

SUPPLEMENT FOR THE MAY 9, 2013 BOARD MEETING



Agenda Item 2a Supplemental Information

2a Presentation, Discussion, and Possible Action regarding Preclearance requests for Community Revitalization Plans filed with Pre-Applications in the 2013 Competitive Housing Tax Credit Cycle

The backup documentation included in the board book posted on Thursday, May 2, 2013, under agenda item 2a only represents the documentation that was included in the WPDD packets submitted to the Department by January 8, 2013. This Supplement includes information that was received by the Department prior to May 2, 2013. Although this information is permitted for inclusion in the board book, it is not considered part of the original submission on record. While the supplemental information may be helpful in providing clarity to the original submission, the decision of the board will be based upon the original submission.

Villas at Justin, #13140
Supplemental Information



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March 29, 2013

512.475.1676
jean.latsha@tdhca.state.tx.us

Kecia Boulware
AT Villas at Justin, LP
30141 Agoura Road, Suite 100
Agoura Hills, California 91301

(via email to: kboulware@amcalhousing.com)

RE: REQUEST FOR PRECLEARANCE FOR COMMUNITY REVITALIZATION PLAN FOR VILLAS AT JUSTIN,
TDHCA # 13140

Dear Ms. Boulware:

In connection with the Application referenced above, we have reviewed your request for preclearance from the Governing Board ("Board") of the Texas Department of Housing and Community Affairs (the "Department") and the granting of a determination that the community revitalization plan ("CRP") for the City of Justin substantively and meaningfully satisfies a revitalization effort as contemplated in 10 TAC §11.9(d)(6). As provided for in 10 TAC §11.8(b)(1)(I) the CRP was submitted with the pre-application made in connection with the Application. The basis for Department staff's recommendation for either the granting or denial of preclearance is based solely on that submission. While staff did not issue administrative deficiencies regarding this matter, staff has met with representatives of the Applicant to enable them to present information and aid the staff in understanding as fully as possible the CRP as submitted.

Below is a summary of what staff believes the record does and does not support with respect to possible points under the Qualified Allocation Plan ("QAP") for a community revitalization plan. The fact that staff has not been able to conclude that the CRP "meaningfully satisfies a revitalization effort," as described by the QAP, should in no way be taken as a negative judgment or comment on the plan itself with regard to the purpose for which it was developed provided, or on the importance and benefit of the efforts that the city has undertaken. The finding only relates to the extent to which the plan satisfies the requirements of the QAP.

Staff Assessment of the Submitted CRP

The Applicant submitted a resolution from the City of Justin adopting a community revitalization plan in December 2012 as well as the plan itself. While on its face the plan does appear to meet some of the requirements of the QAP, staff developed several concerns with the content after a thorough review and meeting with the Applicant. First, the plan lists factors that were presumably used in determining the target area and the strategies of the plan. Staff was unable to discern material or significant *problems* in the existing area which gave rise to a need for a concerted plan for revitalization. It did not appear there was any identified need for revitalization



efforts in order for the city to be able to return the neighborhood to a vital state more in line with neighborhoods *not* requiring revitalization. Instead, the plan pointed to the fact that the target area is located in a recognized school district and that there are several large employment centers nearby. The plan did mention inadequate transportation as an issue. Staff believed that the plan speaks more to economic development than to revitalization.

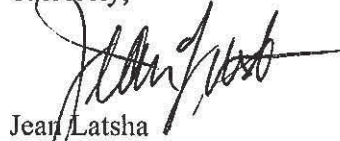
Secondly, staff was unable to determine from the submission record that the target area did, in fact, have in a material and substantive way the physical characteristics of a neighborhood in need of revitalization. A large portion of the target area is either undeveloped land or has been very recently developed. While the target area does include an older (1970s built) single family neighborhood, staff learned (through a site visit and from pictures presented by the Applicant) that the homes and the neighborhood itself were generally not in any apparent state of severe disrepair. The Applicant pointed to a few structures that were vacant or in some disrepair, but again staff saw no evidence of a prevalence of blighted or existing aging structures in the area. The Applicant pointed to a creek/greenbelt area as an environmental factor that makes development difficult, but this type of area is more often viewed by a community as a positive attribute. Staff acknowledges and commends the city for developing a parks plan to take advantage of this feature, but this effort is not consistent with the idea of revitalization but more so with economic development. There is also newly constructed commercial business along the highway, giving the sense that this area is experiencing economic development typical of a growing city rather than revitalization of a community that has deteriorated over time.

