



November 19, 2025

Mr. Rosalio Banuelos,
Director of Asset Management
Texas Department of Housing and Community Affairs ("TDHCA")
221 E 11th Street
Austin, Texas 78701
Via Email: rosalio.banuelos@tdhca.state.tx.us

RE: TDHCA Application #22135 (CMTS 5915) – Red Oaks – Material Amendment Request

Dear Mr. Banuelos,

On behalf of HTG ANDERSON, LLC (the "Owner"), a Texas limited liability company, please accept this correspondence as our formal request for approval of a material amendment, pursuant to §10.405(a)(4) of the 2022 Qualified Allocation Plan ("QAP") for TDHCA#22135, Red Oaks (the "Development"). The Owner respectfully requests TDHCA approval in order to formally change (1) the bedroom mix, (2) the architectural design/layout and (3) the amount of Common Area in the Development.

Revising the bedroom mix, architectural design/layout and optimizing the Common Area space results in a more efficient design framework that enhances overall livability, minimizes unnecessary construction expenditures, and introduces amenities that deliver measurable value and improved comfort for residents.

Change to Bedroom Mix:

Located in Austin, Texas, the Development intends to serve the general population and comprises of seventy (70) efficiency, one, two and three-bedroom units. The Owner submitted an application to TDHCA in February 2022 for the 2022 Housing Tax Credit application cycle that included a bedroom mix of:

# of Bedrooms	# of Baths	# of Units
0	1	10
1	1	25
2	2	27
3	2	8
Total Units:		70 units

After further review of the submarket and demographics that the Development intends to serve, the Owner believes that the Development would greatly benefit from the following minor change

to the bedroom mix which includes reducing studios and one-bedrooms by one unit each while increasing two- and three-bedrooms by one unit each:

# of Bedrooms	# of Baths	# of Units
0	1	9
1	1	24
2	2	28
3	2	9
Total Units:		70 units

The updated bedroom mix reflects and aligns with current demographics and demand in the submarket. While not proposing a significant change to the bedroom mix, local population growth, particularly among families and multi-person households, has increased the need for larger units. This is particularly true and relevant in suburban, family-oriented areas such as Anderson Mill and Northwest Austin. Market studies indicate that two- and three-bedroom units are leasing at a faster pace and provide greater flexibility for shared living arrangements, which is critical in a market where housing costs remain elevated. Within 1-, 3- and 5-mile radii of the property, the average household size is 2.4 persons, further highlighting this trend. Additionally, given the softening in the Austin rental market due to oversupply, the Owner aims to ensure that the Development once completed will be competitive not only amongst rent-restricted affordable housing communities, but also relative to non-restricted market-rate properties. For reference, the studio and one-bedroom restricted rents are closest in difference to the non-restricted market-rate rents whereas two- and three-bedroom units have a larger differential. This ensures these units are more affordable, attractive and accessible relative to the supply in submarket.

This adjustment to the bedroom mix ensures the Development remains competitive, responsive to community needs, and financially sustainable. It does not change the total unit count and instead improves the overall livability and appeal of the Development for the target population.

The Owner as evidence of this revised bedroom mix has attached Exhibits A-C herein as supporting documentation.

Change to Architectural Design:

Following the award of Tax Credits, the Owner engaged a new architect to refine the building design and elevation while remaining within the framework of the approved application. After a comprehensive review of the plans included in the TDHCA application, the new architect recommended strategic modifications to the site plan to address critical factors impacting marketability, cost efficiency, and site constraints. Key revisions included:

1. **The addition of private balconies** to enhance marketability and competitiveness with nearby market-rate communities in light of a softening rental market in Austin;

2. **The reduction of interior corridor space** to eliminate unnecessary construction costs and improve overall efficiency;
3. **The adaptation to site conditions**, including an 18-foot gradual slope across the property, which presented drainage and elevation challenges. To maintain ADA accessibility and avoid excessive fill costs, the design incorporated a split-slab foundation solution;
4. **The transition to double-loaded corridors** to improve circulation efficiency and replace exterior corridors with fully interior corridors featuring open breezeways;
5. **Architectural enhancements to the elevation**, including a pitched shingle roof, fiber cement siding, and stone veneer, to complement the surrounding single-family neighborhood; and
6. **Increased setback from adjacent single-family homes** to provide greater privacy and minimize potential impacts on neighboring properties.

