

HOUSING AUTHORITY OF THE CITY OF LAKE CHARLES

"Providing safe, decent, affordable housing to low income families"

Commissioners:

Pastor Charles Robertson
Margaret Jackson
Lollion Elmer
Robert Shannon
Joseph Thomas

S. Benjamin Taylor, JR.
Executive Director

April 15, 2010

TO: Louisiana Housing Finance Agency Board Members

FROM: Ben Taylor, Executive Director of the Lake Charles Housing Authority

The Louisiana Housing Council (LHC) is the state chapter of the National Association of Housing and Redevelopment Officials (NAHRO) based in Washington, D.C. For forty-eight years the LHC has been the largest and most effective organization of its kind in the state of Louisiana. Our chapter consists of 104 Public Housing Agencies, 87 Section 8 Agencies, and 15 Community Development Block Grant Agencies which administer 30,400 units of public housing and 32,200 units of Section 8 Housing Choice Vouchers. Based on the national averages, these Louisiana housing programs assist more than 200,000 low to moderate income family members and more than 50,000 elderly and disabled individuals. As you can see, we have a big stake in the affordable housing arena. The LHC and LHFA share a common goal in providing affordable housing for low and moderate income families in our great state.

These agencies are rooted in rural and urban areas across the state and in many instances are the only providers of housing for low to moderate income families within their community. As quasi-state political entities these agencies follow local, state, and federal regulations in administering these housing programs. However, their only source of funding is a direct subsidy or administrative fee from the Department of Housing and Urban Development that has consistently declined over the past several years. There have been no funds allocated for any new development of housing units since 1990, yet the need for low income affordable housing has continued to rise each year. In view of this lack of funding, the Department of Housing and Urban Development has urged these agencies to aggressively seek alternative resources to meet the challenge of providing for the affordable housing needs of their communities. Because preservation of Public Housing is a priority of the current

Administration and HUD, our Louisiana PHA's are actively involved in the redevelopment of Public Housing utilizing the Tax Credit and Mixed Finance Programs available to them.

Through a special working relationship and in partnership with the LHFA over the past 6-7 years, several of our PHA's have been able to compete for and receive allocations of tax credits to add to the housing stock they manage. PHA's such as Monroe, Baton Rouge, Bossier City, Denham Springs, Lafayette, Ruston, New Iberia, Covington, Ville Platte, Lake Charles, and Sulphur have been successful in developing new properties in their communities. Many of our PHA's look forward to using these tax credit allocations to develop Mixed Income Housing in their communities.

These new developments would not exist without the partnership existing between the LHFA and the LHC. We appreciate the opportunities provided to our public housing agencies and we are asking today that this partnership be extended and strengthened in the coming years by continuing to give consideration to public housing agencies in the Low Income Housing Tax Credit program.

Specifically, we request your consideration of the following in the 2010 Qualified Allocation Plan:

1. Maintain the PHA sub-Pool containing 10% of the credits

We request that the LHFA give serious consideration to the Changes to Definitions, as found attached below.

We strongly recommend that any PHA Sponsored Application be required to submit the attached certification by the Louisiana Housing Council, that the application is a certified PHA project. This process worked very effectively in 2009.

On behalf of the Louisiana Housing Council and the Public Housing Authorities in Louisiana, we want to offer a commitment to do our part in making the most of these opportunities for the families we serve. Thank you for your consideration of our request.

Sincerely,



Ben Taylor

Executive Director

PHA POOL

Public Housing Agency (PHA) Pool: Ten Percent (10%) of the State's Per Capital component will be allocated to qualified applications from Public Housing Authorities. To qualify for this pool, applicants must have a certification from the Louisiana Housing Council and have at least 51% ownership in the project.

Changes to Definitions:

AFFILIATE: Any corporation, entity, partnership, venture, syndicate, or arrangement in which a local housing authority has a majority ownership or governance interest either directly or indirectly through one or more subsidiaries.

DISTRESSED PROPERTY: Add “public housing property with excessive vacancies or excessive deferred maintenance or rehabilitation needs”

PHA SPONSOR (add): A PHA that receives an ACC contribution from HUD and owns 51% of the interests in the project at the time 8609s are issued, either directly or through its affiliate or instrumentality. Prior to 8609, it must control the GP through its affiliate or instrumentality. If a PHA partners with a for-profit developer and/or partner, the PHA must certify that any for-profit or non-profit development partners were selected in accordance with HUD’s procurement requirements.

ELIGIBLE TARGET POPULATION FOR PERMANENT SUPPORTIVE HOUSING: comment-will public housing Residents qualify as “most-at-risk of homelessness”? Will DSS make this determination and will LHFA accept? If so, PHAs can also compete in PSH pool.

Changes to Project Threshold Requirements: Design Features:

1. Change exterior to allow thin-set brick or any fiber-cement type product that has a manufacturer warranty of 30-years. 75% brick exterior may not be appropriate design solution. Brick is not a characteristic of “Coastal” design and “Craftsman” design.
2. Remove requirement for storm windows when energy efficient insulated windows are used. Storm windows add no energy value when used on top of an insulated window and add maintenance costs. Storm windows are appropriate in a rehabilitation project when installing over a non-insulated existing window.

Scoring:

Add PHA public housing redevelopment project (35 points) this is in addition to the set-aside. The set-aside is not large enough to accommodate multiple PHA redevelopment projects. This allows an opportunity to compete competitively in other pools such as Non-Profit, Permanent Supportive Housing and Elderly.

