



March 26, 2026

Via Email

Jonathan Chilson, Asset Manager (Region 12) – jonathan.chilson@tdhca.texas.gov

Texas Department of Housing and Community Affairs
221 E 11th Street
Austin, Texas 78701

Re: Material Amendment;
TDHCA Application #25271 – Lofts at Birdwell, Big Spring, Texas;

Dear Mr. Chilson,

On behalf of Lofts at Birdwell, LLC (the “Company”), we are writing to notify the Texas Department Housing and Community Affairs (the “Department”) of a material amendment request for the Company. We are requesting the following changes to the Company’s 2025 9% LIHTC application:

- Updating the development owner to Lofts at Birdwell, LP (the “Owner”);
- Admitting CHDC Lofts at Birdwell GP, LLC as the new general partner of the Owner;
- Admitting Crossroads Housing Development Corporation as the sole member of the general partner to obtain a 50% property tax exemption;
- Moving G2 Equity, Inc. over to a 90% owner of the newly formed Lofts at Birdwell SLP, LLC entity (the “SLP”);
- Admitting Jonathan Estrada as a 10% owner of the developer and SLP entities as sole member of LIHTC Wiz, LLC;
- Removing BETCO Consulting, LLC from both the Owner and developer entities;
- Adding Paul Stell as a guarantor;
- Updates to the site plan which combined all residential buildings into one building which includes the leasing office and all indoor common areas;
- Increase in total number of 2-bedroom units from 27 to 37, bringing the total units to 49. Three of the additional 2-bedroom units will be affordable at 60% AMI rent and income restrictions, and the remaining seven additional units will be market rate;
- Increase total parking spaces from 89 to 92;
- Increase in the total NRA from 31,167 SF to 39,930, an increase of 28.12%;
- Increase in total common area from 6,643 SF to 8,170 SF; an increase of 22.98%;
- Updates to the financial exhibits (Tabs 24 – 31, and 35) to account for the changes in costs, interest rates, loan amounts, and equity pricing.

The reason for the material amendment is the result of value engineering to minimize/mitigate costs associated with detention/retention requirements and additional retainage walls that would have been required for topographic concerns, as well as to accommodate feedback from the City of Big Spring on the need and desire for additional market rate units. The changes in the Org Chart are to maintain financial feasibility with the 50% property tax exemption, as well as including an additional guarantor to meet REO experience requirements requested by the investor. Included in our request are copies of the pre and post transfer Org Charts (Tab 37), additional previous participation review forms (Tab 39), formation documents



for all newly created entities, updated architectural package (Tab 22), Tabs 23, 23a-c, and updated financial Tabs 24, 26, 27, 28, 29, 30, 31, and 35 LOIs. Changes in operating expenses reflected on Tab 26 include an increase in property management fees to 5%, updates from increased unit counts, and the 50% property tax exemption.

If you have any questions or would like to discuss these items further, please do not hesitate to contact me directly at (512) 785-3710 or via email at lora@betcohousinglab.com any time.

Sincerely,

Lora Myrick, Principal
BETCO Consulting, LLC

CC: Michael Beard, Rosalio Banuelos, Ronnie Gyani, Jonathan Estrada, Josh Goldberger

LOFTS AT BIRDWELL

BIG SPRING, HOWARD COUNTY, TEXAS

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SAMPLE EXTERIOR RENDERING



PROJECT LOCATION



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BIG SPRING, HOWARD COUNTY, TEXAS

AP0

NET RENTABLE AREA (NRA) - MEASURED TO THE OUTSIDE OF THE STUDBS OF A UNIT OR TO THE MIDDLE OF WALLS IN COMMON WITH OTHER UNITS									
UNIT LABEL	BEDROOM(S) PER UNIT	BATHROOM(S) PER UNIT	NRA PER UNIT	BUILDING / LEVEL IDENTIFICATION			TOTAL NUMBER OF LEVEL(S)		
				"A"					
				FIRST	SECOND	THIRD	(3)		
				NUMBER OF UNIT(S) PER FLOOR			NUMBER OF UNIT(S) PER UNIT TYPE	RESIDENTIAL AREA PER UNIT TYPE:	
		TOTAL NRA							
(12) 1-BR UNIT(S) 24%									
TYP. 1-BR-A	1	1	609 SF	-	3	3	6	3,904 SF	
FHA 1-BR-A	1	1	659 SF	1	-	-	1	659 SF	
TYP. 1-BR-B	1	1	714 SF	-	1	1	2	1,428 SF	
FHA HEARING/VISUAL 1-BR-B	1	1	714 SF	1	-	-	1	714 SF	
ADA 1-BR-A	1	1	659 SF	2	-	-	2	1,318 SF	
(3/7) 2-BR UNIT(S) 76%									
TYP. 2-BR-A	2	2	861 SF	-	12	12	24	20,664 SF	
FHA 2-BR-A	2	2	861 SF	9	-	-	9	7,749 SF	
TYP. 2-BR-B	2	2	861 SF	-	1	1	2	1,722 SF	
FHA 2-BR-B	2	2	861 SF	1	-	-	1	861 SF	
ADA 2-BR-A	2	2	861 SF	1	-	-	1	861 SF	
TOTAL NUMBER OF UNITS PER FLOOR:				16	17	17			
TOTAL NRA PER FLOOR:				12,162 SF	15,684 SF	15,684 SF	49	39,930 SF	
NON-RESIDENTIAL AREA:								TOTAL	
BREEZEWAY AREA PER FLOOR:				2,345 SF	2,345 SF	2,001 SF	6,691 SF		
COMMON AREA - ACCESSIBLE TO TENANTS AREA PER FLOOR:				1,479 SF	-	-	1,479 SF		
UTILITY CLOSET - RESTRICTED TO EMPLOYEES AREA PER FLOOR:				304 SF	-	-	304 SF		
RESIDENTIAL BUILDING(S)		TOTAL RESIDENTIAL AREA:					39,930 SF		
		TOTAL NON-RESIDENTIAL AREA:					8,474 SF		
		RESIDENTIAL BUILDING(S) TOTAL AREA:					48,404 SF		
		TOTAL DEVELOPMENT AREA:					48,404 SF		

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Gyani Capital

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AP1

TABLE 1: UNITS PER BUILDING TYPE

UNIT LABEL	NRA PER UNIT TYPE	BUILDING / LEVEL IDENTIFICATION			TOTAL NUMBER OF UNITS PER UNIT TYPE
		"A"			
		FIRST	SECOND	THIRD	
NUMBER OF UNIT(S) PER FLOOR					
TYP. 1-BR-A	659 SF	-	3	3	6
FHA 1-BR-A	659 SF	1	-	-	1
TYP. 1-BR-B	714 SF	-	1	1	2
FHA HEARING/VISUAL 1-BR-B	714 SF	1	-	-	1
ADA 1-BR-A	659 SF	2	-	-	2
TYP. 2-BR-A	861 SF	-	12	12	24
FHA 2-BR-A	861 SF	9	-	-	9
TYP. 2-BR-B	861 SF	-	1	1	2
FHA 2-BR-B	861 SF	1	-	-	1
ADA 2-BR-A	861 SF	1	-	-	1
TOTAL NUMBER OF UNITS PER FLOOR:		15	17	17	49

