Texas Department of Housing and Community Affairs

Governing Board

Board Action Request

File #: 1579 **Agenda Date:** 9/3/2026 **Agenda #:**

Presentation, discussion, and possible action regarding a Material Amendment to the Housing Tax Credit Application and waiver of 10 TAC §11.9(e)(6)(A)(i) for Waverly North (HTC #25158)

RECOMMENDED ACTION

WHEREAS, Waverly North (Development) received an award of 9% Housing Tax Credits (HTCs) in 2025 and was conditionally approved for a Multifamily Direct Loan in 2026 for the adaptive re-use and new construction of 76 multifamily units in Austin, Travis County;

WHEREAS, to address concerns raised by neighborhood and the State Historic Preservation Office and the National Park Service, Waverly North, LLC (the Applicant) requests approval for a significant modification of the architectural design, which will result in changes to the unit mix among other changes;

WHEREAS, Board approval is required for a significant modification of the site plan, a modification of the bedroom mix of units, and a significant modification of the architectural design of the Development, as directed in Tex. Gov't Code §2306.6712(d)(1), (2), and (5), and in 10 TAC §10.405(a)(4)(A), (B), and (E), and the Applicant has complied with the amendment requirements therein;

WHEREAS, the Application for the Development was awarded five points for Historic Preservation, but because the proposed redesign will result in 47.4% (36) of the total units in the historic buildings, which is lower than the 55% (42 units) required for points under 10 TAC §11.9(e)(6)(A)(i), the Applicant requests a waiver of this requirement; and

WHEREAS, the requested changes do not negatively affect the Development, impact the viability of the transaction, impact the scoring of the Application, or impact the funding award;

NOW, therefore, it is hereby

RESOLVED, that the requested material amendment to the Application and waiver of 10 TAC §11.9(e)(6)(A)(i) for Waverly North are approved as presented at this meeting, and the Executive Director and his designees are each authorized, directed, and empowered to take all necessary action to effectuate the foregoing.

BACKGROUND

Waverly North was approved for a 9% HTC award in 2025 for the adaptive re-use and construction of 76 low-income housing units in Austin, Travis County, and was also approved for a Multifamily Direct Loan at the Board meeting on July 23, 2026, subject to finalizing of the underwriting review and approval for this pending amendment. In a letter dated April 29, 2026, Megan Lasch, the representative of the Applicant, requested approval for a material amendment to the Application for a significant modification of the site plan, a modification of the bedroom mix of units, a significant modification of the architectural design.

The development plan includes the construction of residential units within two historic buildings, as well as the new construction of a third building with additional residential units and community space. Because the Development includes historic buildings, the development plan must be reviewed by state and federal agencies. Subsequent to the submission of the original Application, the State Historic Preservation Office (SHPO) and the National Park Service (NPS) expressed concern about the design. Based on their feedback and feedback from the neighborhood, certain elements of the Development have been amended.

The original site plan had 17 surface parking spaces on the site, which exceeded the number of parking spaces required by the City of Austin. During the zoning change hearings and site plan review process, the neighborhood expressed concerns about the number of parking spaces and requested more on-site parking spaces for the residents. In order to accommodate this request, the design of the Development has changed to include more parking. The parking has increased from 17 spaces to 29 spaces by providing parking between the historic buildings and the new construction building.

Additionally, the historic buildings have changed from the time of Application based on comments received during the historic review, which occurred after submission of the application. Certain elements of the historic buildings must remain unaltered, including some interior corridors, certain windows and doors, and exterior facades. The building floor plans, unit floor plans, and square footages have changed to incorporate the required historic elements.

The 76 total units is unchanged from the time of Application; however, the total Net Rentable Area (NRA) has increased from 56,868 square feet to 58,150 square feet. Common Area has also increased from 12,305 square feet at Application to 12,962 square feet. Additionally, there has been a change to the unit mix due to the changes with the buildings. At Application, the 76 total units proposed included 10 efficiency units, 28 one-bedroom/one-bathroom units, 29 two -bedroom/two-bathroom units, and nine three-bedroom/two-bathroom units. The proposed amendment includes eight efficiency units, 30 one-bedroom/one-bathroom units, 29 two-bedroom/two-bathroom units, and nine three-bedroom/two-bathroom units.

Also, due to the historic review determination that certain elements of the historic buildings remain unaltered, the proposed modifications and additions to the historic buildings that initially accommodated the 42 units would not be approved. Therefore, in order to maintain the required historic features, the architectural plans have been revised, and a total of 36 units can be constructed fully or partially within the historic buildings. The Application for the Development was awarded five points for Historic Preservation, which requires that at least

55% of the units be constructed fully or partially within the historic structures. The proposed amendment results in a reduction from 55.3% to 47.4% of the units being in the historic structures. As a result, the Applicant is requesting a waiver of 10 TAC §11.9(e)(6)(A)(i), which requires that for Developments with under 100 total units at least 55% of the residential units be constructed fully or partially within the historic structures. It was unknown at the time of Application that certain modifications that allowed for 55% of the units to be constructed in the historic structures would not be approved by SHPO and NPS. The alternative to this requested lower percentage would be a reduction in the total number of units that could be constructed on the Development site. The granting of this waiver would serve the purpose found in 2306.6701(2) which is to maximize the number of suitable, affordable residential rental units added to the state's housing supply.

The Applicant also explained that, while the parking proposed in the Application complied with City of Austin requirements, it was unknown at the time of application that the neighborhood would request more parking. Additionally, it was unknown at the time of application which elements of the historic buildings would need to remain unaltered in the final design. These changes are necessary to work with the neighborhood to finalize the site plan and to maintain historic elements in the existing buildings. The good cause for this amendment is to comply with local requests and historic requirements and to provide affordable units in Austin.

Additionally, the application to the Multifamily Direct Loan (MFDL) Program was submitted for this Development, and additional 30% units will be required in that application. This amendment request includes a financing structure that incorporates the additional rent and income restrictions for the MFDL program. The average income remains the same as at application, but there are more 30% units and more 80% units.

Staff’s re-underwriting review of the modified financing indicates no impact on the HTC amount. With the exception of the requested waiver, staff has determined that the proposed changes do not affect the scoring of the Application or the HTC award, and the Development will continue to meet the accessibility requirements.

Staff recommends approval of the Application amendment and granting of the waiver of 10 TAC §11.9(e)(6)(A)(i) as presented herein.

Real Estate Analysis Division
August 5, 2026

Addendum to Underwriting Report

TDHCA Application #: **26502_25158** Program(s): **9% HTC/MDL**

Waverly North

Address/Location: 3710 Cedar Street

City: Austin County: Travis Zip: 78705

	APPLICATION HISTORY
Report Date	**PURPOSE**
08/05/26	**MDL 2026-1 NOFA NHTF Award Memo & Amendment**
11/06/25	Carryover Memo
06/20/25	Original Underwriting Report

ALLOCATION

	Previous Allocation				RECOMMENDATION						
TDHCA Program	**Amount**	**Int. Rate**	**Amort**	**Term**	**Amount**	**Int. Rate**	**Amort**	**Perm. Term**	**Perm. Lien**	**Const. Term**	**Const. Lien**
MF Direct Loan Const, to Perm	$0	0.00%	0	.0 yrs	**$5,800,000**	**2.00%**	**40**	**30.0 yrs**	**1**	**30 mos**	**2**
FHTC (9% Credit)	$1,990,204				**$1,990,204**						

* Multifamily Direct Loan Terms:

* The term of a Multifamily Direct Loan should match the term of any superior loan (within 6 months).

** Construction loan term cannot exceed the recommendation above, but may be less depending on actual closing date. Final construction term will be noted in the loan documents

CONDITIONS STATUS

1 Receipt and acceptance by Carryover:

- Formal approval for $6,500,000 loan from AHFC clearly stating all terms, conditions and source of

Status: Satisfied. Applicant provided approval of AHFC loan stating all terms, conditions and source of funding however, the amount decreased from $6.5mm to $5.5mm.

