



# Plymouth Avenue Apartments Tax Increment Financing Plan

Draft for Public Review:  
March 16, 2023

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Table of Contents

- I. Introduction
  - II. TIF District Boundary
  - III. Type of TIF District
  - IV. Maximum Duration of the TIF District
  - V. Statement of Objectives
  - VI. Proposed Development Activity
    - A. Description of Proposed Development Activity
    - B. Property That May be Acquired
    - C. Other Anticipated Development Activity
  - VII. Description of Financing
    - A. Costs to be Paid With Tax Increment Revenue
    - B. Construction of Affordable Housing Outside the TIF District
    - C. Maximum Amount of Bonds to be Issued
    - D. Original Net Tax Capacity
    - E. Original Tax Capacity Rate
    - F. Fiscal Disparities Election
    - G. Projected Captured Net Tax Capacity and Tax Increment
  - VIII. Estimated Impact on Other Taxing Jurisdictions
  - IX. Basis for Finding That Development Would Not Occur Without TIF Assistance
- Exhibits
- 1. TIF District Boundary Map
  - 2. Site Plan and Renderings
  - 3. Assumptions Schedule
  - 4. Projected Tax Increment Schedule
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**I. Introduction**

The Plymouth Avenue Apartments Tax Increment Financing Plan has been prepared to help finance the construction of two new buildings on Plymouth Avenue North consisting of 63 units of affordable housing. The project is located on the south side of Plymouth Avenue, between Queen Avenue North and Russel Avenue North.

The TIF Plan establishes a new housing TIF district to finance the costs of a qualified housing development and includes a budget for the use of tax increment revenue generated by the new TIF district.

**II. TIF District Boundary**

<u>PID</u>	<u>Property Address</u>
20-029-24-11-0020	2309 Plymouth Avenue North
20-029-24-11-0040	1254 Russell Avenue North

This property is located within the Willard-Hay neighborhood of Minneapolis.

A TIF District Boundary Map is attached as Exhibit 1.

**III. Type of TIF District**

The TIF District is a “housing district” as defined in the Minnesota Tax Increment Financing Act (the “TIF Act”, M.S. Sections 469.174-469.1799).

Pursuant to M.S. Section 469.174, Subd. 11, a "housing district" means a type of tax increment financing district which consists of a project, or a portion of a project, intended for occupancy, in part, by persons or families of low and moderate income, as defined in chapter 462A, Title II of the National Housing Act of 1934, the National Housing Act of 1959, the United States Housing Act of 1937, as amended, Title V of the Housing Act of 1949, as amended, any other similar present or future federal, state, or municipal legislation, or the regulations promulgated under any of those acts and that satisfies the requirements of section 469.1761. Housing project means a project, or a portion of a project, that meets all of the qualifications of a housing district under this subdivision, whether or not actually established as a housing district.

In order for a TIF district to qualify as a housing district, the development must comply with certain income restrictions. There is also a limit on the amount of space that can be occupied by non-residential uses.

In particular, for a residential rental property, the property must satisfy the income requirements for a qualified residential rental project as defined in Section 142(d) of the Internal Revenue Code. These income requirements specify that at least one of the following two income tests must be met:

- 1) 20@50 Test – Twenty percent or more of the residential units are occupied by individuals or families whose income is 50 percent or less of the area median gross income (AMI).
- 2) 40@60 Test – Forty percent or more of the residential units are occupied by individuals or families whose income is 60 percent or less of AMI.

Plymouth Avenue Apartments meets both tests, since all 63 apartment units will be affordable at or below 50 percent AMI.

Additionally, no more than 20 percent of the square footage of any building that receives tax increment financing assistance in a housing district may consist of commercial, retail, or other non-residential uses. There is no commercial or retail space proposed in this project.

#### **IV. Maximum Duration of the TIF District**

The maximum duration of the TIF District is that which is prescribed by the TIF Act for a housing district. At the time this document was prepared, the TIF Act allowed for a maximum of 26 years of tax increment collection from a housing district.

#### **V. Statement of Objectives**

The City of Minneapolis (the “City”) seeks to achieve the following objectives through the establishment of the TIF District:

- Increase the number of housing units and choices within the City.
- Provide housing units affordable to persons or families of low and moderate income.
- Support strong and diverse neighborhoods where people choose to live.
- Promote sustainable development.
- Increase the property tax base.

