

January 15, 2026

Jonathan Chilson
Asset Management
TDHCA
P.O. BOX 13941
Austin, TX 78711-3941

Re: HTC 23210 Roosevelt Lofts Waiver/Amendment Request

Dear Mr. Chilson,

This letter concerns a waiver/amendment request for HTC 23210 Roosevelt Lofts. Roosevelt Lofts is the adaptive reuse of a historic building in San Angelo. This amendment requests a waiver of the following sections of the 2023 QAP concerning Mandatory Development Amenities: Section 11.101(b)(4)(D) Screens on all operable windows and Section 11.101(b)(4)(N) Energy-Star or equivalently rated windows. An amendment fee has been sent to TDHCA.

Waiver of Mandatory Window Requirements

Originally constructed in 1929, the development was certified to receive tax credits under the Texas Historic Preservation Tax Credit program and the Federal Rehabilitation Tax Credit program. To comply with historic requirements, the renovation of the building was required to be reflective of the historic character of the building, including the installation of replacement windows.

The Texas Historical Commission and National Park Service were required to approve the replacement windows installed in the building. It was determined that the original building would not have window screens and that the windows would have had very clear glazing. The closest match found to the original windows was the Pella Reserves Traditional Single-Hung (All Wood) window, which was approved and installed in the building. However, these windows do not include screens, and they have a clear glazing that does not meet Energy Star rating requirements.

Per Section 11.101(b)(4) of the QAP, "The Board may waive one or more of the requirements of this paragraph for Developments that will include Historic Tax Credits, with evidence submitted with the request for amendment that the amenity has not been approved by the Texas Historical Commission or National Park Service, as applicable." The attached letter from the Texas Historical Commission describes the historical characteristics of the windows in the building and confirms that window screens and Energy Star rated windows were not approved to be installed at the development.

Explanation and Good Cause for the Amendment Request

The good cause for this change is to comply with historic requirements. It was unknown at the time of application that the use of window screens and Energy Star rated windows would not be approved by the Texas Historical Commission and National Park Service. This change

is necessary to maintain compliance with, and retain the benefits from, the historic tax credits. The use of these windows did not significantly impact costs.

LURA Amendment after Application Amendment

As outlined in the *Post Award Activities Manual* Updated August 2024, “There may be situations when the approval of an application amendment requires a LURA amendment as well.” The LURA for this development includes a list of Mandatory Development Amenities in Addendum D that lists Screens and Energy Star windows. Per the *Post Award Activities Manual*, we understand that after the Application amendment is approved by the Board or Executive Director, the Asset Manager will begin the process of drafting the LURA amendment as approved.

Thank you for your attention and please contact me with any questions.

Regards,



Meredith Edwards
(303) 513-0544



P.O. Box 12276
Austin, Texas 78711-2276
512-463-6100
thc.texas.gov

January 6, 2026

Attention: Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, TX 78701

Subject: Roosevelt Hotel
50 N. Chadbourne Street, San Angelo, Tom Green County

The above historic building was built in 1929 as the Rainbow Hotel, subsequently operated as the Roosevelt Hotel. This 97-year-old building operated as an anchor on the north side of downtown San Angelo for many decades, and has secured individual designation in the National Register of Historic Places. This three-story brick building was saved from destruction through this project; although heavily deteriorated, the building still retained its original design and historic significance, showing unique features such as a sculpted Mission-style front parapet and a rebuilt historic rooftop sign.

A major rehabilitation project to repair this building and convert it to housing was recently completed. The work was certified to receive tax credits under the Texas Historic Preservation Tax Credit program and the Federal Rehabilitation Tax Credit program late last year, based on successful completion of construction in compliance with program requirements. Both of these programs require projects to meet the Secretary of the Interior's *Standards for Rehabilitation (Standards)*, an analysis that was completed during construction. The TDHCA requirements for insect screens (line item 44) as well as Energy Star ratings for window units (line item 63) are of concern to our office.

In approving proposed replacement windows under the Standards for Rehabilitation, replacement windows are required to be reflective of the historic character of the building. Details and specifications of the proposed windows were carefully reviewed by our office and the National Park Service for compliance with the Standards, and the resulting window assemblies were approved, ordered, and installed, and the full project was certified. Changes to the windows at this point would damage the character of the building and would not meet the Secretary of the Interior's *Standards*, therefore threatening the project's compliance with the tax credit programs and potentially triggering recapture of the federal tax credit already earned for the entire project.

Window Screens: We have studied historic photographs depicting the hotel over time, and have concluded that there were no window screens historically present on the building. Therefore, our office's opinion is that installation of window screens would be incompatible with the character of the building.

Energy Star Rating: Priorities for approval of replacement windows under the Standards include 1) appropriate proportions, profiles, and materials of the window frames, in order to be as close as possible to historic designs, and 2) very clear glazing (Visible Light Transmittance in excess of 70% and Visible Light Reflectance under 11%). These window requirements for the tax credit program were not achievable in an Energy Star rated product.

In summation, our office does not approve window screens nor Energy Star windows for this historic building, and we support the applicant in their request that TDHCA waive these requirements for this project.

Sincerely,

Valerie Magolan
Tax Credit Program Coordinator, Division of Architecture, Texas Historical Commission
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