



February 22, 2010

Texas Department of Housing and Community Affairs
C/O Ms. Robbye Meyer, Director, Multifamily Finance
Multifamily Finance Division
PO Box 13941
Austin, Texas 78711-3491

Re: Wynnewood Seniors Housing, LP
Development Name: Wynnewood Seniors
Project Number: 10044

Comments in **SUPPORT** of the Low Income Housing Tax Credit (LIHTC) application by Wynnewood Seniors Housing, LP to be located at the 1500 Block of South Zang Blvd (West side).

Dear Ms Meyer:

Pursuant to section 2306.6710(b)(1)(B), Texas Government Code, the Wynnewood North Neighborhood Association (WNNA) is providing comments related to the application and allocation of LIHTC for the project above. The WNNA is an all volunteer, non-profit organization established within specified boundaries that are directly adjacent to the proposed development above. The WNNA has been highly engaged in the redevelopment and maintenance of the neighborhood as well as its surrounding retail/commercial facilities. We have met the applicant Bank of America, ("Applicant") and reviewed the above-reference application for LIHTC. We are tentatively in support of the application based on the following preliminary considerations as stated in this letter.

Briefly, the site is located at a parcel of land zoned MF-1, nestled between residential neighborhoods to the North, East and West. Applicant is requesting an allocation to construct a low-income senior independent living complex of 140 units. While the senior citizen component is new to the overall development, it is compatible with the adjacent property and we would request it be designed and built to be consistent with the character of the existing neighborhood.

CHARACTER OF THE NEIGHBORHOOD

The character of a neighborhood is an amalgamation and interaction of different elements, including land use, transportation infrastructure, public amenities and vision for the future. In this instance, the character of the neighborhood reflects a horizontal mix of uses with a retail shopping center located in close proximity to middle and upper-income residential, single family properties. Our neighborhood and surrounding shopping and residential areas were originally designed by the renown Dallas developer, Angus Wynne. The Wynnewood development has been designated as one of the finest examples of 1950's post-war Ranch Style Neighborhoods by several municipal and state agencies, including Preservation Dallas, the City of Dallas Landmark Commission and the Texas Historical Society. The residential base of our community has embraced our history and strives to continue to maintain those historic qualities that makes Wynnewood unique in Dallas.

Based on the above description of the character of our neighborhood, the proposal offered by the Applicant is consistent with the character of our neighborhood only if, (1) the use reflects responsible stewardship of the land in a manner not detrimental to the existing and future residents; and (2) heavily deeded housing developments are regularly evaluated for compliance.

WNNA is concerned that a high saturation of low-income apartment units does not provide the disposable income or ability to sustain and spur long term economic development in terms of retail opportunities, which are sorely lacking in our area. However, in the case of The Parks at Wynnewood, there are existing deed-restrictions that are already in place as stated in the Land Use Restriction Covenants (LURA) dated December, 1995 which require a low-income housing standard be met for current and future developments for a period of 35 years (beginning the date of the first LIHTC allocation in 1995). This would also mean there is a period of 15 years remaining on the LURA requirements. As a result, the WNNA would **ONLY** support the application with the following considerations:

1. The new tax credit allocation in 2010 **does not** extend the current deed restrictions nor allow the uses to include transitional housing for the homeless, but gets the community newer, cleaner and safer units;
2. The new tax credit allocation in 2010 **does not** increase the density of total units in the development of 408 (140 senior housing units are phase 1 and referenced on the pending LIHTC application);
3. The addition of quality green space throughout Phase 1 (sr. component) that will enhance the area's walkability and avoid the "urban infill project" concept most commonly a detriment to economic development;
4. The developer (Bank of America) continue to include the provisions for community services such as community development, health, education, financial planning and GED for community residents but no services for the homeless;
5. The Phase 1 component will relocate the entrance from Pratt St. to Zang Blvd. due to the addition of a "Senior Community Center" component;
6. The Phase 1 structures will be no more than two stories high and incorporate a minimum of 70% brick façade that will maintain the continuity and character of this and the surrounding single family residences and retail facilities (Wynnewood Village Shopping Center);
7. The Phase 1 construction will be limited to Senior Housing, with restriction in place to insure that this is designated as "seniors only", not multi-family units, in other words, we would like assurances in place that the new housing developed for seniors would be designated for seniors only, not seniors who are caring for dependents such as their children or grandchildren.
8. The development maintain all existing covenant restriction currently in place and agree to consider additional restrictions as needed to help insure the safety and property values of WNNA residents and surrounding neighborhoods; and
9. The WNNA be allowed a maximum of 2 residents be invited to join the development team in the formation, development and completion of the project to ensure neighborhood involvement, resident contributions and ultimately create a creative partnership to work together to improve the live/work conditions of the area.

Subject to our preliminary considerations listed above regarding the proposed development, WNNA tentatively agrees that the proposed use by Applicant is consistent with the welfare of our community and the TDHCA requirements as stated in the LURA. Accordingly, we tentatively request that the project be given favorable consideration for Low Income Housing Tax Credits.

WNNA would also request that the TEHCQA take note that WNNA feels our neighborhood and Oak Cliff overall have more than our fair share of low income housing in the Dallas area. Therefore, WNNA feels it is imperative that we remain a part of any and all communications related to this project.

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On behalf of the WNNA, thank you for your time and consideration of our position. Should you have any questions, please do not hesitate to contact me at 817-366-3604 or Jeff Falin, V.P. of WNNA, at 972-571-0919 at anytime.

Very Truly Yours

A handwritten signature in blue ink, appearing to read 'Lynn Sulander', with a long horizontal flourish extending to the right.

Lynn Sulander
President, WNNA
817-366-3604

cc: Councilman Dave Neumann, Dallas City Council District 3
Karl Zavitkovsky, City of Dallas Office of Economic Development
Brian Roop, SVP, Bank of America Community Development Banking Division
Bob Stimson, President, Oak Cliff Chamber of Commerce
Wynnewood North Neighborhood Association Board of Directors