TABLE 2: REQUIRED ACCESSIBLE UNITS

UNIT TYPE	IN COMPLIANCE WITH	BUILDING / LEVEL IDENTIFICATION			TOTAL
		FIRST	SECOND	THIRD	
ADA 1-BR	ADA / MOBILITY	2	-	-	2
FHA / HV 1-BR	HEARING/VISUAL	1	-	-	1
ADA 2-BR	ADA / MOBILITY	1	-	-	1
MOBILITY UNITS REQUIRED (49 X 5% = 2.45)					
MOBILITY UNITS PROVIDED = 3					
HEARING/VISUAL UNITS REQUIRED (49 X 2% = 0.98)					
HEARING/VISUAL UNITS PROVIDED = 1					

UNIT TYPE LEGEND

FHA = FAIR HOUSING ACT
 ADA = AMERICANS WITH DISABILITIES ACT
 HV = HEARING/VISUAL

TABLE 3: SQUARE FOOT CALCULATIONS PER BUILDING

NOTE: SQUARE FOOT CALCULATIONS ARE MEASURED FROM OUT TO OUTSIDE FACE OF STUD TO CENTERLINE OF UNIT PARTITION

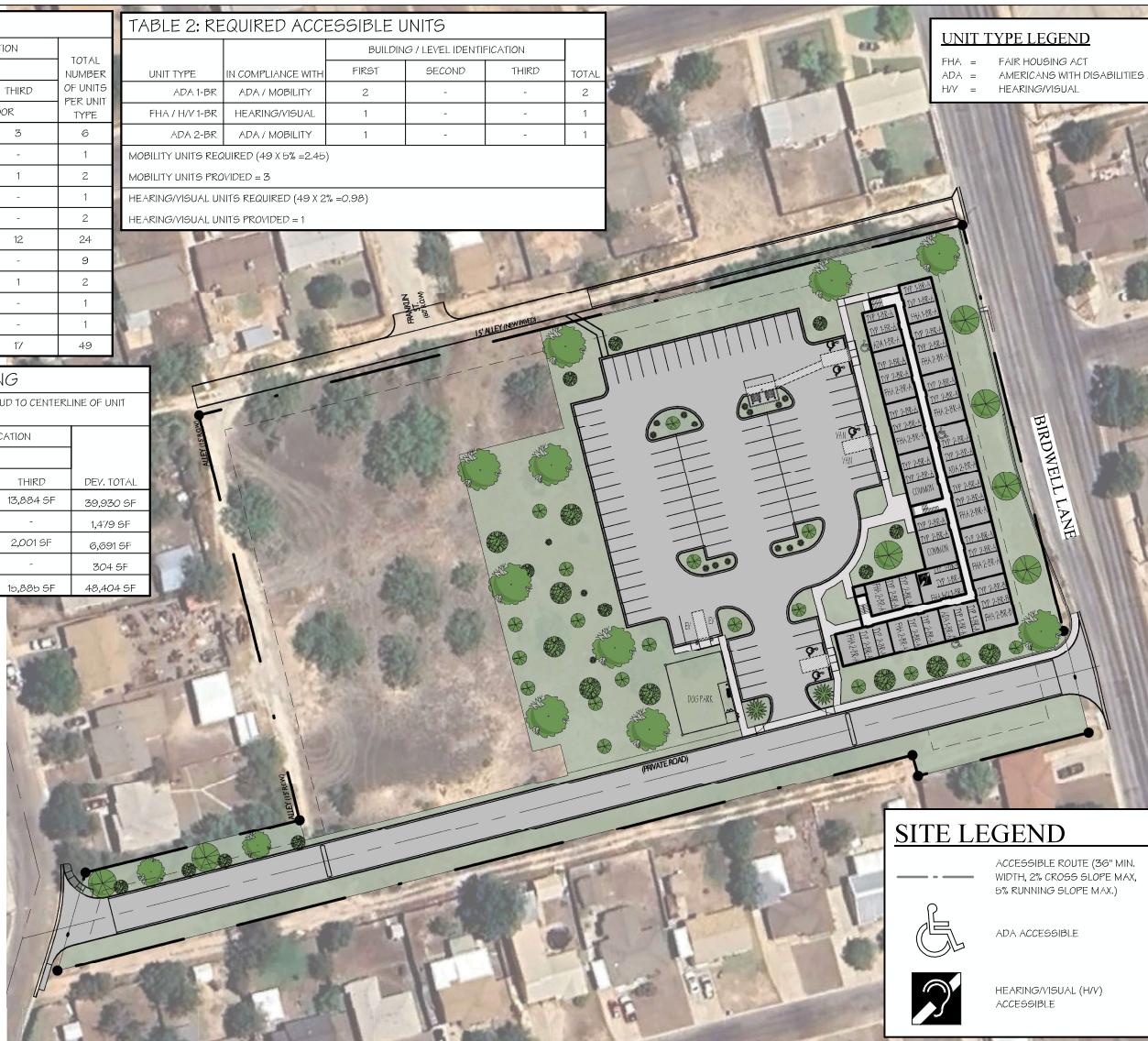
AREA TYPE	BUILDING / LEVEL IDENTIFICATION			DEV. TOTAL
	"A"			
	FIRST	SECOND	THIRD	
TOTAL NRA	12,162 SF	13,884 SF	13,884 SF	39,930 SF
COMMON AREA - ACCESSIBLE TO TENANT(S)	1,479 SF	-	-	1,479 SF
BREEZEWAY(S)	2,345 SF	2,345 SF	2,001 SF	6,691 SF
UTILITY CLOSETS - RESTRICTED TO EMPLOYEE(S)	304 SF	-	-	304 SF
TOTAL BUILDING AREA PER BUILDING:	16,290 SF	16,229 SF	15,885 SF	48,404 SF

TABLE 4: PARKING PROVIDED

NOTE: ALL PARKING PROVIDED IS UNCOVERED	
TYPE	QUANTITY
STANDARD SPACE(S)	85
STANDARD ACCESSIBLE SPACE(S)	5
VAN ACCESSIBLE SPACE(S)	2
TOTAL PARKING PROVIDED:	92
LOCAL PARKING REQUIREMENTS:	(15) SPACE(S) PER 1-BR UNIT (2) SPACE(S) PER 2-BR UNIT
PARKING PROVIDED MEETS ZONING REQUIREMENT	

SITE INFORMATION

LAND AREA:	+/- 3.429 ACRE(S)
EXISTING USE:	VACANT
CURRENT ZONING:	MULTIFAMILY DWELLING
PROPOSED USE:	MULTIFAMILY APARTMENTS
DETENTION/RETENTION POND:	NO DETENTION/RETENTION POND EXISTS
FLOOD PLAIN:	FLOOD ZONE X, NO MITIGATION REQUIRED
NOTE: DEVELOPMENT WILL BE BUILT IN ACCORDANCE WITH TDHCA'S FLOODPLAIN REQUIREMENTS	



SITE LEGEND

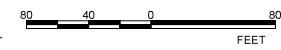
--- ACCESSIBLE ROUTE (36" MIN. WIDTH, 2% CROSS SLOPE MAX, 5% RUNNING SLOPE MAX.)

