



TO: Brenda Evans
Marjorianna Willman
Brad Sweazy
Don Hutchinson

FROM: Helena R. Cunningham

DATE: May 28, 2013

RE: Comments to the 2014 Special Interim QAP

Dear All,

Below are comments to the 2014 Special Interim QAP offered on behalf of National Housing Consultant Services.

General Comments:

- 1) Please confirm when fees are due. On Page 7 (1st paragraph it's 7/31/13), and on pages 8 (#3), 9 & 10 fees are due 8/2/13.
- 2) LHC is encouraged to extend for 30 days, the June 1, 2013 deadline for notifying the LHC of developing in an area not listed or covered by the newspapers outlined in the QAP. By the time the final QAP is approved, the deadline would have occurred.

Selection Criteria:

- 1) De-concentration Projects (Geographic Diversity) – Can LHC identify the census tracts that meet this criterion or can the LHC indicate what document can be utilized to support the area's AMI.
- 2) Location Characteristics – Neighborhood Features – LHC is encouraged to consider allowing all types of city/parish sponsored transportation. An area should not be penalized because of limited resources to fund a mass transit system. In many areas of the state where there's no mass transit, many people utilize and rely on a shuttle system.

Points Deducted – In light of the “Significant Economic Growth or Industrial Investment” criterion” LHC is encouraged to clarify how developing within 25 miles of certain industry can be beneficial if in an area of Significant Economic Growth or Industrial Investment while at the same time can cause a reduction of points if adjacent to and/or within ½ mile. LHC is encouraged to clarify.

- 3) PHA Referrals and Sponsorship: LHC is encouraged to continue accepting self-certification letters from developers agreeing to accept referrals from local PHA. Often, the local PHA is reluctant to provide these referral letters since the local PHA may be in competition for an allocation of credits for its own development.
- 4) Significant Economic Growth or Industrial Investment - LHC is encouraged to define "areas" by providing a map or listing of the specific locations that can qualify to earn the economic development points.
- 5) Special Needs Households – In addition to homeless, disabled and households with children, LHC is encouraged to allow Elderly Households to qualify as a Special Needs Household.
- 6) LHC is encouraged to provide points to HUD financed/insured Elderly developments with subsidy. This criterion will encourage the rehabilitation of HUD financed/insured elderly subsidized properties. Similar to the priority that was previously given to RD Properties.
- 7) LHC is encouraged to stop reducing the Developer Fee Base by Acquisition Costs.
- 8) LHC is encouraged to allow a 30% Basis Bump on a case- by- case determination.
- 9) In the Selection Criteria, the LHC awards 6 points for location in an Enterprise / Renewal Community. This is a federal designation and is an outdated metric in many census tracts. Instead, or in addition, the LHC should award points to projects located in the state's Enterprise Zones.
- 10) Governmental Support – Governments have experienced a decrease in funding levels as a result of budget cuts; thus having fewer dollars to allocate. As a result, developments should be rewarded if it is able to receive any level of leveraging from government. Accordingly, LHC is encouraged to base points on the amount of fund received, notwithstanding the % of TDC. (For example: 2 points for up to \$5,000 to 10,000; 3 points for \$10,001 to \$50,000, etc.)
- 11) LHC is encouraged to create a separate pool of credits to develop a single multi-family development in Terrebonne Parish. Doing so will support the Terrebonne Parish Consolidated Government's current Hurricanes Ike-Gustav Community Development Block Grant (CDBG) RFP. The special pool would set aside tax credits to ensure that Terrebonne funds can be leveraged with tax credits; thereby, producing a stronger viable development.

Thanks and all the best,



Helena R. Cunningham

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