- Must conform to definition of PHA Sponsored project (above)
- Organizational documents are required with the application to qualify for these points.
- Must be part of 5-year CFP plan (evidence)
- Certified by LHC

STATE OF LOUISIANA:

LOUISIANA HOUSING COUNCIL

PARISH OF _____:

**PUBLIC HOUSING AGENCY (PHA)
POOL CERTIFICATION**

BEFORE ME, the undersigned authorities, Notaries Public in and for said respective Parishes and State and in the presence of the undersigned competent witnesses, came and appeared the below listed Housing Authority officials and officials of its wholly owned and controlled non-profit, do hereby certify and warrant that with regard to said Housing Authority's PHA Application for 2010 Tax Credits that the following are true and correct at the time the application is submitted and shall remain true and correct as indicated below:

- 1. The Housing Authority and its wholly owned and controlled non-profit are submitting the application;**
- 2. The Housing Authority and its wholly owned and controlled non-profit jointly or one of them will be the sole and only general partner of the development limited partnership and in control of the development;**
- 3. The Housing Authority and its wholly owned and controlled non-profit as the case shall remain the general partner of the development limited partnership for at least the fifteen (15) year compliance period;**
- 4. The Housing Authority and its wholly owned and controlled non-profit shall ensure that in the provision of the development limited partnership that the general partner which is either the Housing Authority or its wholly owned and controlled non-profit shall have the option or the right of first refusal to purchase the development at the end of the compliance period;**

5. The Housing Authority hereby certifies and warrants that they have selected a development partner in accordance with proper procurement procedures as prescribed by HUD, and as found in the attached evidentiary materials;

6. The Housing Authority further certifies and warrants that this PHA, Housing Authority of the City of _____, meets all requirements to satisfy this certification process for the Louisiana Housing Council by Resolution # _____, dated _____, 2010, a copy of which is attached.

7. The Housing Authority and its wholly owned and controlled non-profit hereby further certify and warrant that they have not entered into any agreement with any developer to have an option or right to become the owner of the proposed development during the development stage, during the compliance period or after the compliance period;

8. The Housing Authority, and its wholly owned non-profit, hereby certifies and warrants that they will control at least a 51% ownership in the development as required by Public Housing Agency (PHA) pool.

9. The representations and warranties of the Housing Authority, and its wholly owned non-profit, set forth herein shall survive the application process and shall be deemed remade by the Housing Authority, and its wholly owned non-profit, as of the Tax Credit closing and at all financial closings involving the proposed development with the same force and effect as if made at that time; and

10. All representatives and warranties made in this agreement shall survive in full, during and after the compliance period and shall not merge into any instrument delivered with regard to the proposed development.

SWORN TO AND SUBSCRIBED, before me, Notary Public, on this _____ day of _____, 2010.

Housing Authority Executive Director Housing Authority Chairman

By: _____ By: _____

Authorized Signor **Authorized Signor**

NOTARY PUBLIC

In and for _____ Parish, Louisiana

Notary Identification Number: _____

Notary Identification Number: _____

Notary Identification Number: _____

My Commission Is Permanent.

SWORN TO AND SUBSCRIBED, before me, Notary Public, on this _____ day of
_____, 2010.

Non-Profit Officer

Non-Profit Officer

By: _____ By: _____

Authorized Signor

Authorized Signor

NOTARY PUBLIC
Printed Name: _____

In and for _____ Parish, Louisiana

Notary Identification Number: _____

My Commission Is Permanent.

SWORN TO AND SUBSCRIBED, before me, Notary Public, on this _____ day of
_____, 2010.

Louisiana Housing Council

By: Cindy Martin

President

NOTARY PUBLIC

Printed Name: _____

In and for _____ Parish, Louisiana

Notary Identification Number: _____

My Commission Is Permanent.

Centerpointe
Regional Housing Development, LLC

April 19, 2010

Ms. Brenda Evans
Louisiana Housing Finance Agency
2415 Quail Drive
Baton Rouge, LA 70808

Re: Input 2010 QAP

Dear Brenda:

I appreciate the time you took to meet with interested stakeholders in Shreveport last week. I felt that some suggestions were made that can help shape the 2010 Qualified Allocation Plan.

As both an architect and developer, I have a few comments regarding threshold items from the 2009 QAP.

Minimum Internet/Cable capacity: Rather than 3 distinct networks, allow owner or manager to decide on the best system that will provide cable TV, Telephone and Internet access for the tenants. The owner will control the system anyway rather than tenants. If the 3 services can be provided with one or two networks, that should be sufficient. All the agency has to do is confirm this before 8609s are issued.

Storm Windows: This requirement has no energy benefit since high efficient insulated windows are required anyway and are so well sealed. In fact, UBC requires that all bedroom windows be of sufficient size for egress in case of a fire. A storm window means a tenant will have to open two windows. Storm windows should only be required in a rehabilitation project that is preserving the existing windows. When in a hurricane coastal zone, building codes require that window frames permit anchoring of plywood protection or the glazing must be impact-resistant. So even in this case, there is no benefit to using storm windows.

30-50 year roof: Many owners replace a roof before 30 years due to hail, wind or other storm damage. A 30-year roof warranty does not cover damage from wind, hail or storms. It only covers a failure of the product, such as delamination. It would be better to require an Architectural 20 or 25 year roof. It would look more attractive and not cost a premium for an extended warranty.

Brick: The 75% brick exterior requirement should be eliminated. This forces a project to a particular design characteristic that may be contrary to the area. For example, "Coastal" and "Craftsman" do not incorporate brick. In lieu of this requirement, simply require a 30-year warranty and allow stucco, hardy-board or any fiber cement product. Thin-set brick should be allowed as an alternative. A new product made by "Nichiha" (www.nichiha.com) is a great alternative that is just as durable and looks just like brick. There is a local product representative in Baton Rouge that can brick a sample to the LHFA. The website shows some exciting multi-family and single-family applications. Hardy-Board now has many commercial applications and

is proven to be a long-lasting, low-maintenance material. The LHFA should be encouraging the use of innovative, durable materials and not eliminating the options.