Finally, staff has concerns about one of the projects in the target area that makes up a substantial portion of the plan's budget. The City of Justin built a wastewater treatment plant in 2012, and this plant has been included in the plan's target area. This type of project, when in proximity to housing, schools, and other features typical of a vibrant neighborhood, would seem more likely to be viewed as negatively impacting the adjacent area. The Applicant pointed out that the plant is across the highway from the rest of the target area. If the city chose to separate the plant in some specific way, the appropriateness of inclusion of the plant costs in the budget becomes tenuous. In addition, the wastewater treatment plant serves the entire city, not just the target area. If the plant were built solely or even primarily to serve and address an inadequacy in the target area, it would be more understandable to include it in the plan budget. Instead, the fact that it does serve the entire city reinforces staff's concern that it does not relate directly to revitalizing some adverse feature inherent in the plan area.

For the preceding reasons staff is recommending denial of preclearance. Staff presently intends to place this matter before the Board at its meeting on April 11, 2013. If on or before April 3, 2013, you make a written request, we will defer presentation of this particular CRP until the May Board meeting.

If you have any further questions or concerns, please feel free to contact me at jean.latsha@thca.state.tx.us or by phone at 512.475.1676.

Sincerely,



Jean Latsha
Competitive Housing Tax Credit Manager

JML

cc: Donna Rickenbacker



April 15, 2013

Mr. Tim Irvine
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

Re: Justin Plan

Dear Mr. Irvine,

The City of Justin has been working with AMCAL Multi-Housing, Inc. on a proposed 158-unit apartment community to be named Villas at Justin and AMCAL's pursuit of housing tax credits to finance the construction and development of their mixed income project. The Villas at Justin will be located in an area of our city that we have committed a considerable amount of time and expenditure of capital to upgrade and improve. The City designated the area as the "Southwest Neighborhood" and adopted the Southwest Neighborhood Revitalization Plan that recognizes and consolidates our community's vision and redevelopment goals and objectives for this area.

It has come to our attention that a staff level panel at TDHCA has determined that our plan for the Southwest Neighborhood does not constitute a "meaningful revitalization effort" under its rules and therefore the Villas at Justin should not be given credit for being located in a city-designated revitalization zone.

The City of Justin has been provided a copy of staff's determination that denies preclearance of the plan for the Southwest Neighborhood, and we are most disappointed by the agency's assessment of our plan and believe several of the conclusions to be in error.

First, it is important to point out that the City of Justin is not a big city. The area within the current Justin city limit is approximately 1,400 acres or 2.19 square miles. The area in the City of Justin ETJ is approximately 2,000 acres. This is a combined area of 3,400 acres (5.31 square miles) in the City of Justin's jurisdiction. We are also an older city that has not seen a lot of change and growth until recently.

In 2005, the City of Justin began the planning process for improving and developing our city. We elected to first target the southwest side of the City where several of our residential neighborhoods that were constructed in the mid 70s had fallen behind and were in disrepair, including the Adams, Wilson and Valley Moore Additions located in the northeast quadrant of the Southwest Neighborhood. The City concentrated on ways to strengthen these older subdivisions and the quality of life for the residents in these neighborhoods while at the same time planning for future and desired growth in this area, which we codified in the Southwest Neighborhood Revitalization Plan.

Tim Irvine - TDHCA

April 15, 2013

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The staff level panel at TDHCA staff determined that it was unable to discern material or significant *problems* in the targeted area which "gives rise to a need for a concerted plan for revitalization". The Justin community, in an open and collaborative planning process, determined what problems it endeavored to address in the targeted area and elected to spend in excess of \$6,000,000 of taxpayer funds towards responding to these issues and concerns, a significant investment for a city the size of Justin. As set forth in the plan, we targeted housing, including those located in the older residential subdivisions described above, by constructing and reconstructing streets and utility infrastructure and by integrating the neighborhoods in this area through an extensive and costly parks and recreational system.

The staff level panel at TDHCA staff characterizes our plan and priorities for the Southwest Neighborhood as economic development instead of revitalization, as if the two objectives do not have commonality. Staff came to our city and took selective pictures to support their economic development determination. They also found that the location of the City's sewer treatment plant negatively impacts the target area. At no time were we contacted by your staff to discuss our plan, to better understand what we are trying to achieve in our City for this neighborhood or to address issues for the agency such as where we have chosen to locate utility facilities that service our community.