#### **VI. Proposed Development Activity**

##### **A. Description of Proposed Development Activity**

Matrix Development is proposing two new construction buildings located at 2309 Plymouth Avenue North consisting of 63-units of affordable housing. The west building will have four stories and 25 units, and the east building will have five stories and 38 units. The project will include 14 units with supportive housing services provided by Simpson Housing, seven units with project-based Section 8 vouchers from Minneapolis Public Housing Authority and the remaining 42 units will have rents at 30-50% AMI. The buildings will consist of 14 studios, 45 one-bedroom apartments and four two-bedroom apartments.

The site is within blocks of numerous bus routes and one block from the BRT-C stop at Penn Avenue North and Plymouth Avenue North. The west building will have a community room to be shared by both buildings. Each building will have its own common laundry room and bicycle storage room.

See Exhibit 2 for a site plan and renderings of the planned development.

**B. Property That May Be Acquired**

The City does not intend to acquire any property within the TIF District.

**C. Other Anticipated Development Activity**

No other development activity is currently anticipated within the TIF District.

**VII. Description of Financing**

The amount of tax increment financing identified in this TIF Plan is based on the best estimates and projections available at the time the plan was prepared. Slight changes can be expected. However, if significant changes occur that affect the structure or financial feasibility of the project or increase the project costs to be paid with tax increment revenue beyond the amounts listed below, then a formal modification to this plan may be necessary. In this case, the modification would require the same review and approval process that was required with the original TIF Plan.

**A. Costs to be Paid With Tax Increment Revenue**

The total development cost of the project is currently estimated to be approximately \$20 million. The maximum amount of TIF-eligible project costs that can be paid with tax increment revenue generated by the TIF District is shown below.

<u>Sources</u>		
Tax Increment Revenue		<u>\$1,752,000</u>
Total Sources		\$1,752,000
 <u>Uses</u>		
Construction of Affordable Housing	\$742,500	42.4%
Pay-As-You-Go Note Interest	834,300	47.6%
City Administrative Costs	<u>175,200</u>	<u>10.0%</u>
Total Uses	\$1,752,000	100.0%

The City reserves the right to administratively adjust the amount of any of the line items listed above, or to incorporate additional eligible uses, provided that the Total Uses amount is not increased.

**B. Construction of Affordable Housing Outside the TIF District**

Pursuant to M.S. Section 469.1763, Subd. 2(b), the expenditure of housing district TIF for a housing project, as defined in M.S. Section 469.174, Subd. 11, is deemed to be an in-district activity for pooling purposes. Accordingly, tax increment expenditures are not restricted to the TIF district or “project area” (as that term is defined in M.S. Section 469.174), but may be spent on housing projects meeting the qualifications of a housing district at M.S. Section 469.174, Subd. 11 anywhere within the City of Minneapolis.

**C. Maximum Amount of Bonds to be Issued**

The City does not currently anticipate issuing any tax increment bonds for the Plymouth

Avenue Apartments Project. It is anticipated that the City will issue the developer a pay-as-you-go TIF revenue note in an amount not to exceed \$742,500. The City will semi-annually distribute net tax increment to the developer under the terms of the TIF note. The developer will use this tax increment revenue, along with net operating income from the housing development, to pay debt service on private debt (secured by the developer) that is used to finance the construction of the project.

As provided in M.S. Section 469.178, Subd. 7, the City may advance one or more interfund loans between the tax increment (“TI”) special revenue fund for the TIF District and the other TI special revenue funds of the City. Each such interfund loan to or from the TIF District shall be in the principal amount needed to offset a negative cash balance. The interest rate charged on each such interfund loan to or from the TIF District shall be equal to the average interest rate that revenue in the City’s TI special revenue funds earn at the time the loan is made, and such interest rate shall vary over time. In no event will the interest rate charged on any such interfund loan exceed the greater of the rates specified under Minnesota Statutes, Section 270C.40 or 549.09, as such statutory rates are adjusted from time to time. The maximum term of each such interfund loan to the TIF District shall be the earlier of 1) the date that all principal and accrued interest on the loan is repaid, and 2) the date the TIF District is decertified. The maximum term of each such interfund loan from the TIF District to another TIF district shall be the earlier of 1) the date that all principal and accrued interest on the loan is repaid, and 2) the date the other TIF district is decertified.

