CCHIP-eligible units are located within the Central Business District subarea. The average value of these 2,819 units is \$232,092. There were over 10 projects with at least 150 units.
- Given strong demand and proximity to the Pearl, the Midtown subarea attracted the most CCHIP projects, but these were typically smaller multifamily developments. Only 3 projects had more than 50 units. This is largely a result of small parcels, difficulty in assembling multiple parcels, and relatively high land costs
- The area with the fewest CCHIP projects was the Near Westside. Over the past 5 years, 350 CCHIP units were approved in this area. This subarea also had the lowest average value per unit.
- There were 9 CCHIP projects that included some level of affordable housing (1,272 units). The majority of these projects are not subject to paying property taxes. Therefore, the primary incentive gained from CCHIP was fee waivers.

Table 1: CCHIP Projects by Study Area

	Projects	Residential Units	Total Project Costs	Value Per Unit
Southtown-King William	4	259	\$52,225,688	\$201,644
Central Business District	18	2,819	\$654,268,052	\$232,092
Lone Star-Roosevelt Park	6	797	\$127,439,221	\$159,899
Near Westside	3	350	\$43,160,000	\$123,314
Midtown	19	588	\$144,417,222	\$245,608
Outside Study Area	14	1,730	\$265,003,466	\$153,181
Total	64	6,543	\$1,286,513,649	\$196,624

Source: City of San Antonio

Table 2: CCHIP Projects by Year

Year	Projects	Housing Units	Project Cost	Total City Incentives
2012	1	17	\$3,300,000	\$299,276
2013	11	962	\$151,226,446	\$9,288,005
2014	8	1,215	\$186,030,303	\$17,005,423
2015	17	1,859	\$332,896,151	\$19,353,525
2016	13	991	\$175,478,021	\$11,701,391
2017	14	1,499	\$437,582,728	\$39,858,521
Total	64	6,543	\$1,286,513,649	\$97,506,140

Source: City of San Antonio

Table 3: CCHIP Housing Unit Characteristics

	Market Rate	Affordable	Total
Southtown-King William	177	82	259
Central Business District	2,552	267	2,819
Lone Star-Roosevelt Park	797	0	797
Near Westside	335	15	350
Midtown	363	225	588
Outside Study Area	1,047	683	1,730
Total	5,271	1,272	6,543

Source: City of San Antonio

Table 4: CCHIP Incentives by Study Subarea

	Projects	Residential Units	Total City Incentives	Incentives Per Unit
Southtown/King William	4	259	\$1,697,947	\$6,556
Central Business District	18	2,819	\$58,612,014	\$20,792
Lone Star / Roosevelt Park	6	797	\$11,103,895	\$13,932
Near Westside	3	350	\$5,659,718	\$16,171
Midtown	19	588	\$9,334,203	\$15,874
Outside Study Area	14	1,730	\$11,098,363	\$6,415
Total	64	6,543	\$97,506,140	\$14,902