It appears to us that staff has compared our revitalization efforts to those of much larger cities. Cities of differing sizes and appearance have vastly different degrees of revitalization needs and desired outcomes. Each revitalization plan should be considered independently by the agency with a high degree of sensitivity and dialogue with the stakeholders on what each has chosen to target for recovery and expansion, especially given that staff's decisions regarding these plans will significantly influence where affordable housing will be located.

We want the Villas at Justin development and believe that such housing will enhance and support our revitalization efforts in the Southwest Neighborhood to provide a wide spectrum of housing choices to families of all income levels. We believe that our plan does meet the requirements of your rules and should be revisited by your staff. We are therefore respectfully requesting that the panel reconsider its determination and allow the City the opportunity to speak to its plan and the activities taking place in the target area.

We look forward to hearing from you on this very important matter to the City of Justin.

Sincerely,



Greg Scott, Mayor of Justin, Texas

cc: Senator Jane Nelson, District 12
Representative Tan Parker, District 63
David Speicher, Mayor Pro-Tem of Justin, Texas



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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GOVERNOR

April 16, 2013

Writer's direct dial; 512.475.3296
Email: tim.irvine@tdhca.state.tx.us

The Honorable Greg Scott
Mayor of the City of Justin
P. O. Box 129
Justin, Texas 76247

Dear Mr. Mayor:

I am in receipt of your letter dated April 15, 2013, and your request that the materials submitted in connection with the low income housing tax credit application #13140, submitted by AT Villas at Justin, LP (the "Applicant") be found to have substantively and meaningfully satisfied a community revitalization effort as provided for in 10 TAC §11.9(d)(6)(A)(iv). The materials submitted by the Applicant constitute the record upon which the Governing Board (the "Board") of the Texas Department of Housing and Community Affairs ("TDHCA" or the "Department") will make its determination as to whether these materials met those criteria.

We were very mindful that this scoring item for community revitalization plans ("CRPs") was newly developed and a fully compliant submittal required a city to undergo a number of steps which they likely did not and could not meet in time for applications under the 2013 qualified allocation plan ("QAP"). In recognition of that fact, the Board included a transitional provision in the 2013 QAP that the Board could determine that a CRP submission substantively and meaningfully satisfied a community revitalization effort notwithstanding the fact that it might have fallen short in one or more of the technical requirements of the rule. The Applicant's submission regarding possible development in Justin was considered under that provision.

The staff and Board are constrained as regards the record that they may consider in arriving at their recommendations and decisions. As noted above, that record is those materials actually included in the pre-application and full application.

Out of an abundance of caution and an effort to be as fair and open-minded as possible, the staff that administers the program made its own assessment but sought other points of view. To that end an informal panel was created. This group included diverse perspectives of management, legal, housing




research, and HOME program administration as well as inclusion of people involved in administering the tax credit program.

This group met with different applicants. The purpose of the meetings was to give each applicant the fullest possible opportunity to explain in detail what was reflected in the official record and why, in the Applicant's belief, the record demonstrated that these materials substantively and meaningfully satisfied a community revitalization effort. There was also diversity in the presentations. Some applicants sent solo presenters while others included a variety of third parties including attorneys, consultants, and even city officials who had been personally involved in the efforts for which CRP status was sought.

As you noted, staff did go to Justin to see firsthand what was occurring; staff visited several sites for similar reasons during the preclearance process. While this was informative it was not dispositive. The meeting of the panel with representatives of the Applicant in this case focused on several issues. First and foremost was "What were the factors set out in the Department's rule on revitalization plans that were being addressed?" Another critical factor was, "What was the specific budget allocated to addressing those factors?" The budget for the Justin plan reflected that the predominant investment was in the water treatment facility serving the entire community and foreseeable growth. The plant itself appears from the map to be across the highway from the preponderance of the plan area, and the majority of that planning area on the other side of the highway from the plant is designated as residential. Any comments or thoughts on whether the plant itself is a positive or a negative were contextual in that placing a water treatment plant in or next to a neighborhood is generally not typically viewed as a positive feature by the residents.

You have asked that the panel reconsider its determination. The panel made no determination. Only the Board has authority in that regard. Staff may, of course provide its recommendation to the Board, and that recommendation will be based on input from the panel. The issue of whether or not this submittal met the criteria of substantively and meaningfully satisfying a community revitalization effort will be posted and presented to the Board at its May 9, 2013, meeting, and the Board will make its decision. You are welcome to come and testify on that item when it is being considered. Although the time is yet to be set officially, it will likely begin around 9:00 a.m. and will be at the Greer Building on 11th Street, across from the Capital.