These revisions were essential to ensure long-term viability, resident satisfaction, and neighborhood compatibility. The updated design reflects a deliberate effort to balance program compliance with practical considerations of market demand, accessibility, and cost management, ultimately delivering a development that is both sustainable and responsive to community needs.

The Owner as evidence of this revised architectural design has attached Exhibits B, D & E herein as supporting documentation.

Change to Common Area:

The Owner's application to TDHCA in February 2022 for the 2022 Housing Tax Credit application cycle included 3,975 of Common Area Square Footage, as certified in the applications Architect Certification form. On July 25, 2022, the Owner responded to administrative deficiency items issued by TDHCA related to its application. As a part of its response, the Owner provided an updated Architect Certification form reflecting an updated Common Area calculation of 22,173 square feet. This adjustment accounted for interior corridors and a workroom that were not included in the initial calculation, resulting in a 458% increase from the original figure.

As mentioned above, following the award of Tax Credits, the Owner engaged a new architect to refine the building design and elevation while remaining within the framework of the approved application. After studying the proposed layout and floorplans, the Architect recommended that the site plan be modified to primarily reduce the inefficient interior corridor space. The original design included excessive open areas at corridor turns, which would have significantly increased construction costs without adding value to the Development or its residents. The redesign reduced corridor space by 6,324 square feet, lowering costs considerably while maintaining functionality. This revision primarily explains the variance between the information submitted to TDHCA in response to the administrative deficiency and the final design being constructed today. Even with this reduction, the revised Common Area square footage as proposed still remains a 294% increase over what was originally presented in its application.

For reference, below is a side-by-side comparison of the Common Area square footage at each of the different stages:

Area	TDCHA Common Area – per App	TDCHA Common Area – per App (after revising for Admin. Deficiency)	TDCHA Common Area – per this Material Amendment Request
Business Center	512 SF	512 SF	0 SF*
Fitness Center	691 SF	691 SF	608 SF
Interior Corridor	0 SF	18,198 SF	11,874 SF
Laundry	403 SF	403 SF	0 SF**
Leasing Lobby	434 SF	434 SF	582 SF
Lounge	188 SF	188 SF	1,040 SF
Pool Clubhouse	947 SF	947 SF	899 SF
Restroom	277 SF	277 SF	363 SF
Meeting Room	132 SF	132 SF	0 SF*
Office	280 SF	280 SF	0 SF*
Workroom	0 SF	113 SF	0 SF*
Dog Washroom	0 SF	0 SF	80 SF
Mail/Packages	0 SF	0 SF	215 SF
Total	3,975 SF	22,173 SF	15,661 SF

- * = included within Pool Clubhouse
- ** = included within each of the residential units

By optimizing corridor space, the Owner not only improved design efficiency but also reinvested the resulting cost savings into resident-focused amenities that enhance quality of life and promote community engagement. While these features do not meet the QAP definition of Common Area space, they represent substantial value-added improvements accessible to all residents, including: a dog park, playground, outdoor kitchen island with BBQ grill and lounge seating, bicycle storage, storage closets, EV charging stations, and perimeter site fencing. These enhancements align with QAP objectives by fostering livability, sustainability, and resident well-being.

