



Mr. Don Hutchinson
Interim-President
Louisiana Housing Corporation
2415 Quail Dr.
Baton Rouge, LA
70808

Re: 2013 Draft Qualified Allocation Plan Comments

Dear Mr. Hutchinson,

Please accept the following as our comments to the current Draft of the 2013 Qualified Allocation Plan

- 1) **Definition of “Rural Area”:** Metairie, Gretna, Harahan, Covington, Mandeville, Slidell, etc. etc. are NOT rural areas. Rural Projects already have a \$1,800,000 pool. This is enough. Eliminate ANY point advantage for “Rural Projects” and especially ones that are not actually rural.
- 2) **10 points for “Geographic Diversity”:** This request was not made by the development community. Why is it in the revised Draft? Since projects in 120% AMI census tracts will not qualify for the Basis Bump Up this seems tailor made to assist particular developments? Please eliminate.
- 3) **11 Points for Veterans Projects:** This is too many points and it is out of proportion to the benefit provided. If you leave it in you need to define what “support” from the local VA means.
- 4) **Deadline:** Many applicants are relying on NSP2 funds to provide project leveraging and bridge Funding Sources. These Funds need to be expended by 2-27-12. Moving the Deadline up, even by one month to 6-30-12, will allow one crucial month during which to expend NSP2 dollars and successfully leverage LIHTC proceeds.
- 5) **Non-Profit/CHDO Pool Projects not funded in the Non-Profit/CHDO Pool.** The current QAP does not specify what happens to eligible projects not funded in the non-profit CHDO pool. They should compete in the overflow pool but the QAP does not state this like it does for the Congressional District and Rural Pools. Please clarify.

Thank you for your consideration and please contact me if you have any questions.

Sincerely,

Neal Morris