Respectfully,



Timothy K. Irvine
Executive Director

cc: The Honorable Jane Nelson, Texas Senate
The Honorable Tan Parker, Texas House of Representatives
The Honorable David Speicher, Mayor Pro-Tem
Ashley Stathatos, City Manager
Donna Rickenbacker

Wynnewood Family Housing, #13234

Supplemental Information

WYNNEWOD FAMILY HOUSING, LP

April 25, 2013

Board Members
Texas Department of Housing
And Community Affairs
211 East 11th Street
Austin, Texas 78711

RE: 13234 – Wynnewood Family Housing, Dallas, Texas;
The Wynnewood Revitalization Plan.

Ladies and Gentlemen:

We are requesting that the TDHCA Board follow the provisions of §11.9(d)(6)(A)(iv) of the 2013 QAP (attached) and determine in its May 9, 2013 Board Meeting that the Wynnewood Revitalization Plan (the “Plan”) substantively and meaningfully satisfies a revitalization effort, notwithstanding any failure to fulfill one or more of the factors in §11.9(d)(6)(A), to the extent that any such failure might be identified by TDHCA Staff. The Plan was submitted for Pre-clearance on January 8, 2013, in accordance with QAP requirements.

Because the Plan has been evolving since 2010, we were not able to submit a cohesive document that was written with an eye on the 2013 QAP requirements for a revitalization plan in Region 3 Urban. Instead, we submitted City of Dallas Resolution No. 112360 that:

- (i) recited the history of the City’s prior support for on multiple occasions of the redevelopment of an 8-acre tract that received Housing Tax Credits (Wynnewood Seniors Housing);
- (ii) adopted a plan for the multi-phase redevelopment of approximately 48-acres (including the 8-acre tract) constituting a 404-unit development from the 1940s that was rehabbed with low-income housing tax credits in the early 1990s;
- (iii) provided for \$850,000 economic assistance in the form of forgiveness of debt for Phase I, and authorized forgiveness of the remaining debt, half upon completion of Phase II and half upon completion of Phase III of the Plan; and
- (iv) authorized master planning to expand the revitalization area to include the Wynnewood Village Shopping Center (an additional 60-acre tract).

We provided evidence of the extensive community participation in the direction of the revitalization through conducting two charrettes¹. We further provided evidence that the first \$850,000 in economic assistance had already been provided pursuant to the Plan, as well as letters from the City of Dallas indicating that (a) \$4,000,000 of City of Dallas bond money for improvements had been earmarked for this area in the master Plan; and (b) the Plan would have the projected economic value of increasing the property tax income by approximately \$2,600,000.

In our Application, filed March 1, 2013, we submitted City of Dallas Resolution No. 130461 dated February 27, 2013, which evidenced approval of \$425,000 in economic assistance for Wynnewood Family Housing pursuant to the Plan.

Admittedly, the Plan started out as the City of Dallas' support for a single redevelopment project of 140 units for seniors. However, the City's support morphed into a revitalization plan that was proposed by the City of Dallas (not the developers), acting at the behest of the City Council Member for District 3, and incorporated 48 acres. Subsequently, based upon the master planning required by Resolution 112360, the Plan has expanded to include the revitalization of the Wynnewood Village Shopping Center and other surrounding land in the Beckleywood neighborhood, so that the revitalization target area now consists of approximately 130 acres located just outside the Central Business District of Dallas. We point out that there is nothing wrong with having a plan and then expanding the plan - which is exactly what has happened here.

We enclose a March 20, 2013 letter from Mayor Michael S. Rawlings of the City of Dallas, in which he states that the revitalization process ties into the City's current "Grow South" initiative which promotes population growth and economic development toward the southern sector of the City on a neighborhood-by-neighborhood basis.

