



April 24, 2025

Mr. Cody Campbell
Director of Multifamily Finance
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, TX 78701

RE: The Commons at St. Anthony's (TDHCA #20042/21706/22801), Amarillo, Potter County

Dear Mr. Campbell,

I am writing on behalf of KRS Housing and our development team to respectfully request a 6-month extension to the current June 30, 2025 Placed in Service (PIS) deadline for The Commons at St. Anthony's.

This request is based on a continuation of similar extraordinary and unforeseeable circumstances that warranted our previously approved Force Majeure extensions. These circumstances, which began during the height of the COVID-19 pandemic and its resulting impacts on the construction market, have compounded through 2024 and into 2025, creating further unavoidable delays despite our continued diligence and problem-solving efforts.

Project Background and Previous Approvals:

- The Commons at St. Anthony's was awarded 9% Housing Tax Credits in 2020 and received a Force Majeure extension from TDHCA in September 2021, extending the PIS deadline to December 31, 2023.
- In 2021, the development was also awarded \$2,000,000 in National Housing Trust Fund (NHTF) dollars and subsequently received \$1,550,000 in ARPA funds from Potter County and the City of Amarillo.
- Rising construction costs and supply chain challenges led to an additional Force Majeure extension being approved in April 2022, extending the PIS deadline to December 31, 2024.
- Continued rising construction costs and supply chain challenges led to yet another Force Majeure extension being approved in September of 2024, extending the PIS deadline to June 30, 2025.

Despite this support and progress, the project has continued to face severe labor shortages, materials procurement issues, and regulatory-driven modifications that have added significant delays to our construction timeline.

Summary of Ongoing and Recent Delays:

From late 2024 into 2025, the project has been impacted by the following additional issues:

- Replacement of roofing, masonry, finish carpentry, plumbing, fire protection, and site utility contractors due to manpower shortages.
- Delayed delivery of major materials including storefronts (May 2025), electrical gear and fixtures (January 2025), generator (April 2025), and elevator equipment (September 2025).
- Structural modifications and conflicts requiring redesigns of unit layouts, MEP rough-ins, and wall rating compliance from November 2024 through March 2025.
- Amarillo Building Department requirements have necessitated rooftop electrical changes and HVAC modifications utilizing existing elevator cores.
- Theft and vandalism at the construction site, contributing to material and scheduling setbacks.
- City-required demolition and replacement of deteriorated sidewalks and curbs at the Polk Street lot.
- Additional construction delays directly tied to switch gear installation, testing of MEP systems, and coordination of phased building turnovers (Buildings A, B, C), now extending the schedule by 4+ months.
- Please see attached **Exhibit A** for a current construction schedule to get us to completion in December 2025.
- Please see **Exhibit B** for a more detailed list of delays along with what is mentioned above.
- In response to these continued delays, ownership has employed a secondary local general contractor to help oversee the construction and schedule to ensure completion by December 2025.

All told, these events have created a cascading impact that now necessitates a further extension of six (6) months, moving the Placed in Service deadline to December 31, 2025.

None of the delays experienced on the project have stemmed from willful negligence by the Owner. We have submitted extensive evidence documenting the Force Majeure events that have impacted the project timeline to date. In response, the Owner has pursued every reasonable mitigation strategy available, including the replacement of subcontractors, securing local funding, reworking project schedules, and implementing daily site management to maintain progress. Despite these efforts, without the requested extension, the project will not be able to meet its June 30, 2025, Placed-in-Service (PIS) deadline, which would jeopardize the tax credits and threaten the overall financial viability of the development. Guaranteeing the extension is critical to preserving the project's tax credit equity and avoiding recapture. The development is currently 78% complete, and this modest extension will provide the necessary time to reach full completion and undergo final inspection.