**D. Original Net Tax Capacity**

The TIF District is projected to have an original estimated market value (EMV) of \$174,500, and an original net tax capacity (ONTC) of \$2,181.

**E. Original Tax Capacity Rate**

The original tax capacity rate for the TIF District will be the total local tax capacity rate for all applicable taxing jurisdictions for taxes payable in 2023, which is not yet available. For the purpose of calculating the estimated impact on other taxing jurisdictions, the total tax capacity rate for taxes payable in 2022 was used (see Section VIII).

For tax increment projection purposes, a total tax capacity rate of 118 percent was assumed.

**F. Fiscal Disparities Election**

For the purpose of calculating tax increment, the City of Minneapolis elects that the fiscal disparity contribution that is required for all commercial and industrial property located within the TIF District will be made from “outside” the TIF District (M.S. Section 469.177, Subd. 3, Paragraph (a)).

**G. Projected Captured Net Tax Capacity and Tax Increment**

Upon project completion, it is projected that the total EMV of the property in the TIF District will be \$11,655,000 and the total net tax capacity (NTC) will be \$60,638. The captured NTC of the TIF District is therefore projected to be \$58,457.

The Assumptions Schedule (Exhibit 3) shows the various assumptions used in projecting net tax increment from the TIF District.

The Projected Tax Increment Schedule (Exhibit 4) shows how tax increment was projected over the life of the TIF district.

**VIII. Estimated Impact on Other Taxing Jurisdictions**

It is the position of the City of Minneapolis that the development of the property included in this TIF District would not occur as proposed without tax increment financing assistance.

Nevertheless, it has been assumed in the analysis below that the proposed development would occur without TIF assistance. Under this assumption the projected captured net tax capacity at project completion would be immediately available to the applicable taxing jurisdictions, and the resulting property taxes would be as follows:

<u>Taxing Jurisdiction</u>	<u>Pay 2022 Tax Capacity Rate</u>	<u>Property Taxes Resulting From \$58,457 in Captured Net Tax Capacity</u>
City of Minneapolis	59.351%	\$34,695
Hennepin County	38.466%	22,486
Mpls. Special School Dist. No. 1	20.527%	11,999
Other	<u>6.784 %</u>	<u>3,966</u>
Total	125.128%	\$73,146

Fiscal and Economic Implications of the TIF District

The projected amount of tax increment revenue that would be distributed to the City over the maximum duration of the TIF District is \$1,751,404.

The probable impact of the TIF District on City-provided services such as police and fire protection, public infrastructure, and borrowing costs attributable to the TIF District is projected to be very minor due to the small size of the project in comparison to the size of the City budget and tax base.

The projected amount of tax increment revenue generated over the life of the TIF District that would be attributable to the School District, assuming the School District’s tax rate remains at approximately 16.4 percent of the total tax rate, is \$287,230.

The projected amount of tax increment revenue generated over the life of the TIF District that would be attributable to the County, assuming the County’s tax rate remains at approximately 30.7 percent of the total tax rate, is \$537,681.

**IX. Basis for Finding That Development Would Not Occur Without TIF Assistance**

M.S. Section 469.175, Subd. 3 provides that, prior to approval of a TIF plan, the City Council must find that the proposed development or redevelopment would not reasonably be expected to occur solely through private investment within the reasonably foreseeable future, and therefore the use of TIF is deemed necessary.

After thorough financial analysis, it is the position of the City of Minneapolis that the proposed private development to be constructed in the Plymouth Avenue Apartments TIF District would not occur within the reasonably foreseeable future without public financial assistance. This analysis indicates that projected development costs exceed available funding sources, and that a significant upfront funding gap exists. This funding gap is in large part due to the inclusion of the affordable rental housing units in the project. The amount of TIF assistance that has been requested is reasonable when compared to the overall cost of developing the project, and TIF assistance is therefore deemed necessary and appropriate to close this funding gap.