Staff's letter of March 29, 2013, set out three reasons why Staff is recommending denial of pre-clearance. They are as follows:

- 1. "[W]hile it appears that the city has contributed and intends to continue to contribute funds to this specific project, that there is not an actual budget associated with a community revitalization plan."** We point out that the QAP does not give any guidance whatsoever as to what constitutes a "budget" or what is "projected economic value." The Plan has already provided \$850,000 in funding completed in July 2012, \$425,000 in authorized funding, and the potential for at least \$420,000 in additional debt

¹ **charrette** noun: a public meeting or workshop devoted to a concerted effort to solve a problem or plan the design of something.

forgiveness for another phase of the revitalization. The City officials have also provided confirmation that there is approximately \$4,000,000 in 2006 bond funds that are available for improvements to the infrastructure surrounding the revitalization target area, and that the revitalization of the initial 48 acres will provide an estimated \$2,600,000 in additional tax income to the City (a projected economic value to the City). Finally, \$125,000 in funding for master planning was required by Resolution No. 112360. We think that even though the numbers may not have been all listed on a sheet of paper entitled "Budget," they are clearly present. Given that the City of Dallas was not aware of the requirements of the 2013 QAP at the time the Plan was initially evolving, we request that you determine that the Plan does contain a substantive budget, which may increase in the future as the Plan expands.

2. **"[T]he target area of the plan encompasses only the shopping center and the proposed housing development along with additional phases of that same development."** It is totally correct that this Plan was initiated with a request for economic support for a 2010 Housing Tax Credit application covering an 8-acre tract. However, in considering that request, the City of Dallas determined that it wanted not just an 8-acre redevelopment, but a 48-acre revitalization effort that encompassed more than merely reconstruction of existing affordable housing, as set out in the plan attached to Resolution No. 112360. Additionally, the City took the opportunity to extend the revitalization effort to include an abutting shopping area and other abutting land through its master planning process, so that a total of 130 acres is now part of the Plan. Because the Plan includes private land, the revitalization effort must be achieved through inducing the owners' cooperation. The City's vision, however, consists of "... the goal of developing an urban framework or proper zoning for the property to 1) provide an equal or greater number of affordable housing units as are now provided on the property, but in a denser more urban design in the approximate acreage set forth herein; and 2) provide the necessary zoning for the use of the remainder of the property and the Wynnewood Village shopping center in the highest and best use that is feasible."² Additionally, we point out that §11.9(d)(6)(A) does not include any requirement concerning the amount of land, or the nature of the land, that must be included in order to have a qualified community revitalization plan.

3. **"[W]hile there may be a redevelopment plan in place, the process by which the plan was developed does not meet the requirements of the QAP, which calls for the adopting municipality to perform an assessment of certain factors needing to be addressed, receive public comment on that assessment and the resulting plan, and subsequently adopt the plan as its own."** It seems to us that this is the exact situation that was contemplated by §11.9(d)(6)(A)(iv). When the Plan was put into place by

² Exhibit A to City of Dallas Resolution No. 112360 passed September 7, 2011.

Resolution No. 112360, there was no foreshadowing of the requirements of the 2013 QAP. The developers have held multiple public meetings with various neighborhood organizations (including Wynnewood North Neighborhood Association and Elmwood Neighborhood Association) and with various governmental officials. At some of these meetings it was indicated that study should be given to including the Wynnewood Village shopping center within the Plan, and the Dallas City Council approved master planning concerning expanding the Plan to include the shopping center. The two charrettes that were held by the Dallas city **designstudio** were an effort to obtain public input concerning addressing various factors in the community, including (i) reducing traffic speeds along Zang, (ii) adding new east-west streets connecting to Zang but not directly to Beckleywood, (iii) new intersections and enhancements to existing intersections on Zang, (iv) improving pedestrian accommodations, (v) using small setbacks with windows and direct access from each ground level unit to the street with stoops/porches to provide transition from public to private spaces, (vi) converting otherwise unbuildable land along the creek to the amenity of a linear park and trail network for alternative recreation and transportation opportunities, (vii) buffering existing single-family neighborhoods east and west of the target area by adjacency to lower-density residential development, (viii) enhancing shape and character of the street with parking hidden internal to buildings; and (ix) increasing density toward Zang with the higher density development generally occurring on the southern end of the target area.

This Plan has had tremendous public input, as shown on the Timeline attached. The community's recommendation for Phase II that came out of the November Charrette actually shaped the specifications for the current application, Wynnewood Family Housing. The opportunity for public comment was additionally an element of the Dallas City Council's consideration of Resolution No. 112360 and also Resolution No. 130461 that approved \$425,000 in support.