ADA ACCESSIBLE

HEARING/VISUAL (HV) ACCESSIBLE

PROPOSED SITE PLAN

SCALE: 1" = 80'-0"



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 BIG SPRING, HOWARD COUNTY, TEXAS

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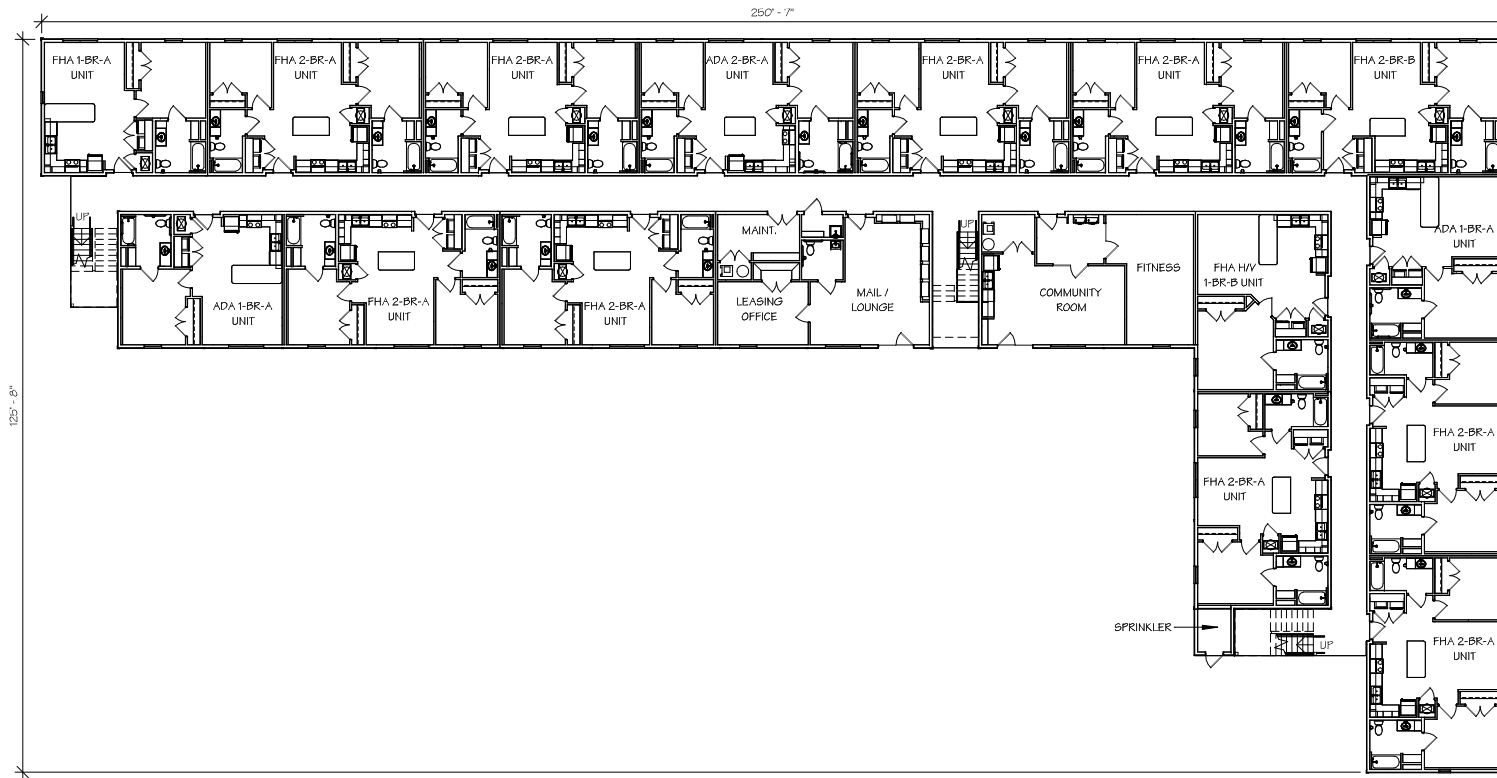
TABLE 3: SQUARE FOOT CALCULATIONS PER BUILDING

NOTE: SQUARE FOOT CALCULATIONS ARE MEASURED FROM OUT TO OUTSIDE FACE OF STUD TO CENTERLINE OF UNIT PARTITION

AREA TYPE	BUILDING / LEVEL IDENTIFICATION			DEV. TOTAL
	"A"			
	FIRST	SECOND	THIRD	
TOTAL NRA	12,162 SF	13,884 SF	13,884 SF	39,930 SF
COMMON AREA - ACCESSIBLE TO TENANT(S)	1,479 SF	-	-	1,479 SF
BREEZEWAY(S)	2,345 SF	2,345 SF	2,001 SF	6,691 SF
UTILITY CLOSETS - RESTRICTED TO EMPLOYEE(S)	304 SF	-	-	304 SF
TOTAL BUILDING AREA PER BUILDING:	16,290 SF	16,229 SF	15,885 SF	48,404 SF

UNIT TYPE LEGEND

- FHA = FAIR HOUSING ACT
- ADA = AMERICANS WITH DISABILITIES ACT
- HV = HEARING/VISUAL



FIRST FLOOR BUILDING PLAN

SCALE: 3/8" = 1'-0"

