



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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April 1, 2025

Writer's direct dial: 512-475-1676
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John Hoffer
1090 Vermont Ave. NW
Suite 400
Washington, DC, 20005

RE: Termination of Trinity East Senior (TDHCA #25090)

Mr. Hoffer

The Texas Department of Housing and Community Affairs (Department) received the Application named above on February 28, 2025. The Application was submitted to compete within the Urban 6 subregion and requests \$2,000,000 in Competitive Housing Tax Credits for the new construction of 90 affordable units in Houston, Texas.

10 TAC §11.101(a)(3)(D)(ii) identifies certain Neighborhood Risk Factors that may render a proposed development site ineligible, including sites located in a census tract where the rate of Part I violent crime exceeds 18 per 1,000 persons annually, as reported on NeighborhoodScout.com. The Application's Neighborhood Risk Factor Mitigation Package acknowledges that the site is in such a high-crime census tract.

To be considered eligible under this section of the Qualified Allocation Plan (QAP), mitigation must demonstrate either (a) a reasonable expectation that crime rates will fall below the threshold within two years, supported by sufficient evidence and analysis, or (b) that the data reported by NeighborhoodScout does not accurately reflect crime in the area and that actual crime rates do not rise to a level that would cause concern to the Board.

After review of the mitigation submitted and the NeighborhoodScout data, Department staff has determined that the Application does not meet the requirements of 10 TAC §11.101(a)(3)(D)(ii). According to the attached NeighborhoodScout report dated March 27, 2025, the census tract in which the proposed development is located has a Part I violent crime rate of 35.68 incidents per 1,000 persons. Data provided in the Application shows that the number of violent crime offenses in the area decreased



by 1% between 2022 and 2024 (after increasing in 2023), which is not sufficient to determine that this rate will be below the threshold of 18 per 1,000 persons annually within the next two years.

While the Applicant has referenced citywide and local initiatives aimed at crime reduction, including efforts under the Choice Neighborhoods Implementation Plan and enforcement strategies by the Houston Police Department, the data and evidence provided do not meet the threshold of showing either a sufficient downward trend or an expected rate below the limit in the required timeframe. The mitigation presented does not establish a reasonable basis to conclude that the Development Site will no longer be subject to this Neighborhood Risk Factor by the time it is placed into service.

Accordingly, the Application is terminated.

An appeal process exists for the Housing Tax Credit Program. The restrictions and requirements related to the filing of an appeal can be found in 10 TAC §11.902 of the 2025 Qualified Allocation Plan. Should you choose to appeal this decision to the Executive Director, you must file your appeal, in writing, with the Department not later than seven calendar days after the date of this letter. If you are not satisfied with the decision of the Executive Director or if the Executive Director does not respond, you may file a further appeal with the Board of Directors of the Texas Department of Housing and Community Affairs. Please review §11.902 of the 2025 Qualified Allocation Plan for full instructions on the appeals process.

If you have any questions, please contact me at cody.campbell@tdhca.state.tx.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'CCP' with a stylized flourish.