The 2013 QAP was only adopted at the November 13, 2012 Board Meeting, subject to changes to be made by Staff and approval by the Governor. Community revitalization plans in Region 3 Urban were required to be submitted for Pre-clearance not later than January 8, 2013. Given the intervening holidays and the vacation schedules of city staff and governing bodies, there was insufficient time to initiate any meaningful citizen input directly addressing the seven factors set out in §11.9(d)(6)(A)(i)(II) of the QAP. We believe, however, that had the community regarded any of those specific factors as a problem, that factor would have been addressed in previous public meetings held during the prior three years – as were the factors identified in (i) through (ix) above. The current Plan is a living document that the community and its elected representatives have been working on for more than three years now. We believe this work represents the type of depth of substantive planning that the TDHCA Board recognized is the functional equivalent—or better—of plans that address all the formal criteria set forth by the

2013 QAP, but were necessarily put together in an extremely compressed time frame. There are times when an orderly process and adherence to the exact terms of the rules are necessary to be fair to all applicants, but in this particular case, where the QAP explicitly states that the substance and meaning of a revitalization plan will be given priority over exact compliance with specific criteria, not only fairness but adherence to the rules set forth in the QAP require that the Board credit the revitalization plan under which this Applicant is working.

Accordingly, we request that the Board take note that the Plan can reasonably be expected to revitalize the neighborhood, and is replete with public input. The Plan specifies \$850,000 in funding that was provided in July 2012, another \$425,000 in funding that has been approved by Resolution No. 130461, and other funding dependent upon meeting benchmarks, as well as 2006 bond funds for infrastructure that have been earmarked for the area (see the Mayor's letter). Phase I of the Plan is currently under construction, replacing 19 residential buildings that dated from the 1940s. Nearly all of the structures within the target area date from the 1940s and 1950s and qualify as "aging" as required by §11.9(d)(6)(A)(i)(V) of the QAP.

Summary

In conclusion, we believe that although the City of Dallas may have "backed into" the Plan by first addressing only one 8-acre redevelopment project, the process ultimately led to the City's implementation of its desire to have 48 acres revitalized through a multi-phased approach. The City's Housing Department, in consultation with Council Member Scott Griggs of District 3, wrote the Plan. The Dallas City Council required that the master planning be expanded to include the Wynnewood Village Shopping Center land so that now the revitalization target area consists of approximately 130 acres. While the Plan is definitely evolving to include more than it originally encompassed, we ask you to consider the Plan in the context in which it was conceived, and agree that it "substantively and meaningfully satisfies a revitalization effort, notwithstanding a failure to fulfill one or more of the factors in this subparagraph" as required by §11.9(d)(6)(A)(iv). Exercising the right to make this determination under §11.9(d)(6)(A)(iv) is not the same thing as granting a waiver of the rules. The provisions of §11.9(d)(6)(A)(iv) specifically contemplated that there might be community revitalization plans that pre-existed the publication of the final 2013 QAP, and that such plans might be equally appropriate to qualify for points as a plan adopted using the exact language of the QAP to make sure that all the requirements were met. Wynnewood Revitalization Plan is exactly this kind of a community revitalization plan, and we ask that you recognize it as such by approving it as a qualified community revitalization plan.

Thank you for your attention to this matter.

Sincerely,

Wynnewood Family Housing, LP

By: Brian L. Roop, by permission
Brian L. Roop, Authorized Representative

Central Dallas Community Development
Corporation

By: John Greenan, by permission
John Greenan, Executive Director

Banc of America Community Development
Corporation

By: Darren W. Smith, by permission
Darren W. Smith, Senior Vice President

Enclosures: 1. Text of §11.9(d)(6)(A)(iv)
 2. Letter from Dallas Mayor Michael S. Rawlings
 3. Wynnewood Revitalization Plan Timeline

cc: Tim Irvine, Executive Director
 Cameron Dorsey, Director, Multifamily Finance
 Jean Latsha, Competitive Tax Credit Program Manager

(V) The adopted plan, taken as a whole, must be a plan that can reasonably be expected to revitalize the neighborhood and address in a substantive and meaningful way the material factors identified. Generally, because revitalization must identify specific matters needing to be addressed by revitalization and provide a plan and budget specifically directed to those identified issues, revitalization will be considered distinct and separate from broader economic development efforts. For example, staff will review the neighborhood for the presence of existing aging structures and infrastructure, and staff will review plans for evidence that the local government endeavors to address the aging nature of the structures and area through a deliberate and substantive revitalization effort. The adopted plan must specifically address how providing affordable rental housing fits into the overall plan and is a necessary component thereof. The target areas should be limited in size along the lines of specific neighborhoods rather than encompassing large areas of a city or county.