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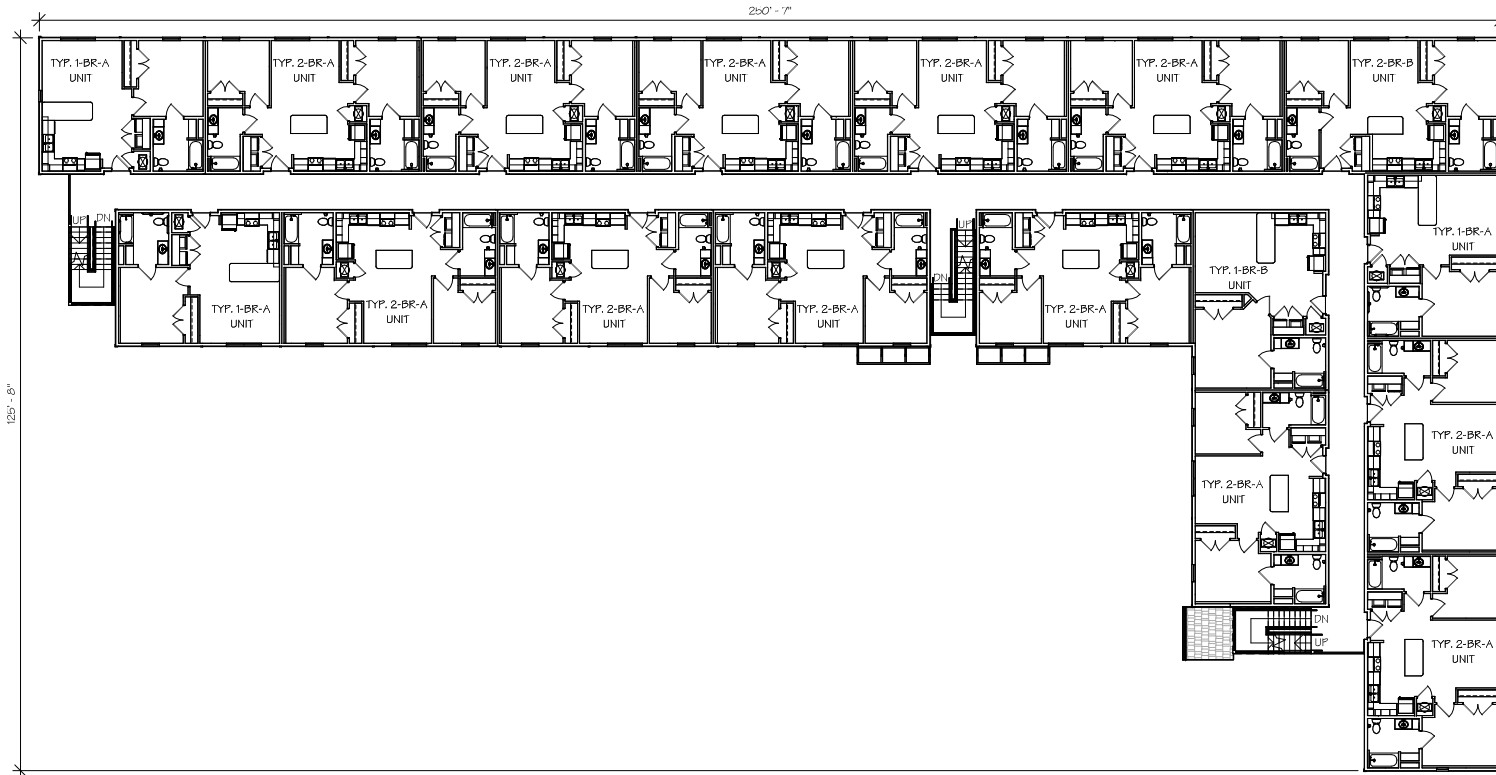
TABLE 3: SQUARE FOOT CALCULATIONS PER BUILDING

NOTE: SQUARE FOOT CALCULATIONS ARE MEASURED FROM OUT TO OUTSIDE FACE OF STUD TO CENTERLINE OF UNIT PARTITION

AREA TYPE	BUILDING / LEVEL IDENTIFICATION			DEV. TOTAL
	"A"			
	FIRST	SECOND	THIRD	
TOTAL NRA	12,162 SF	13,884 SF	13,884 SF	39,930 SF
COMMON AREA - ACCESSIBLE TO TENANT(S)	1,479 SF	-	-	1,479 SF
BREEZEWAY(S)	2,345 SF	2,345 SF	2,001 SF	6,691 SF
UTILITY CLOSETS - RESTRICTED TO EMPLOYEE(S)	304 SF	-	-	304 SF
TOTAL BUILDING AREA PER BUILDING:	16,290 SF	16,229 SF	15,885 SF	48,404 SF

UNIT TYPE LEGEND

- FHA = FAIR HOUSING ACT
- ADA = AMERICANS WITH DISABILITIES ACT
- HV = HEARING/VISUAL



SECOND FLOOR BUILDING PLAN

SCALE: 3/8" = 1'-0"

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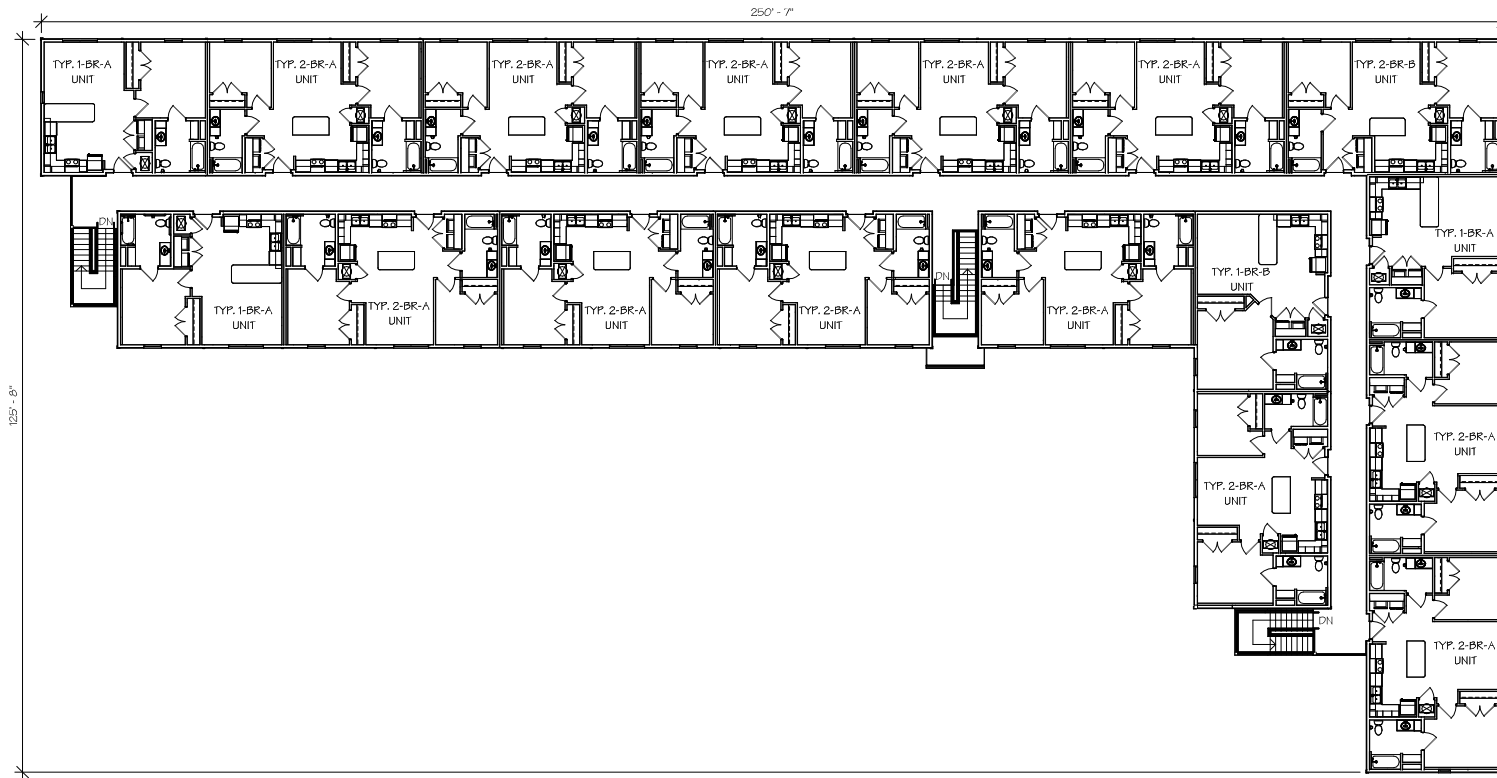
TABLE 3: SQUARE FOOT CALCULATIONS PER BUILDING