2 Receipt and acceptance by Cost Certification:

a: Architect certification that a noise assessment was completed, and that all recommendations were implemented and the Development is compliant with HUD noise guidelines.

b: Certification of comprehensive testing for asbestos, lead-based paint, and lead in drinking water; that any appropriate abatement procedures were implemented; and that any remaining asbestos-containing materials, lead-based paint and lead in drinking water are being managed in accordance with an acceptable Operations and Maintenance (O&M) program.

c: Certification that testing for asbestos was performed on the existing structures prior to demolition, and if necessary, a certification that any appropriate abatement procedures were implemented.

d: Attorney opinion validating federally sourced funds can be considered bona fide debt with a reasonable expectation that it will be repaid in full and further stating that the funds should not be deducted from eligible basis.

3 Receipt and acceptance before Direct Loan Closing:

a: Updated application exhibits: Rent Schedule, Utility Allowance, Operating Expenses, Long-Term Pro Forma, Development Cost Schedule, Schedule of Sources; and documentation necessary to support any changes from previous underwriting.

b: Substantially final construction contract with Schedule of Values.

c: Updated term sheets with substantially final terms from all lenders.

d: Substantially final draft of limited partnership agreement.

Should any terms of the proposed capital structure change or if there are material changes to the overall development plan or costs, the analysis must be re-evaluated and adjustment to the credit allocation and/or terms of other TDHCA funds may be warranted.

PREVIOUS SET-ASIDES

TDHCA SET-ASIDES for HTC LURA		
Income Limit	Rent Limit	Number of Units
30% of AMI	30% of AMI	17
50% of AMI	50% of AMI	20
60% of AMI	60% of AMI	27
80% of AMI	80% of AMI	12

CURRENT SET-ASIDES

TDHCA SET-ASIDES for HTC LURA		
Income Limit	Rent Limit	Number of Units
30% of AMI	30% of AMI	28
50% of AMI	50% of AMI	9
60% of AMI	60% of AMI	17
80% of AMI	80% of AMI	22

TDHCA SET-ASIDES for DIRECT LOAN LURA		
Income Limit	Rent Limit	Number of Units
30% of AMFI	30% of AMFI	28

ANALYSIS

The development received an annual 9% HTC allocation of $1,990,204 in July 2025.

At carryover, the Austin Housing Finance Corporation cash flow loan was approved for $5.5M instead of the $6.5M requested.

Applicant is now requesting a Multifamily Direct Construction to Perm Loan for $5.8M at 2% interest rate with a 40-year term. The construction term is assumed at 30 months.

The funding is from NHTF under the 2026-1 NOFA.

There will be 28 NHTF and 12 Match Units.

In addition, the Applicant is submitting for an amendment. The development will remain two two-story existing historic building with residential units and a new construction third building with three stories that includes residential units and a clubhouse.

In the original application, 42 of the 76 units, or 55.3% of the total units, were proposed to be constructed fully or partially within the two historic structures on the development site, as required by Section §11.9(e)(6) of the QAP.

During the historic review, parts of which occurred after application and after submission of the January amendment, the State Historic Preservation Office and National Park Service determined that certain elements of the historic buildings must remain unaltered, including some interior corridors, certain windows and doors, and exterior facades. The proposed modifications and additions to the historic buildings that accommodated the 42 units would not be approved.

Therefore, in order to maintain the required historic features, the architectural plans have been revised and a total of 36 adaptive re-use units can be constructed fully or partially within in the historic buildings. This is a reduction from 55.3% to 47.4%. The number of new units constructed will increase from 34 to 40 units.

The Applicant is also requesting a waiver of Section 11.9(e)(6)(A)(i), which is the requirement that for Developments with under 100 total Units, at least 55% of the residential Units shall be constructed fully or partially within the historic structures. It was unknown at the time of application that certain modifications that allowed for 55% of the units to be constructed in the historic structures would not be approved by State Historic Preservation Office and the National Park Service.

Changes were made to the unit mix from the original application shown in the table below as well as the size of the units. The NRA has increased from 56,868 sf to 58,150 sf.

Total parking spaces have been increased from 17 to 29 spaces.

Common area has increased from 12,305 sf to 12,962 sf.

Unit Types	Original Development Plan	New Development Plan
0 br/1 BR	10	8
1 br/2 BR	28	30
2 br/2 BR	29	29
3 br/2 BR	9	9

The unit mix has changed since adding the MFDL Loan and the 28 units at 30% AMI are inclusive of the MFDL Units. However, MFDL Units and HOME Match Units will float among the Unit Types.

Income Limit	Number of Units Original Rent Schedule	Number of Units New Rent Schedule
30% of AMI	17	28
50% of AMI	20	9
60% OF AMI	27	17
80% OF AMI	12	22

Operating Pro Forma

2026 program rent limits are being used.

An updated Market Rental comparison was provided. The demand analysis remained the same however, the market rents decreased. Underwriter adjusted for the updated market rents in the analysis.

The market rents are between 6% to 31% lower than max net program rents. Effective Gross Income has decreased by $194k from previous underwriting.

Applicant's proforma is $1k higher than the Underwriter's as the rent schedule was submitted with two instances of rents collected higher than the market rents.

Applicant submitted updated Utility Allowances (compliance approved) dated January 23, 2026 to the most recent figures indicated by the Housing Authority of City of Austin:
0BR decreased from $73 to $67
1BR decreased from $84 to $76
2BR decreased from $106 to $98
3BR decreased from $130 to $121

TDHCA's Proforma is used for analysis due to the difference in assumed expenses. Underwriter used comparable Austin Comps to estimate the expenses.

G&A expense was submitted at $573 per unit. Underwriter is averaging $882 per unit. The deal is still feasible with the higher expense.

The adjustments from rental income and expenses have resulted in decrease in total expenses by $46k; most notable decrease was the property tax expense; and decrease in NOI by $147k.

Development Cost

Building costs increased by $426k;
Off-site costs increased by $70k;
Developer fee decreased by $422k;
Total Development costs decreased by $519k.

Sources of Funds

Citibank's Construction to Perm loan was replaced with PNC providing a construction loan only.
The construction loan amount decreased from $15.1M to $13.6M; interest rate decreased from 7.5% to 6.51% and the term increased from 24 to 30 months.

TDHCA will be in the second lien position during construction.

Mercy Housing was added as a source. They are providing a private loan of $1.9M; interest rate of 4.5% with a 20-year term and amortized over 40 years. Under these terms, there is a debt service payment of $102,500.

The loan has been added as hard debt to bring the DCR from 1.83 down to 1.23

Hudson equity investor, which was going to provide equity for Federal LIHTC, Federal Historic, and State Historic Tax Credits, has been replaced with PNC to provide Federal LIHTC, and Federal Historic tax credits. Fallbrook will provide the State Historic tax credits. The changes with the capital contribution and credit price are reflected below:

Equity Investor	Capital Contribution Previous Underwriting	Credit Price Previous Underwriting	Capital Contribution Current Report	Credit Price Current Report
Hudson	$17,114,043	$0.86		
Hudson-Federal Historic Tax Credits	$1,540,398	$0.90		
Hudson-State Historic Tax Credit	$1,925,498	$0.90		
PNC			$15,918,448	$0.80
PNC-Federal Historic Tax Credits			$1,174,661	$0.80
Fallbrook-State Historic Tax Credits			$1,725,284	$0.94

The Direct Loan Match is through a net Present Value of a below market rate loan and is not shown as a source.

Deferred Developer Fee decreased by $1.158M and pays off in year 8.

As a result of the difference in expenses used by the Underwriter, the cash flow becomes negative starting in year 33 in the Long-term Proforma.