Additionally, essential functional spaces that were previously included such as the Business Center, Meeting Room, Office, and Workroom were preserved through a thoughtful consolidation strategy. These areas have been integrated into the Pool Clubhouse, which now includes a glass-enclosed workspace designed to support collaborative activities and private meetings, ensuring residents retain access to critical resources for work and community interaction. The Laundry Room was removed following consultation with our property management company, who confirmed that residents in this submarket overwhelmingly prefer the convenience and option of having in-unit washer and dryer installations. This design decision reflects a resident-centric approach and aligns with market expectations, further strengthening the Development's compliance with QAP goals of providing modern, desirable housing solutions.

These enhancements underscore the Owner's strategic commitment to creating a thoughtfully designed, high-quality residential environment that prioritizes functionality, convenience, and community engagement.

The Owner as evidence of this reduction to its Common Area space has attached Exhibits E-F herein as supporting documentation.

Conclusion:

Pursuant to section 10.405(a)(4) of the 2022 Asset Management Rules, the Owner respectfully requests TDHCA approval of this material amendment request in order to formally change the bedroom mix, architectural design/layout and the amount of Common Area in the Development.

The Owner further affirms to TDHCA that neither of these changes would negatively impact application scoring.

If staff has any questions, please contact Matthew Rieger or Mauricio Teran via email at operationalcontact_tx@htgf.com or via phone at 305-860-8188.

Sincerely,

HTG ANDERSON LLC,
a Texas limited liability company

By: HTG ANDERSON MEMBER, LLC,
a Florida limited liability company,
its managing member

By: _____
Matthew Rieger, Manager

Enclosure

GENERAL CODE PARAMETERS (IBC 2021)

ENERGY CONSERVATION REQUIREMENTS (IBC 2021 - ZONE 2A)

PK

ARCHITECTURE

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CONCLUDE

ISSUE HISTORY

No.	Date	Description
	02/19/2024	Permit Set

REVISION HISTORY

No.	Date	Description
1	03/11/2024	Cycle 2 - Permit Comments
4	12/12/2024	Mechanical & Owner Changes

DRAWN: A. HENSON
CHECKED: J. KIMBLE

HIGH - RED OAKS

A003A.DWG

Drawn:

Checked:

Approved:

Date:

Project #:

12/27/2024

550

CODE ANALYSIS

A0.03

EXHIBIT "B"



GENERAL NOTES:

1. SEE THE PLAN FOR PARKING SUMMARY.
2. THE SITE PLAN FOR ARCHITECTURAL INFORMATION SHALL BE USED TO LOCATE EXISTING AND PROPOSED STRUCTURES AND TO LOCATE THE PROPOSED IMPROVEMENTS.
3. SEE THE LANDSCAPE ARCHITECT'S PLAN FOR THE PROPOSED LANDSCAPE, PLANTING, AND SOILS TO BE IMPROVED.
4. THE BUILDING POOLS SHOWN ON THE DRAWINGS ARE PROVIDED FOR GENERAL INFORMATION ONLY. THE POOLS ARE NOT TO BE CONSIDERED AS A REQUIREMENT TO PROVIDE POOLS FOR ALL UNITS. THE POOLS ARE NOT TO BE CONSIDERED AS A REQUIREMENT TO PROVIDE POOLS FOR ALL UNITS. THE POOLS ARE NOT TO BE CONSIDERED AS A REQUIREMENT TO PROVIDE POOLS FOR ALL UNITS.

LEGEND:

- HTG - INTER-CENTER, APPROX 300' MAP LONG PER SEC
- DEGRADED ACCESSIBLE LOT
- DEGRADED HEAVY DUTY LOT, IMPROVED LOT

ISSUE HISTORY

No.	Date	Description
1	01/10/2011	REVIEW SET

REVISION HISTORY

No.	Date	Description
0	04/10/2011	1.5 & R1, 25 Changes

No.	Date	Description
1	04/10/2011	1.5 & R1, 25 Changes
2	04/10/2011	1.5 & R1, 25 Changes
3	04/10/2011	1.5 & R1, 25 Changes
4	04/10/2011	1.5 & R1, 25 Changes
5	04/10/2011	1.5 & R1, 25 Changes
6	04/10/2011	1.5 & R1, 25 Changes
7	04/10/2011	1.5 & R1, 25 Changes
8	04/10/2011	1.5 & R1, 25 Changes
9	04/10/2011	1.5 & R1, 25 Changes
10	04/10/2011	1.5 & R1, 25 Changes
11	04/10/2011	1.5 & R1, 25 Changes
12	04/10/2011	1.5 & R1, 25 Changes
13	04/10/2011	1.5 & R1, 25 Changes
14	04/10/2011	1.5 & R1, 25 Changes
15	04/10/2011	1.5 & R1, 25 Changes
16	04/10/2011	1.5 & R1, 25 Changes
17	04/10/2011	1.5 & R1, 25 Changes
18	04/10/2011	1.5 & R1, 25 Changes
19	04/10/2011	1.5 & R1, 25 Changes
20	04/10/2011	1.5 & R1, 25 Changes
21	04/10/2011	1.5 & R1, 25 Changes
22	04/10/2011	1.5 & R1, 25 Changes
23	04/10/2011	1.5 & R1, 25 Changes
24	04/10/2011	1.5 & R1, 25 Changes
25	04/10/2011	1.5 & R1, 25 Changes
26	04/10/2011	1.5 & R1, 25 Changes
27	04/10/2011	1.5 & R1, 25 Changes
28	04/10/2011	1.5 & R1, 25 Changes
29	04/10/2011	1.5 & R1, 25 Changes
30	04/10/2011	1.5 & R1, 25 Changes
31	04/10/2011	1.5 & R1, 25 Changes
32	04/10/2011	1.5 & R1, 25 Changes
33	04/10/2011	1.5 & R1, 25 Changes
34	04/10/2011	1.5 & R1, 25 Changes
35	04/10/2011	1.5 & R1, 25 Changes
36	04/10/2011	1.5 & R1, 25 Changes
37	04/10/2011	1.5 & R1, 25 Changes
38	04/10/2011	1.5 & R1, 25 Changes
39	04/10/2011	1.5 & R1, 25 Changes
40	04/10/2011	1.5 & R1, 25 Changes
41	04/10/2011	1.5 & R1, 25 Changes
42	04/10/2011	1.5 & R1, 25 Changes
43	04/10/2011	1.5 & R1, 25 Changes
44	04/10/2011	1.5 & R1, 25 Changes
45	04/10/2011	1.5 & R1, 25 Changes
46	04/10/2011	1.5 & R1, 25 Changes
47	04/10/2011	1.5 & R1, 25 Changes
48	04/10/2011	1.5 & R1, 25 Changes
49	04/10/2011	1.5 & R1, 25 Changes
50	04/10/2011	1.5 & R1, 25 Changes

Drawn by: [Name] Checked by: [Name] Approved by: [Name]

HTG - RED OAKS

Drawn	Checked	Approved
[Name]	[Name]	[Name]
Date	Project	
01/10/2011	HTG - RED OAKS	

ARCHITECTURAL SITE PLAN

A1.01

K1 ARCHITECTURAL SITE PLAN



A4.01

A4.01

1 2 3 4 5 6 7 8 9 10 11 12

EXHIBIT D

E1 CLUBHOUSE PERSPECTIVE

E5 WEST AXONOMETRIC

K5 EAST AXONOMETRIC

The image displays three architectural drawings of a clubhouse building. The top left drawing is a perspective view of the clubhouse, showing a multi-story building with a central entrance and a covered outdoor area. The top right drawing is a west axonometric view of the building, showing its long profile and multiple gabled roof sections. The bottom drawing is an east axonometric view, showing the building from a different angle. The drawings are labeled E1, E5, and K5 respectively. The drawing is titled 'EXHIBIT D' and is located on a grid with horizontal and vertical axes labeled 1 through 12.