NOTE: SQUARE FOOT CALCULATIONS ARE MEASURED FROM OUT TO OUTSIDE FACE OF STUD TO CENTERLINE OF UNIT PARTITION

AREA TYPE	BUILDING / LEVEL IDENTIFICATION			DEV. TOTAL
	"A"			
	FIRST	SECOND	THIRD	
TOTAL NRA	12,162 SF	13,884 SF	13,884 SF	39,930 SF
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TOTAL BUILDING AREA PER BUILDING:	16,290 SF	16,229 SF	15,885 SF	48,404 SF

UNIT TYPE LEGEND

- FHA = FAIR HOUSING ACT
- ADA = AMERICANS WITH DISABILITIES ACT
- HV = HEARING/VISUAL



THIRD FLOOR BUILDING PLAN

SCALE: 3/64" = 1'-0"

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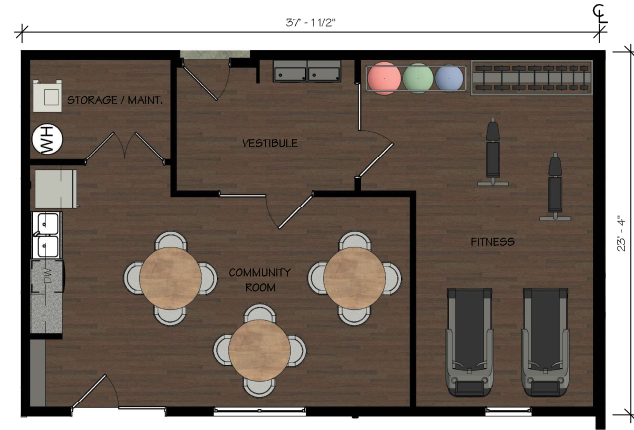
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 BIG SPRING, HOWARD COUNTY, TEXAS
 AP5

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COMMON AREA MATRIX

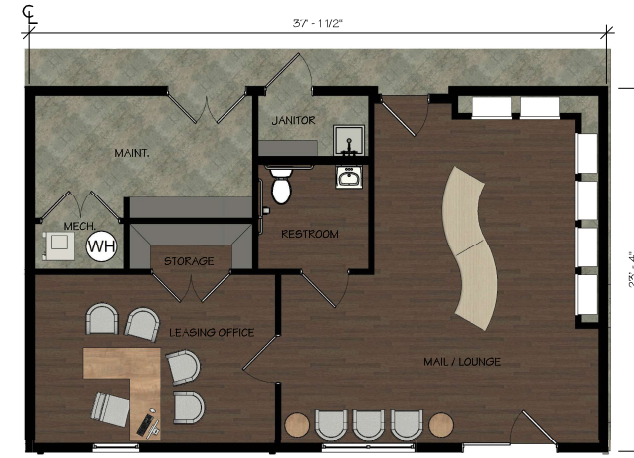
NOTE: SQUARE FOOT CALCULATIONS ARE MEASURED FROM OUTSIDE FACE OF STUD ON EXTERIOR WALLS TO CENTERLINE OF INTERIOR WALLS

SQUARE FOOTAGE ACCESSIBLE TO TENANTS		
DESCRIPTION	CONDITIONED	UNCONDITIONED
COMMUNITY ROOM	378 SF	-
VESTIBULE	105 SF	-
FITNESS	312 SF	-
MAIL / LOUNGE	419 SF	-
LEASING OFFICE	184 SF	-
OFFICE CLOSET	27 SF	-
RESTROOM	54 SF	-
TOTAL CONDITIONED/UNCONDITIONED:	1,479 SF	-
TOTAL COMMON AREA - ACCESSIBLE TO TENANTS:	1,479 SF	
SQUARE FOOTAGE RESTRICTED TO EMPLOYEES		
DESCRIPTION	CONDITIONED	UNCONDITIONED
JANITOR	35 SF	-
MAINTENANCE	125 SF	-
MECH.	21 SF	-
STORAGE / MAINT.	69 SF	-
SPRINKLER	-	54 SF
TOTAL CONDITIONED/UNCONDITIONED:	250 SF	54 SF
TOTAL UTILITY CLOSETS - RESTRICTED TO EMPLOYEES:	304 SF	
TOTAL AREA:	1,783 SF	



COMMON AREA 1 PLAN

SCALE: 1/8" = 1'-0"



COMMON AREA 2 PLAN

SCALE: 1/8" = 1'-0"

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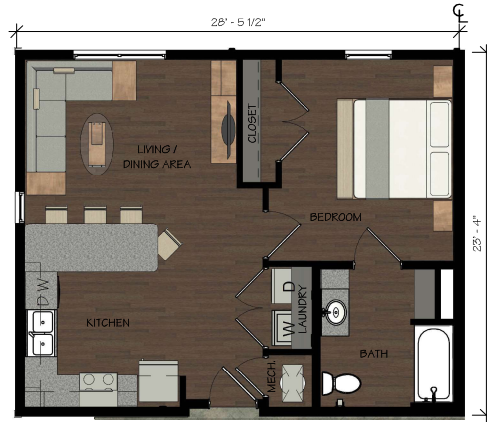


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BIG SPRING, HOWARD COUNTY, TEXAS
 AP6

UNIT MATRIX

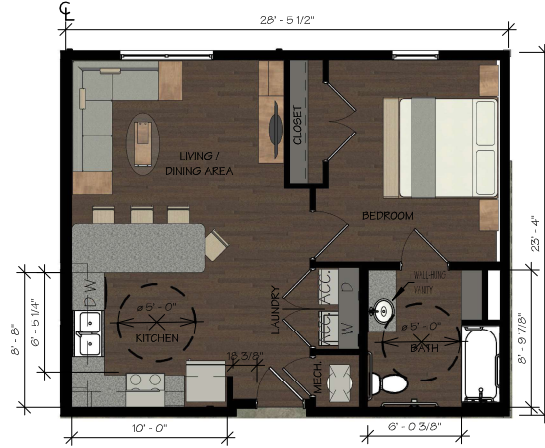
NET RENTABLE AREA (NRA) - MEASURED TO THE OUTSIDE OF THE STUDS OF A UNIT OR TO THE MIDDLE OF WALLS IN COMMON WITH OTHER UNITS

UNIT LABEL	BEDROOM(S) PER UNIT		NRA PER UNIT
	BEDROOM(S) PER UNIT	BATHROOM(S) PER UNIT	
(12) 1-BR UNIT(S) 24%			
TYP. 1-BR-A	1	1	659 SF
FHA 1-BR-A	1	1	659 SF
TYP. 1-BR-B	1	1	714 SF
FHA HEARING/VISUAL 1-BR-B	1	1	714 SF
ADA 1-BR-A	1	1	659 SF
(37) 2-BR UNIT(S) 76%			
TYP. 2-BR-A	2	2	861 SF
FHA 2-BR-A	2	2	861 SF
TYP. 2-BR-B	2	2	861 SF
FHA 2-BR-B	2	2	861 SF
ADA 2-BR-A	2	2	861 SF



FHA /TYP. 1-BR-A UNIT PLAN

SCALE: 1/8" = 1'-0"



ADA 1-BR-A UNIT PLAN

SCALE: 1/8" = 1'-0"