Per 11.302(i)(4)(B) of the QAP "A development will be characterized as infeasible if..Negative Cash Flow at any time throughout the term of a Direct Loan.."

The deal was submitted for a 40-year term however in order to meet the rule, the Underwriter is recommending the term of the loan decrease to 30-years.

Conclusion:

Underwriter recommends a Multifamily Direct Loan of $5,800,000 at 2% interest with a 30-year term; 30-month construction term is assumed. Under these terms, the annualized monthly debt service payment is $210,767. The MDL funding is NHTF funds. The Direct Loan is in the second lien position during construction.

Any portion of the loan not repaid will be due to the earlier of the end of the loan term or upon sale, refinance, or transfer of the property.

The original annual 9% HTC allocation of $1,990,204 is still recommended.

Underwriter:	*Bin Ni*
Manager of Real Estate Analysis:	*Robert Castillo*
Director of Real Estate Analysis:	*Jeanna Adams*

UNIT MIX/RENT SCHEDULE

Waverly North, Austin, 9% HTC/MDL #26502_25158

LOCATION DATA	
CITY:	Austin
COUNTY:	Travis
Area Median Income	$134,400
PROGRAM REGION:	7
PROGRAM RENT YEAR:	2026

UNIT DISTRIBUTION						
# Beds	# Units	% Total	Assisted	MDL	SHTC	Match
Eff	8	10.5%	0	4	0	1
1	30	39.5%	0	10	0	5
2	29	38.2%	0	10	0	4
3	9	11.8%	0	4	0	2
4	-	0.0%	0	0	0	0
5	-	0.0%	0	0	0	0
TOTAL	76	100.0%	-	28	-	12

PRO FORMA ASSUMPTIONS	
Revenue Growth	2.00%
Expense Growth	3.00%
Basis Adjust	130%
Applicable Fraction	100.00%
APP % Acquisition	4.00%
APP % Construction	9.00%
Average Unit Size	765 sf

54%	Income	20%	30%	40%	50%	60%	70%	80%	EO / MR	TOTAL
Average Income	# Units	-	28	-	9	17	-	22	-	76
	% Total	0.0%	36.8%	0.0%	11.8%	22.4%	0.0%	28.9%	0.0%	100.0%

UNIT MIX / MONTHLY RENT SCHEDULE

FEDERAL HTC		MFDL NHTF Units		Match Units	UNIT MIX				APPLICABLE PROGRAM RENT			APPLICANT'S PRO FORMA RENTS				TDHCA PRO FORMA RENTS				MARKET RENTS		
Type	Gross Rent	Type	Gross Rent	Match Units	# Units	# Beds	# Baths	NRA	Gross Rent	Utility Allow	Max Net Program Rent	Delta to Max	Rent psf	Net Rent per Unit	Total Monthly Rent	Total Monthly Rent	Rent per Unit	Rent psf	Delta to Max	Underwritten		Mrkt Analyst
Adaptive Re-Use Units																						
TC 30%	$705	NHTF 30%	$706		4	0	1	503	$705	$67	$638	$0	$1.27	$638	**$2,552**	**$2,552**	$638	$1.27	$0	$1,110	$2.21	$1,110
TC 50%	$1,176			LH50%	1	0	1	503	$1,176	$67	$1,109	$0	$2.20	$1,109	**$1,109**	**$1,109**	$1,109	$2.20	$0	$1,110	$2.21	$1,110
TC 50%	$1,176				1	0	1	503	$1,176	$67	$1,109	$0	$2.20	$1,109	**$1,109**	**$1,109**	$1,109	$2.20	$0	$1,110	$2.21	$1,110
TC 50%	$1,176				2	0	1	504	$1,176	$67	$1,109	$0	$2.20	$1,109	**$2,218**	**$2,218**	$1,109	$2.20	$0	$1,111	$2.20	$1,111
TC 30%	$756	NHTF 30%	$756		1	1	1	600	$756	$76	$680	$0	$1.13	$680	**$680**	**$680**	$680	$1.13	$0	$1,312	$2.19	$1,312
TC 30%	$756	NHTF 30%	$756		2	1	1	601	$756	$76	$680	$0	$1.13	$680	**$1,360**	**$1,360**	$680	$1.13	$0	$1,313	$2.18	$1,313
TC 30%	$756	NHTF 30%	$756		2	1	1	604	$756	$76	$680	$0	$1.13	$680	**$1,360**	**$1,360**	$680	$1.13	$0	$1,313	$2.17	$1,313
TC 30%	$756	NHTF 30%	$756		2	1	1	617	$756	$76	$680	$0	$1.10	$680	**$1,360**	**$1,360**	$680	$1.10	$0	$1,321	$2.14	$1,321
TC 30%	$756	NHTF 30%	$756		2	1	1	635	$756	$76	$680	$0	$1.07	$680	**$1,360**	**$1,360**	$680	$1.07	$0	$1,330	$2.09	$1,330
TC 30%	$756	NHTF 30%	$756		1	1	1	637	$756	$76	$680	$0	$1.07	$680	**$680**	**$680**	$680	$1.07	$0	$1,330	$2.09	$1,330
TC 50%	$1,260				2	1	1	653	$1,260	$76	$1,184	$0	$1.81	$1,184	**$2,368**	**$2,368**	$1,184	$1.81	$0	$1,339	$2.05	$1,339
TC 50%	$1,260				2	1	1	662	$1,260	$76	$1,184	$0	$1.79	$1,184	**$2,368**	**$2,368**	$1,184	$1.79	$0	$1,343	$2.03	$1,343
TC 60%	$1,512				2	1	1	673	$1,512	$76	$1,436	($86)	$2.01	$1,350	**$2,700**	**$2,698**	$1,349	$2.00	($87)	$1,349	$2.00	$1,349
TC 60%	$1,512				1	1	1	686	$1,512	$76	$1,436	($86)	$1.97	$1,350	**$1,350**	**$1,350**	$1,350	$1.97	($86)	$1,350	$1.97	$1,355
TC 60%	$1,512			HH80%	1	1	1	687	$1,512	$76	$1,436	($86)	$1.97	$1,350	**$1,350**	**$1,350**	$1,350	$1.97	($86)	$1,350	$1.97	$1,356
TC 60%	$1,512			HH80%	2	1	1	700	$1,512	$76	$1,436	($86)	$1.93	$1,350	**$2,700**	**$2,700**	$1,350	$1.93	($86)	$1,350	$1.93	$1,362
TC 60%	$1,512			HH80%	2	1	1	709	$1,512	$76	$1,436	($86)	$1.90	$1,350	**$2,700**	**$2,700**	$1,350	$1.90	($86)	$1,350	$1.90	$1,362
TC 80%	$2,017				2	1	1	717	$2,017	$76	$1,941	($591)	$1.88	$1,350	**$2,700**	**$2,700**	$1,350	$1.88	($591)	$1,350	$1.88	$1,372
TC 80%	$2,017				2	1	1	719	$2,017	$76	$1,941	($591)	$1.88	$1,350	**$2,700**	**$2,700**	$1,350	$1.88	($591)	$1,350	$1.88	$1,372
TC 80%	$2,420				2	2	2	900	$2,420	$98	$2,322	($697)	$1.81	$1,625	**$3,250**	**$3,250**	$1,625	$1.81	($697)	$1,625	$1.81	$1,625
New Construction Units																						
TC 60%	$1,512				4	1	1	634	$1,512	$76	$1,436	($86)	$2.13	$1,350	**$5,400**	**$5,320**	$1,330	$2.10	($106)	$1,330	$2.10	$1,330
TC 30%	$907	NHTF 30%	$907		10	2	2	852	$907	$98	$809	$0	$0.95	$809	**$8,090**	**$8,090**	$809	$0.95	$0	$1,600	$1.88	$1,600
TC 50%	$1,512			HH80%	1	2	2	852	$1,512	$98	$1,414	$0	$1.66	$1,414	**$1,414**	**$1,414**	$1,414	$1.66	$0	$1,600	$1.88	$1,600
TC 60%	$1,815			HH80%	3	2	2	852	$1,815	$98	$1,717	($117)	$1.88	$1,600	**$4,800**	**$4,800**	$1,600	$1.88	($117)	$1,600	$1.88	$1,600
TC 80%	$2,420				13	2	2	852	$2,420	$98	$2,322	($722)	$1.88	$1,600	**$20,800**	**$20,800**	$1,600	$1.88	($722)	$1,600	$1.88	$1,600
TC 30%	$1,048	NHTF 30%	$1,048		4	3	2	1,066	$1,048	$121	$927	$0	$0.87	$927	**$3,708**	**$3,708**	$927	$0.87	$0	$1,900	$1.78	$1,900
TC 60%	$2,097			HH80%	2	3	2	1,066	$2,097	$121	$1,976	($76)	$1.78	$1,900	**$3,800**	**$3,800**	$1,900	$1.78	($76)	$1,900	$1.78	$1,900
TC 80%	$2,796				3	3	2	1,066	$2,796	$121	$2,675	($775)	$1.78	$1,900	**$5,700**	**$5,700**	$1,900	$1.78	($775)	$1,900	$1.78	$1,900
New Construction Unit Total Units/S.F.					40			35,134														
Adaptive Re-Use Units Total Units / S.F.					36			23,016														
TOTALS/AVERAGES:					**76**			**58,150**				**($224)**	**$1.58**	**$1,206**	**$91,686**	**$91,604**	**$1,205**	**$1.58**	**($225)**	**$1,480**	**$1.93**	**$1,482**
ANNUAL POTENTIAL GROSS RENT:															**$1,100,232**	**$1,099,248**						