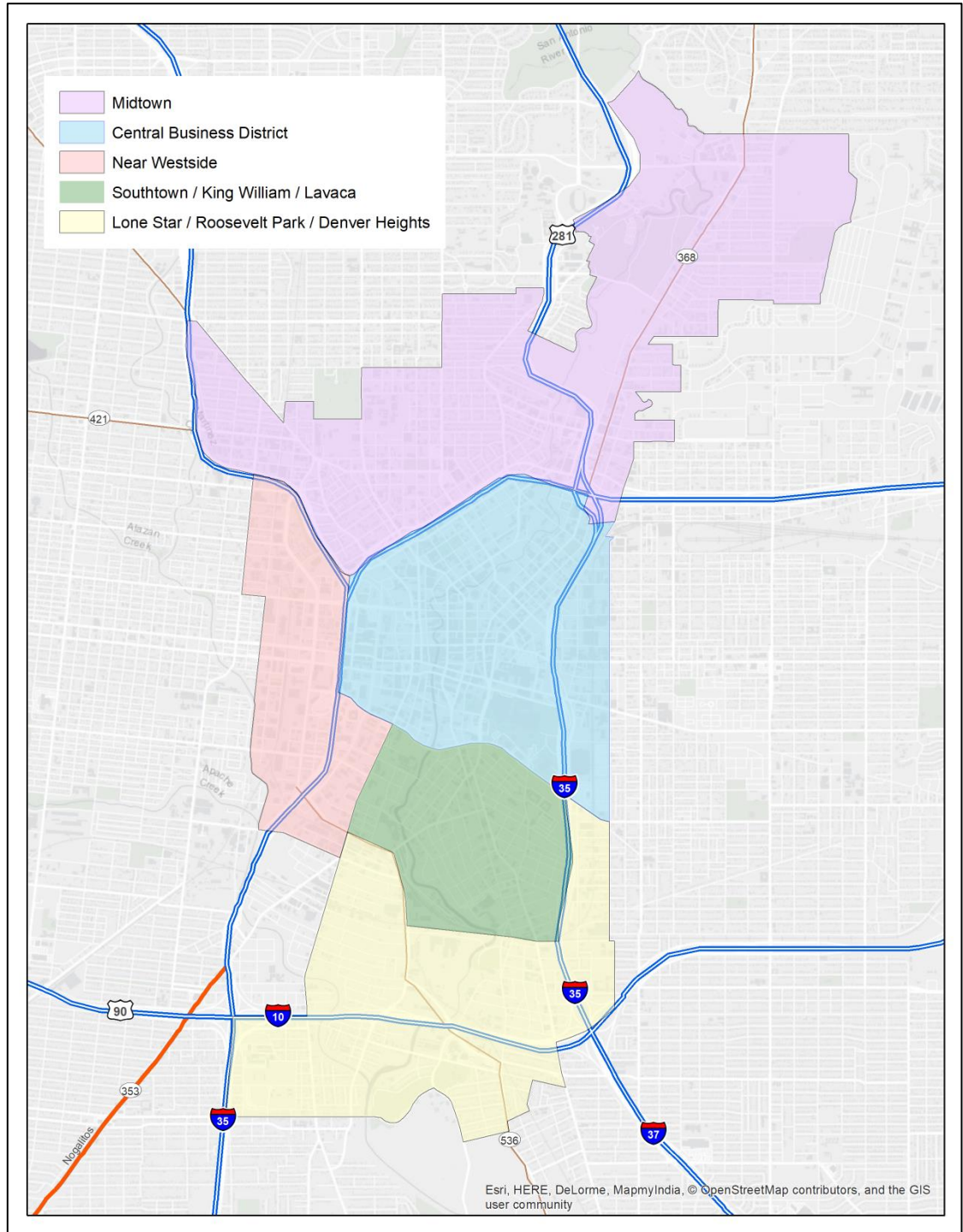
Source: City of San Antonio

Table 5: CCHIP Incentives by Year

Year	City Property Tax Reimbursement	SAWS Impact Fee Waivers	City Fee Waivers	Mixed-Use & Development Loan	Total
2012	\$234,970	\$53,106	\$11,200	\$0	\$299,276
2013	\$5,957,560	\$2,369,838	\$461,247	\$499,360	\$9,288,005
2014	\$12,000,183	\$2,652,607	\$521,673	\$1,830,960	\$17,005,423
2015	\$12,906,732	\$4,523,688	\$896,175	\$1,026,930	\$19,353,525
2016	\$8,773,767	\$2,426,765	\$482,859	\$18,000	\$11,701,391
2017	\$32,756,627	\$3,620,316	\$1,202,578	\$2,279,000	\$39,858,521
Total	\$72,629,839	\$15,646,320	\$3,575,731	\$5,654,250	\$97,506,140