FHA /TYP. 1-BR-B UNIT PLAN

SCALE: 1/8" = 1'-0"

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BIG SPRING, HOWARD COUNTY, TEXAS

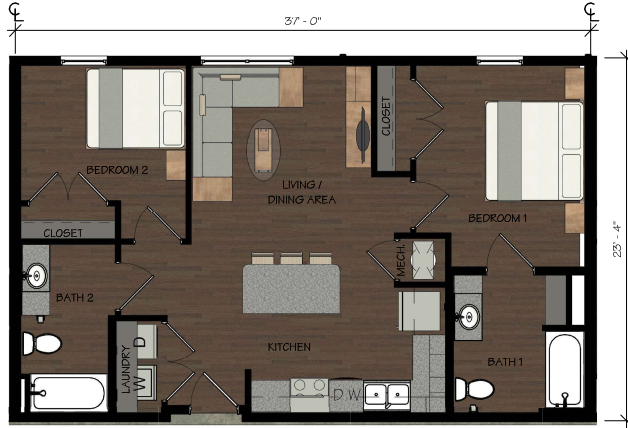
AP7

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UNIT MATRIX

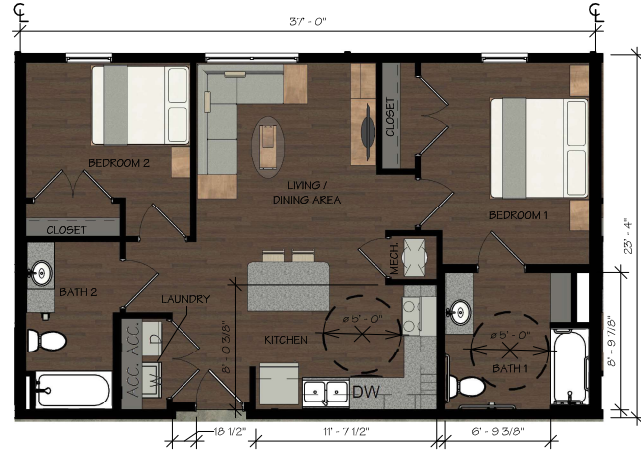
NET RENTABLE AREA (NRA) - MEASURED TO THE OUTSIDE OF THE STUDS OF A UNIT OR TO THE MIDDLE OF WALLS IN COMMON WITH OTHER UNITS

UNIT LABEL	BEDROOM(S) PER UNIT	BATHROOM(S) PER UNIT	NRA PER UNIT
(12) 1-BR UNIT(S) 24%			
TYP. 1-BR-A	1	1	659 SF
FHA 1-BR-A	1	1	659 SF
TYP. 1-BR-B	1	1	714 SF
FHA HEARING/VISUAL 1-BR-B	1	1	714 SF
ADA 1-BR-A	1	1	659 SF
(37) 2-BR UNIT(S) 76%			
TYP. 2-BR-A	2	2	861 SF
FHA 2-BR-A	2	2	861 SF
TYP. 2-BR-B	2	2	861 SF
FHA 2-BR-B	2	2	861 SF
ADA 2-BR-A	2	2	861 SF



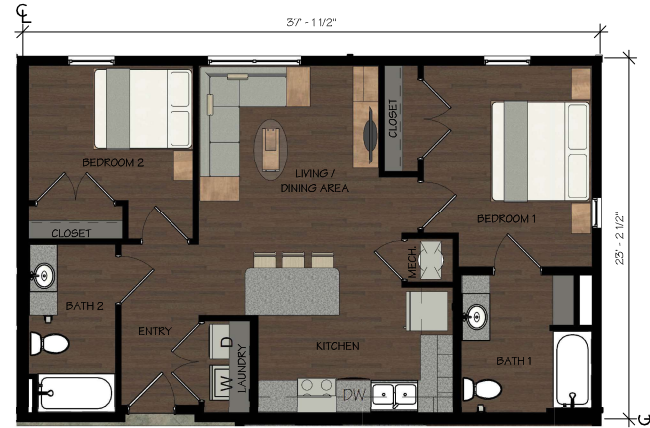
FHA /TYP. 2-BR-A UNIT PLAN

SCALE: 1/8" = 1'-0"



ADA 2-BR-A UNIT PLAN

SCALE: 1/8" = 1'-0"



FHA /TYP. 2-BR-B UNIT PLAN

SCALE: 1/8" = 1'-0"

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AP8

TOTAL APPROXIMATE BUILDING
EXTERIOR COMPOSITION
SIDING: 100%

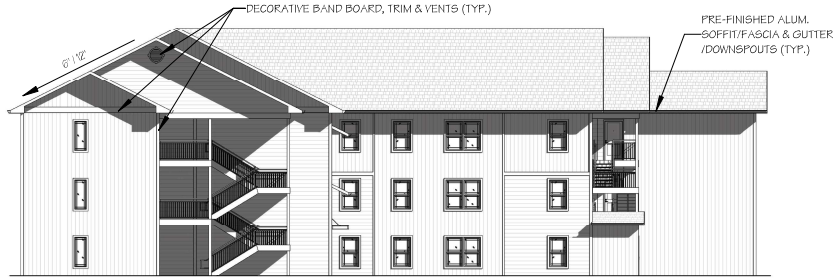
APPROXIMATE BUILDING
EXTERIOR COMPOSITION
SIDING: 100%



BUILDING TYPE "A" FRONT ELEVATION

SCALE: 3/64" = 1'-0"

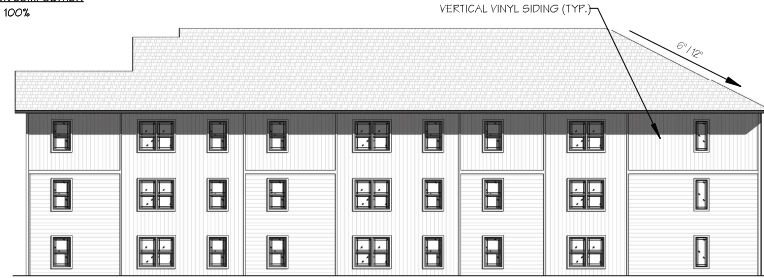
APPROXIMATE BUILDING
EXTERIOR COMPOSITION
SIDING: 100%



BUILDING TYPE "A" LEFT ELEVATION

SCALE: 3/64" = 1'-0"