*MFDL units float among Unit Types

STABILIZED PRO FORMA

Waverly North, Austin, 9% HTC/MDL #26502_25158

	STABILIZED FIRST YEAR PRO FORMA																	
	COMPARABLES				APPLICANT				Carryover Memo	PRIOR REPORT		Carryover Memo	TDHCA				VARIANCE	
	Database		Austin Comps		% EGI	Per SF	Per Unit	Amount		Applicant	TDHCA		Amount	Per Unit	Per SF	% EGI	%	$
POTENTIAL GROSS RENT						$1.58	$1,206	$1,100,232	$1,309,392	**$1,235,352**	**$1,235,352**	$1,309,392	$1,099,248	$1,205	$1.58		0.1%	$984
late fees, app fees, retained deposits							$15.00	$13,680	$13,680	13,680								
Total Secondary Income							$15.00				13,680	13,680	$13,680	$15.00			0.0%	$0
POTENTIAL GROSS INCOME								$1,113,912	$1,323,072	$1,249,032	$1,249,032	$1,323,072	$1,112,928				0.1%	$984
Vacancy & Collection Loss							7.5% PGI	(83,543)	(99,230)	(93,677)	(93,677)	(99,230)	(83,470)	7.5% PGI			0.1%	(74)
EFFECTIVE GROSS INCOME								$1,030,369	$1,223,842	$1,155,355	$1,155,355	$1,223,842	$1,029,458				0.1%	$910
General & Administrative	$46,318	$609/Unit	$67,064	$882	4.23%	$0.75	$573	$43,560	$35,200	$35,200	$45,828	$45,828	$67,064	$882	$1.15	6.51%	-35.0%	(23,504)
Management	$40,658	3.3% EGI	$47,373	$623	4.00%	$0.71	$542	$41,215	$61,197	$57,768	$57,768	$61,192	$41,179	$542	$0.71	4.00%	0.1%	36
Payroll & Payroll Tax	$117,268	$1,543/Unit	$182,251	$2,398	14.89%	$2.64	$2,018	$153,400	$140,700	$140,700	$140,700	$140,700	$153,400	$2,018	$2.64	14.90%	0.0%	-
Repairs & Maintenance	$76,284	$1,004/Unit	$108,274	$1,425	5.54%	$0.98	$751	$57,100	$45,500	$45,500	$53,200	$53,200	$53,200	$700	$0.91	5.17%	7.3%	3,900
Electric/Gas	$21,380	$281/Unit	$22,573	$297	1.48%	$0.26	$200	$15,200	$13,300	$13,300	$17,167	$17,167	$21,380	$281	$0.37	2.08%	-28.9%	(6,180)
Water, Sewer, & Trash	$66,153	$870/Unit	$59,951	$789	5.30%	$0.94	$718	$54,600	$31,300	$31,300	$55,615	$55,615	$54,600	$718	$0.94	5.30%	0.0%	-
Property Insurance	$52,063	$0.90 /sf	$73,069	$961	9.41%	$1.67	$1,276	$97,000	$97,000	$97,000	$97,000	$97,000	$97,000	$1,276	$1.67	9.42%	0.0%	-
Property Tax (@ 100%) 1.9818	$62,821	$827/Unit	$112,059	$1,474	12.13%	$2.15	$1,645	$125,000	$209,260	$164,531	$164,035	$180,189	$127,675	$1,680	$2.20	12.40%	-2.1%	(2,675)
Reserve for Replacements					2.21%	$0.39	$300	$22,800	$22,800	$22,800	$22,800	$22,800	$22,800	$300	$0.39	2.21%	0.0%	-
TDHCA Compliance fees ($40/HTC unit)					0.30%	$0.05	$40	$3,040	$3,040	$3,040	$3,040	$3,040	$3,040	$40	$0.05	0.30%	0.0%	-
Alarm					0.15%	$0.03	$21	$1,580	$1,580	$1,580	$1,580	$1,580	$1,580	$21	$0.03	0.15%	0.0%	-
TOTAL EXPENSES					**59.64%**	**$10.57**	**$8,085**	**$614,495**	**$660,877**	**$612,719**	**$658,732**	**$678,310**	**$642,917**	**$8,459**	**$11.06**	**62.45%**	**-4.4%**	**$ (28,422)**
NET OPERATING INCOME ("NOI")					**40.36%**	**$7.15**	**$5,472**	**$415,874**	**$562,965**	**$542,636**	**$496,623**	**$545,531**	**$386,541**	**$5,086**	**$6.65**	**37.55%**	**7.6%**	**$ 29,332**

CONTROLLABLE EXPENSES							$4,261/Unit							$4,601/Unit				

CAPITALIZATION / TOTAL DEVELOPMENT BUDGET / ITEMIZED BASIS

Waverly North, Austin, 9% HTC/MDL #26502_25158

DEBT / GRANT SOURCES

		APPLICANT'S PROPOSED DEBT/GRANT STRUCTURE								Prior Underwriting			AS UNDERWRITTEN DEBT/GRANT STRUCTURE						
		Cumulative DCR																Cumulative	
DEBT (Must Pay)	Fee	UW	App	Pmt	Rate	Amort	Term	Principal	Carryover Memo	Applicant	TDHCA	Carryover Memo	Principal	Term	Amort	Rate	Pmt	DCR	LTC
TDHCA - Multifamily Direct NHTF Loan 2026-1 NOFA		1.83	1.97	210,767	2.00%	40	40.0	$5,800,000	$5,300,000	$5,300,000	$5,300,000	$5,300,000	$5,800,000	30.0	40.0	2.00%	$210,767	1.83	17.8%
Mercy Housing		1.23	1.33	$102,500	4.50%	40	20.0	$1,900,000					$1,900,000	20.0	40.0	4.50%	$102,500	1.23	5.8%
CASH FLOW DEBT / GRANTS																			
City of Austin		1.23	1.33		0.00%	0	0.0	$500					$500	0.0	0.0	0.00%		1.23	0.0%
Austin Housing Finance Corp		1.23	1.33		0.00%	0	45.0	$5,500,000	$5,500,000	$6,500,000	$6,500,000	$5,500,000	$5,500,000	45.0	0.0	0.00%		1.23	16.9%
				$313,267	**TOTAL DEBT / GRANT SOURCES**			**$13,200,500**	**$10,800,000**	**$11,800,000**	**$11,800,000**	**$10,800,000**	**$13,200,500**	**TOTAL DEBT SERVICE**			**$313,267**	**1.23**	40.5%
NET CASH FLOW		$73,274	$102,607											**TDHCA**	**NET OPERATING INCOME**	**$386,541**	**$73,274**	**NET CASH FLOW**	