Finally, my last comments are related to scattered site applications. The need for points for a competitive application forces many developers to the scattered site or homeownership categories. A developer will even use scattered sited to develop elderly because of the points, which is not conducive to elderly housing and services. Development costs for engineering, platting, public streets and utilities are a time consuming and expensive development option. Projects are often held up by local governments who have control over approving preliminary and final platting. With equity pricing at a 30-year low and building costs on the rise, I believe the LHFA can encourage smarter development approaches. The LHFA should encourage the option to build a single-family style development on a single parcel that is unplatting as a residential subdivision. The housing could each still have a private yard, garages or carports and characteristics favored by tenants and communities, but its infrastructure can be developed in a multi-family approach with master water mains, check meters and private streets. The scattered site/single-family approach now in the 2009 QAP actually adds considerable cost burden to local communities who have to extend and maintain new utilities and streets. The LHFA should also perhaps encourage scattered "in-fill" housing approaches. This is a much "greener" approach and will gain greater support in many communities.

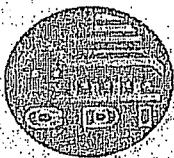
Thanks for your consideration.

Sincerely:

CENTERPOINTE REGIONAL HOUSING DEVELOPMENT, LLC



Arthur J. Schuldt, Jr.



Community Development Incorporated
4110 Eaton Ave, Suite A
Caldwell, ID 83607

Toll: 800.617.2498
Phone: 208.459.8522
Fax: 208.459.9692

April 21, 2010

Louisiana Housing Finance Agency
Attn: Brenda Evans
2415 Quail Drive
Baton Rouge, LA 70808

RE: 2010 Qualified Allocation Plan

Dear Ms. Evans:

We are submitting this letter as an additional follow up based on the stakeholders meeting that was held on April 15th in Baton Rouge. There are concerns that the following section of the QAP, II. Allocation Process, G. Other Program Requirements, #7. Pro Forma Cash Flows; g. Maximum Rents, will prohibit the development of affordable housing in a majority of the parishes in the state of Louisiana. Our reasons are as follows:

- This section is requiring that the applicant apply the lesser of FMR's, HOME rents or Tax Credit rents on all of the units in the development. This section, as it currently reads, will restrict the revenue a development could reasonably generate for the servicing of hard debt.
- This section should only apply to the units which receive HOME funds based on a calculation of HOME funds to construction costs, and not to the remaining units.
- HOME regulations require that this provision in the QAP be applied to HOME units only and does not require that this provision be applied to any other units within the development.
- Section 42 also does not require this provision to be enforced on the individual units that are considered as tax credit units.
- The current section of the QAP will require an applicant to apply for more HOME funds or other sources of soft money in order to fill the gap created by this provision. That is if you can structure the development to be financially feasible.

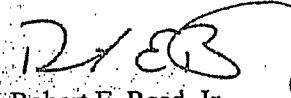
Alaska Arizona California Hawaii Idaho Louisiana Montana Nebraska
New Mexico Nevada North Dakota South Dakota Utah Washington Wyoming

W.W.W.CDINET.U.S.

- We currently develop affordable housing in other neighboring states as follows, which do not enforce the current section of the QAP.
 - Nebraska
 - Idaho
 - Nevada
 - New Mexico
 - Alaska
 - Utah
 - North Dakota
 - South Dakota
- The current section of the QAP will prohibit the development of affordable housing and/or require the applicant to request larger allocations of HOME funds from the Agency.

We would request that the Agency consider the revising of the QAP to encourage development of affordable housing in those parishes that need the ability to assess the higher tax credit rents when the market conditions and tenant base would allow such rents.

Respectfully yours,



Robert E. Reed, Jr.
Senior Vice President
Housing Development, Eastern Division

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**SHER GARNER CAHILL RICHTER
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FAX (504) 299-2300

April 22, 2010

Louisiana Housing Finance Agency
2415 Quail Drive
Baton Rouge, Louisiana 70808
Attn: Brenda Evans, Tax Credit Department

RE: 2010 Qualified Allocation Plan for Low Income Housing Tax Credit
Program ("2010 QAP") by the Louisiana Housing Finance Agency ("LHFA")

Dear Ms. Evans:

We understand that the LHFA has requested comments and input from the public with respect to the rules and procedures governing the 2010 QAP. As a law firm that has represented numerous affordable housing developers, as well as other parties on all sides of these types of transactions, we appreciate the opportunity to voice our thoughts with respect to the 2010 QAP.

Based on our experience representing affordable housing developers and our review of the current 2009 Qualified Allocation Plan for the Low Income Housing Tax Credit Program ("LIHTC"), we respectfully submit the following comments to be entered into the public record for discussion in connection with the 2010 QAP:

1. **I. General Program Information, Section (G)(2) HOME Investment Partnership Program.** We respectfully request that LHFA consider adding HOME fund allocations for elderly housing and rural development under this section of the 2010 QAP. It is difficult for our clients and other developers to develop housing in rural areas of the Louisiana without the assistance of soft funds such as HOME funds due

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KLEIN & HILBERT, L.L.C.**

April 22, 2010

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to lower median incomes in rural areas and lower rent revenues. The same holds true for elderly housing as development costs will be higher because of heightened construction requirements. Louisiana also has an increased need for elderly housing and low-income housing in the rural areas of the state.

2. **I. General Program Information, Section (G)(4) 30% Basis Bump Up Determination.** We respectfully request that LHFA consider designating St. Landry Parish as a Difficult to Develop Area ("DDA"). This parish has very low incomes which translate into very low rents, making it difficult for our clients and other developers to develop affordable housing for residents in St. Landry. Designation of the parish as a DDA will allow developers to provide affordable housing for very low income families in the parish community.
3. **II. Allocation Process, Section (G)(7)(g) Maximum Rents.** We respectfully request that, for projects utilizing both LIHTC funds and HOME funds, this section of the QAP be revised to require that the Pro Forma Rents not exceed the lesser of fair market rents (or HOME rents) or LIHTC rents only for those units in the project that are subsidized by HOME funds. The HOME program and the HUD guidelines require only the units to which HOME funds are allocated to meet the HOME rent requirements.¹

The remaining units in the project would need to meet the LIHTC rent requirements if LIHTC funds are used, but LIHTC rents are usually higher than fair market rents (or HOME rents) in low-income parishes.² Allowing the Pro-Forma Rents to reflect the higher LIHTC rents for units in the project to which HOME funds are not allocated makes affordable housing development more financially feasible in these parishes. An example would be:

- Proposed project with 40 units
- Development cost per unit is \$120,000.00
- HOME funds allocated is \$500,000.00
- In this example, four (4) units in the project would be HOME units and thirty six (36) units would be LIHTC units.