# Plymouth Avenue Apartments TIF District

14TH AVE N

PENN AVE N

SHERIDAN AVE N

PLYMOUTH AVE N

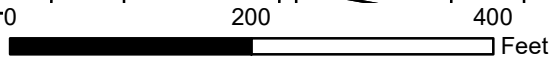
QUEEN AVE N

RUSSELL AVE N

12TH AVE N



TIF District Boundary



Prepared by  
Development Finance Division  
Finance & Property Services Department  
City of Minneapolis, Minnesota  
March 2023



NORTHEAST CORNER



NORTHWEST CORNER



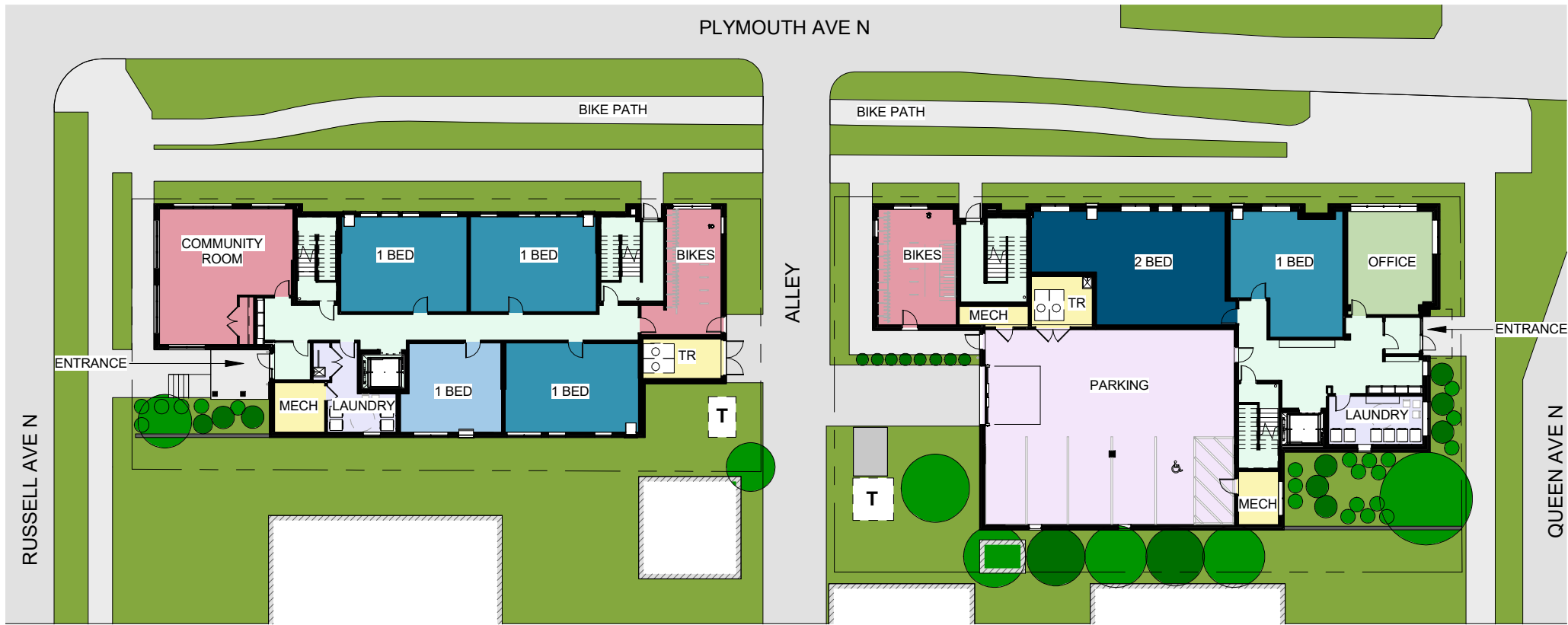
SOUTHEAST CORNER



SOUTHWEST CORNER

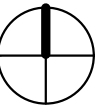
RENDERINGS

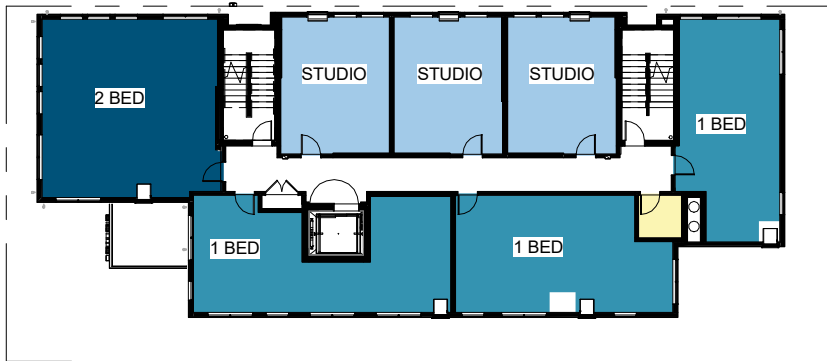




# GROUND FLOOR PLANS - SITE PLAN

1" = 30'-0"