EQUITY SOURCES

	APPLICANT'S PROPOSED EQUITY STRUCTURE						Prior Underwriting			AS UNDERWRITTEN EQUITY STRUCTURE					
EQUITY / DEFERRED FEES	DESCRIPTION	% Cost	Annual Credit	Credit Price	Amount	Carryover Memo	Applicant	TDHCA	Carryover Memo	Amount	Credit Price	Annual Credit	% Cost	Annual Credits per Unit	Allocation Method
PNC	LIHTC Equity	48.9%	$1,990,204	$0.80	$15,918,448	$17,114,043	$17,114,043	$17,114,043	$17,114,043	$15,918,448	$0.80	$1,990,204	48.9%	$26,187	Previous Allocation
PNC-Federal Historic Tax Credits	Federal Historic TC	3.6%		$0.80	$1,174,661	$1,540,398	$1,540,398	$1,540,398	$1,540,398	$1,174,661	$0.80		3.6%		
Fallbrook-State Historic Tax Credits	State Historic TC	5.3%		$0.94	$1,725,284	$1,925,498	$1,925,498	$1,925,498	$1,925,498	$1,725,284	$0.94		5.3%		
O-SDA Industries, LLC	Deferred Developer Fees	1.7%	(18% Deferred)		$544,307	$1,702,222	$702,222	$702,222	$1,702,222	$544,304	(18% Deferred)		1.7%	**Total Developer Fee:**	**$3,039,780**
Additional (Excess) Funds Req'd		0.0%						$0		$0			0.0%		
TOTAL EQUITY SOURCES		59.5%			$19,362,700	$22,282,161	$21,282,161	$21,282,161	$22,282,161	$19,362,697			59.5%		
TOTAL CAPITALIZATION					**$32,563,200**	**$33,082,161**	**$33,082,161**	**$33,082,161**	**$33,082,161**	**$32,563,197**				**15-Yr Cash Flow after Deferred Fee:**	**$655,745**

DEVELOPMENT COST / ITEMIZED BASIS

		APPLICANT COST / BASIS ITEMS						Prior Underwriting			TDHCA COST / BASIS ITEMS					COST VARIANCE	
		Eligible Basis												Eligible Basis			
		Acquisition	New Const. Rehab	Total Costs			Carryover Memo	Applicant	TDHCA	Carryover Memo	Total Costs			New Const. Rehab	Acquisition	%	$
Land Acquisition					$17,895 / Unit	$1,360,000	$1,360,000	$1,360,000	$1,370,000	$1,370,000	$1,370,000	$18,026 / Unit				-0.7%	($10,000)
Building Acquisition		$0			$84,737 / Unit	$6,440,000	$6,440,000	$6,440,000	$6,430,000	$6,430,000	$6,430,000	$84,605 / Unit			$0	0.2%	$10,000
Carrying Costs						$92,250	$0	$0	$0	$0	$92,250					0.0%	$0
Off-Sites			$0		$6,053 / Unit	$460,000	$390,000	$390,000	$390,000	$390,000	$460,000	$6,053 / Unit		$0		0.0%	$0
Site Work			$880,000		$15,526 / Unit	$1,180,000	$1,180,000	$1,180,000	$1,180,000	$1,180,000	$1,180,000	$15,526 / Unit		$880,000		0.0%	$0
Site Amenities			$180,450		$2,374 / Unit	$180,450	$200,000	$200,000	$200,000	$200,000	$180,450	$2,374 / Unit		$200,000		0.0%	$0
Building Cost			$11,910,130	$204.82 /sf	$156,712/Unit	$11,910,130	$11,484,399	$11,484,399	$11,031,232	$11,031,232	$11,781,705	$155,022/Unit	$202.61 /sf	$11,781,705		1.1%	$128,425
Contingency			$1,008,624	7.78%	7.78%	$1,067,724	$1,325,440	$1,325,440	$1,280,123	$1,280,123	$1,067,724	7.85%	7.84%	$1,008,624		0.0%	$0
Contractor Fees			$1,957,088	14.00%	14.00%	$2,071,762	$2,041,177	$2,041,177	$1,971,390	$1,971,390	$2,053,783	14.00%	14.00%	$1,941,846		0.9%	$17,979
Soft Costs		$0	$2,176,157		$34,302 / Unit	$2,606,956	$2,568,042	$2,568,042	$2,568,042	$2,568,042	$2,606,956	$34,302 / Unit		$2,176,157	$0	0.0%	$0
Financing		$0	$1,477,319		$21,914 / Unit	$1,665,467	$2,095,037	$2,095,037	$2,095,037	$2,095,037	$1,665,467	$21,914 / Unit		$1,477,319	$0	0.0%	$0
Developer Fee		$0	$2,938,465	15.00%	15.00%	$3,061,330	$3,482,940	$3,482,940	$3,408,459	$3,408,459	$3,039,780	15.00%	15.00%	$2,919,848	$0	0.7%	$21,550
Reserves					6 Months	$467,128	$515,126	$515,126	$515,126	$515,126	$467,128	6 Months				0.0%	$0
TOTAL HOUSING DEVELOPMENT COST (UNADJUSTED BASIS)		**$0**	**$22,528,233**		$428,463 / Unit	**$32,563,197**	**$33,082,161**	**$33,082,161**	**$32,439,409**	**$32,439,409**	**$32,395,244**	$426,253 / Unit		**$22,385,499**	**$0**	**0.5%**	**$167,954**
Acquisition Cost		$0				$0		$0									
Contingency			$0			$0		$0									
Contractor's Fee			$0			$0		$0									
Financing Cost			$0														
Developer Fee	0.00%	$0	$0			$0		$0									
Reserves						$0		$0									
ADJUSTED BASIS / COST		**$0**	**$22,528,233**		$428,463/unit	**$32,563,197**	**$33,082,161**	**$33,082,161**	**$32,439,409**	**$32,439,409**	**$32,395,244**	$426,253/unit		**$22,385,499**	**$0**	**0.5%**	**$167,954**
TOTAL HOUSING DEVELOPMENT COSTS BASED ON 3RD PARTY SCR/CNA AND COST OF NEW BUILDING								**$32,563,197**									

CAPITALIZATION / TOTAL DEVELOPMENT BUDGET / ITEMIZED BASIS

Waverly North, Austin, 9% HTC/MDL #26502_25158

CREDIT CALCULATION ON QUALIFIED BASIS

	Applicant		TDHCA	
	Acquisition	Construction Rehabilitation	Acquisition	Construction
ADJUSTED BASIS	$0	$22,528,233	$0	$22,385,499
Deduction of Federal Grants	$0	($1,468,326)	$0	($1,468,326)
TOTAL ELIGIBLE BASIS	$0	$21,059,907	$0	$20,917,173
High Cost Area Adjustment		130%		130%
TOTAL ADJUSTED BASIS	$0	$27,377,879	$0	$27,192,325
Applicable Fraction	100.00%	100.00%	100%	100%
TOTAL QUALIFIED BASIS	$0	$27,377,879	$0	$27,192,325
Applicable Percentage	4.00%	9.00%	4.00%	9.00%
ANNUAL CREDIT ON BASIS	$0	$2,464,009	$0	$2,447,309
CREDITS ON QUALIFIED BASIS	$2,464,009		$2,447,309	

