



Humanities Foundation
"Housing from the Heart"

April 5, 2012

Louisiana Housing Finance Agency
2415 Quail Drive
Baton Rouge, LA 70808

Sent Via Email

Dear Sirs,

The Humanities Foundation respectfully submits the following suggestions and changes to the 2013 Draft Qualified Allocation Plan:

1. We suggest that the due date of applications remain similar to last year's QAP reflecting an early September deadline. Since we are applying for 2013 credits, there is not a need to have the May 25th deadline. Furthermore, there needs to be a longer period of time between the final approval of the QAP and the application deadline. There could be late changes to the QAP that could potentially make a quality project not competitive. A later application deadline would allow developers to adjust to QAP changes and produce higher quality applications.
2. Developers should be allowed to order their own market studies. Developers may have market analyst that they prefer working with and may negotiate cheaper prices than those charged by LHFA. We recommend setting threshold market criteria such as capture rate limits, or have point scoring categories associated with market study conclusions (lowest capture rates, market rent advantage, absorption times, etc...). The agency may reserve the right to have a second market study commissioned at the developer's expense if the agency disagrees with the original market analyst's conclusions.
3. We suggest eliminating the Superior Design section of the QAP. Superior Design is highly subjective and should be removed as a point scoring item. We believe that subjective items in the QAP should be eliminated or held to a minimum. If there are subjective scoring items in this year's QAP, they need to be scored by the state agency and not by a third party.
4. The credit limit per developer should be increased to \$1,500,000. This would allow experienced developers the opportunity to be funded multiple projects. Having the limits at \$1,000,000 could eliminate high quality and better scoring projects in needed areas because the developer has reached their credit limit with a competing project.

The Humanities Foundation competes in multiple states and has a long history of developing affordable housing. We respectfully submit these suggestions based on our experience working with other state agencies. Many state agencies have similar guidelines to those stated above. While we understand that the QAP is drafted to meet the housing goals of Louisiana, we believe that the above suggestions

would contribute to a fair and balanced QAP which will reward quality projects to be developed by experienced developers.

Sincerely

A handwritten signature in blue ink, appearing to read "Tracy Doran".

Tracy Doran
President
Humanities Foundation, Inc.