

**From:** [Michelle Kimball](#)  
**To:** [QAP Comments](#)  
**Subject:** QAP Comments  
**Date:** Friday, November 14, 2014 11:56:58 AM

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Mr. Fred Tombar  
Louisiana Housing Corporation  
[2415 Quail Dr.](#)  
[Baton Rouge, LA](#)  
70808

Subject: 2015 Draft Qualified Allocation Plan Comments

Dear Mr. Tombar,

We suggest the following revisions to the Qualified Allocation Plan.

- 1) Please reinstate the 2014 per unit maximum allowed Total Development Costs for historic rehabilitation projects. According to a study prepared by a Tulane University professor the per square foot maximums in the Draft QAP are 1/3 less than the actual development costs of historic rehabilitation projects across all project types.
- 2) The Draft QAP can do more to eliminate blight. Please provide 10-20 bonus points for projects that consist entirely of existing, blighted, historic, single-family and two-family structures.
- 3) Please incorporate the model definitions regarding, "Blight," "Historic Rehabilitation," and "Historic Structure" provided by the Louisiana Landmarks Society and listed in the attached Exhibit A. These model definitions will close loopholes and encourage appropriate historic rehabilitation.
- 4) The threshold Energy Efficiency standards are often incompatible with the Secretary of the Interior's Standards for Historic Rehabilitation. Please allow the Architect for the LHC to grant waivers relating to energy efficiency requirements if recommended by the State Historic Preservation Officer.

Sincerely,  
Michelle Kimball  
Preservation Resource Center of New Orleans

Sent from my iPhone  
Sent from my iPhone