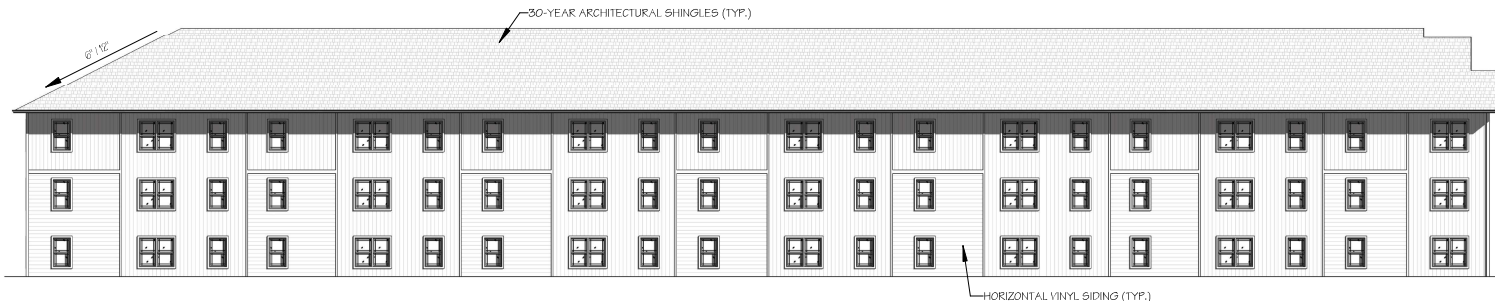
APPROXIMATE BUILDING
EXTERIOR COMPOSITION
SIDING: 100%



BUILDING TYPE "A" RIGHT ELEVATION

SCALE: 3/64" = 1'-0"

APPROXIMATE BUILDING
EXTERIOR COMPOSITION
SIDING: 100%



BUILDING TYPE "A" REAR ELEVATION

SCALE: 3/64" = 1'-0"

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AP9



SAMPLE RESIDENTIAL BUILDING



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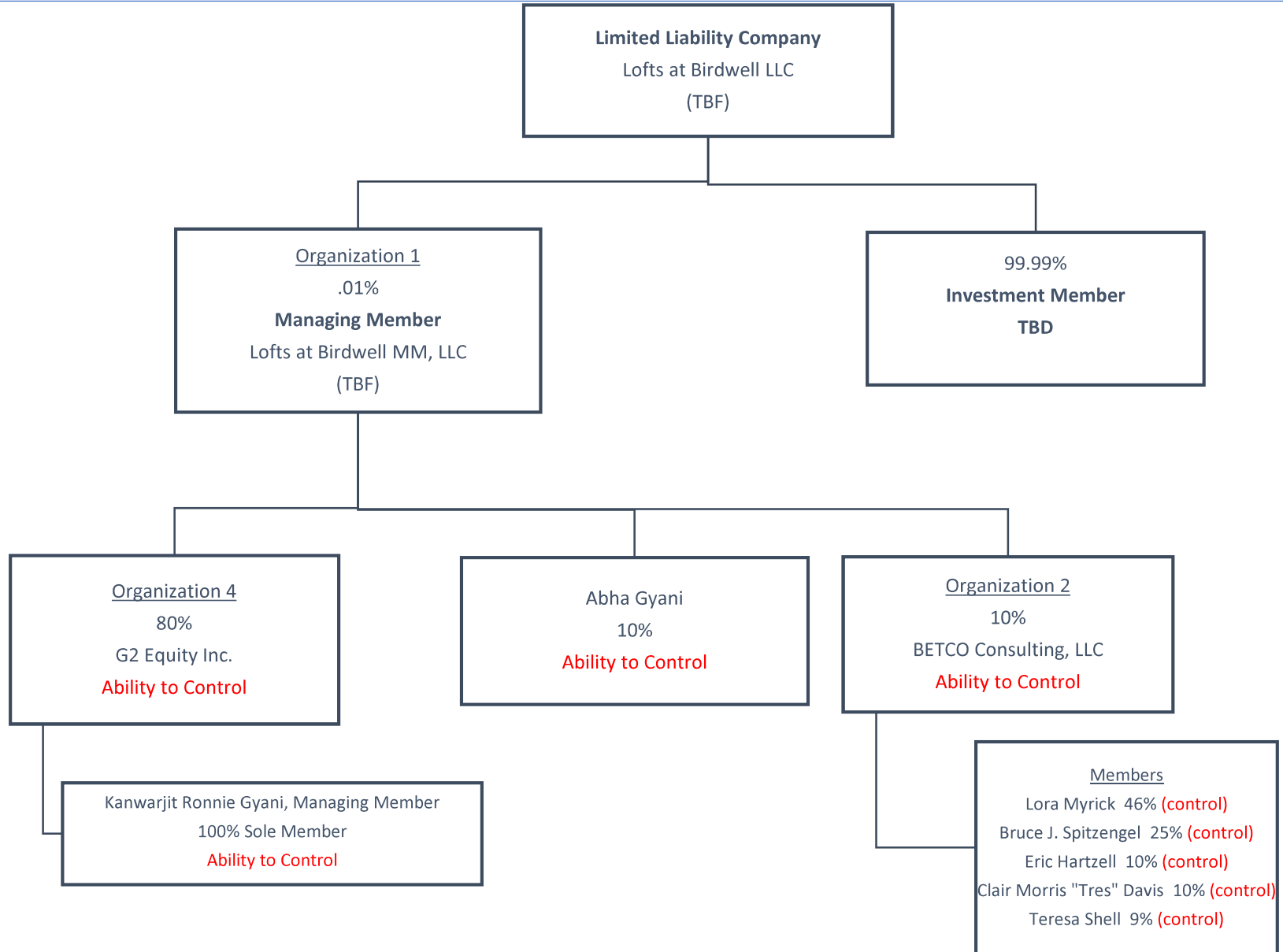