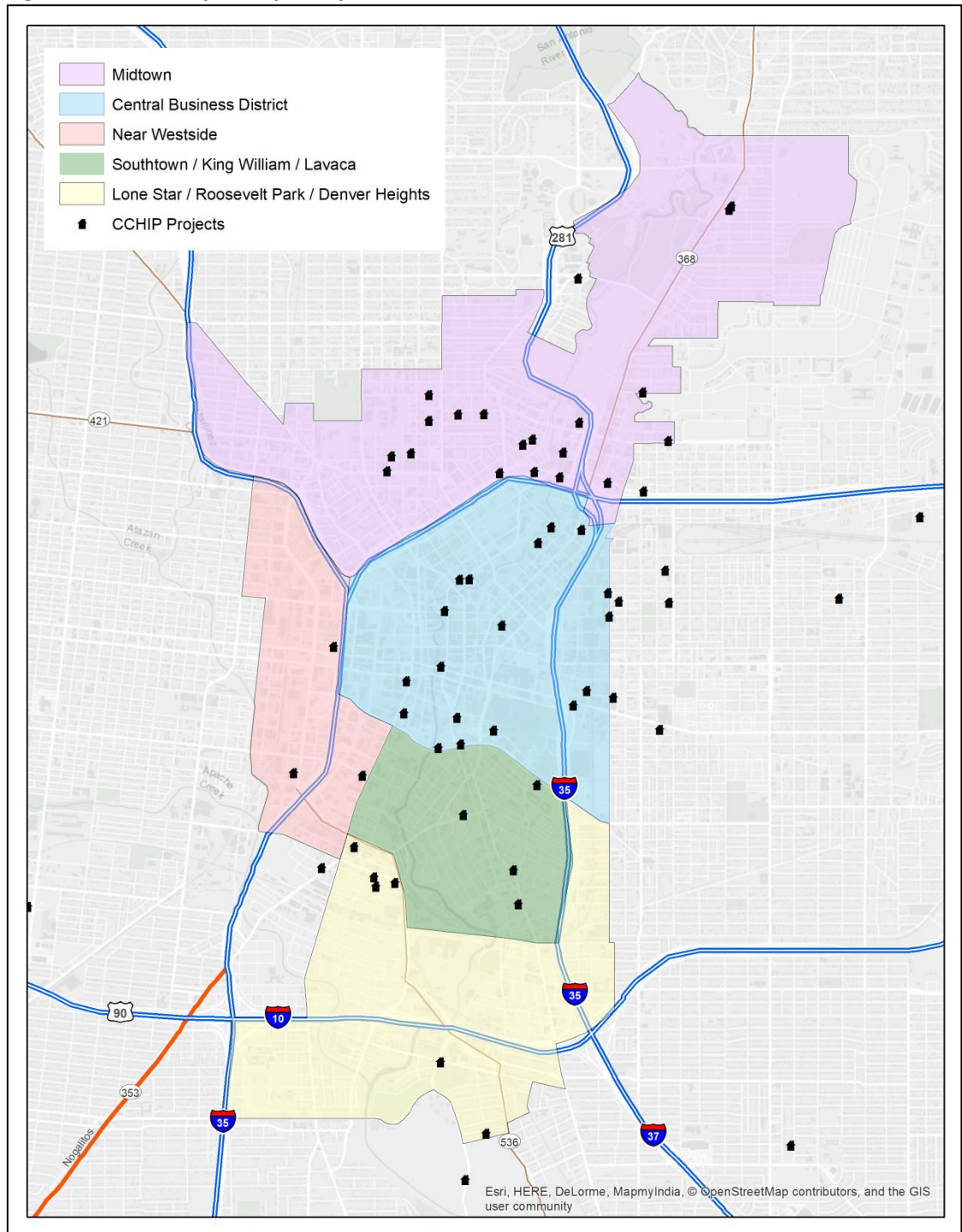
Source: City of San Antonio

Figure 1: CCHIP Study Areas



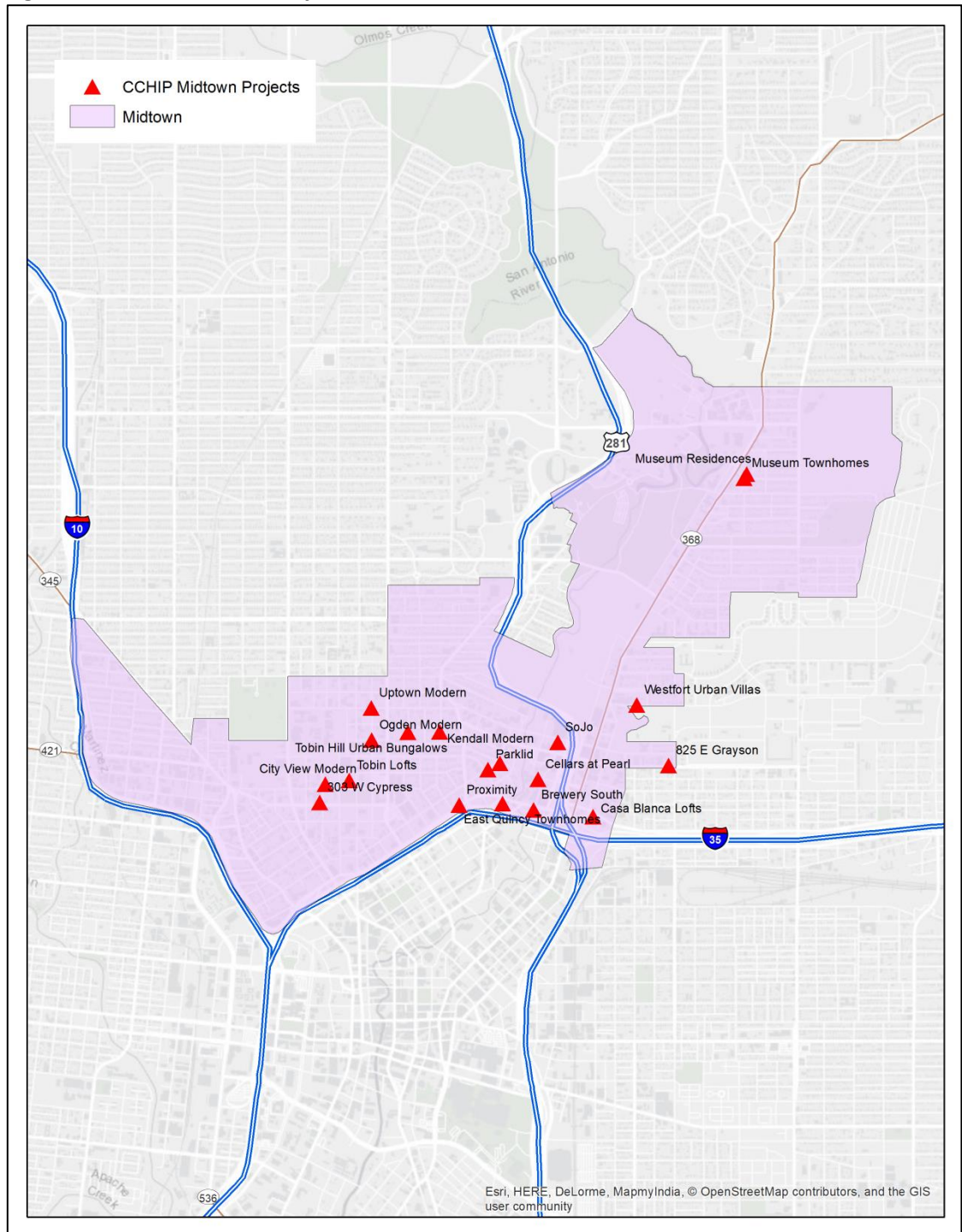
Source: TXP, Inc.; City of San Antonio

Figure 2: CCHIP Projects by Study Area



