



## TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

[www.tdhca.texas.gov](http://www.tdhca.texas.gov)

Greg Abbott  
GOVERNOR

### BOARD MEMBERS

Leo Vasquez, *Chair*  
Kenny Marchant, *Vice Chair*  
Cindy Conroy, *Member*  
Anna Maria Fariás, *Member*  
Holland Harper, *Member*  
Ajay Thomas, *Member*

October 28, 2025

Writer's direct phone # (512) 475-4065  
Email: [shay.erickson@tdhca.texas.gov](mailto:shay.erickson@tdhca.texas.gov)

PFC User/Operator  
EHF APV Haven at Main Propco, LP c/o AEW Capital Management, LP  
Boston, MA  
[legal@aew.com](mailto:legal@aew.com)

RE: Haven at Main

Dear PFC User/Operator:

The Texas Department of Housing and Community Affairs (Department) received documentation on September 15, 2025, addressing the noncompliance identified during the review of the Audit Report submitted by Sanchez Compliance & Consulting, LLC on July 1, 2025. Corrective action was due on October 27, 2025.

The documentation submitted was sufficient to correct the noncompliance related to **Failure to comply with the Public Facility Regulatory Agreement**, which requires five (5) of the 60% units to be occupied by Housing Choice Voucher (HCV) holders, eighty (80) units to be reserved for Low-Income Tenants at or below 80% AMI, and fifty (50) units to be reserved for Low-Income Tenants at or below 60% AMI. The documentation also resolved findings related to **Households above the income limit** affecting units 1115, 1132, 2204, and 2205, as well as **Gross rents exceeding the maximum rent allowed under the Regulatory Agreement** affecting units 1418, 1503, and 2208. Please see attached Finding Report for details.

The next Audit report is due June 1, 2026.

If you have any questions, please contact Shay Erickson toll free in Texas at (800) 643-8204, directly at (512) 475-4065, or email: [shay.erickson@tdhca.texas.gov](mailto:shay.erickson@tdhca.texas.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Shay Erickson".

Shay Erickson  
PFC Compliance Monitor

CC:[jessica.wheeler@greystar.com](mailto:jessica.wheeler@greystar.com);[legal@aew.com](mailto:legal@aew.com);[mike.lebrun@aew.com](mailto:mike.lebrun@aew.com);[krystle.muisse@aew.com](mailto:krystle.muisse@aew.com)  
; [dylan.swaebe@aew.com](mailto:dylan.swaebe@aew.com);[haven@aogliving.com](mailto:haven@aogliving.com);[juanita@sanchezcompliance.com](mailto:juanita@sanchezcompliance.com)



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION REPORT

PFC ID: A24-101-0063  
PFC User: EHF APV Haven at Main Propco, LP c/o AEW Capital Management, LP  
Property Name: Haven at Main  
Address: 8700 Main St. Houston, TX 77025

Regulatory Agreement Date: 7/27/2022  
Audit Report Received Date: 7/1/2025  
Corrective Action Due Date: 9/15/2025

Audit Report Review Date: 7/14/2025

PROGRAM: PFC

PROPERTY FINDINGS

| Finding: Failure to comply with the Public Facility Corporation Regulatory Agreement |                     |  |   |                           |
|--|---------------------|--|---|---------------------------|
| Unit #   | Non-Compliance Date | Reason   | Corrective Action   | Correction Date           |
| Property Wide  | 7/1/2025            | The Development's Regulatory Agreement requires at least five (5) of the 60% AMI units be reserved for or rented to and occupied by HCV holders. The Development currently has four. | As units become available, lease to HCV holders until the requirements of the Regulatory Agreement have been met. | Corrected Date: 8/28/2025 |

| Finding: Failure to comply with the Public Facility Corporation Regulatory Agreement |                     |  |   |                           |
|--|---------------------|--|---|---------------------------|
| Unit #   | Non-Compliance Date | Reason   | Corrective Action   | Correction Date           |
| Property Wide  | 7/1/2025            | The Development's Regulatory Agreement requires at least eighty (80) units be reserved for or rented to and occupied by Low Income Tenants at 80% AMI. The Development currently has fifty (50). | As units become available, lease units to households' with 80% AMI or less until the occupancy requirements of the Regulatory Agreement have been met. The owner may also survey existing market rate households and certify them if their income is at or below 80% AMI. Submit a current rent roll showing at least fifty (50) units are restricted. Provide the Department copies of the following for the new certified households: application(s), verifications of income/assets, executed Income Certification and the lease contract. | Corrected Date: 8/28/2025 |

| Finding: Failure to comply with the Public Facility Corporation Regulatory Agreement |                     |  |   |                           |
|--|---------------------|--|---|---------------------------|
| Unit #   | Non-Compliance Date | Reason   | Corrective Action   | Correction Date           |
| Property Wide  | 7/1/2025            | The Development's Regulatory Agreement requires at least fifty (50) units be reserved for or rented to and occupied by Low Income Tenants at 60% AMI. The Development currently has forty-nine (49). | As units become available, lease units to households' with 60% AMI or less until the occupancy requirements of the Regulatory Agreement have been met. The owner may also survey existing market rate households and certify them if their income is at or below 60% AMI. Submit copies of one (1) new move-ins etc. that have been certified at 60% AMI and a current rent roll showing at least fifty (50) units are restricted. Provide the Department copies of the following for the new certified households: application(s), verifications of income/assets, executed Income Certification and the lease contract. | Corrected Date: 8/28/2025 |