[illegible]

H FOR
REFERENCE
ONLY

AUSTIN, TX

BUILDING AXONOMETRICS

A4.10

Engineer/Architect Certification

I (We) certify that the Development will be designed and built to meet the accessibility requirements of the Federal Fair Housing Act as implemented by HUD at 24 CFR Part 100 and the Fair Housing Act Design Manual, Titles II and III of the Americans with Disabilities Act (42 U.S.C. Sections 12131-12189) as implemented by the Department of Justice regulations at 28 CFR Parts 35 and 36, and the Department's Accessibility rules in 10 TAC Chapter 1, Subchapter B, in effect at the time of certification.

I (we) certify that all materials submitted to the Department by the Architect or Applicant constitute records of the Department subject to Chapter 552, Tex. Gov't Code, and the Texas Public Information Act.

I (We) certify that in accordance with Section 504 of the Rehabilitation Act of 1973 and implemented at 24 CFR. Part 8, if the Development includes the New Construction or substantial rehabilitation of multifamily units (4 or more units), at least five percent (5%) of all dwelling units will be designed and built to be accessible for persons with mobility impairments. A unit that is on an accessible route and is adaptable and otherwise compliant with the 2010 ADA Standards with the exceptions listed in "Nondiscrimination on the Basis of Disability in Federally Assisted Programs and Activities" (Federal Register 79 FR 29671) meets this requirement. In addition, at least two percent (2%) of all dwelling units will be designed and built to be accessible for persons with hearing or vision impairments.

I (We) certify that the requirements of Section 504 of the Rehabilitation Act of 1973 and implemented at 24 CFR. Part 8 and Tex. Gov't Code §§2306.6722 and 2306.6730, will be met as described in 10 TAC Chapter 1, Subchapter B, including the accessibility requirements relating to Unit Type distribution.

I (We) certify that I (We) have reviewed and understand the Department's fair housing educational materials posted on the Department's website as of the beginning of the Application Acceptance Period.

I (We) acknowledge that the Department may publish the full Development Plan on the Department's website, release the Development Plan in response to a request for public information and make other use of the Development Plan as authorized by law.

I (We) certify that if the Development includes the New Construction or Rehabilitation of single family units (1 to 3 units per building), every unit will be designed and built to meet the accessibility requirements of Tex. Gov't Code §2306.514, as it may be amended from time to time.

I (We) have attached a statement describing how, regardless of building type, all Units accessed by the ground floor or by elevator (affected units) meet the visitability requirements at 10 TAC §11.101(b)(8)(B), or the Applicant has requested a waiver of specific provisions of the visitability requirements at 10 TAC §11.101(b)(8)(B) as necessary for Rehabilitation Developments.

EXHIBIT "F"


2022 Engineer/Architect Certification

I (We) certify that all accessible Units under 10 TAC Chapter 1, Subchapter B will be dispersed throughout the Development.

If the Applicant is applying for Multifamily Direct Loan funds, I (We) further certify that the Development meets the Property Standards in 24 CFR §92.251 or 24 CFR §93.301 and as further outlined in 10 TAC Chapters 11 and 13, as applicable.

If the Applicant is applying for Housing Tax Credits, Tex. Gov't Code §2306.6712(d)(4) requires that the board by vote approve or reject an amendment that would result in a reduction of three percent (3%) or more in the square footage of the units or common areas. I (We) certify that the net rentable square footage as defined by 10 TAC §11.1(d)(82) of the Development is 57,804 square feet, and the common area square footage as defined by 10 TAC §11.1(d)(22) is 15,661 square feet. This certification will be applied for square footage comparison at Cost Certification, unless the application is amended prior to Cost Certification.

This certification meets the requirement that the Applicant provide a certification from the Development engineer or an accredited architect after careful review of the Department's accessibility requirements, including Tex. Gov't Code §§2306.6722 and 2306.6730.

By: 

Signature

November 18, 2025

Date

Edward Hunton

Printed Name of Architect or Engineer

TX 28761

License Number and State

Fugleberg Koch, LLC

Firm Name (If applicable)