

**From:** [Frederick "Fred" Tombar III](#)  
**To:** [Bradley Sweazy \(LHC\)](#); [Brenda Evans](#); [Marjorianna Willman](#); [Anita Tillman](#)  
**Subject:** FW: Critique of Draft QAP  
**Date:** Wednesday, October 08, 2014 3:42:24 PM

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FYI

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-----Original Message-----

From: kingferdinandsr@earthlink.net [<mailto:kingferdinandsr@earthlink.net>]  
Sent: Wednesday, October 08, 2014 11:01 AM  
To: Frederick "Fred" Tombar III  
Cc: Brenda Evans; Lhc malcolm young; LhC-Dr. Daryl Burckel; LHC-Ellen Lee; LHC-Guy Williams; mike airhart2; LHC-Mayson Foster  
Subject: Critique of Draft QAP

Fred, thanks so much for your hard work and that of your staff. As you may recall, when I voted to give you and your staff more time for this QAP, I stated that I expected a QAP worthy of national Best Practices recognition.

Also, I remembered that more time was requested so you could have the Statewide Housing Needs Assessment(HNA). The one area in which there was some reliance on the HNA, the allocation of tax credits via labor markets, I am opposed to as it does not appear to put enough of our scarce resources where the need is the greatest.

The following comments are my views based on the different hats I've worn in the past, and one being a Community Developer:

- The overall document seems to be at cross purposes and demonstrates a bias away from urban infill development and development in rural areas. This in the light of allocations to entitlement urban cities have decreased over the years(Ex: In 2000 Shreveport's CDBG+HOME were appx \$5.4MM; 2014 it was appx \$1.5MM).

- The draft appears to move away from the economic development model we established last year. I was hoping the HNA would have been more specific regarding where to put LIHTC's resources. Did you all consider going back to an economic development criteria or one that better matches needs with resources.

- The draft QAP purports to have a preference for preservation property. For the most part, this seems to focus primarily on HUD owned or financed properties and those Section 8 projects based units. From my understanding, these developments are generally older, have already received substantial federal subsidies and operate with a high level of concentration of poverty. However, in other areas of the QAP you state that de-concentration of poverty is also a priority. I believe de-centration of poverty should be a priority which is keeping with national best practices.

- In Shreveport(like other urban areas), as of 2012, there was over 6000 vacant lots. These lots sit on paved streets with water, sewer, and drainage that have to be maintained. Also, they are located on transportation lines. Data is available to show, transportation is a major hindrance to folks below the poverty level. In his book "Comeback Cities", Paul Grogan talks about innovative ways to do infill projects. In addition, HNA mentioned these urban "transit" related developments as highly desirable and something LHC should encourage. This QAP appears to discourage these types of development. As you are aware, original city fathers built certain infrastructure(such as water & sewer plants & power stations) near their places of residences. When they migrated to the suburbs, many low-to-moderate families moved in to backfill the homes vacated. This QAP appears to penalize developers for locating

near certain infra-structures.

My experience as Community Developer as well as an elected official that represented a district with a great deal of urban blight and vacant lots and concentration of poverty, I'm concerned that this QAP misses the mark to address these type issues and others mentioned earlier in this email. I know you will, but please point out where my statements may have been in error and provide as much empirical data to allay my fears.

Thanks,

Larry

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