



LOUISIANA HOUSING ALLIANCE

June 4th, 2013

Don J. Hutchinson, Interim Executive Director
Michael Airhart, Chairman—Board of Directors
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Re: Recommendations to Improve the Draft Special Interim 2014 Qualified Allocation Plan

Dear Mr. Hutchinson & Mr. Airhart:

The Louisiana Housing Alliance (LHA) is a nonprofit organization whose members form a statewide coalition working to ensure the preservation and production of quality affordable housing for low and moderate income people in Louisiana. These recommendations and comments were developed through the LHA Policy Committee's work reviewing the draft Special Interim 2014 Qualified Allocation Plan (QAP) for Low Income Housing Tax Credits (LIHTC). It is important that these issues are resolved before the formal adoption of the 2014 QAP.

1. The LHA recommends holding public hearings in other regions of Louisiana, especially those which may be targeted for LIHTC investments, to give a needed venue for state wide in-person public comments.

An open and transparent process is required to ensure that the general public, advocates and the affordable housing developer community have confidence in the fair allocation of LIHTCs. Improving and extending the process for public comment will help ensure such confidence.

Limited Public Hearing Locations

The limited number of public hearing locations made it difficult and costly for those living in the Western and Northern parts of the state to comment in person. Only interested parties in Baton Rouge and New Orleans were able to participate in the scheduled meetings without incurring travel and other costs. In addition, the Memorial Day Holiday placed added constraints on the ability of the public and housing developers to offer meaningful comments. This in part could explain the limited participation in the New Orleans meeting.

2. The LHA recommends a map based delineation or listing of these targeted areas.

The heavy weighting of points aimed at, "targeting areas of significant economic growth and industrial investments", leaves much room for interpretation and added research costs for the applicants. There are no maps delineating such areas and little specifics on the methods for determining what constitute, "significant" economic growth, industrial investments and/or job centers.

3. The LHA recommends that additional points be awarded to incentivize the serving of low and very low income families and for providing for longer term affordability.

The LHA supports the objectives of the LIHTC program as laid out in federal law. The QAP point system will; "(a) serve the lowest income families; and (b) are structured to remain affordable for the longest period of time."

The LHA also supports the recommendations of the Lawyers' Committee for Civil Rights Under Law (and others) three primary concerns in the areas of; providing incentives in high opportunity areas, ensuring development consistent with Concerted Community Redevelopment Plans and incentivizing integrated housing for persons with disabilities. Additionally, the LHA supports the work of the Greater New Orleans Housing Alliance (GNOHA) and the Crescent City Community Land Trust's (CCCLT) comments and recommendations on extending affordability particularly with regards to new points for "permanent affordability".

Addressing these comments by the LHA, whose current members and partners are represented in each region of the State, and other specific suggestions of the organizations listed above will serve to enhance and improve the allocation of LIHTCs in Louisiana.

Sincerely,



MARLA Y. NEWMAN
Executive Director