(VI) The adopted plan must describe the planned sources and uses of funds to accomplish its purposes.

(VII) To be eligible for points under this item, the community revitalization plan must already be in place as of the Pre-Application Final Delivery Date pursuant to §11.2 of this chapter (relating to Program Calendar for Competitive Housing Tax Credits) evidenced by a certification that:

- (-a-) the plan was duly adopted with the required public comment processes followed;
- (-b-) the funding and activity under the plan has already commenced; and
- (-c-) the adopting municipality or county has no reason to believe that the overall funding for the full and timely implementation of the plan will be unavailable.

(ii) Points will be awarded based on:

(I) Applications will receive (4 points) if the community revitalization plan has a total budget or projected economic value of \$6,000,000 or greater; or,

(II-) Applications will receive (2 points) if the community revitalization plan has a total budget or projected economic value of at least \$4,000,000; and,

(III) Applications may receive (2 points) in addition to those under subclauses (I) or (II) if the Development is explicitly identified by the city or county as contributing most significantly to the concerted revitalization efforts of the city or county (as applicable). A city or county may only identify one single Development during each Application Round for the additional points under this subclause. A resolution from the Governing Body of the city or county that approved the plan is required to be submitted in the Application (this resolution is not required at pre-application). If multiple Applications submit resolutions under this subclause from the same Governing Body, none of the Applications shall be eligible for the additional points. A city or county may, but is not required, to identify a particular Application as contributing most significantly to concerted revitalization efforts.

(iii) At the time of the tax credit award the site and neighborhood of any Development must conform to the Department's rules regarding unacceptable sites.

(iv) It is recognized that municipalities and counties will need to devote time and effort to adopt a concerted revitalization plan that complies with the requirements of this scoring item. Therefore, for purposes of the 2013 Application Round only, the Department's Board may, in a public meeting, determine whether a revitalization plan substantively and meaningfully satisfies a revitalization effort, notwithstanding a failure to fulfill one or more of the factors in this subparagraph. Such pre-clearance shall be prompted by a request from the Applicant pursuant to the waiver provisions in §10.207 of this title (relating to Waiver of Rules for Applications).

(B) For Developments located in Urban Areas outside of Region 3.



MICHAEL S. RAWLINGS

March 20, 2013

Texas Department of Housing
And Community Affairs
221 East 11th Street
Austin, Texas 78701

RE: Wynnewood Revitalization Plan

Dear Ladies and Gentlemen:

This is to confirm that by Resolution 112360, the City of Dallas supports a currently evolving plan for the revitalization of the Parks at Wynnewood, the Wynnewood Village Shopping Center, and a portion of the Beckleywood Neighborhood, altogether about 130 acres, for the purpose of improving affordable residential opportunities and drawing local business to provide employment opportunities. This revitalization process ties in to the City's current "Grow South" initiative, which is an effort to encourage population growth and economic development in the southern sector of the City, neighborhood by neighborhood.

Master planning is currently underway by the Dallas CityDesign Studio in furtherance of the Wynnewood Revitalization Plan, has incorporated public comments and design assistance through the use of community charettes. Two charettes have occurred thus far and have been attended by people from multiple neighborhoods in the surrounding community. As part of the master plan, the Dallas CityDesign Studio is preparing a PD zoning overlay which will be designed to provide improved structure to the redevelopment of the Wynnewood area.

The City's financial support for the Parks of Wynnewood redevelopment has thus far included \$850,000 in forgiveness of indebtedness in connection with Wynnewood Seniors Housing which took place in July 2012, and by Resolution 13-0461, the City has further approved \$425,000 in debt forgiveness for Wynnewood Family Apartments, and anticipates another approximately \$420,000 in debt forgiveness for another phase of redevelopment for the Parks at Wynnewood site. Additionally, the City has identified approximately \$4 million in 2006 bond funds available for improvements to the infrastructure surrounding the Parks at Wynnewood.