Cody Campbell
Director of Multifamily Programs



Neighborhood Crime Data

2620 Live Oak St, Houston, TX 77004

67 Vital Statistics | 7 Condition Alerts

March 27, 2025

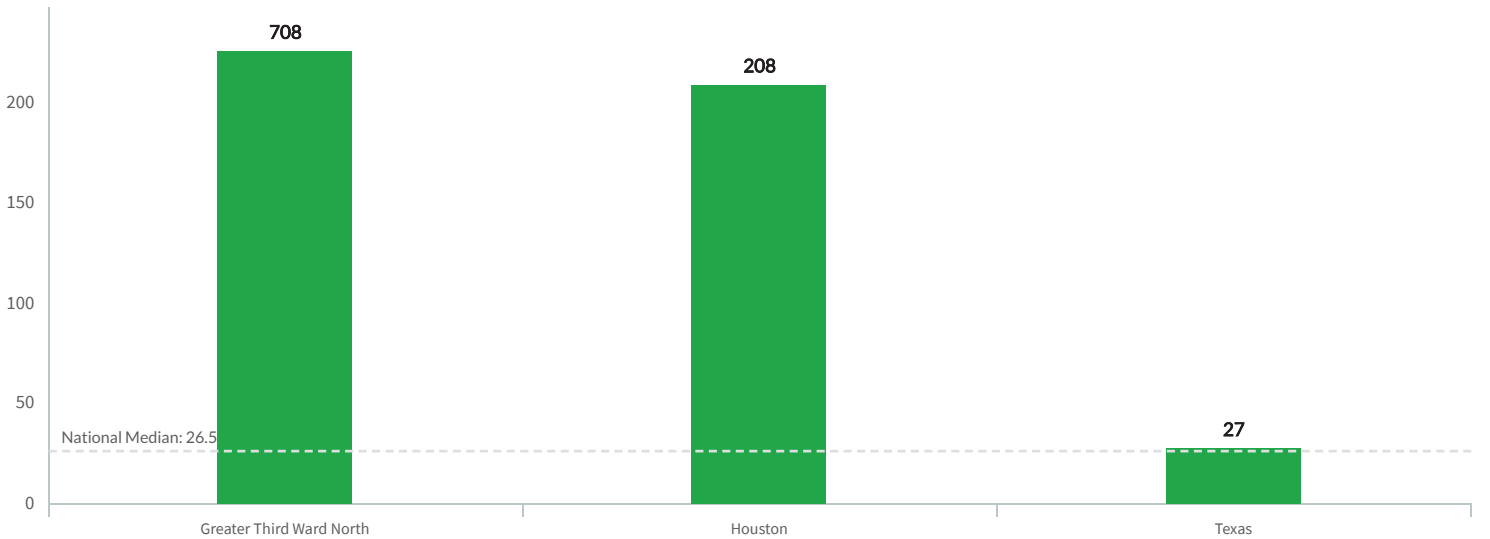
NEIGHBORHOOD CRIME INDEX

Total Crime Index	Violent Crime Index	Property Crime Index
0 (100 is safest) Safer than 0% of U.S. neighborhoods. ⚠️ This neighborhood has one of the highest overall rates of crime incidents per 1,000 resident population in America, according to exclusive NeighborhoodScout analysis. Overall crimes include both property crimes and violent crimes. To see the details of violent vs. property crime rates for this neighborhood, please refer to the respective sections below.	0 (100 is safest) Safer than 0% of U.S. neighborhoods. ⚠️ This neighborhood has one of the highest violent crime rates per 1,000 residents of any neighborhood in America, according to exclusive NeighborhoodScout data and analysis. Violent crimes include murder, non-neglegent manslaughter, forceble rape, armed robbery and aggravated assault.	1 (100 is safest) Safer than 1% of U.S. neighborhoods. ⚠️ This neighborhood has one of the highest property crime rates per 1,000 residents of any neighborhood in America, according to exclusive NeighborhoodScout data and analysis. Property crimes include burglary (i.e., breaking and entering, including home break-ins), theft (over \$50), and motor vehicle theft.

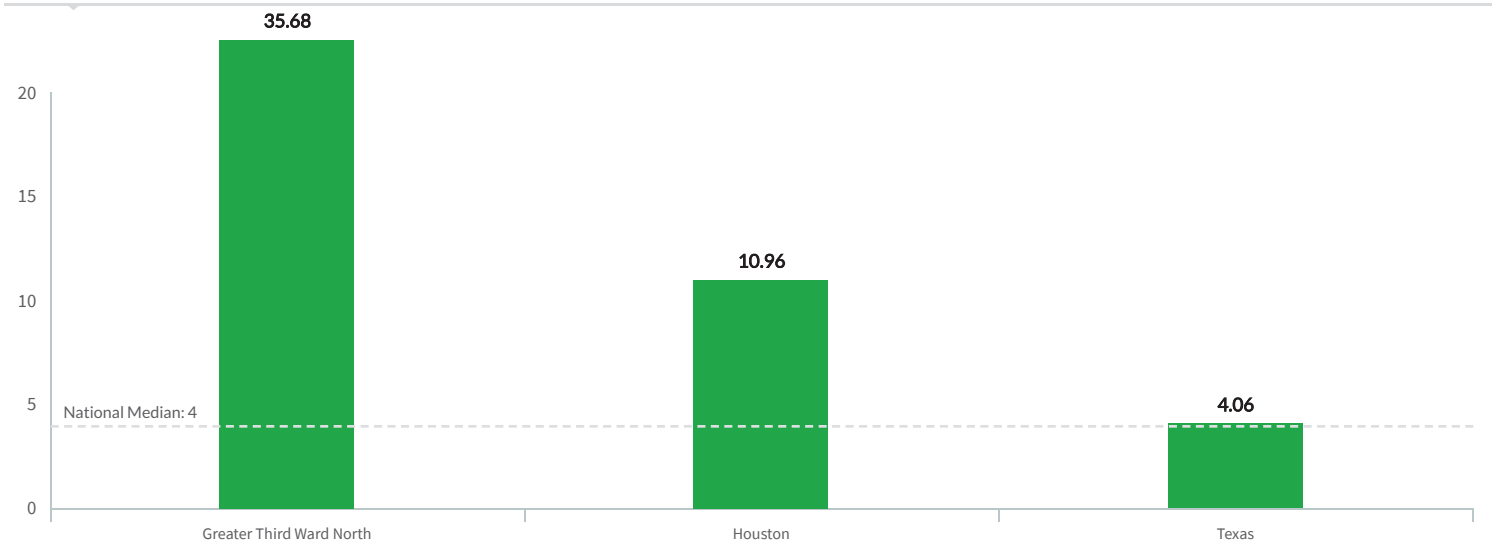
NeighborhoodScout® provides exclusive crime risk analytics for every neighborhood in America with up to 98% predictive accuracy. Crime risk indices are nationally comparable on a 1 – 100 scale, where 100 means safer than 100% of U.S. neighborhoods.