¹ See <http://www.hud.gov/offices/cpd/affordablehousing/training/web/lihtc/> and 24 CFR 92.252

² According to 2009 HOME program rent limits published by HUD, fair market rents equal HOME rents for all Louisiana parishes besides Natchitoches parish and the New Orleans Metro Area - <http://www.hud.gov/offices/cpd/affordablehousing/programs/home/limits/rent/2009/la.pdf>; to calculate LIHTC rents for any Louisiana parish, see <http://www.novoco.com/products/rentincome.php>

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KLEIN & HILBERT, L.L.C.

April 22, 2010

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-Rent requirements for the HOME units would be the lesser of HOME rents (fair market rents) or LIHTC rents.

-Rent requirements for the thirty-six (36) LIHTC units would be in accordance with LIHTC program requirements under Section 42 of the Internal Revenue Code.

Based on our clients' research, allocation programs in other states, including but not limited to those listed below, do not place fair market rent (or HOME rent) requirements on units in a project to which LIHTC funds, but not HOME funds, are allocated:

-Nebraska	-Alaska
-Idaho	-Utah
-Nevada	-North Dakota
-New Mexico	-South Dakota

4. **II. Allocation Process, Section (G)(7)(h) Minimum Operating and Maintenance Expenses.** We respectfully request that LHFA revise this section to clarify whether the \$3,600.00 per unit figure includes the replacement reserve amount. The current language could be interpreted to include the replacement reserve amount within the \$3,600.00 per unit figure, but our clients' experience has been the opposite.

We also respectfully request that exceptions be granted to this minimum requirement in special circumstances for projects that can demonstrate lower operating expenses, as a result of low property taxes or otherwise, without sacrificing maintenance requirements.

5. **II. Allocation Process, Section (G)(12) Financing Commitments.** We respectfully request that LHFA revise this section to delete the words "Fully Executed Financing Commitments," as it is unlikely that any developer will be able to receive a full financing commitment at the time of application. Generally, most investors and lenders will not fully commit to a developer at this stage of the development process, but they will provide letters of interest subject to a variety of conditions. Provided the developer represents in its application that it will use its best efforts to satisfy those conditions, the LHFA should consider accepting this form of financing commitment in the application.

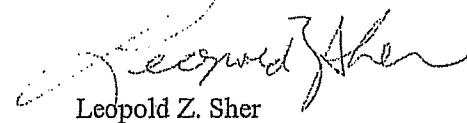
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April 22, 2010
Page - 4 -

We thank you for taking our comments under consideration and look forward to the continuation of open dialog and assistance from the Louisiana Housing Finance Agency in assisting our clients with the development of affordable housing in the State of Louisiana.

With warmest regards, I am

Respectfully yours,



Leopold Z. Sher
Chad P. Morrow

RE:

Louisiana
Finance Agency

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May 12, 2010

Louisiana Housing Finance Agency
2415 Quail Drive
Baton Rouge, Louisiana 70808
Attn: Brenda Evans, Tax Credit Department

RE: 2010 Qualified Allocation Plan for Low Income Housing Tax Credit Program ("2010 QAP") by the Louisiana Housing Finance Agency ("LHFA")

Dear Ms. Evans:

As you may recall, we previously sent a letter dated April 22, 2010 to the LHFA in connection with the LHFA's request for public comment and input with respect to the rules and procedures governing the 2010 QAP. As a law firm that has represented affordable housing developers, as well as other parties on all sides of these types of transactions, we appreciate the opportunity to voice our thoughts with respect to the 2010 QAP.

In that prior correspondence, we respectfully requested that, for projects utilizing both LIHTC funds and HOME funds, Section (G)(7)(g) of the QAP be revised to require that the Pro Forma Rents not exceed the lesser of fair market rents (or HOME rents) or LIHTC rents only for those units in the project that are subsidized by HOME funds. We also brought to the attention of the LHFA the fact that, based on our clients' research, allocation programs in many other states, including but not limited to the eight (8) states listed in our prior correspondence, do not place fair market rent (or HOME rent) requirements on units in a project to which LIHTC funds, but not HOME funds, are allocated.

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KLEIN & HILBERT, L.L.C.**

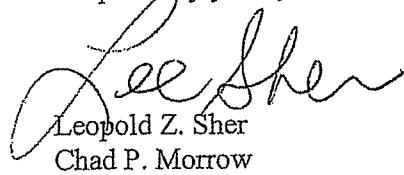
May 12, 2010
Page - 2 -

We are writing to you today to update that list to also include TEXAS and ARKANSAS based on information we have received from our clients.

We thank you again for taking all of our comments under consideration and look forward to the continuation of open dialogue and assistance from the Louisiana Housing Finance Agency in assisting our clients with the development of affordable housing in the State of Louisiana.

