

EVANS MCNEILL INVESTMENTS, LLC

1515 Mockingbird Lane, Suite 410
Charlotte NC 28209

October 3, 2025

Rosalio Banuelos
Director of Asset Manager
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

Re: 24136 Moore Grocery Lofts
§11.207. Waiver of Rules
§11.101(b)(4) Mandatory Development Amenities

Mr. Banuelos:

Moore Grocery Lofts, located in the City of Tyler, Smith County, received an allocation of 2024 competitive housing tax credits for rehabilitation of 88 units housed in four buildings. Two of the buildings are historic structures that will benefit from the sale of state and federal historic tax credits. Specific requirements must be met in the rehabilitation plan to qualify for the historic tax credits.



In accordance with §11.207 of the 2024 Qualified Allocation Plan (QAP), we respectfully request staff recommendation for Board approval of waiver of

§11.101(b)(4) Mandatory Development Amenities

(D) Screens on all operable windows; and

(N) Energy-Star or equivalently rated windows (for Rehabilitation Developments, only if windows are planned to be replaced as part of the scope of work);

This waiver request is specific to the two historic buildings. The two non-historic buildings will meet the requirements of §11.101(b)(4) (D) and (N).

§11.101(b)(4)(D) Screens on all operable windows

A letter from the Texas Historical Commission (THC) stating the two historic buildings are subject to the Secretary of the Interior's Standards for Rehabilitation has been requested and will be forwarded. The letter will indicate THC will not approve the installation of window screens, supporting our request for waiver of the requirement for screens on all operable windows for the two historic buildings.

§11.101(b)(4)(N) Energy-Star or equivalently rated windows

The development team plans to include replacement of all (100%) of the windows in the historic buildings in the scope of rehabilitation. The replacement windows must match the size, design, proportions, profiles, and appearance of the existing historic windows, and must feature clear glazing. In order to meet these requirements, the windows will be custom-made. The existing 100+ historic windows are single pane glass and constructed of wood.

It has been difficult to identify and contract with a window manufacturer that can meet the timing constraints associated with a competitive housing tax credit allocation. The recommended manufacturer with products previously approved by THC and the National Parks Service (NPS), and able to deliver the windows in a timely manner to meet our placed in service deadline, is Quaker Windows. The U-Factor for their windows do not meet the minimum requirement for equivalency with Energy Star standards for Smith County, which is in the South-Central Climate Zone (energystar.gov). The lowest U Factor that Quaker Historic Replica Window Products offers is 0.29, while the maximum allowed to meet Energy Star requirements for the South-Central Climate Zone is 0.28.



Report No.: QCT-SIM-12271.02
Project Name: H650/655 Single Hung
Manufacturer: Quaker Window Products

Revision Date: 04/05/24

NFRC PRODUCT LINE SUMMARY

ID	Description	Glass Thickness (in)	Gap Width (in)	Gap Fill	Emissivity (Surface #)	Tint	Spacer	Divider	U-Factor (Btu/h·ft ² ·°F)	No Divider		Divider < 1"		Divider ≥ 1"		CR
										SHGC	VT	SHGC	VT	SHGC	VT	
219	Extended Frame Reinforced - with Insulation 3mm 366 AIR 3mm 189-1" IG	0.118,0.117	0.778	AIR	0.02(#2)0.149(#4)	CL	SS-D	N,G,S	0.31	0.20	0.45	0.18	0.40	0.17	0.35	46
220	Extended Frame Reinforced - with Insulation 3mm 272 AIR 3mm 189-1" IG	0.117,0.117	0.778	AIR	0.042(#2)0.149(#4)	CL	SS-D	N,G,S	0.31	0.30	0.50	0.27	0.45	0.24	0.39	45
221	Extended Frame Reinforced - with Insulation 3mm 366 ARG 3mm CL-1" IG	0.118,0.118	0.778	ARG 90	0.02(#2)	CL	SS-D	N,G,S	0.32	0.21	0.46	0.19	0.41	0.17	0.36	59
	Extended Frame Reinforced - with Insulation 3mm BZ ARG 366 3mm-1" IG	0.129,0.118	0.778	ARG 90	0.02(#3)	BZ	SS-D	N,G,S	0.32	0.23	0.34	0.21	0.30	0.19	0.27	59
	Extended Frame Reinforced - with Insulation 3mm GY ARG 366 3mm-1" IG	0.129,0.118	0.778	ARG 90	0.02(#3)	GY	SS-D	N,G,S	0.32	0.22	0.31	0.20	0.27	0.18	0.24	59
222	Extended Frame Reinforced - with Insulation 3mm 272 ARG 3mm CL-1" IG	0.117,0.118	0.778	ARG 90	0.042(#2)	CL	SS-D	N,G,S	0.33	0.31	0.52	0.28	0.46	0.25	0.40	58
	Extended Frame Reinforced - with Insulation 3mm BZ ARG 272 3mm-1" IG	0.129,0.117	0.778	ARG 90	0.042(#3)	BZ	SS-D	N,G,S	0.33	0.29	0.38	0.26	0.34	0.24	0.30	58
	Extended Frame Reinforced - with Insulation 3mm GY ARG 272 3mm-1" IG	0.129,0.117	0.778	ARG 90	0.042(#3)	GY	SS-D	N,G,S	0.33	0.27	0.34	0.25	0.30	0.22	0.27	58
223	Extended Frame Reinforced - with Insulation 3mm 366 ARG 3mm 189-1" IG	0.118,0.117	0.778	ARG 90	0.02(#2)0.149(#4)	CL	SS-D	N,G,S	0.29	0.20	0.45	0.18	0.40	0.17	0.35	49
224	Extended Frame Reinforced - with Insulation 3mm 272 ARG 3mm 189-1" IG	0.117,0.117	0.778	ARG 90	0.042(#2)0.149(#4)	CL	SS-D	N,G,S	0.29	0.30	0.50	0.27	0.45	0.24	0.39	48