WEST BUILDING -LEVEL 2-4



EAST BUILDING -LEVEL 2-5

## TYPICAL FLOOR PLANS

1" = 30'-0"



**Assumptions Schedule**  
**Plymouth Avenue Apartments**  
**TIF Model**

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Type of Tax Increment Financing District	Housing
Maximum Duration of TIF District	26 Years of Tax Increment Collection
Certification Request Date	06/01/23
Decertification Date	12/31/50 (Years of Increment = 26)

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Construction Year =	2022	2023	2024	2025
Assessment Year =	2023	2024	2025	2026
Taxes Payable Year =	2024	2025	2026	2027

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**Housing Property**

EMV Upon Completion (a)		\$11,655,000	\$11,655,000	\$11,655,000
Percent Complete		25%	90%	100%
Total Estimated Market Value	\$174,500	\$2,913,750	\$10,489,500	\$11,655,000
Percent of Housing Property - Class 4a	100%	100%	0%	0%
Percent of Housing Property - Class 4d	0%	0%	100%	100%
Class Rate - 4a	1.25%	1.25%	1.25%	1.25%
Class Rate - 4d	0.75%	0.75%	0.52%	0.52%
Net Tax Capacity (NTC)	\$2,181	\$36,422	\$54,574	\$60,638

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Assessment Year =	2022	2023	2024	2025	2026
Taxes Payable Year =	2023	2024	2025	2026	2027

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Original EMV (b)	\$174,500	\$174,500	\$174,500	\$174,500	\$174,500
Times: Class Rate	1.25%	1.25%	1.25%	1.25%	1.25%
Original Net Tax Capacity	\$2,181	\$2,181	\$2,181	\$2,181	\$2,181

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<b>Pay-As-You-Go Note</b>		Total Tax Capacity Rate	118.000%
Interest Start Date	12/31/23	City Administrative Fee	10.00%
Annual Interest Rate	5.65%	Annual TI Coverage Percent (c)	110%

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**Notes**

- (a) Post-development Estimated Market Value based on 63 apartments at \$185,000 per unit.  
(b) Original EMV based on pay-2023 assessed value.  
(c) Debt coverage ratio (annual TI coverage percent) is based on lender underwriting.

### Projected Tax Increment Schedule

#### Plymouth Avenue Apartments TIF Model

Year Ending (1)	Total Net Tax Capacity (2)	<u>Less:</u> Original Net Tax Capacity (3)	<u>Equals:</u> Retained Captured NTC (4)	<u>Times:</u> Total Tax Capacity Rate (5)	<u>Equals:</u> Annual Gross Tax Increment (6)	<u>Less:</u> State Aud. Fee @ 0.36% (7)	<u>Equals:</u> Increment Distributed to City (8)	<u>Less:</u> City Adm. Fee @ 10.00% (9)	<u>Equals:</u> Available Tax Increment (10)	<u>Less:</u> Pay-Go Note Payments (11)	<u>Equals:</u> TI Coverage (12)	TI Coverage Percent (10/11) (13)	
12/31/25	36,422	2,181	34,241	118.000%	40,404	145	40,259	4,026	36,233	32,939	3,294	110%	
12/31/26	54,574	2,181	52,393	118.000%	61,824	223	61,601	6,160	55,441	50,401	5,040	110%	
12/31/27	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/28	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/29	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/30	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/31	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/32	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/33	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/34	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/35	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/36	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/37	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/38	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/39	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/40	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/41	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/42	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/43	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/44	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/45	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/46	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/47	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/48	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/49	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
12/31/50	60,638	2,181	58,457	118.000%	68,979	248	68,731	6,873	61,858	56,235	5,623	110%	
						\$1,757,724	\$6,320	\$1,751,404	\$175,138	\$1,576,266	\$1,432,980	\$143,286	