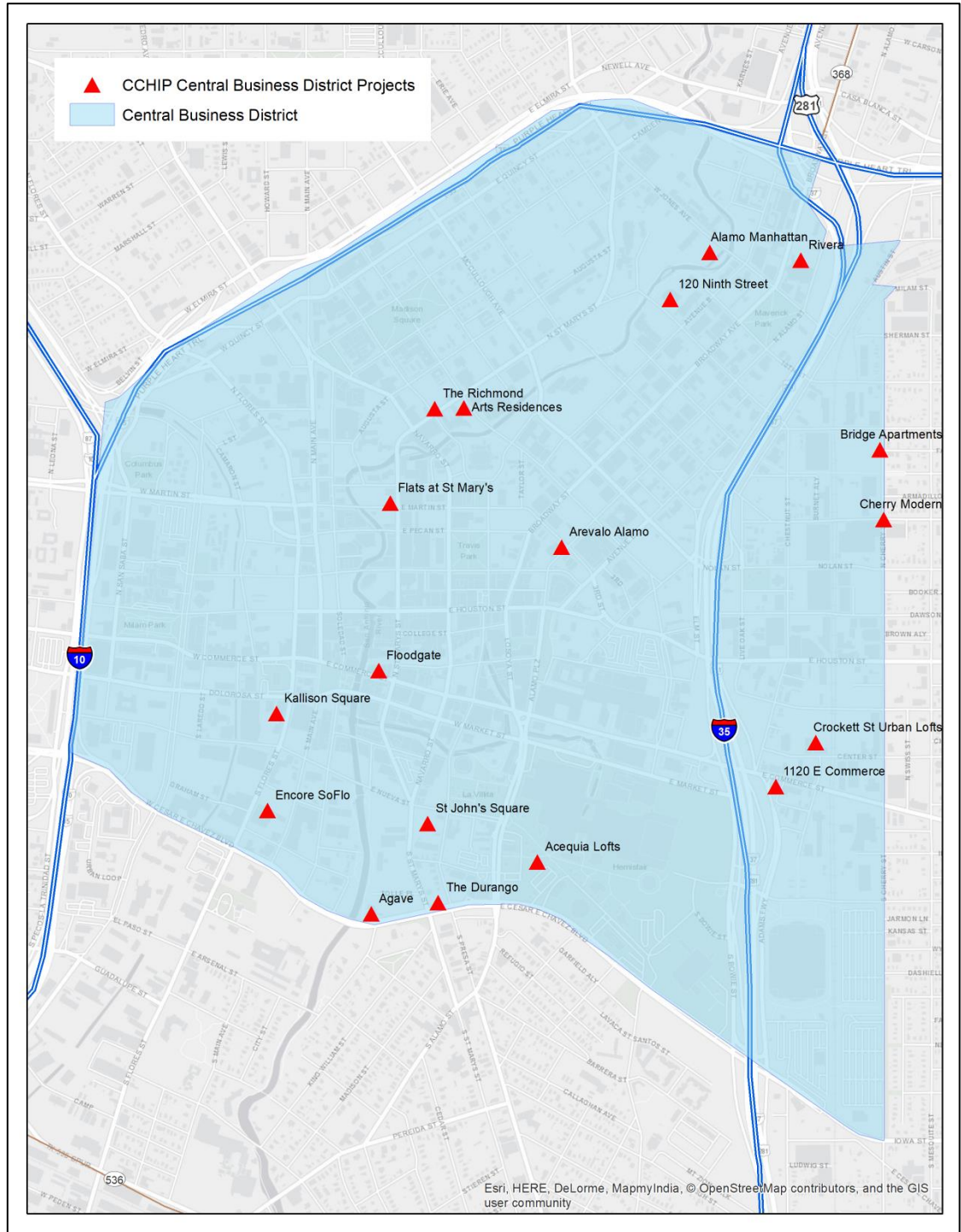
Source: TXP, Inc.; City of San Antonio

Figure 3: Midtown CCHIP Projects



Source: TXP, Inc.; City of San Antonio

Figure 4: Central Business District CCHIP Projects

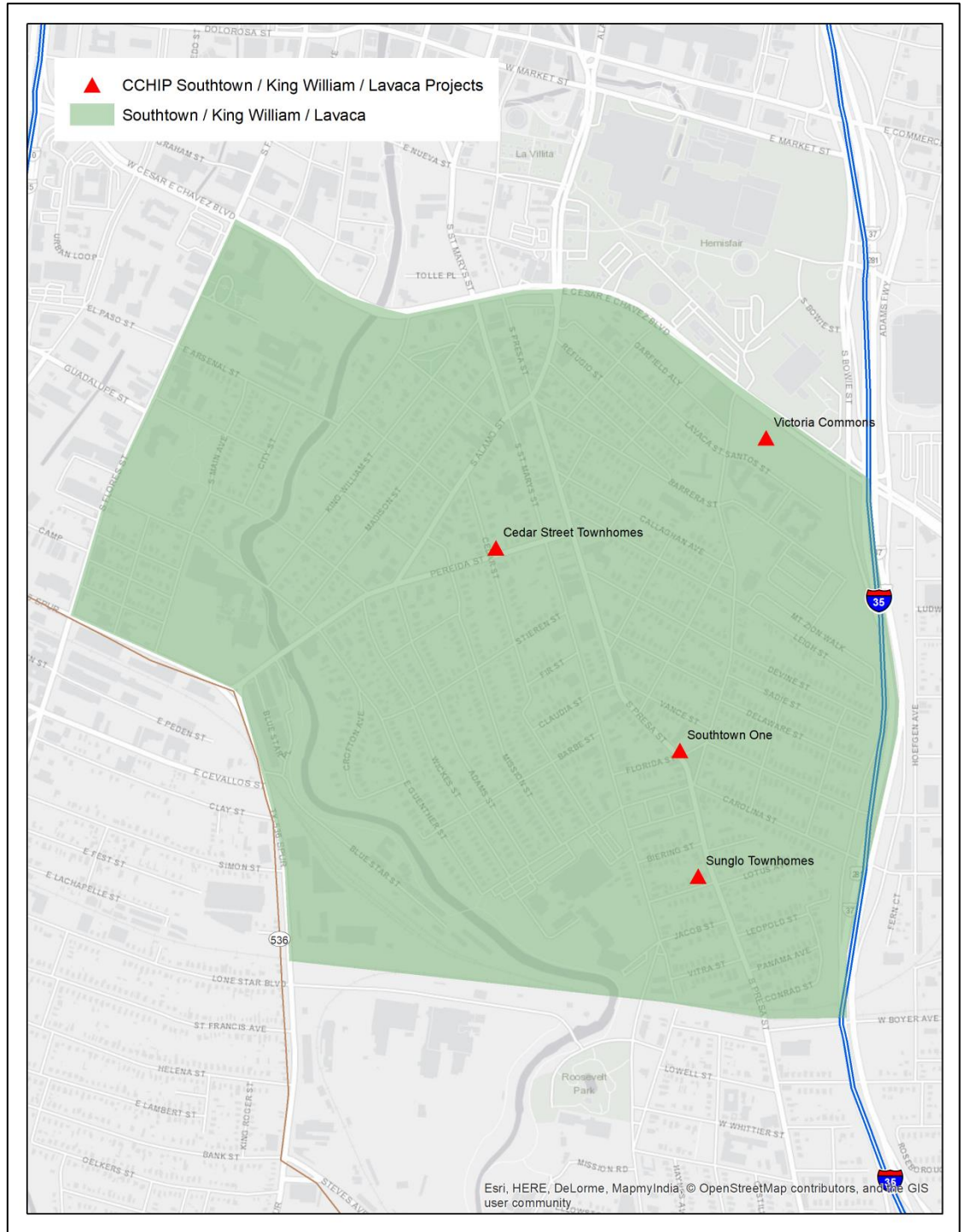