Community and State Support:

As noted in our previous submissions (**see Exhibit C**), this project continues to have the support of numerous community leaders and elected officials, including State Representative John Smithee, Senator Kevin Sparks, Mayor Stanley, and Potter County Judge Nancy Tanner. The Commons at St. Anthony's is a transformational, preservation-based development in the North Heights Neighborhood and repurposes the historic St. Anthony's Hospital into much-needed affordable housing.

We remain committed to completing this project with the highest standards and delivering on our promises to the community and funding partners. This request represents our sincere effort to align with the spirit and letter of the QAP while navigating a uniquely challenging development environment. We respectfully ask for your approval of this Placed in Service extension to December 31, 2025. Please do not hesitate to reach out to me directly at 512-925-9200 should you have any questions or require further documentation.

Sincerely,

A handwritten signature in black ink that reads "Kent Hance". The signature is fluid and cursive, with the first and last names being clearly legible.

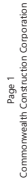
Representative of St. Anthony's Amarillo Housing 20, LP

The Honorable Kent Hance

KRS Housing LLC, Managing Member

khance@hslawmail.com

Cc: Bobby Wilkinson (via email)
Cody Campbell (via email)
Kent Hance (via email)
Dan Kroetz (via email)
Jennifer Hicks (via email)



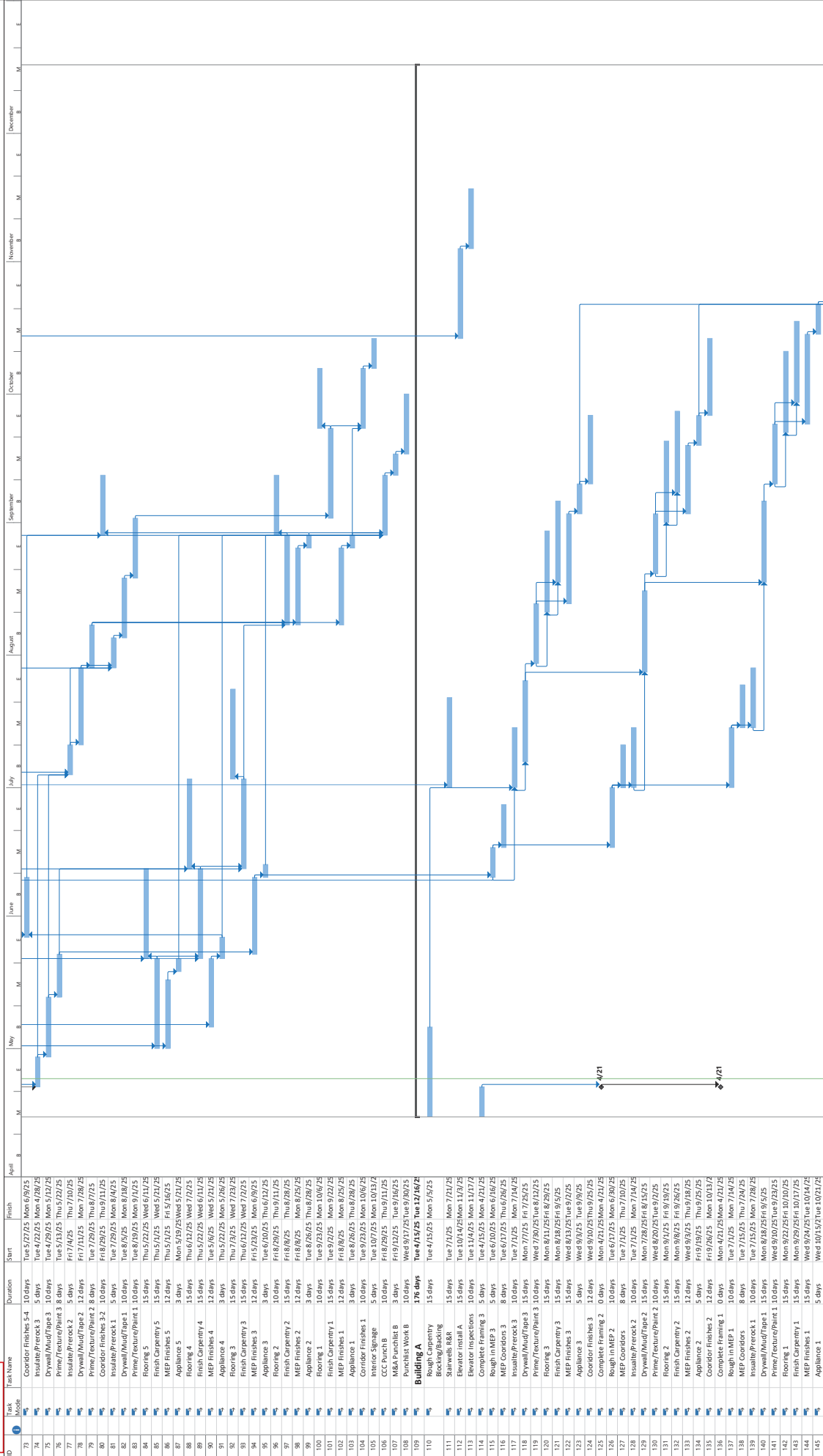
Commons At St. Anthony's
Construction Finish Schedule