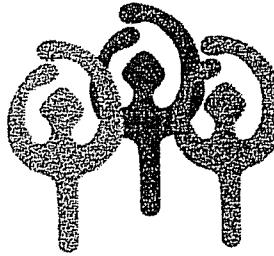
With warmest regards, we are

Respectfully yours,



Leopold Z. Sher
Chad P. Morrow

cc: Ms. Allison A. Jones
Mr. Mark Madderra
Mr. Milton Bailey
Mr. Wayne Neveu



AAMAGIN

PROPERTY GROUP

April 22, 2010

Mr. Milton Bailey – President
Louisiana Housing Finance Agency
2415 Quail Drive
Baton Rouge, LA 70808

RE: Qualified Allocation Plan

Dear Mr. Bailey:

Thank you for arranging a meeting for me on March 26, 2010, with members of LHFA staff. I appreciate the opportunity to provide input for changes in QAP. Please accept the following comments for consideration in the Qualified Allocation Plan for the State of Louisiana.

As a follow up to my meeting with your staff, please consider some policy to provide assistance to non-profit sponsors and their developer partners, whose low income housing tax credits recaptured and reallocated to LHFA at risk projects. Given the downturn in the global market, coupled with projects reallocated credits from recaptured projects, now by all measures at risk, please consider allowing projects previously reserved per capita credits and recaptured, but still remain shovel ready, to participate in Section 1602 Grants under ARRA. Where non-profit sponsors and their partners have a proven track record of closing multiple transactions during this global downturn, and but for recapture their project financing would have closed given closing success of each development team.

In our case, we must debt service predevelopment loans, approximately \$40,000. 00 monthly, to continue our readiness to proceed with our non-profit partner projects, and additionally, for all of the reasons aforementioned, any relief LHFA can provide would help mitigate some downside of developers with proving track records participating in LHFA housing programs.

Thank you for your cooperation and assistance in this matter.

Sincerely

Will J. Belton
President

Cc: Alesia Y. Wilkins- Braxton, Vice President
Terri Porche Ricks, General Counsel



Louisiana Association of Affordable Housing Providers

April 23, 2010

Ms. Brenda Evans
Housing Program Administrator
Louisiana Housing Finance Agency
2415 Quail Drive
Baton Rouge, LA 70808

Re: 2010 QAP Comments

Dear Brenda,

Here are the comments that LAAHP would like to see incorporated in the 2010 QAP:

1. **Minimum Internet/Cable capacity:** Eliminate the requirement of 3 distinct networks and simply require that a system be in place to provide the capability of cable TV, telephone and internet rather than specifying the number and type of networks.
2. **30-50 year roof:** Reduce this requirement to an Architectural 20 year roof, since due to weather conditions in Louisiana, most roofs have to be replaced before 30 years.
3. **Brick:** Eliminate the 75% requirement for brick or stucco and require that the construction be made of **acceptable durable materials** and then provide a list of acceptable durable materials including products such as brick, stucco, and Hardiplank. In addition, provide a process for a developer to apply to have a new product added to the list of acceptable durable materials after review by the staff of LHFA's construction program team.

Thank you for considering these changes.

Yours truly,

Charlotte Bourgeois
Charlotte Bourgeois
Executive Director

SP JEFFERSON LAKES I, LP
7920 Ward Parkway
Kansas City, MO 64114

April 23, 2010

Ms Brenda Evans
Housing Program Administrator
Mr. Louis Russell
Housing Tax Credit Manager
Louisiana Housing Finance Agency
2415 Quail Drive
Baton Rouge, LA 70808

Via e-mail

Re: Stakeholder Comments
2009 QAP

Dear Ms Evans and Mr. Russell:

Due to scheduling conflicts I was unable to attend the recent stakeholders meeting. In accordance with the Agency's request, please accept the following comments regarding the 2009 Selection Criteria and Qualified Allocation Plan along with suggestions for the 2010 QAP.

1. 2009 Selection Criteria

- a. There is no consideration or points awarded for preservation of properties that are at the end of an initial 15 year LIHTC compliance period. Could the preservation of existing LIHTC properties be added for points in the 2010 QAP?
- b. 2009 QAP awards a disproportionate number of points to abandoned or high vacancy properties. Should successful LIHTC properties proposing an additional phase be acknowledged by points? If a property can document its quality location, historical occupancy rates above 90% and market demand for the proposed additional units, could points be awarded?
- c. A substantial rehab is awarded 2 points. A historic rehab is awarded 10 points. This seems disproportionate.

2. Qualified Allocation Plan

a. IV Glossary Amenities

The 2009 QAP states, "If a Project is one phase of a larger development, only the amenities identified on the Project Site of the phase which is being processed may qualify as an amenity for that phase only and such amenity shall not be qualified for any other phase."

Comment: This appears to be an unreasonable burden for a multi-phase property.

Example: It is common for a multi-family property's recreation, business center and community room facilities to be located adjacent to or within a central management building near the primary entrance to the property. These facilities are normally constructed within the initial phase. Subsequent phases would not have the need for similar amenity features. Resident activities such as before and after school programs and adult education courses would be conducted at single location within the management office building.

Jefferson Lakes Apartments, Baton Rouge is a multi-phase property. In Phase I (296 units) there are 3 swimming pools, a tennis court and the amenities offered at the management office (business center, work-out equipment and community room). All residents in Phase II (112 units) have convenient access to the amenities provided in Phase I.

The above comments also relate to Community Facilities as defined in the QAP.

b. Project Threshold Requirements

i. QAP # 8. – Design Features

"All projects must contain the following: (1) Exceeds 15-year maintenance-free exterior (2) Has at least 75% brick exterior (3) Have a 30-50 year roof warranty (4) Have storm windows."

Comment: For rehabilitation project to have at least 75% brick exterior seems an unreasonable criteria.

c. Design Standards

The following standards, which per the QAP apply to rehabs, could be cost prohibitive or impractical to achieve for an existing building

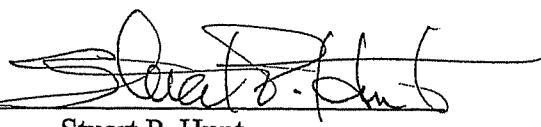
- ii. Exterior Walls: R-21 Insulation
- iii. R-6 to R-8 HVAC ducts

- iv. All bathroom areas to have moisture resistance gyp board
- v. Exhaust fans in baths and kitchens shall be ducted to the building exterior.