Source: TXP, Inc.; City of San Antonio

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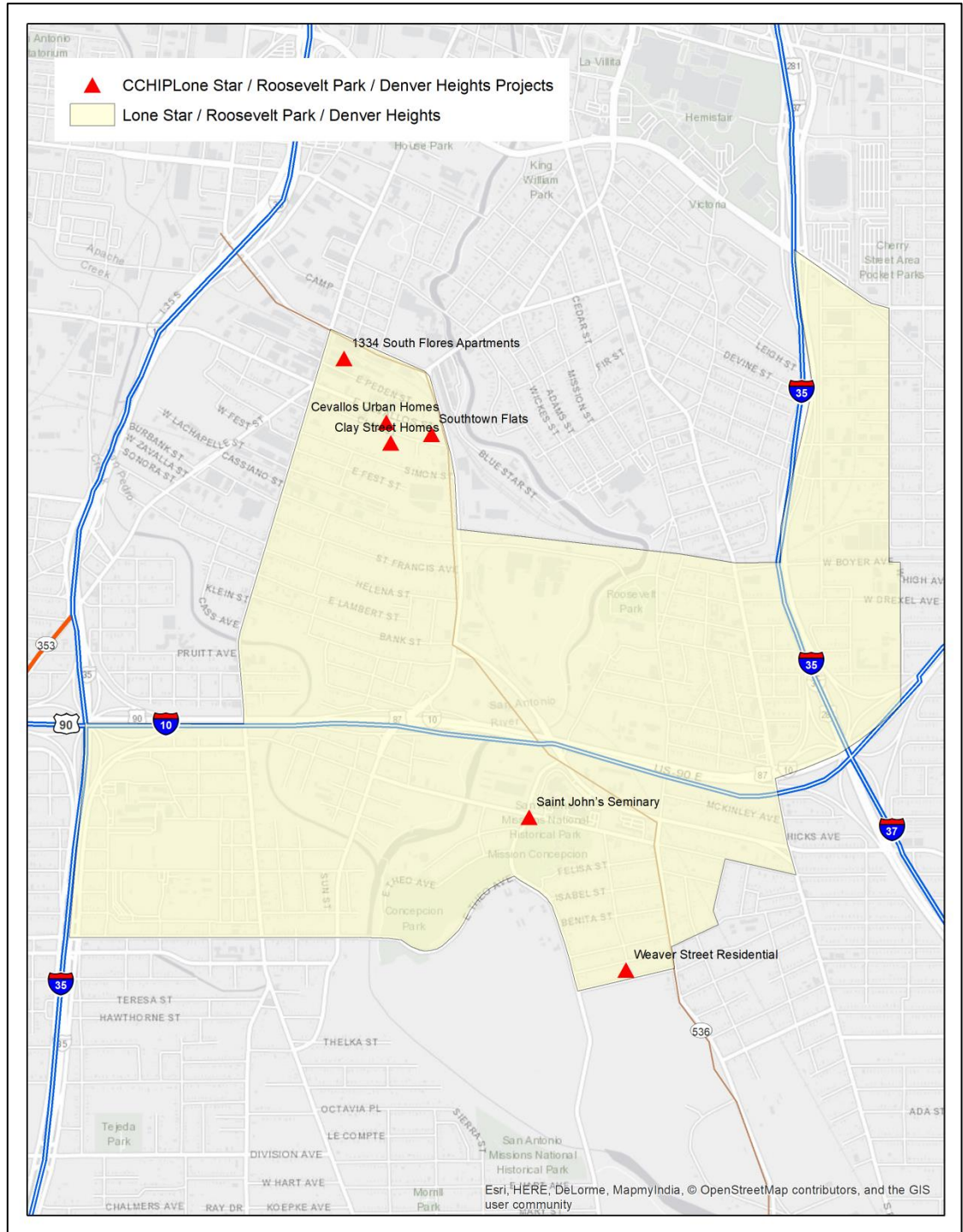
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Figure 6: Southtown-King William-Lavaca CCHIP Projects



