

A PROFESSIONAL CORPORATION

TAMEA A. DULA OF COUNSEL tdula@coatsrose.com Direct Dial (713) 653-7322 Direct Fax (713) 890-3918

November 7, 2025

By Email to Rosalio.Banuelos@tdhca.texas.gov
Rosalio Banuelos, Director of Multifamily Asset Management
Texas Department of Housing and Community Affairs
221 East 11<sup>th</sup> Street
Austin, Texas 78701

RE: HTC #99111 – Roseland Townhomes, Dallas, Dallas County, Texas; HTC #02006 – Roseland Estates, Dallas, Dallas County, Texas;

Amended Request for Material LURA Amendments.

#### Dear Rosalio:

This letter was requested by you to supplement my letter of September 12, 2025 initiating contact with the TDHCA concerning the redevelopment of Roseland Townhomes and Roseland Estates. As you are aware, our client, the Dallas Housing Authority, now known as DHA Housing Solutions of North Texas ("DHA"), developed the referenced multifamily apartment complexes in 1999 for Roseland Townhomes (152 total units, 114 LIHTC units, General population - "Townhomes") and in 2002 for Roseland Estates (138 total units, 103 LIHTC units, General population - "Estates," and collectively with Townhomes, the "Properties"). DHA now wishes to redevelop the Properties as a single development, tentatively named "Roseland Homes." Roseland Homes will additionally incorporate an existing community gym constructed in 2004 and not previously included within the Housing Tax Credit Program. Redevelopment of the Properties will be pursuant to an anticipated 4% Tax Credit and Tax-Exempt Bond financing, as well as HUD's Rental Assistance Demonstration (RAD) Program.

On behalf of DHA, we ask that the following Material Amendments to the LURAs currently regulating the Properties be granted, based upon an anticipated LURA for the redeveloped single Property ("Roseland Homes") under the terms indicated:

9 Greenway Plaza, Suite 1000 Houston, Texas 77046 Phone: 713-651-0111 Fax: 713-651-0220 Web: www.coatsrose.com

- 1. **Temporary Suspension of Enforcement.** We request that the TDHCA temporarily suspend enforcement of the minimum number of LIHTC units that must be maintained pursuant to the Land Use Restriction Agreements, as currently amended (collectively, the "LURAs") for each of Townhomes and Estates until construction completion. Such a suspension of the LURAs will permit DHA and the Developer to redevelop using a Relocation Plan that relocates existing tenants to vacant units within the Properties, in order to conduct the extensive renovations without having to move residents off site. In exchange for the requested suspension until construction completion, DHA and the Developer would agree to include an additional agreed period of extended compliance over the 40-year periods currently required by the Properties' existing LURAs.
- 2. **Revisions to Bedroom Mix**. The redevelopment of the two Properties is anticipated to include the demolition of 14 units. All remaining formerly Market Rate units will be redeveloped as Tax Credit Units (w/o public housing subsidy).

## **Roseland Townhomes (North Side)**

Proposed Changes
142 Total Units
114 Public Housing/LIHTC:
8-1 Bedroom
54 - 2 Bedroom
52 - 3 Bedroom
28 LIHTC:
13 - 3 Bedroom
12 – 4 Bedroom
3-5 Bedroom

# **Roseland Estates (South Side)**

Proposed Changes
134 Total Units
103 Public Housing/LIHTC:
7 – 1 Bedroom
49 – 2 Bedroom
47 – 3 Bedroom
31 LIHTC:
20-3 Bedroom
11 – 4 Bedroom

**3.** Unit Mix in Redeveloped Property (Roseland Homes). The two original sites will be redeveloped with placement of buildings not necessarily in the identical locations previously shown. As a whole, the redeveloped Roseland Homes will have the following Bedroom Mix (taken from the "Proposed Changes" shown above):

### Roseland Homes – 276 Total Units

217 Public Housing/LIHTC: 59 LIHTC: 33 – 3 Bedroom 103 – 2 Bedroom 23 – 4 Bedroom 99 – 3 Bedroom 3 – 5 Bedroom

4. Current Design of Unit Mix. The current design of the redeveloped site uses the following income and rent limitations:

### Roseland Homes – 276 Total Units

<b>Bedroom Type</b>	60% AMGI	50% AMGI	Total	
1 – Bedroom	4	11	15	
2 – Bedroom	21	82	103	
3 – Bedroom	43	89	132	
4 – Bedroom	11	12	23	
5 – Bedroom	0	3 Total:	<u>3</u> 276	

- 5. **Evidence of Public Hearing.** Evidence of the Public Hearing that was held at 4:00 pm Central on Monday, November 3, 2025, was previously sent to you under separate cover, including a Sign-in Sheet and Minutes of the Public Hearing.
- 6. Request for Approval of Material LURA Amendments. On behalf of DHA and the Developer, we respectfully request that Staff recommend the TDHCA Board approve Material LURA Amendments that will suspend the effects of the two existing LURAs through a date to be mutually agreed between the DHA and the TDHCA Staff, and for the proposed redevelopment of the two Properties as a single site. These amendments will permit completion of the reconstruction and commencement of the lease-up of the redeveloped Roseland Homes. As previously discussed, we request that this be placed on the Agenda for the December TDHCA Board Meeting.

Rosalio Banuelos, Director of Multifamily Asset Management November 7, 2025 Page 4

Thank you for your consideration of this request for a Material LURA Amendment. If you need any additional information or have any questions, please contact me or Dana Arnette, Director of Development at DHA at <a href="mailto:Dana.Arnette@dhantx.com">Dana.Arnette@dhantx.com</a> (469-324-2929).

Sincerely,

Tamea A. Dula

cc: Lucy Weber
Troy Broussard
Debbie Quitugua
Dana Arnette
Greg Mayes
Barry Palmer