Comment: Some exception for rehabilitation projects should be considered.

Respectfully submitted,

By: _____


Stuart P. Hunt

Nicole C. Carter

From: Brenda Evans
Sent: Monday, May 03, 2010 10:05 AM
To: Tax Credit; Guy Williams; Milton Bailey
Subject: Comments to LHFA for 2010 QAP

We are still receiving comments so we will continue to compile them.

Thanks,
Brenda

From: Kirsten Vaselaar [mailto:kvaselaar@hriproperties.com]
Sent: Monday, May 03, 2010 9:57 AM
To: Brenda Evans
Subject: Comments to LHFA for 2010 QAP

Brenda,

My apologies for the very late response to your request for input from QAP stakeholders. We would like to make two recommendations for the 2010 QAP:

- 1) Raise the number of projects that can be awarded to one developer to four (4) projects
- 2) Increase the annual allocation cap to \$1,500,000

Thank you so much for hosting the stakeholder meetings and requesting our input.

Kirsten Vaselaar

HRI Properties
909 Poydras Street, Suite 3100
New Orleans, LA 70112
504.679.5076 (Direct)
504.566.0204 (Main)
504.525.3932 (Fax)
kvaselaar@hriproperties.com

June 2, 2010

Milton Bailey
President
Louisiana Housing Finance Agency
2415 Quail Drive
Baton Rouge, LA 70808
Sent Via Email & US Mail

RE: Qualified Application Plan FY 2010

Dear Mr. Bailey:

As a follow up to the QAP Stakeholders Meeting held by LHFA, as well as discussions with Executive Staff and Board Commissioners, please accept this as an official communiqué in developing and addressing priorities set in the 2010 QAP.

Our firm, The Cartesian Company, is engaged and working on behalf of the Acadiana Outreach Center (AOC) in Lafayette, LA. AOC is a local, non-profit organization focused on providing market-based solutions that address the root causes of social problems in order to encourage self-sufficient people and sustainable communities. AOC's mission is "to restore the lives of our poverty-stricken neighbors by providing critical recovery services - access to housing, meaningful employment, and addiction treatment."

In support of this mission, AOC has taken the lead in its sponsorship of *Joie de Vivre* – an affordable smart growth, mixed-demographic housing development in Downtown Lafayette. As a multi-family housing development, the goal is to provide 118 units encompassing 135,000 square feet. As it targets low and moderately-low income individuals and families, we expect JDV to be home to young professionals, retired elderly, as well as area artists and musicians. The development will boast unique and innovative design as previously presented, while maintaining its affordability. JDV will also be a catalyst for additional public and private development in this under-utilized area. AOC's sponsorship of the development has come from the vision to offer safe and affordable housing that is part of a diverse and vibrant community that enriches the lives of its residents through: unique architectural design, convenient on-site amenities, pedestrian-friendly walkways & green common areas, while helping to support its residents and the downtown Lafayette community.

JDV emulates the priorities set forth by HUD, EPA, DOE, and the DOT's "Partnership for Sustainable Communities," as well as being been master-planned as a transit-oriented development (TOD).

The development has received substantial support from Federal, State & Local Government, along with industry and local community organizations. In FY 2007 and FY 2009 Senator Landrieu and Senator Vitter secured Federal Economic Development Incentive Funds that were committed to JDV. Additionally, in 2008 Senator Michot and Representative Cortez secured State General Appropriation funds for the project.



Additionally, as part of our Public Outreach regarding the development, the La Centre Coterie (LINC Neighborhood 13 – a division of the Lafayette Consolidated Government Planning Commission) voted unanimously to support the project.

We have also received support from:

- Downtown Development Authority (DDA)
- Lafayette Land Revitalization Authority (LLRA)
- Community Foundation
- Lafayette Economic Development Authority (LEDA)
- Stuller Foundation
- Local Initiatives Support Corporation (LISC)

With support from all levels of Government and Community, we feel it is important for LHFA to consider this development, and others who have demonstrated such support and progressive and meticulous planning, in setting its priorities for the FY 2010 Qualified Application Plan.

RECOMMENDATIONS TO 2010 QAP

In the 2009 QAP, LHFA had categories of "Superior Site & Design/Quality Designations". These criteria carried 5 points for a superior site and 5 points for superior design. It is our understanding that LHFA did not award these points to any development in 2009 since it was unclear as to what the specific supporting documentation to certify such should be. We recommend that LHFA keep these point categories and establish minimum thresholds to support such consideration. These criteria sections would remain subjective in nature to that of the LHFA Board and Staff; however, it would allow an applicant to indicate its effort for consideration of such points. Some of these thresholds could be:

- Site to be considered Urban Area with documented need of revitalization (HUBzone qualification should document such need).
- Site to have approval of support from neighborhood community group (group should be sponsored, formed or somehow connected to a governing authority).
- Site to be area of economic distress (QCT should document such distress).
- Site should encourage walk-ability to nearby public and private resources (resources could be library, park, arts district, large employment base – all within 1 mile).
- Site should emulate the priorities of a transit-oriented development (TOD) such as a transportation center that accommodates public transportation with bus, rail and taxi service – all at one location.
- Design should include master plan if part of a phased plan.
- Design should document master plan was developed with experienced team, academia and community involvement.
- Design details should be presented in clear depictions of site location, structure placements and structure renderings in order to determine marketability & desirability.
- Design requirements should include LEED or Green Communities sustainability requirements.

Many priorities of location have been addressed in previous QAPs, but not on equal ground. By way of example, in 2009 a HUBzone qualified site received 3 points while an Enterprise or Renewal Community received 6 points. We would recommend that location qualifiers all receive equal points (6 points).