LOFTS AT BIRDWELL
BIG SPRING, HOWARD COUNTY, TEXAS

AP10

Organizational Chart
Lofts at Birdwell

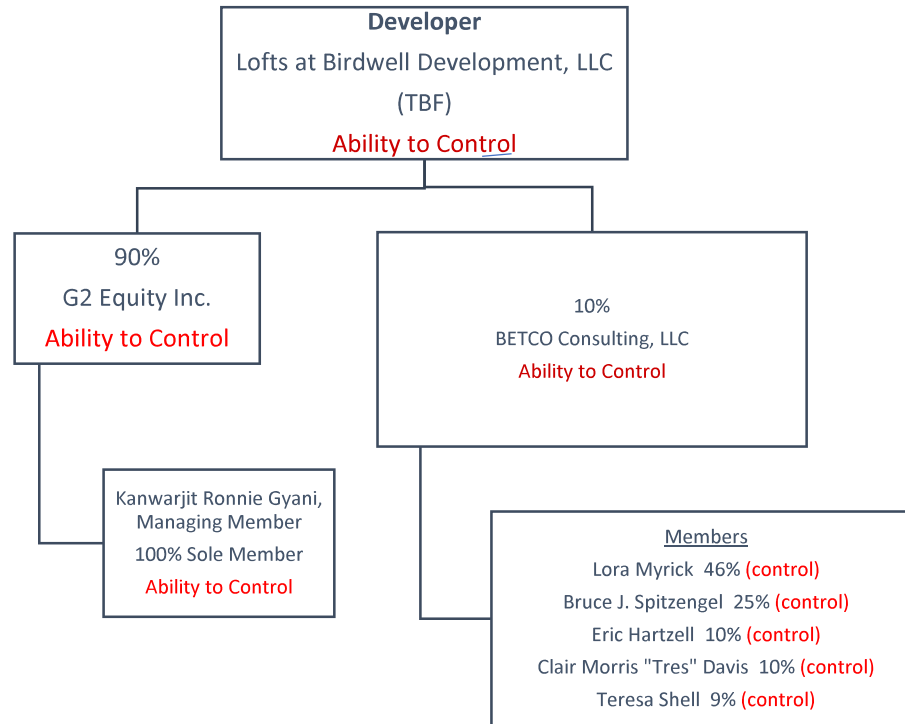
Owner Chart



Organizational Chart
Lofts at Birdwell

Pre-Transfer

Developer Chart



Organizational Chart
Lofts at Birdwell

Pre-Transfer

Guarantors Chart

Guarantors

Kanwarjit Ronnie Gyani

Ability to Control

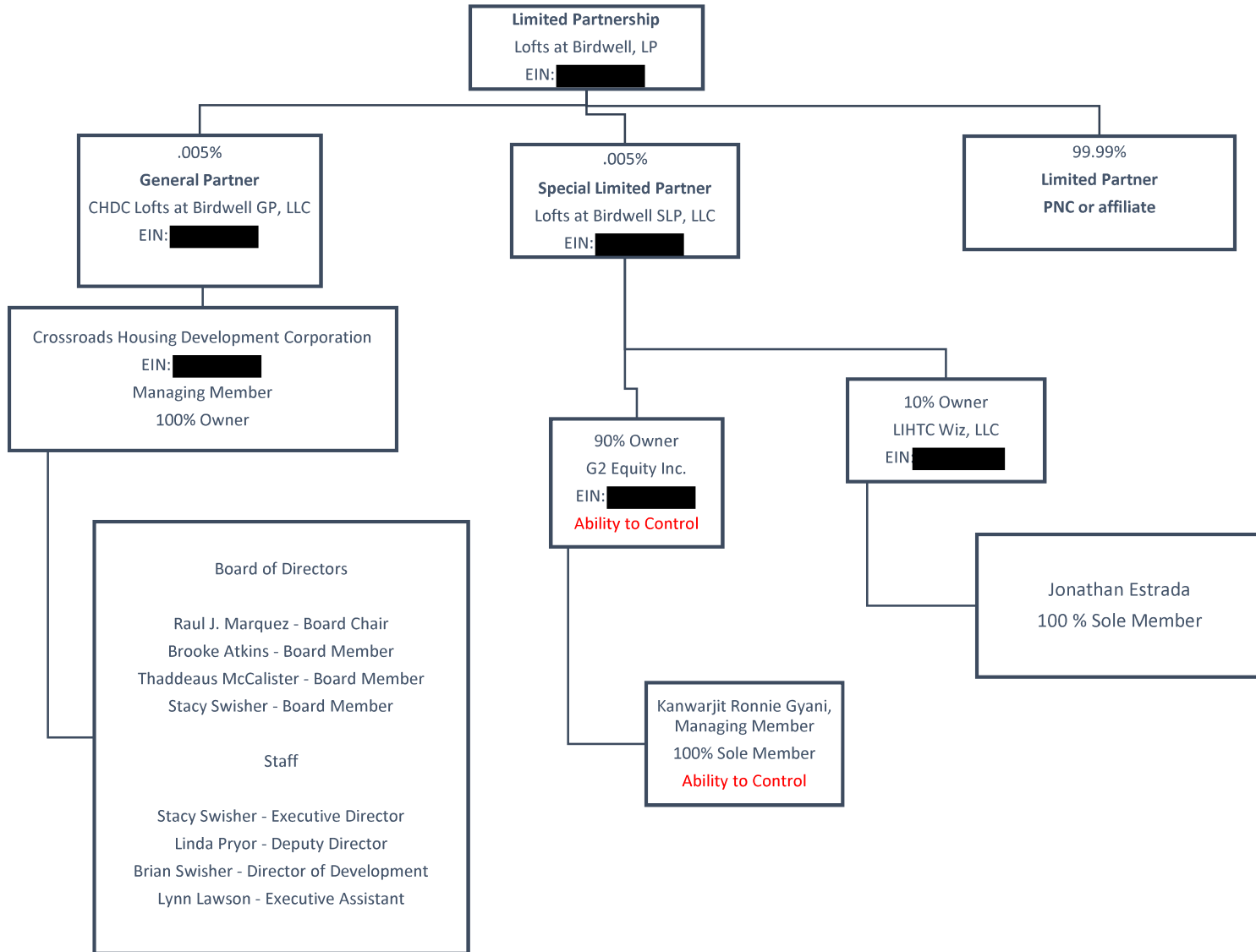
Abha Gyani

Ability to Control

Post Transfer

Organizational Chart Lofts at Birdwell

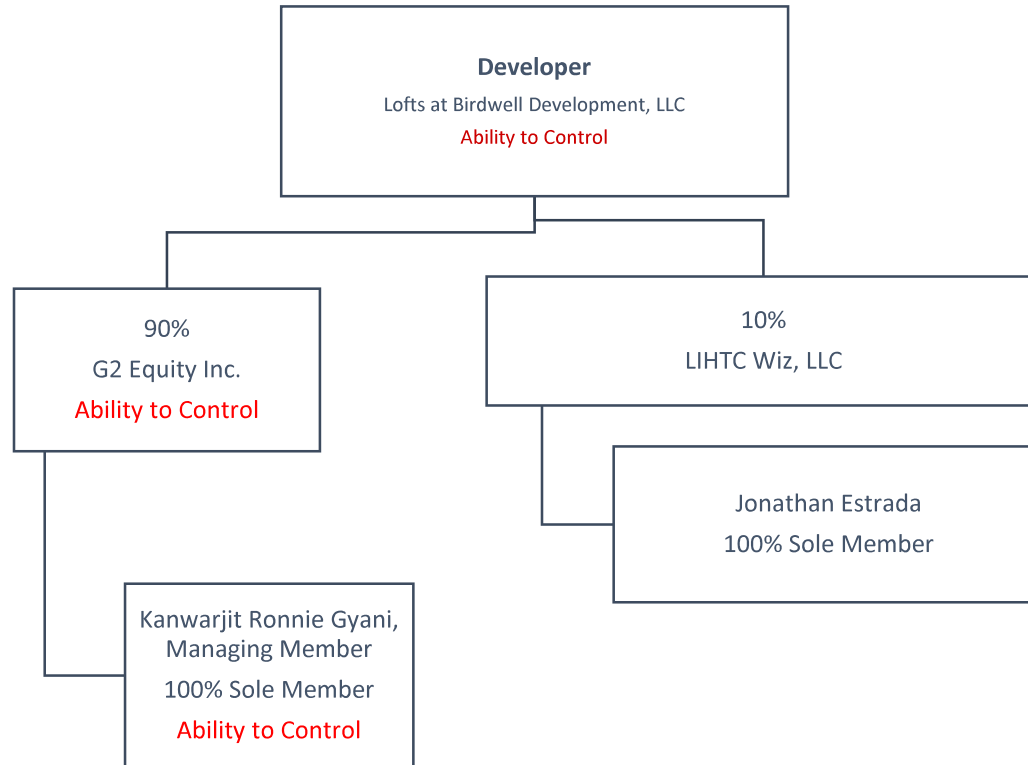
Owner Chart



Organizational Chart
Lofts at Birdwell

Post Transfer

Developer Chart



Guarantors Chart

Guarantors

Kanwarjit Ronnie Gyani

Ability to Control

Paul D. Stell