May 30, 2013

Ms. Brenda Evans
Program Administrator
Louisiana Housing Council
2415 Quail Dr.
Baton Rouge, LA 70808

Re: 2014 Special Interim Qualified Allocation Plan

Dear Brenda:

Please accept my written comments relative to the 2014 QAP.

Significant Economic Growth: This section should remain as written in the existing draft of the QAP. Any increase to the 25 mile radius would dilute the efforts being made to generate needed housing for the economic growth areas. Also, no effort should be made to publically identify the qualifying areas. Any publication of the qualifying areas would all but diminish the competitive spirit of the QAP.

Renewal Community: It is my understanding that the renewal community/ RC-EZ areas have expired. If points are awarded under this category, the LHC should look at the possibility of replacing renewal community with the states enterprise zones.

PHA project: Points under this category should be deleted or reduced. Under no circumstance should the Louisiana Housing Council have to approve a certification for a development to qualify for these points. The certification approving board of the council is made up of 5 persons. 3 of the 5 persons are active developers by way of their affiliated PHA. Past experience shows that the certification approving board may deny certifications in an effort to reduce competition.
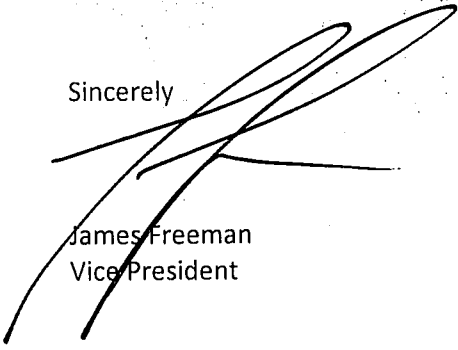
Government Support: This section should be deleted. There is no mechanism in place to verify the committed funds ever were utilized after construction. This section is often abused by developers as a way to generate points.

Project TDC: The established project types max TDC is not practical. Single family TDC limits should be raised to $200,000 per unit OR to the FHA limit. A quick review of single family cost certs would show that the typical per unit TDC is $200,000- $205,000.

Thank you for the opportunity to present my comments in writing. Please let me know if you have any questions relating to any of my comments.

Sincerely

James Freeman
Vice President