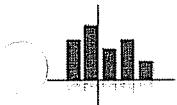
In addition there should not be a benefit to developing in rural areas versus urban areas. Many syndicators have indicated that purchasing credits in rural markets is simply not viable in today's capital market-place. Additionally, infrastructure costs are considerably more expensive in rural areas versus urban areas, thereby potentially reducing amount of units able to be produced. Finally, rural developments place individuals further from transportation alternatives, larger employment base, and quality of life amenities. This discrepancy exists in section III "C" & "D" of the 2009 selection criteria list. As such, Section "C" location of QCT/DDA should be increased from 2 to 4 points along with CCR plan from 2 to 4 points. Section "D" should be removed in its entirety.

As indicated above, we are concerned with prioritizing rural Parishes. In Section "H" of the 2009 selection criteria list certain parishes were identified as priority parishes, most of which are considered rural parishes. This simply provides a priority to parishes that have a comparable need to other parishes, but are not attractive to investors purchasing tax credits, hence creating a cycle of the development not being able to come to fruition.

Local Government support has continued to be an enormous factor in the development of affordable housing. Whether or not we who advocate such are right or wrong, the concern, outright blocking or support from local government must be considered in the reality of whether or not a development will be viable. Section III "G" of the 2009 selection criteria list provides points for some form of assistance from local government, but it does not address the support of Federal & State Funds. Federal & State Funds take support to an entirely new level. The amount of time, energy and commitment on the part of an applicant to secure such funding is enormous and is a clear indication of substantial support for a particular development. We would recommend and advocate that such support should receive additional priority points in the QAP based on the source of Government assistance. If an applicant can demonstrate Federal and/or State grant(s) committed to the development, they should receive 5 points for each such grant. These points should be in addition to the current points awarded for Local Government support.

Section IV (A) of the 2009 selection criteria list is for neighborhood features. In a detailed review of this section, it is possible that such "deduction" features could impede the efforts of revitalization of an area/neighborhood. Many areas that are considered a QCT/DDA or a HUBzone have these designations due the lack of continued investment and the concentration of blight, which leads to some of the items listed in (ii) of this section. By discouraging investment near such sites we will be unable to break the cycle of deterioration of certain neighborhoods. We understand and appreciate the need not to locate near certain sites; however, if those sites have come into an established neighborhood and caused the deterioration, LHFA should promote the return of that neighborhood in an effort to push out the items of negative cause. This consideration could be addressed in a number of ways: Match the "deduction points" to that of the "gained points"; "deduction points" should be 1 point if located < 1 mile and $\frac{1}{2}$ point if located >1 mile but < 2 miles and maximum deduction should be 10 points. Another way to address this is in relation to an established neighborhood in need of revitalization. If an applicant can demonstrate that a thriving neighborhood once existed and the negative sites were located in the neighborhood and contributed to the cause of its deterioration subsequent to the establishment of the neighborhood, than no "deduction points" should be taken.

Based on early meetings in the QAP development, it appears that the LHFA Board and Staff are inclined to keep the 2009 credit ceiling limit in place of \$800,000. While this ceiling may be sufficient in many basic affordable housing developments, it is very difficult to develop the encouraged "superior" affordable housing developments in areas that are most conducive and in critical need, such as Urban, Smart-Growth



infill developments. With this in mind we would encourage LHFA to remove credit ceiling caps on Urban, HUBzone qualified developments. By doing this, it will allow an applicant to pursue a superior site, develop a greater number of units, and produce the highest quality affordable development that will be sustainable for generations to come.

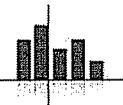
Section VII (A) of the 2009 selection criteria indicates a negative point structure for "phasing" of a development, presuming in the same round. However, the QAP does not address "phasing" of a development in multiple rounds (multiple FYs whether or not applied in one round) based on a master plan. Such consideration of a master plan should be considered in future QAPs. Master Planning is a founding principle of smart growth principles and sustainable design. The QAP should also allow priority points to be carried from one funding round to another based on the developments inclusion of a master plan. In other words, if a development is awarded points in one round for items such as leverage, support, community center, etc., an addition to that development in a future round should be awarded those same points without having to duplicate construction of such or provide duplicate support; it should be an automatic calculation of scoring.

Other technical/logistical recommendations to the QAP in order for such developments to be constructed in more practical ways are:

- Allow developer to determine best way to provide Phone, Internet & TV services as opposed to the requirement of separate networks.
- Requirement of Storm Windows to be in wind zones of 140 MPH only.
- Remove requirement of 75% brick. Exterior shell should be of durable material such as brick, stucco, hardi-board or the like. No vinyl siding should be allowed.
- Adjust priorities to prioritize Urban Infill Developments using Smart Growth Principles.
- Remove Rural Development Sub Pool.
- Remove Permanent Supportive Housing Sub Pool.

SUMMARY OF RECOMMENDATIONS

- Identify Superior Site & Design minimum thresholds for consideration.
- Increase HUBzone points to 6.
- Increase QCT/DDA points to 4 in non-rural areas.
- Increase CCR Plan points to 4.
- Remove Rural Target Area points.
- Allow 5 points for each Federal or State Grant connected to a development.
- Remove Rural Targeted Parishes.
- Change Neighborhood points so points gained matches points deducted or remove deduction points for Urban Revitalization Developments.
- Remove credit ceiling caps for Urban Revitalization Developments located in HUBzones.
- Insert language that allows a master planned phased development to carry their priority points from one round to another.
- Adjust telecommunications network requirements.
- Remove storm window requirements.
- Remove brick requirements.
- Adjust priorities and remove Rural & PSH Sub-Pools.



THE CARTESIAN COMPANY
Real Estate Development & Finance Solutions

Thank you for your time and consideration of these initiatives, recommendations and modifications.
Please feel free to request any other information you feel important to support these requests.