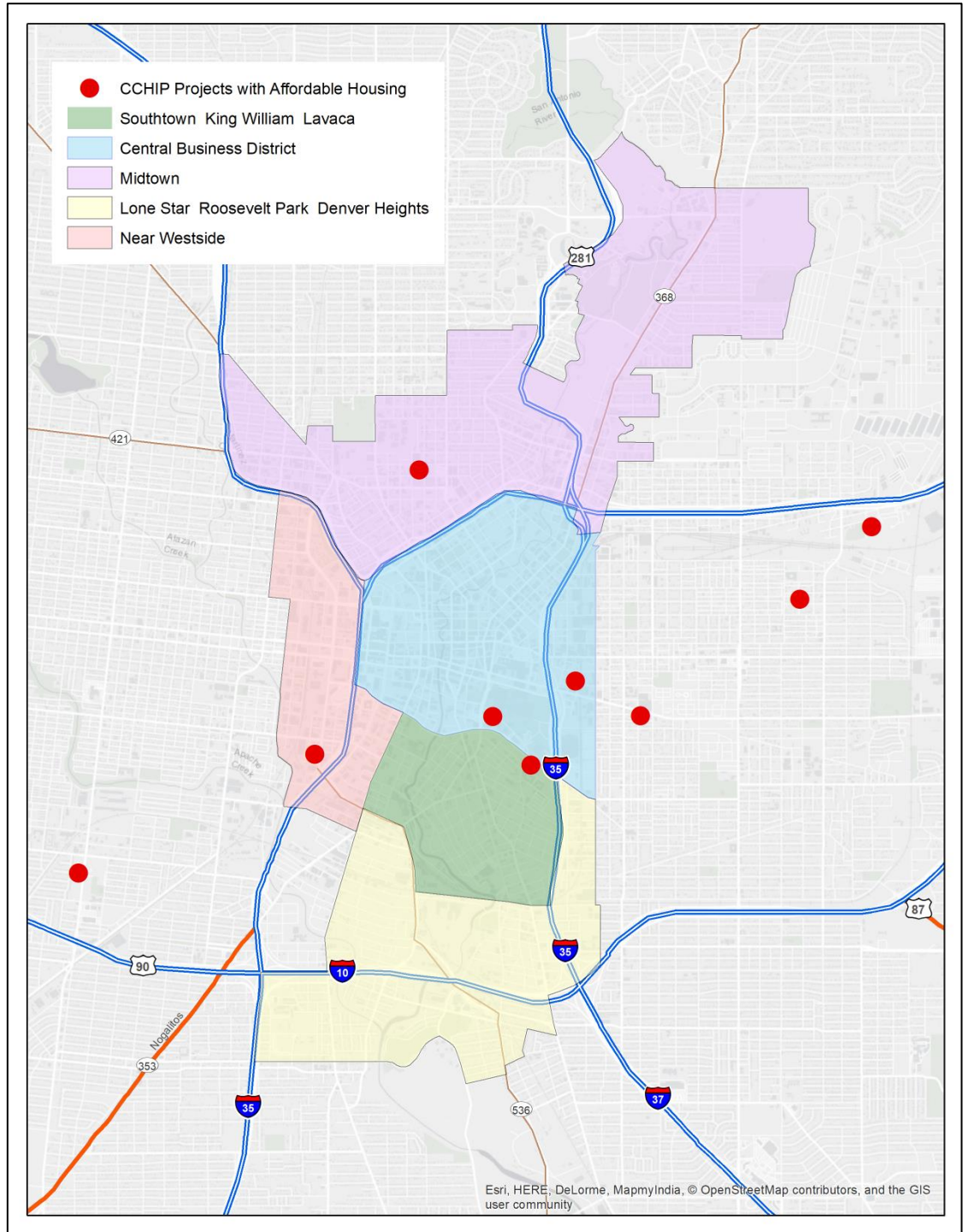
Source: TXP, Inc.; City of San Antonio

Figure 7: Lone Star-Roosevelt Park-Denver Heights CCHIP Projects



Source: TXP, Inc.; City of San Antonio

Figure 8: CCHIP Projects with Affordable Housing Units



Source: TXP, Inc.; City of San Antonio

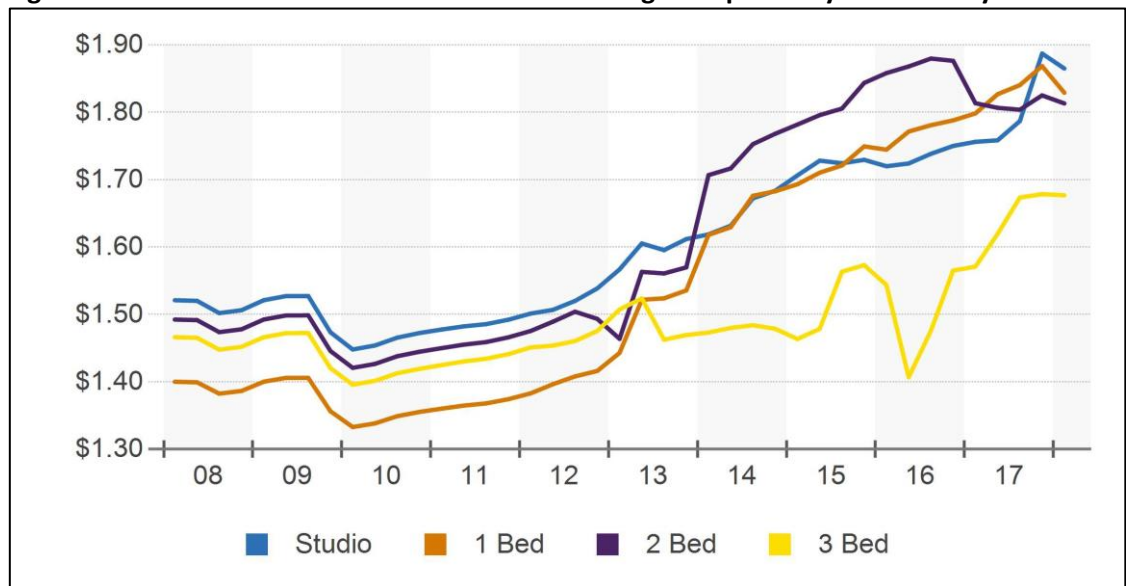
Existing Properties and Rents in the Central Business District

The previous analysis of historic CCHIP datasets focuses on the where and what was built but **not the why**. A review of CoStar datasets for multifamily rental units in the downtown area provides additional context.

Two issues that CCHIP was designed to address include: 1) What is the market demand for urban multifamily living, and 2) Are residents willing to pay a premium to live in new units compared to other San Antonio submarkets, or older and less expensive existing urban core product?

The following figure from CoStar is a clear indication that San Antonians, when given the option, are willing to live in the downtown area. Depending on the number of bedrooms, the monthly rent ranges from \$883 for a studio to \$2,038 for a 2-bedroom unit. Since 2012, rents have steadily increased for all bedroom sized units. Rising rents in combination with thousands of new units added are a clear indication that unmet demand existed.

Figure 9: San Antonio Central Business District Asking Rent per SF by Bedroom by Year



Source: CoStar

Study Area Multifamily Units and Rents by Area Median Income

The following tables come from other CoStar datasets. City staff regrouped the information to get a sense of existing affordability. The major finding from this dataset is that there are many existing, older properties that meet different definitions of affordability. However, the newer projects built within that last few years are not affordable to a person below 80.0 percent of the area median income (AMI). While CCHIP was not designed to be an affordable housing program, this information provides an overall picture of downtown living.

Table 6: Central Business District (2017) - Rent by Bedroom Size + AMI

Bedrooms	< 30% AMI	31 < 50% AMI	51 < 60% AMI	61 < 65% AMI	66 < 80% AMI	> 80% AMI
Studio						
Rent	\$333	\$556	\$667	\$775	\$890	>\$890
# of Units	0	138	9	136	0	339
Avg Unit Year Built	N/A	1925	1923	1979	N/A	2001
1 Bedroom						
Rent	\$357	\$595	\$714	\$832	\$953	>\$953
# of Units	0	175	53	2	224	1318
Avg Unit Year Built	N/A	1926	1929	1925	1979	2013
2 Bedroom						
Rent	\$429	\$715	\$858	\$1,001	\$1,144	>\$1,144
# of Units	0	0	18	0	18	535
Avg Unit Year Built	N/A	N/A	1923	N/A	1979	2013

Source: City of San Antonio, CoStar

Table 7: Near Westside (2017) - Rent by Bedroom Size + AMI

Bedrooms	< 30% AMI	31 < 50% AMI	51 < 60% AMI	61 < 65% AMI	66 < 80% AMI	> 80% AMI
Studio						
Rent	\$333	\$556	\$667	\$775	\$890	>\$890
# of Units	0	0	108	0	0	0
Avg Unit Year Built	N/A	N/A	1992	N/A	N/A	N/A
1 Bedroom						
Rent	\$357	\$595	\$714	\$832	\$953	>\$953
# of Units	0	187	286	0	0	73
Avg Unit Year Built	N/A	2008	1981	N/A	N/A	2014
2 Bedroom						
Rent	\$429	\$715	\$858	\$1,001	\$1,144	>\$1,144
# of Units	0	47	127	0	0	22
Avg Unit Year Built	N/A	2014	1996	N/A	N/A	2014

Source: City of San Antonio, CoStar

Table 8: Southtown-King William-Lavaca (2017) - Rent by Bedroom Size + AMI

Bedrooms	< 30% AMI	31 < 50% AMI	51 < 60% AMI	61 < 65% AMI	66 < 80% AMI	> 80% AMI
Studio						
Rent	\$333	\$556	\$667	\$775	\$890	>\$890
# of Units	0	16	0	0	0	299
Avg Unit Year Built	N/A	1960	N/A	N/A	N/A	2016
1 Bedroom						
Rent	\$357	\$595	\$714	\$832	\$953	>\$953
# of Units	0	0	152	0	93	217
Avg Unit Year Built	N/A	N/A	1960	N/A	2003	2007
2 Bedroom						
Rent	\$429	\$715	\$858	\$1,001	\$1,144	>\$1,144
# of Units	0	0	17	0	86	175
Avg Unit Year Built	N/A	N/A	1960	N/A	2003	2011

Source: City of San Antonio, CoStar

Table 9: Lonestar-Roosevelt Park-Denver Heights (2017) - Rent by Bedroom Size + AMI