	ANNUAL CREDIT CALCULATION BASED ON TDHCA BASIS		FINAL ANNUAL LIHTC ALLOCATION		
			Credit Price $0.7998	Variance to Request	
Method	Annual Credits	Proceeds	Credit Allocation	Credits	Proceeds
Eligible Basis	$2,447,309	$19,574,558	----	----	----
Needed to Fill Gap	$2,058,256	$16,462,752	----	----	----
Previous Allocation	$1,990,204	$15,918,448	**$1,990,204**	**$0**	**$0**

BUILDING COST ESTIMATE

CATEGORY		FACTOR	UNITS/SF	PER SF	
Base Cost:	Elevator Served		35,134 SF	$150.49	5,287,226
Adjustments					
Exterior Wall Finish		4.80%		7.22	$253,787
Elderly		0.00%		0.00	0
9-Ft. Ceilings		0.00%		0.00	0
Roof Adjustment(s)				1.71	60,000
Subfloor				(0.23)	(8,081)
Floor Cover				3.75	131,753
Breezeways		$54.40	4,980	7.71	270,912
Balconies		$0.00	0	0.00	0
Plumbing Fixtures		$1,460	81	3.37	118,260
Rough-ins		$715	80	1.63	57,200
Built-In Appliances		$2,200	40	2.50	88,000
Exterior Stairs		$4,250	4	0.48	17,000
Heating/Cooling				4.11	144,401
Storage Space		$54.40	0	0.00	0
Carports		$21.40	0	0.00	0
Garages		$41.00	0	0.00	0
Common/Support Area		$129.21	4,200	15.45	542,674
Elevators			2	0.00	0
Other:	Concrete, Masonry, Metal Premiums			17.80	625,500
Fire Sprinklers		$4.60	44,314	7.26	255,140
SUBTOTAL				**223.25**	**7,843,771**
Current Cost Multiplier		1.00		0.00	0
Local Multiplier		1.00		0.00	0
Reserved					0
TOTAL BUILDING COSTS				**223.25**	**$7,843,771**
Plans, specs, survey, bldg permits		3.10%		(6.92)	($243,157)
Contractor's OH & Profit		11.10%		(24.78)	(870,659)
NET BUILDING COSTS			$168,249/unit	$191.55/sf	$6,729,955

Long-Term Pro Forma

Waverly North, Austin, 9% HTC/MDL #26502_25158

	Growth Rate	Year 1	Year 2	Year 3	Year 4	Year 5	Year 10	Year 15	Year 20	Year 25	Year 30	Year 35	Year 40
EFFECTIVE GROSS INCOME	2.00%	$1,029,458	$1,050,048	$1,071,049	$1,092,469	$1,114,319	$1,230,298	$1,358,348	$1,499,726	$1,655,819	$1,828,158	$2,018,434	$2,228,515
TOTAL EXPENSES	3.00%	$642,917	$661,793	$681,226	$701,235	$721,835	$834,344	$964,518	$1,115,141	$1,289,443	$1,491,163	$1,724,630	$1,994,863
NET OPERATING INCOME ("NOI")		**$386,541**	**$388,255**	**$389,822**	**$391,235**	**$392,484**	**$395,954**	**$393,831**	**$384,585**	**$366,376**	**$336,996**	**$293,804**	**$233,652**
EXPENSE/INCOME RATIO		62.5%	63.0%	63.6%	64.2%	64.8%	67.8%	71.0%	74.4%	77.9%	81.6%	85.4%	89.5%
MUST -PAY DEBT SERVICE													
TDHCA - Multifamily Direct NHTF Loan 20		$210,767	$210,767	$210,767	$210,767	$210,767	$210,767	$210,767	$210,767	$210,767	$210,767	$210,767	$210,767
TOTAL DEBT SERVICE		$313,267	$313,267	$313,267	$313,267	$313,267	$313,267	$313,267	$313,267	$313,267	$313,267	$313,267	$313,267
DEBT COVERAGE RATIO		1.23	1.24	1.24	1.25	1.25	1.26	1.26	1.23	1.17	1.08	0.94	0.75
ANNUAL CASH FLOW		**$73,274**	**$74,988**	**$76,555**	**$77,968**	**$79,217**	**$82,687**	**$80,564**	**$71,318**	**$53,109**	**$23,729**	**($19,463)**	**($79,615)**
Deferred Developer Fee Balance		$471,030	$396,042	$319,487	$241,519	$162,302	$0	$0	$0	$0	$0	$0	$0
CUMULATIVE NET CASH FLOW		$0	$0	$0	$0	$0	$246,158	$655,745	$1,034,020	$1,339,981	$1,522,346	$1,517,529	$1,247,245

April 29, 2026

Rene Ruiz
Asset Management
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, TX 78701

RE: HTC 25158 Waverly North Material Amendment Request

Dear Mr. Ruiz:

This letter concerns a revision to the material amendment request submitted in January 2026 for HTC 25158 Waverly North to modify the site plan and architectural design of the development.

Waverly North is the adaptive reuse of existing historic buildings in the City of Austin. The development plan includes the construction of residential units within two historic buildings as well as the new construction of residential units and community space. Because the development includes historic buildings, the development plan must be reviewed by state and federal agencies. Subsequent to the submission of the original application and the January amendment request to TDHCA, the State Historic Preservation Office and the National Park Service expressed concern about the height and design of the new construction building proposed in the January amendment as well as the modifications to the historic buildings. Based on their feedback, certain elements of the development have been amended. Please see the attached revised architectural plans, applications forms, and financing documents with these changes.

Modification of Site Plan
In the original application, Waverly North was proposed to be three buildings: two two-story existing historic buildings with residential units and a new construction third building with three stories that included residential units and clubhouse space. The original site plan had 17 surface parking spaces on the site. The 17 surface parking spaces proposed at application exceeded the number of parking spaces required by the City of Austin.

The January amendment request proposed a change from three to four buildings, with the new construction residential building increasing from three to four stories to accommodate increased parking on the site as requested by the neighborhood. However, the review from SHPO and NPS for historic tax credits objected to the design of the four-story new construction building and the overall height of that structure. Please see the attached emails. In response, the design of the development has changed from four total buildings in the January amendment back to three total buildings with a surface parking lot: the two two-story historic buildings, and the third three-story new construction building with residential units and community space. The three-story building will be slab on grade construction with an elevator, and parking has increased from the original 17 spaces in the application to 29 spaces by providing parking between the historic buildings and the new construction building.

Reduction in the Percentage of Units in the Historic Buildings

In the original application, 42 of the 76 units, or 55.3% of the total units, were proposed to be constructed fully or partially within the two historic structures on the development site, as required by Section 11.9(e)(6) of the QAP. During the historic review, parts of which occurred after application and after submission of the January amendment, the SHPO and NPS determined that certain elements of the historic buildings must remain unaltered, including some interior corridors, certain windows and doors, and exterior facades. The proposed modifications and additions to the historic buildings that accommodated the 42 units would not be approved. Please see the attached emails.

Therefore, in order to maintain the required historic features, the architectural plans have been revised and a total of 36 units can be constructed fully or partially within in the historic buildings. This is a reduction from 55.3% to 47.4%.

We are requesting consideration of a waiver of Section 11.9(e)(6)(A)(i), which is the requirement that for Developments with under 100 total Units, at least 55% of the residential Units shall be constructed fully or partially within the historic structures. It was unknown at the time of application that certain modifications that allowed for 55% of the units to be constructed in the historic structures would not be approved by SHPO and NPS. The alternative to this requested lower percentage would be a reduction in the total number of units that could be constructed on the development site. The granting of this waiver would serve the purpose found in 2306.6701 which is to “(2) maximize the number of suitable, affordable residential rental units added to the state's housing supply.” Allowing for a percentage lower than 55% would enable the maximal 76 units to be added to the state’s housing supply; otherwise, fewer units would be constructed.