Greg Gachassin
President, The Cartesian Company
Development Consultant for Acadiana Outreach Center

cc: Allison Jones, Chairman, LHFA
Mike Airhart, Vice-Chairman, LHFA
Guy Williams, Multi-Family Committee Chairman, LHFA
Mark Madderra, Multi-Family Committee Member, LHFA
Brenda Evans, Program Director, LHFA
Sen. Mary Landrieu, Senator, US Senate
Sen. David Vitter, Senator, US Senate
Rep. Jim Tucker, Speaker of the House, LA House of Representatives
Rep. Joel Robideaux, Speaker Pro Tempore, LA House of Representatives
Rep. Page Cortez, Representative, LA House of Representatives
Sen. Mike Michot, Senator, LA State Senate
David Wilson, Chairman, Acadiana Outreach Center
Rick Newton, CEO, Acadiana Outreach Center

Nicole C. Carter

From: Brenda Evans
Sent: Wednesday, July 07, 2010 5:04 PM
To: Louis Russell; Marjoriana Willman; Nicole C. Carter
Subject: FW: Green Certification and Opportunities
Attachments: Green Communities Criteria.pdf

From: Gonzalez, Monica [mailto:mgonzalez@enterprisecommunity.org]

Sent: Monday, June 28, 2010 10:20 AM

To: Brenda Evans

Subject: RE: Green Certification and Opportunities

Brenda,

Good morning. Hope all is well. Below are the mandatory energy efficiency measures for the Green Communities criteria that would be a good standard to use for the QAP. They are pretty universal and relevant to this climate. I am attaching the criteria which has these listed in the checklist (pages 6 - 10) and a full explanation beginning on page 29. Please let me know if you have any questions. Thanks!

Monica

Mandatory Energy Efficiency Measures of Green Communities

Efficient Energy Use: New Construction

Meet Energy Star standards (single family and low rise residential); exceed ASHRAE 90.1-2004 by 15 percent

Efficient Energy Use: Moderate and Substantial Rehabilitation

Perform an energy analysis of existing building condition, estimate costs of improvements, implement measures that will improve

Energy Star Appliances

If providing appliances, install Energy Star clothes washers, dishwashers and refrigerators.

Efficient Lighting: Interior

Install the Energy Star Advanced Lighting Package in all interior units and use Energy Star or high-efficiency commercial grade fixtures in all common areas and outdoors.

Efficient Lighting: Exterior

Install daylight sensors or timers on all outdoor lighting, including front and rear porch lights in single family homes.

Electricity Meter

Install individual or sub-metered electric meters.

From: Brenda Evans [mailto:bevans@lhfa.state.la.us]

Sent: Wednesday, June 23, 2010 1:56 PM

To: Gonzalez, Monica

Subject: RE: Green Certification and Opportunities

Monica – on a separate issue – I'm working on language for the QAP concerning target energy efficiency on windows, furnace, ac, refridg, dishwate etc. Do you have any information that you could send to give me some direction on what we should target for in our climate zone?

From: Gonzalez, Monica [mailto:mgonzalez@enterprisecommunity.org]

Sent: Wednesday, June 23, 2010 11:40 AM

To: Brenda Evans; Dr. Roger Tijerino; Marjorianna Willman

Subject: RE: Green Certification and Opportunities

Good afternoon. Hope all is well. I am following up on the spreadsheet we requested with the developers that chose the green bonus points in the 2009 QAP along with their contact information (email & phone #). Please let me know if we can get that by next week. We would like to move forward soon with the RFP and technical assistance. If you have any questions, do not hesitate to contact me. Thank you!

Monica Gonzalez
Program Officer
Enterprise Community Partners, Inc.
1050 S. Jefferson Davis Parkway, Suite 338
New Orleans, LA 70125
504.335.2307 (office)
504.821.7248 (fax)

From: Gonzalez, Monica

Sent: Friday, June 11, 2010 2:14 PM

To: Brenda Evans; Dr. Roger Tijerino; Marjorianna Willman

Cc: Whetten, Michelle

Subject: RE: Green Certification and Opportunities

Brenda,

Thank you for taking the time to speak with me this afternoon. As I mentioned, Enterprise would like to provide technical assistance to the developers who chose the green building points and were awarded tax credits in 2009. By having a list with the developers and contact information, it will also help us as we release a competitive RFP for grant funds to help augment the costs associated with building green. Once we get a comprehensive list, we can also determine what TA we can provide and pick a random sample to do onsite verification. I would also like to make sure the developers are aware of our new online certification for Green Communities - <http://www.greencommunitiesonline.org/tools/certification/>.

I look forward to reviewing the list. In the meantime, if you have any questions please feel free to contact me.

Best,

Monica Gonzalez
Program Officer
Enterprise Community Partners, Inc.
1050 S. Jefferson Davis Parkway, Suite 338
New Orleans, LA 70125
504.335.2307 (office)
504.821.7248 (fax)

From: Brenda Evans [mailto:bevans@lhfa.state.la.us]
Sent: Friday, June 11, 2010 1:00 PM
To: Gonzalez, Monica; Dr. Roger Tijerino; Marjorianna Willman
Subject: Green Certification and Opportunities

Monica,

It was a pleasure speaking with you this afternoon. It is thrilling to know that the developers may be able to tap into technical assistance and or additional grant opportunities. I'm asking Marjorianna Willman, our new Tax Credit Manager, by copy of this e-mail, to supply you a list of the developments, with contact information, that received points for Green Buildings so that you may contact the developers directly. I would ask that you include us on the correspondence that you transmit to them. In reference to the site reviews, Roger is over that department, but I could image that it may be helpful to his department to have some of his staff present, when you make your on-site visits but I defer to him.

Lastly, just for your information, I'm sending you a copy of the Architect's Certification recently approved for use by the Agency on Green Building Certification.

Let me know if I missed anything from our conversation, otherwise, you will be hearing from us shortly.

Thanks again,
Brenda