Bedrooms	< 30% AMI	31 < 50% AMI	51 < 60% AMI	61 < 65% AMI	66 < 80% AMI	> 80% AMI
Studio						
Rent	\$333	\$556	\$667	\$775	\$890	>\$890
# of Units	0	0	0	0	0	71
Avg Unit Year Built	N/A	N/A	N/A	N/A	N/A	2012
1 Bedroom						
Rent	\$357	\$595	\$714	\$832	\$953	>\$953
# of Units	0	0	0	20	0	233
Avg Unit Year Built	N/A	N/A	N/A	1976	N/A	2015
2 Bedroom						
Rent	\$429	\$715	\$858	\$1,001	\$1,144	>\$1,144
# of Units	0	0	0	0	0	175
Avg Unit Year Built	N/A	N/A	N/A	N/A	N/A	2013

Source: City of San Antonio, CoStar

Table 10: Midtown (2017) - Rent by Bedroom Size + AMI

Bedrooms	< 30% AMI	31 < 50% AMI	51 < 60% AMI	61 < 65% AMI	66 < 80% AMI	> 80% AMI
Studio						
Rent	\$333	\$556	\$667	\$775	\$890	>\$890
# of Units	0	11	135	27	81	138
Avg Year Built	N/A	1968	1968	1969	2004	2005
1 Bedroom						
Rent	\$357	\$595	\$714	\$832	\$953	>\$953
# of Units	0	142	376	63	141	678
Avg Unit Year Built	N/A	1967	1970	1964	1982	2013
2 Bedroom						
Rent	\$429	\$715	\$858	\$1,001	\$1,144	>\$1,144
# of Units	0	20	223	40	11	471
Avg Unit Year Built	N/A	1968	1985	1964	1960	2006

Source: City of San Antonio, CoStar

Stakeholders Interviews

TXP interviewed stakeholders, attended an SA Tomorrow public meeting focused on downtown, and discussed general issues with the SA Tomorrow consulting team. The results of individual interviews and discussions were kept confidential. TXP combined the CCHIP data analysis with the stakeholder input to develop the key findings (next section). The following questions were provided to each interviewee prior to the conversation. The conversations were not limited to these questions but provided a framework to gather similar information from each stakeholder.

Stakeholder Interview Questions

1. Why did you choose to develop a residential project in downtown San Antonio?
2. At the time you commenced your project, were there factors that made your project financially infeasible? Do those same factors exist today and are there any new challenges?
3. What return is required to attract capital investment for high density residential development? Do return requirements vary on for sale vs for rent product? Have return rates varied in recent years?
4. The City's CCHIP program provided incentives in the form of City Fee Waivers, SAWS Fee Waivers, Incremental Tax Rebates, and Loans in the City's Urban Core. Which of these tools is the most valuable to the project's financing?
5. Developers typically specialize in certain real estate products or markets. Assuming San Antonio offered appropriate incentives to make projects financially feasible, would you pursue a project that had some level of affordable units?
6. The City recognizes that Downtown needs to be a place for everyone to live, work, and play and mixed income neighborhoods are vital to creating a downtown for everyone. What specific roles do you think the City should play in facilitating the development of mixed income neighborhoods?
7. If the City were to set goals for affordable housing what should that goal be to ensure fair and equitable access to downtown neighborhoods? What strategies can you think to help us reach that goal?
8. What strategies do you recommend on how affordable housing can be created in the downtown submarket?

Key Findings

TXP's data analysis and interviews resulted in key findings that can be used to inform community discussion related to the possible evolution of CCHIP. While TXP was not tasked with developing specific new strategies, the key findings provide context and direction to possible program changes.

The overarching finding is that CCHIP has played a positive and significant role in attracting new development to downtown, but like any incentive policy, it should be reviewed, modified, and recalibrated as downtown reaches the goal of 7,500 new housing units.

#1 – CCHIP was designed to increase housing density and to support an economically vibrant downtown.

The success of CCHIP in improving the economic viability of the City's urban core is reflected in the number of new housing units added since 2012. Over the past few years, downtown developers in San Antonio were able to take advantage of unmet demand for urban living and rising rents. For the initial projects, CCHIP support played an important role in closing the financial gap and offsetting perceived higher risk. The success of these early projects and other market factors lowered the required rate of return for these types of projects going forward.

#2 – Higher density rental multifamily units comprise the majority of CCHIP eligible projects and the majority of development is in Midtown and Southtown.

Over 6,000 of the 6,500 housing units are rental. This represents over 92.0 percent of all housing units built. The remaining 500 units are for sale properties. In addition to housing, 200,000 square feet of commercial and office space has been incorporated within CCHIP projects. The majority of housing units being constructed are in Midtown and Central Business District because the infrastructure and market conditions exist to support 4-story stick-built projects, a preferred product in the local market.

#3 – The economics of downtown development are evolving.

Current conditions are accommodative to development, as capital has been available from a wider range of sources at historically low rates, and demand (as evidenced by population and job growth) remains strong. In the meantime, the success of the CCHIP program in stimulating and supporting the growth of market rate central city housing has laid a solid foundation going forward. Capital sources and developers have learned that there is market acceptance for the type of central city housing that largely did not exist when the program started. While current conditions are favorable, development in downtown San Antonio is subject to many of the same financial pressures found in other Texas markets including rising materials prices, tightening labor markets, and the anticipated rise in interest rates. As market conditions evolve, rate of return requirements will also evolve.

Stakeholders interviewed indicated the current required rate of return now falls in the 6.0 to 7.0 percent range. A major implication is that some types of projects (ex. 4 and 5-story multifamily) may no longer need any incentive to be financial viable. Other desirable projects such as a 10+ story residential tower would require financial support.

#4 – Project sizes reflect changing market conditions.

One of the implications of these evolving conditions is that smaller projects are seldom cost-effective, as the level of soft costs must be allocated over a significant number of units in order to pencil out. However, larger projects, all other things being equal, require more land. While developers are working to squeeze in more units per acre in some cases, the fact remains that many of the larger parcels that made sense for housing in the urban core have already been developed. This could be a significant constraint on downtown residential development going forward.

#5 – Older infrastructure is a major cost concern that creates financial uncertainty.

Redevelopment and infill projects can be negatively impacted by outdated and poorly maintained infrastructure. Who should pay for these upgrades and improvements is frequently debated between private developers and public utilities (SAWS and CPS). While there is not a clear answer to this issue, this cost uncertainty is frequently cited as the reason to keep the CCHIP program in place.