Modification of Unit Mix, NRA, and Common Area
In the original application, 76 total units were proposed with 10 0 bed/1 bath units. 28 1 bed/2bath units, 29 2 bed/2 bath units, and 9 3 bed/2 bath units. Due to changes with the buildings, the unit mix has changed to 8 0 bed/1 bath units. 30 1 bed/2bath units, 29 2 bed/2 bath units, and 9 3 bed/2 bath units.

The NRA has increased from 56,868 at application to 58,150.

Common area has increased from 12,305 square feet at application to 12,962 square feet.

Financing Structure
An application to the MFDL Program was submitted in January 2026, and the attached revised development financing exhibits have also been submitted as an update to the MFDL application. The financing structure incorporates the additional rent/income restrictions for the NHTF Program. The average income remains the same as at application, but there are more 30% units and more 80% units. This income mix will be used if MFDL funds are awarded to the development. If MFDL funds are not awarded to the development, the rent and income levels will be the same as at application.

Explanation and Good Cause for the Amendment Request
While the site plan proposed in the application complied with City of Austin requirements, it was unknown at the time of application that the neighborhood would request more parking and that the NPS/SHPO review would reject the design for the new construction building proposed in the January amendment. Additionally, it was unknown at the time of application

and in January which elements of the historic buildings would need to remain unaltered in the final design and that the NPS and SHPO would not approve certain changes to the historic buildings. The changes proposed in this amendment are necessary to work with the neighborhood to finalize the site plan and to make the changes required in the historic review. The good cause for this amendment is to comply with local requests and historic requirements and to provide affordable units in Austin.

Thank you for your attention and please contact me with any questions.

Sincerely,

Megan Lasch
President, O-SDA Industries

From:	Valerie Magolan
To:	Claire Bushemi
Cc:	Jen Davel
Subject:	Re: Confederate Women"s/Nurses" home - Part 2
Date:	Friday, March 13, 2026 7:24:33 AM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png image007.png image008.png image009.png rp26_email_signature_3ed926eb-f645-4ef4-9479-c1f50fe8be7e.png

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Good morning Claire,

NPS has provided very timely feedback from their group staff meeting, which I'll relay for you below. I'm glad that we could take a look at this preliminarily and get you quick responses, so the applicants can make informed decisions.

For the preliminary review, I requested feedback on the site plan only, to include demolition, new construction siting and massing, and addition siting and massing. NPS's goals in a preliminary are generally to provide feedback about potentially deniable items that could stand in the way of the applicant receiving tax credits.
Note that comments are from the TPS team only, generally from a lens of Part 2 review and whether the work meets the Standards. Please note that since the comments here are targeted to the site plan and do not reflect review of any other aspect of the project (e.g. interior work), nor do they reflect consultation with National Register staff regarding overall eligibility of the property (which we also will want to be keeping our eye on).

NPS found that the site plan contains multiple major issues that would likely warrant denial.

- There is too much density overall, and the size/scale/massing of new construction is particularly out of character and incompatible with the property (and the neighborhood).
- The two additions to the rear and side of the historic main building are both problematic (the covered porch on rear elevation that would be removed/ enclosed is character-defining, and side addition extends beyond octagonal bay on the front of the building, also character-defining).
- The east elevation of the heating plant (facing the main building) is the front elevation of that building, judging from the site plan and design of the building. The proposed addition to the east/front elevation inappropriately changes that building's historic appearance and massing, which is incompatible, and which NPS also notes would impact the ability of that building to be determined a contributing resource on the site.
- The free-standing new leasing office location is also not compatible, as it projects forward toward the street beyond the historic main building.

If the applicant team wants to move forward with tax credits, NPS believes (as do we) that there would have to be significant redesign of the broad design moves on the project. It is doubtful that there is a way to provide the proposed unit count (as well as parking count) on this constrained site in a way that will meet the Standards and be sufficiently subservient to the historic buildings.

I'm very aware how challenging this situation is now for the applicants, and the level of planning and financial ramifications at stake given their participation in the LIHTC program as well as ours. Once you've had a chance to discuss with the applicants, please let us know how you and the applicants would like to proceed from here. As it stands, the Part 2 application is on hold at our office. There is no timeline on our end, and the applicants could request to keep it on hold for as long as they need while they consider options or new plans.

Thanks,
Valerie

Valerie Magolan

From: Claire Bushemi <cbushemi@heritage-consulting.com>
Sent: Monday, March 9, 2026 4:33 PM
To: Valerie Magolan <Valerie.Magolan@thc.texas.gov>
Cc: Jen Davel <jdavel@heritage-consulting.com>
Subject: RE: Confederate Women's/Nurses' home - Part 2

Thanks Valerie!

Thanks,

Claire Bushemi
Project Manager

HERITAGE | CONSULTING GROUP

Direct: 312-264-4645
Cell: 219-741-1977
heritage-consulting.com

From: Valerie Magolan <Valerie.Magolan@thc.texas.gov>
Sent: Monday, March 9, 2026 5:19 PM
To: Claire Bushemi <cbushemi@heritage-consulting.com>
Cc: Jen Davel <jdavel@heritage-consulting.com>

Subject: Re: Confederate Women's/Nurses' home - Part 2

Hi Claire,
I just sent over the request a few minutes ago. I'll keep in touch and let you know how NPS wants to proceed.

Valerie Magolan

From: Claire Bushemi <cbushemi@heritage-consulting.com>
Sent: Monday, March 9, 2026 4:17 PM
To: Valerie Magolan <Valerie.Magolan@thc.texas.gov>
Cc: Jen Davel <jdavel@heritage-consulting.com>
Subject: RE: Confederate Women's/Nurses' home - Part 2

Good afternoon Valerie!

Thanks for chatting today. Just sending an email as a follow up. The project team would like to proceed with the NPS preliminary review of the new construction on site.

Thanks,

Claire Bushemi
Project Manager

HERITAGE | CONSULTING GROUP

Direct: 312-264-4645
Cell: 219-741-1977
heritage-consulting.com

From: Claire Bushemi
Sent: Friday, March 6, 2026 3:19 PM
To: 'Valerie Magolan' <Valerie.Magolan@thc.texas.gov>
Cc: Jen Davel <jdavel@heritage-consulting.com>
Subject: RE: Confederate Women's/Nurses' home - Part 2

Ill give you a call Monday then!

Have a great weekend Valerie!

Thanks,

Claire Bushemi
Project Manager

HERITAGE | CONSULTING GROUP

Direct: 312-264-4645
Cell: 219-741-1977
heritage-consulting.com

From: Valerie Magolan <Valerie.Magolan@thc.texas.gov>
Sent: Friday, March 6, 2026 3:18 PM
To: Claire Bushemi <cbushemi@heritage-consulting.com>
Cc: Jen Davel <jdavel@heritage-consulting.com>
Subject: Re: Confederate Women's/Nurses' home - Part 2

Hi Claire,

Thanks for the note. I'm free most of the day Monday, except for a meeting I have at 2 eastern.

Valerie Magolan

From: Claire Bushemi <cbushemi@heritage-consulting.com>
Sent: Friday, March 6, 2026 2:14 PM
To: Valerie Magolan <Valerie.Magolan@thc.texas.gov>
Cc: Jen Davel <jdavel@heritage-consulting.com>
Subject: RE: Confederate Women's/Nurses' home - Part 2

Thanks Valerie for the quick turnaround. I put in a word with the project team to get their preference, but we recommended the prelim review.

Do you have time Monday to chat about it?