Crime risk data are updated annually. Raw crime incidents are sourced from all 18,000+ local law enforcement agencies – municipal, county, transit, park, port, university, tribal and more, assigned to localities, then built into NeighborhoodScout’s proprietary predictive models to provide a comprehensive crime risk profile for every neighborhood and address-vicinity in the U.S.

CRIMES (per square mile)

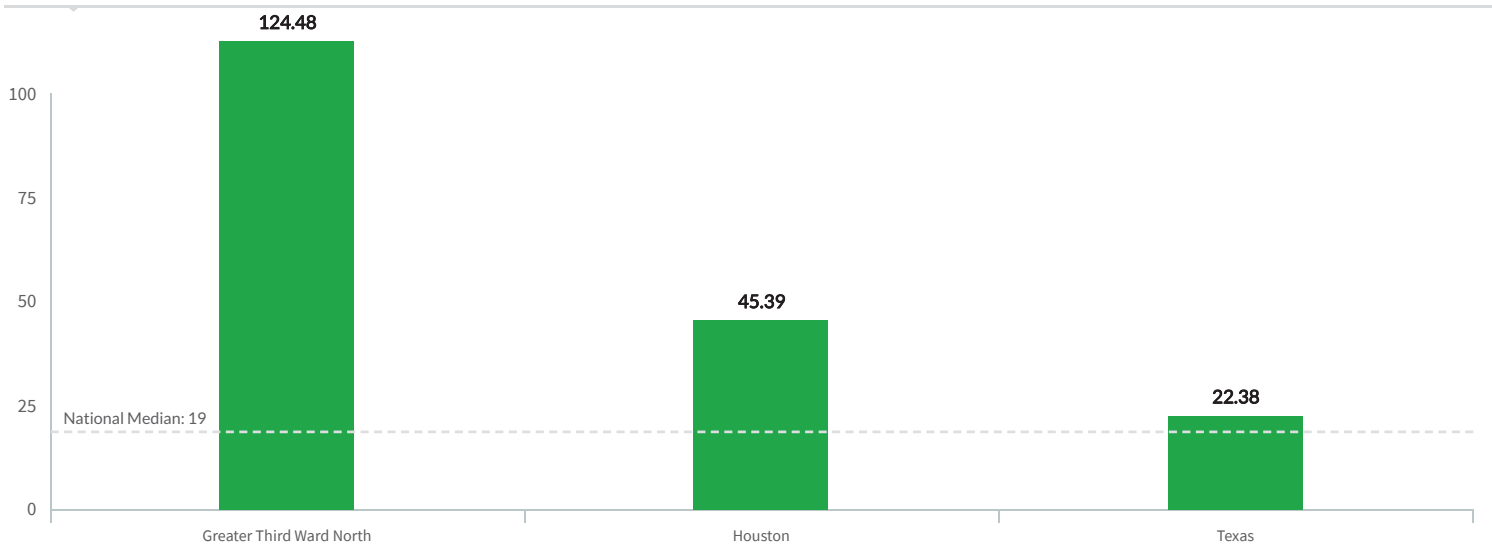


VIOLENT CRIME COMPARISON (per 1,000 residents)



Chances of Becoming a Victim of a Violent Crime			
1 in 28 in this Neighborhood	In this neighborhood residents have one of the highest chances of becoming a victim of violent crime of any neighborhood in this state, according to exclusive NeighborhoodScout data and analysis. Violent crimes include murder, non-neglegent manslaughter, forceble rape, armed robbery and aggravated assault.	1 IN 91 in Houston	1 IN 246 in Texas

PROPERTY CRIME COMPARISON (per 1,000 residents)



Chances of Becoming a Victim of a Property Crime			
1 in 8 in this Neighborhood	In this neighborhood residents have one of the highest chances of becoming a victim of property crime of any neighborhood in this state, according to exclusive NeighborhoodScout data and analysis. Property crimes include burglary (i.e., breaking and entering, including home break-ins), theft (over \$50), and motor vehicle theft.	1 IN 22 in Houston	1 IN 45 in Texas