Best regards,


Michael S. Rawlings
Mayor

TIMELINE

WYNNEWOOD REVITALIZATION PLAN

GOVERNMENTAL AND PUBLIC MEETINGS HELD IN CONNECTION WITH REVITALIZATION PLAN

1. Preliminary meeting on March 4, 2009 with HUD (Don Babers, Michael Backman and others) to discuss proposed Senior Development.
2. Meeting on July 14, 2009 with Jerry Killingsworth at Dallas City Hall to discuss proposed Senior Development.
3. Meeting on December 10, 2009 with Jerry Killingsworth and Charles Brideau of the City of Dallas to discuss proposed Senior Development.
4. Meeting on February 2, 2010 with TDHCA Staff to discuss proposed Senior Development.
5. Meeting on February 4, 2010 with Joseph Hernandez, President of the Wynnewood North Neighborhood Association to discuss development plans.
6. Meeting on February 4, 2010 with Regina Foster, City of Dallas staffer who manages relocation-related matters.
7. Meeting on February 5, 2010 with County Commissioner John Wiley Price to discuss Senior Development.
8. Meeting February 9, 2010 with Council Member David Neumann to discuss Senior Development.
9. Meeting on February 17, 2010 with HUD (Ken Byrd, Sharon Gordon-Ribeiro and Angela Bell) to discuss the proposed Senior Development and the HAP Contract.
10. Meeting on March 11, 2010 with Senator Royce West in his Austin office to discuss proposed Senior Development.
11. Public Meeting on March 24, 2010 with Senator Royce West and Council Member Dave Neumann attending to discuss proposed Senior Development (meeting held at Senator West's request – Senator West subsequently provided a letter of support for the Senior Development).

12. Meeting on March 25, 2010 with Wynnewood North Neighborhood Association to discuss proposed Senior Development (Council Member David Neumann in attendance).
13. Meeting on April 7, 2010 with all interested neighborhood groups to discuss Senior Development, with meeting coordinated by Oak Cliff Conservation League.
14. Meeting on April 27, 2010 with Wynnewood North Neighborhood Association Board to discuss proposed senior Development.
15. Meeting on May 6, 2010 with Wynnewood North Neighborhood Association (Council Member Dave Neumann attending) to discuss proposed Senior Development. Vote for support of the project: 57 voting to support the Senior Development, 8 voting to not support the Senior Development. Council Member Neumann subsequently supported the Senior Development before Dallas City Council by moving to provide local political subdivision financing to the Senior Development.
16. Meeting May 19, 2010 with Elmwood Neighborhood Association (Council Member Delia Jasso attending) to discuss proposed Senior Development. At end of meeting the Association members voted overwhelmingly to support the proposed Senior Development.
17. Meeting on June 11, 2010 with Council Member David Neumann and Jerry Killingsworth to discuss proposed Senior Development.
18. Public meeting on June 14, 2010 with all interested citizens invited to discuss the proposed Section 108 financing for the Senior Development from the City of Dallas. Public notice of the meeting was published in the newspaper by the City Housing Department. Charles Brideau of the City Housing Department officiated.
19. Meeting on June 18, 2010 with County Commissioner John Wiley Price to discuss Senior Development.
20. Public hearing on February 23, 2011 to discuss the proposed amendment of the existing LURA.
21. Meeting March 25, 2011 with Charles Brideau and Bernadette Mitchell of the City Housing Department.
22. Late May through June 2011 – multiple public meetings with neighborhood organizations regarding proposed revitalization.

23. Meeting with officers of Wynnewood North Neighborhood Association on June 22, 2011.
24. June 30, 2011 meeting with First Assistant City Manager A. C. Gonzalez to discuss revitalization plan.
25. Meeting on July 20, 2011 with Wynnewood North Neighborhood Association (Council Member Scott Griggs attending).
26. Community meeting to discuss revitalization on August 31, 2011 (Council Member Scott Griggs attending).
27. Public comment opportunity at City Council Meeting on September 7, 2011, prior to adoption of Resolution No. 112360.
28. Community meeting on September 19, 2011 (Council Member Scott Griggs attending).
29. Community meeting on September 21, 2011 (Council Member Scott Griggs attending).
30. Meeting with HUD on January 11, 2012 (Ken Byrd, Kathryn Price Vaughn and Angela Bell attending).
31. Meeting on February 16, 2012 with HUD (Michael Backman attending).
32. Meeting with HUD on March 6, 2012 (Michael Reardon, Scott Bearden, Ken Byrd, Kathryn Price Vaughn, Angela Bell, Joseph Pennel and Wil'lwin Wallace attending).
33. Public Charrette held July 21, 2012 to discuss proposed revitalization.
34. Public Charrette held November 3, 2012
35. Public comment opportunity at City Council Meeting on February 27, 2013, prior to adoption of Resolution No. 130461.