| Finding: Household above the income limit |                     |   |   |                           |
|---|---------------------|---|---|---------------------------|
| Unit #                                    | Non-Compliance Date | Reason  | Corrective Action   | Correction Date           |
| 1115                                      | 11/10/2023          | Annualizing the average of the most recent paystubs for the household resulted in the household's annual gross income of \$40,341, which exceeds the applicable 60% AMI income limit of \$39,720. | To correct, designate unit 1115 to an 80% AMI unit since their income exceeds the 60% AMI limit and lease the next available unit of comparable or smaller size to a household that income qualifies at the 60% AMI limit. Owner may survey existing vacant non-program units to replace unit 1115 and reserve as a program-unit to be occupied with a household that income qualifies at 60% AMI. Submit documentation to the Department that the unit is vacant and a statement that it is reserved to be occupied by a Low-Income Household. Or if the household's circumstances have changed, the owner may certify them under current circumstances using current income limits. If verifying under current circumstances, submit a copy of the household file, application, verification of income and assets, executed Income Certification and lease agreement. | Corrected Date: 8/28/2025 |

| Finding: Gross rent exceeds the highest rent allowed under the Regulatory Agreement |                     |  |  |                           |
|---|---------------------|--|--|---------------------------|
| Unit #  | Non-Compliance Date | Reason   | Corrective Action  | Correction Date           |
| 1503  | 4/25/2025           | Unit 1503 is designated as 80% AMI. The household's rent of \$1,295 exceeds the 80% AMI rent limit of \$1,276. | To correct, reduce the household's rent to \$1,276 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a refund is issued). | Corrected Date: 8/28/2025 |

| Finding: Gross rent exceeds the highest rent allowed under the Regulatory Agreement |                     |  |  |                           |
|---|---------------------|--|--|---------------------------|
| Unit #  | Non-Compliance Date | Reason   | Corrective Action  | Correction Date           |
| 2208  | 4/4/2024            | Unit 2208 is designated as 80% AMI. The household's rent of \$1,297 exceeds the 80% AMI rent limit of \$1,276. | To correct, reduce the household's rent to \$1,276 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a refund is issued). | Corrected Date: 8/28/2025 |

| Finding: Gross rent exceeds the highest rent allowed under the Regulatory Agreement |                     |  |  |                           |
|---|---------------------|--|--|---------------------------|
| Unit #  | Non-Compliance Date | Reason   | Corrective Action  | Correction Date           |
| 1418  | 1/11/2025           | Unit 1418 is designated as 60% AMI. The household's rent of \$1,276 exceeds the 60% AMI rent limit of \$1,135. | To correct, reduce the household's rent to \$1,135 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a refund is issued). | Corrected Date: 8/28/2025 |

| Finding: Household above the income limit |                     |   |  |                           |
|---|---------------------|---|--|---------------------------|
| Unit #                                    | Non-Compliance Date | Reason  | Corrective Action  | Correction Date           |
| 1132                                      | 9/11/2024           | In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.<br><br>The household reported income was being received from employment and a rate of pay is anticipated. The change in pay rate was not verified. Auditor reports income cannot be determined or verified. | The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review. | Corrected Date: 8/28/2025 |

| Finding: Household above the income limit |                     |  |   |                           |
|---|---------------------|--|---|---------------------------|
| Unit #                                    | Non-Compliance Date | Reason   | Corrective Action   | Correction Date           |
| 2204                                      | 7/23/2024           | Annualizing the average of the most recent paystubs for the household resulted in the household's annual gross income of \$72,220, which exceeds the applicable 80% AM2221 income limit of \$60,560. | To correct, designate unit 2204 to an non-program unit since their income exceeds the 80% AMI limit and lease the next available unit of comparable or smaller size to a household that income qualifies at the 80% AMI limit. Owner may survey existing vacant non-program units to replace unit 2204 and reserve as a program-unit to be occupied with a household that income qualifies at 80% AMI. Submit documentation to the Department that the unit is vacant and a statement that it is reserved to be occupied by a Low-Income Household. Or if the household's circumstances have changed, the owner may certify them under current circumstances using current income limits. If verifying under current circumstances, submit a copy of the household file, application, verification of income and assets, executed Income Certification and lease agreement. | Corrected Date: 8/28/2025 |

| Finding: Household above the income limit |                     |  |   |                           |
|---|---------------------|--|---|---------------------------|
| Unit #                                    | Non-Compliance Date | Reason   | Corrective Action   | Correction Date           |
| 2205                                      | 11/30/2024          | Annualizing the household's verification of employment resulted in the household's annual gross income of \$46,600, which exceeds the applicable 60% AMI income limit of \$45,420. | To correct, designate unit 2205 to an 80% AMI unit since their income exceeds the 60% AMI limit and lease the next available unit of comparable or smaller size to a household that income qualifies at the 60% AMI limit. Owner may survey existing vacant non-program units to replace unit 2205 and reserve as a program-unit to be occupied with a household that income qualifies at 60% AMI. Submit documentation to the Department that the unit is vacant and a statement that it is reserved to be occupied by a Low-Income Household. Or if the household's circumstances have changed, the owner may certify them under current circumstances using current income limits. If verifying under current circumstances, submit a copy of the household file, application, verification of income and assets, executed Income Certification and lease agreement. | Corrected Date: 8/28/2025 |