



Louisiana Association of Affordable Housing Providers

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June 3, 2013

Louisiana Housing Corporation Board of Directors
2415 Quail Dr
Baton Rouge, LA 70808

Re: Special Interim QAP for 2014

Dear LHC Directors:

In follow-up to the two Public Hearings held to discuss the draft of the Special Interim QAP for 2014, LAAHP and its members would like to provide written feedback on the **Selection Criterion I. G: Significant Economic Growth or Industrial Investment in areas** for 30 to 50 points, the highest number of points by far for any of the selection criteria. Since this selection criterion is new to this QAP, developers and investors require more detailed clarification of how to qualify for these points. Specific concerns are:

1. The selection criterion notes: *Points will only be allowed for Significant Growth or Industrial Investment in areas with \$1 Billion scheduled to be invested in the next three (3) years.* However, there is not a definition in the glossary for any of these terms:
 - a. Significant growth
 - b. Industrial Investment
 - c. Areas with \$1 Billion scheduled to be invested in the next three years.
2. Mr. Williams used the term “Safe Harbor List” in his remarks at the New Orleans Public Hearing. Will this list be presented in a map indicating Safe Harbor areas that will qualify for these points? Will the list be presented as a pin point and a certain distance from that point will qualify and each developer will determine the area from that pin points?
3. The definition of “Area” needs further clarification for each of the selection criteria in which the term “Area” is used. Will the area be defined as being within a 25 mile radius of a specific pin point as listed in the Selection Criteria? What if an area has multiple points? Will an area be defined as a civil parish? An incorporated governing authority?



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4. Does "Industrial Investment" refer to manufacturing plants alone? For example, are technology, construction, medical, motion picture and other business industries eligible for consideration if such industries meet the objectives of *Significant Growth or Industrial Investment*?

5. Mr. Williams also stated that if a parish government can show economic development from multiple plants, more than one can be combined to establish a qualifying area for these points. Will this be written into the QAP?

6. Since LHA staff will be reviewing a project's eligibility for these points, specific guidelines and training needs to be provided to staff prior to processing of applications. This will insure consistency in reviewing applications and avoid multiple appeals once scores are released.

In conclusion, LAAHP recommends that the board provide much more detailed clarification of which projects will qualify for Selection Criterion 1.G.

Thank you for considering our recommendation. If you have any questions, please contact me at CharlotteB@LAAHP.org or 504-905-9433.

Sincerely,

Charlotte Bourgeois
Executive Director

Cc: Mr. Don Hutchinson
Mr. Brad Sweazy
Ms. Brenda Evans
Ms. Marjorianna Willman