



CITY OF HOUSTON

Housing & Community Development Department

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Mayor

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April 30, 2025

Governing Board
Attn: Chairman Leo Vasquez, III
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

Re: TDHCA #25090; Trinity East Seniors, Houston, Harris County, Texas;
Support for Appeal of Termination

Dear Chairman Vasquez and TDHCA Governing Board Members:

On behalf of the City of Houston, we ask the Texas Department of Housing and Community Affairs (TDHCA) Governing Board **grant the appeal** of TDHCA's staff's decision to terminate the 2025 Competitive Application ("Application") for Trinity East Senior (the "Trinity East Project") based upon the existence of a Neighborhood Risk Factor ("NRF") (high Part I Violent Crime rate) under 10 TAC §11.101(a)(3)(D)(ii) of the 2025 Qualified Allocation Plan ("QAP").

The City of Houston and the Houston Housing Authority are partners in the \$50 Million Choice Neighborhood Implementation Grant for Cuney Homes public housing development in the Third Ward neighborhood. This federal grant is designed to completely transform Cuney Homes – an outdated public housing "project" - by investing in new affordable housing, catalyzing neighborhood improvements, and providing social supports for the families. The City of Houston and HHA will be leveraging over \$600 Million in neighborhood investment, including tax credits, federal, and state grants as well as local philanthropy and a significant amount of city investment. It's an understatement to say that Houston is thrilled with this opportunity.

Trinity East Senior Project will serve as the first replacement housing for Cuney Homes. As Cuney Homes buildings are demolished, some of the first public housing tenants to leave could choose to be housed in the Trinity East Senior Project.

Choice Neighborhood Improvement grants require a neighborhood to have a high crime rate to qualify for the Implementation Grant. The benefit of the Choice Neighborhood grant


is that once the housing redevelopment, neighborhood investments, and social supports begin, crime will likely drop. We recognize that the presence of a high crime rate is opposite of the QAP requirement that new tax credit housing not be placed in high crime neighborhoods. However, we believe that Cuney Homes is a unique situation where the new tax credit housing, partnered with a nationally recognized approach to neighborhood redevelopment and family social services, may lead to a lower crime rate. The Choice Neighborhood Implementation transformation approach works, and the redevelopment process is documented by HUD and has withstood significant Congressional and industry-wide monitoring.

We would not ask for TDHCA to grant the appeal for one small housing project standing alone in a neighborhood without these offsetting factors. We are asking TDHCA to consider that new housing in coordination with neighborhood investment and social supports in a HUD-driven, nationally recognized model will lead to a very positive outcome for the residents of the Third Ward and Cuney Homes. Our plan is designed to ensure that these residents will not be left in a high crime neighborhood with limited economic opportunities.

We are collaborating with Houston Police Department and neighborhood crime prevention organizations in our community improvement model. As a result, we are confident that our approach to implementation will lead to less crime in Houston's Third Ward and we are committed to ensuring positive outcomes for our residents.

We hope you will consider and grant our appeal.

Sincerely,

DocuSigned by:

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Michael C. Nichols, Director
City of Houston Housing & Community Development Department

cc: Jaimie Bryant, Houston Housing Authority
Neal Rackleff, Houston Housing Authority
Barry Palmer, Coats Rose
Cynthia Wilson, City of Houston
Mayor John Whitmire, City of Houston
Councilwoman Carolyn Evans-Shabazz