#6 – CCHIP “as of right” status has translated into nearly all downtown area projects receiving this incentive.

Incentive programs typically respond to changing market conditions, achievement of articulated goals, or evolving community priorities. Entitlements represent value in the development process, whether via the regulatory authority conferred by zoning, or due to the revenue stream that the CCHIP program represents. Since CCHIP is automatic, it functions more like an entitlement than a traditional economic development incentive that is not as of right. This predictability was crucial in the early stages of the program, as it likely facilitated an accelerated pace of development, but may not be as essential in the future.

#7 – The most valuable aspects of CCHIP are those available at closing.

Developers emphasized that the fee waivers and other project cost reductions create the most short-term benefit from the program. These reduced costs are easier to monetize; tax abatements, which essentially represent an annuity, also have a present value, but the uncertainty around exactly what that value is make them less valuable than avoided costs that are recognized in the near term.

#8 – CCHIP now represents a relatively small portion of the overall pro forma calculation.

After conversations with a number of stakeholders (including developers of both affordable

and market rate projects of various sizes), it is clear that there is no single answer on what current impact CCHIP has, as every project pencils out slightly differently. However, the impact of CCHIP at present generally falls into the range of adding between a third and a half a percentage point to the overall rate of return. Does CCHIP make the difference between a viable and non-viable project? In the early stages of the program, it likely made a significant difference for many projects, both in terms of enhancing rate of return and providing what essentially was credit support for capital sources. The success of the program has changed the equation, as capital sources are now more comfortable with market conditions in downtown San Antonio and rate of return requirements have fallen. According to the developers interviewed, CCHIP could be the tipping point in some cases, but most projects are not that sensitive to a fairly small shift in return calculations.

#9 – CCHIP alone cannot create affordable housing in downtown.

San Antonio faces a number of challenges in creating affordable housing. San Antonio is competing in the national and global capital markets with other major Texas cities for deal flow. However, while median incomes in San Antonio are below those elsewhere in Texas, the costs of construction are not commensurately lower. As a result, affordable housing that is based on some percentage of median income in San Antonio is much tougher to make work financially than in Dallas, Austin, or Houston, as the gap between applicable rents and costs is wider. As is true for many market rate projects, the level of soft costs associated with affordable housing also means that the project should be at least 250 units, requiring an increasingly scarce large parcel of land in the urban core (and if demolition is required, that only adds to the project cost). Stakeholders responsible for affordable housing development indicated that affordable housing in the central business district would require a level of subsidy well beyond what CCHIP can provide in order to be viable.

#10 – Using existing Tax Increment Reinvestment Zones (TIRZ) to fund significant portions of the CCHIP program (ex. property tax rebates) limits the near-term ability of TIRZs to implement their own project plans.

Many CCHIP-eligible projects received 90 to 100 percent property tax rebates for 10 to 15-years. Existing TIRZ are the mechanism used to refund the developers. These CCHIP projects have positive spillover effects on adjacent properties which can result in higher property values and non-incentivized new developments. In the near term, however, the duration and amount of CCHIP property tax rebates limits the TIRZs impacts on the project plans. However, after the rebate period, will produce significant revenues for future improvements for infrastructure needs to spur additional redevelopment. The Center City Strategic Framework Plan Implementation (2012) describes this effect.

#11 – Potential hotel development is not a major factor driving up land prices outside of the central business district (CBD).

Historically, land owners would price land as if the future user would be a hotel. While this is sometimes still true in the CBD, these effects do not extend to the surrounding area. Within the CBD there are other forces that impact land prices including families who have owned properties for decades and are not interested in selling as well as developers willing to wait for the market to match the highest and best use of a parcel (ex. office tower). As the City's programs that encourage redevelopment of the urban core succeed, supply and demand forces will push land prices up.

#12 - There are political and community issues associated with the existing boundary of CCHIP.

The related factors of rising costs and increasing scarcity of appropriate parcel sizes have pushed urban core development toward some traditional single-family neighborhoods such as King William, Lavaca, Dignowity Hill, Tobin Hill, and Denver Heights. However, this can create issues for communities which may have political implications, resistance from neighborhoods on increasing density, and overall land use patterns that characterize urban core residential development. The SA Tomorrow Downtown Regional Plan provides a focus on corridor development with high density land use versus high density within traditionally single family residential neighborhoods. Stakeholders and developers agreed that modifying the CCHIP boundary could help mitigate many neighborhood concerns while providing predictability to projects that take 12 to 18 months to plan.

#13 – Update the CCHIP Program based on past success and future community goals and priorities.

CCHIP was designed as both an economic development tool and an urban planning initiative. The underlying goal was to create a vibrant neighborhood and align job creation with housing in the urban core, in the process supporting not only downtown but the tourist industry as well. The past five years primarily focused on new housing, but a series of high-profile commercial and office projects have been announced. As the City of San Antonio nears its goal of 7,500 downtown area housing units, now could be the time to reframe and reimagine the goals and objectives of CCHIP. Updating the CCHIP program is also consistent with the recommendation in the San Antonio Center City Strategic Framework Plan (2011).

Conclusion

Since 2012, the CCHIP program has functioned as intended. The initial focus and emphasis on attracting market rate housing by mitigating risk through financial incentives was the primary goal. The resulting clustering and concentration of new multifamily housing units has increased the aggregate level of disposable income in the downtown area. This in turn has stimulated the development of neighborhood serving retail, attracted additional residents, and increased the local labor force (ex. the Broadway Corridor and Pearl Brewery). The final step in the process is to encourage and support businesses moving back into the downtown area.

CCHIP was not designed as an incentive tool for affordable housing. These projects are not excluded from utilizing CCHIP, but the cost challenges of affordable housing go well beyond what CCHIP can provide. The current conversations in San Antonio regarding affordable housing are important. However, market rate housing strategies designed to ultimately attract businesses back to downtown San Antonio and spur economic development are different than more general affordable housing programs that are somewhat independent of geography.

Deciding to end or scale back an incentive program is not without risk. As the City of San Antonio nears its goal of 7,500 downtown area housing units, now could be the time to reframe and reimagine the goals and objectives of CCHIP. This might result in fewer projects over the next 12 to 18 months as the real estate market adapts to the new program. Over the long-term, however, San Antonio transitioning from an “as of right” program to a more targeted program should yield positive results.

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