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Information About Your Climate Zone

Smith County, Texas is located in the **South-Central Climate Zone**. When shopping for ENERGY STAR certified windows:

South-Central Climate Zone Window Criteria

WINDOWS

Climate Zone	U-Factor ¹	SHGC ²
South-Central	≤ 0.28	≤ 0.23

¹ Btu/h·ft²·°F

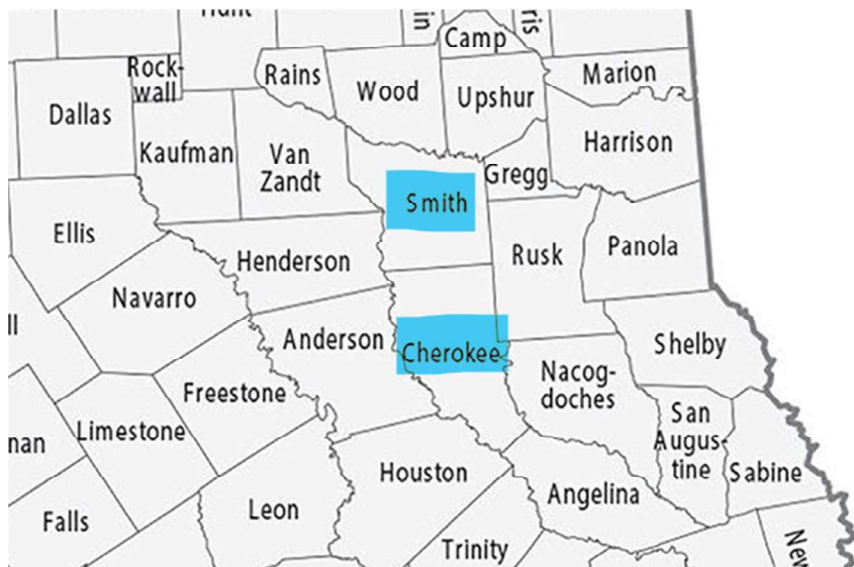
² Solar Heat Gain Coefficient

WINDOWS (Most Efficient Criteria*)

Climate Zone	U-Factor ¹	SHGC ²
South-Central	≤ 0.20	≤ 0.23

*Products must meet this criteria to be eligible for federal tax credits.

Of note, the southern border of Smith County is also the southern border of the South-Central Climate Zone. Cherokee County, which is immediately south of Smith County and in the Southern Climate Zone has a rating of 0.32. Several of Quaker Windows products meet the equivalency test for Energy Star requirements for Cherokee County.



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Information About Your Climate Zone

Cherokee County, Texas is located in the **Southern Climate Zone**. When shopping for ENERGY STAR certified windows:

Southern Climate Zone Window Criteria

WINDOWS

Climate Zone	U-Factor ¹	SHGC ²
Southern	≤ 0.32	≤ 0.23

¹ Btu/h·ft²·°F

² Solar Heat Gain Coefficient

WINDOWS (Most Efficient Criteria*)

Climate Zone	U-Factor ¹	SHGC ²
Southern	≤ 0.21 = 0.22	≤ 0.23 ≤ 0.21

*Products must meet this criteria to be eligible for federal tax credits.

We request waiver of the requirement for “Energy-Star or equivalently rated windows” for the two historic buildings. An alternative to a full waiver would be to apply the standards for the Southern Climate Zone (energystar.gov) when testing for equivalency of the windows.

Due to timing constraints, we are requesting presentation for Board consideration at the November meeting. If you need additional information, please reach out to Lisa Vecchietti at (512) 627-8062 or by email at lisavecchietti@evansmcneill.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Brannon Fitch". The signature is stylized with a large "B" and "F".

Brannon Fitch

Evans McNeill Investments, LLC