Thanks,

Claire Bushemi
Project Manager

HERITAGE | CONSULTING GROUP

Direct: 312-264-4645
Cell: 219-741-1977
heritage-consulting.com

From: Valerie Magolan <Valerie.Magolan@thc.texas.gov>
Sent: Thursday, March 5, 2026 5:59 PM
To: Claire Bushemi <cbushemi@heritage-consulting.com>
Subject: Confederate Women's/Nurses' home - Part 2

Hello Claire,

Our office has taken a look at this proposal, and we have major concerns about the scope of work, in particular with respect to the intensive scope of new construction on the site. We have other, more run-of-the-mill design concerns, but given the significance of unit count and site plan as part of compliance with LIHTC requirements and funding, we wanted to flag this to your team as soon as possible.

If you would like us to send up the Part 2 application to NPS for their formal review, we will go forward with that plan. However, as an alternative, NPS has offered to review the site plan as a preliminary consult, which would allow the project team to get critical feedback sooner without paying a Part 2 review fee.

Please let us know how you would like to proceed.

Thanks,
Valerie

TEXAS HISTORICAL COMMISSION
REAL PLACES TELLING REAL STORIES

Valerie Magolan

Program Coordinator, Historic Tax Credit Program

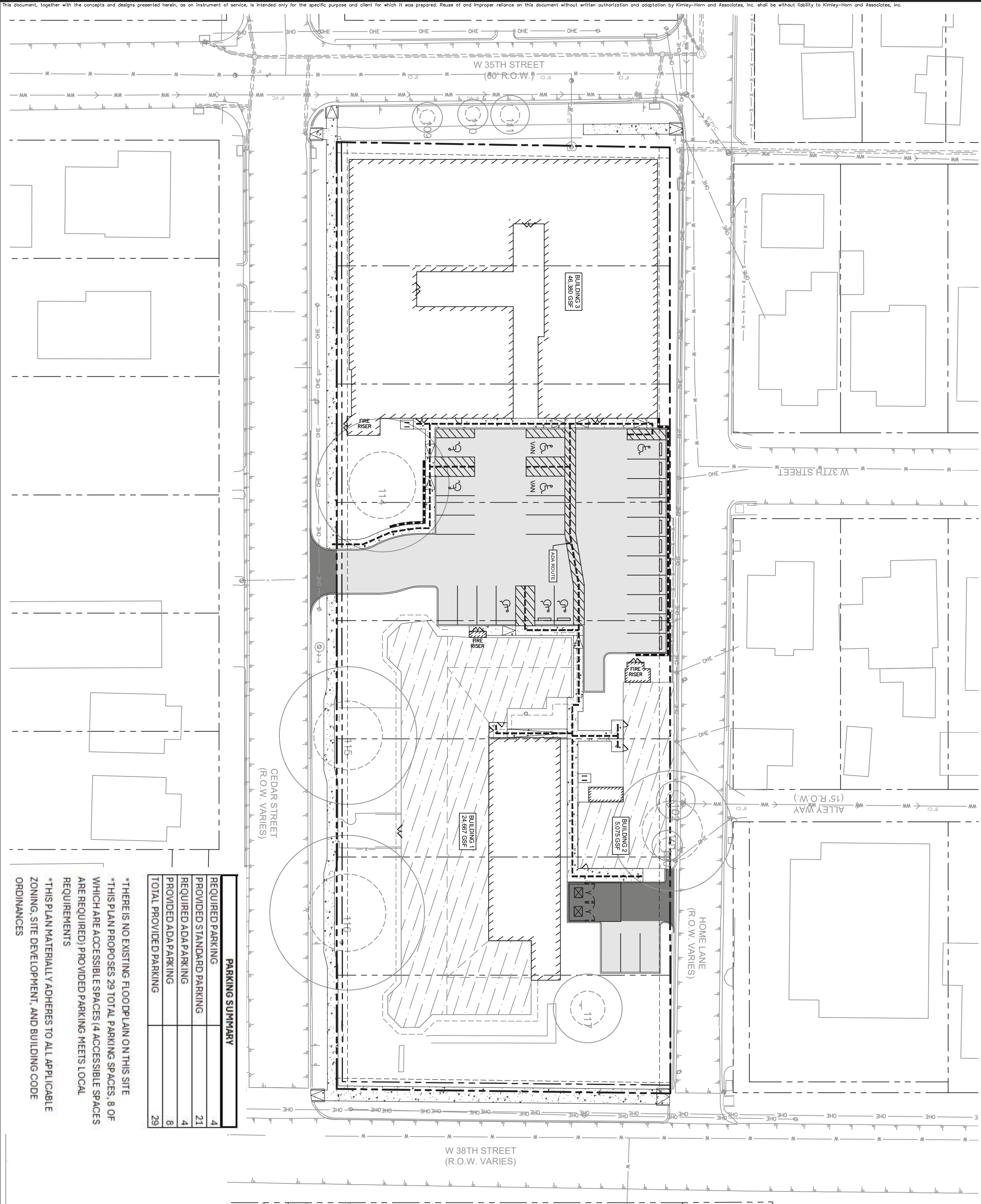
Division of Architecture

P.O. Box 12276, Austin, Texas 78711-2276

Phone: +1 512 463 3857

Fax: + 1 512 463 6095

Plotted By: Leonard, Brett Date: April 27, 2026 01:50:59pm File Path: K:\EAU_Civil\069279312-Waverly North\CAD\PlanSheets\C - Site Exhibit.dwg



PARKING SUMMARY	
REQUIRED PARKING	4
PROVIDED STANDARD PARKING	21
REQUIRED ADA PARKING	4
PROVIDED ADA PARKING	8
TOTAL PROVIDED PARKING	29

*THERE IS NO EXISTING FLOODPLAIN ON THIS SITE

*THIS PLAN PROPOSES 29 TOTAL PARKING SPACES, 8 OF WHICH ARE ACCESSIBLE SPACES (4 ACCESSIBLE SPACES ARE REQUIRED) PROVIDED PARKING MEETS LOCAL REQUIREMENTS

*THIS PLAN MATERIALLY ADHERES TO ALL APPLICABLE ZONING, SITE DEVELOPMENT, AND BUILDING CODE ORDINANCES

BENCHMARKS

TBM #1: MAG NAIL WITH WASHER SET ON A CONCRETE CURB ON THE WEST SIDE OF HOME STREET BEING ±1' NORTH EAST OF A FIBER OPTIC VAULT FOUND ±16' SOUTH OF THE INTERSECTION OF HOME STREET AND 38TH STREET.
ELEVATION = 606.73'

TBM #2: MAG NAIL WITH WASHER SET ON A CONCRETE CURB ON THE SOUTH SIDE OF 35TH STREET AT THE SOUTH EAST CORNER OF THE INTERSECTION OF 35TH STREET AND CEDAR STREET, ±21' EAST OF A FIRE HYDRANT FOUND AT THE SAME INTERSECTION.
ELEVATION = 605.46'

811
Know what's below.
Call before you dig.

WARNING: CONTRACTOR IS TO VERIFY PRESENCE AND EXACT LOCATION OF ALL UTILITIES PRIOR TO CONSTRUCTION.

LEGEND

GRAPHIC SCALE 20'
0 20' 40'

PROPERTY LINE
PROPOSED EASEMENT
ROW DEDICATION
FL FIRE LANE
PROPOSED WALL
BUILDING OVERHANG
X BUILDING NUMBER
TYPE X BUILDING TYPE

SHEET NUMBER	WAVERLY NORTH	SITE EXHIBIT	KHA PROJECT 069279312
EXH	CITY OF AUSTIN TRAVIS COUNTY, TEXAS		DATE APRIL 2026
			SCALE: AS SHOWN
			DESIGNED BY: RMT
			DRAWN BY: ORB
			CHECKED BY: RMT

Kimley»Horn
6800 BURLESON ROAD, BUILDING 312, SUITE 150
AUSTIN, TX 78744
PHONE: 512-616-9942
WWW.KIMLEY-HORN.COM

TBPE Firm No. 928

No.	REVISIONS	DATE	BY

SP-2026-0037C.SH