Exhibit A

ID	Task Name	Duration	Start	Finish	May	June	July	August	September	October	November	December
146	Coordinate Finishes 1	12 days	Wed 10/2/25	Thu 11/16/25								
147	Final Inspections	20 days	Fri 11/16/25	Tue 12/9/25								
148	CCC Punch A	10 days	Wed 11/19/25	Tue 12/16/25								
149	M&A Punch A	3 days	Wed 11/19/25	Tue 11/18/25								
150	PunchList Work	10 days	Wed 11/19/25	Fri 11/21/25								
151	Submittal Review	0 days	Wed 11/19/25	Tue 12/2/25								
152	Closure/Post-CO	0 days	Wed 12/16/25	Tue 12/16/25								



TDHCA Meeting

Project: 20-137-0 Commons at St. Anthony's
200 NW 7th Ave.
Amarillo TX, 79107

STA Delay Recap

MEETING DATE: 4/24/25

PROJECT DELAYS

- Original Roofer was replaced in December 2024 to complete dry in and roof penetrations.
- Roof drain alignment due to structural conflicts and unit layout December 2024 to March 2025
- Requirements per Amarillo Building department on roof top electrical requirements for Mechanical December 2024-January 2025
- Electrical gear package delayed arrival to January 2025
- Generator delayed arrival to April 2025
- Replacement of Finish Carpentry due to manpower issues March 2025.
- Replacement of masonry contractor January 2025 to complete ongoing work.
- Delay in storefront delivery for Buildings A,B,C; not due to arrive until end of May 2025.
- Modifications to MEP rough in for inconsistent existing structural members from floor to floor in all buildings. This required new unit layouts and review by building department. November 2024 to March 2025.
- Coordination/modifications for using existing elevator cores for HVAC to meet Amarillo Building department requirements.
- Dealing with intermittent theft/vandalism on the project.
- Hidden/unknown structural conflicts for MEP rough in below grade in buildings B,C.
- Electrical fixture package arrival January 2025.
- Elevator material delay to September 2025 (one month install and one month to coordinate inspections)
- Sourcing/replacing original finish flooring material for discontinued product.
- Coordination of modifications of structure to meet required wall ratings throughout for Compliance.
- Original Fire protection contractor was replaced April 2025 due to manpower issues.
- Replacing site Utility Fire line contractor May 2025
- Modification of installed Fire protection work to comply with required ceiling heights.
- March 2025 Plumbing contractor needed to be augmented on the rough in due to manpower issues.
- Removal of existing to remain sidewalk and curb at the Polk street lot due to state of disrepair.
- Overall impact of above listed items has compounded to an additional 6 months of construction duration do a December 2025.