

Associated Neighborhood Development (AND)
 A Shared Initiative, Inc.
 Bayou District Foundation
 Broadmoor Development Corporation
 Chase
 Committee for a Better New Orleans (CBNO)
 Covenant House
 Crescent City Community Land Trust
 Enterprise Community Partners, Inc.
 First NBC Bank
 Foundation for Louisiana
 GCR Inc.
 Global Green USA
 Green Coast Enterprises
 Harmony Neighborhood Development
 Historic Restoration, Inc.
 Home Builders Association of Greater New Orleans (HBA)
 Iberia Bank
 Jericho Road, Episcopal Housing Initiative
 Jerusalem Economic Development Corporation (JEDC)
 Louisiana Appleseed
 Louisiana Association of Affordable Housing Providers (LAAHP)
 Louisiana Association of Nonprofit Organizations (LANO)



Louisiana Homebuyer Education Collaborative
 Louisiana Housing Alliance (LHA)
 Lower 9th Ward (NENA)
 Lower 9th Ward Homeownership Association
 lowernine.org
 Make It Right
 New Orleans Area Habitat for Humanity
 New Orleans Neighborhood Development Foundation (NDF)
 NO/AIDS Task Force
 Operation Comeback
 Pontchartrain Park CDC
 Preservation Resource Center (PRC)
 Project Home Again
 Project Homecoming, Inc.
 Providence Community Housing
 Puentes New Orleans
 Rebuilding Together New Orleans
 Redmellon
 Renaissance Neighborhood Development Corporation
 St. Bernard Project
 UNITY of Greater New Orleans
 Urban Focus, LLC
 Volunteers of America (VOA)
 Whitney Bank

November 4, 2014

To Whom It May Concern,

The Greater New Orleans Housing Alliance (GNOHA) commends the efforts of the Louisiana Housing Corporation to maintain outreach and dialogue with members of the housing sector during the creation of the 2015 Qualified Action Plan for the Low-Income Housing Tax Credit Program. GNOHA is a collaborative of non-profit and for-profit affordable housing builders, homebuyer education providers, and community development corporations working together to support the building of workforce housing in the Greater New Orleans area in an ethical and efficient manner. Since its creation in 2007, GNOHA has advocated for the preservation and production of affordable housing with a special emphasis on the needs of the most vulnerable in society - seniors, people with disabilities, veterans, low-wage workers and low-income families. It is with great gratitude towards these efforts that GNOHA submits its recommendations, questions and comments for the 2015 Draft QAP.

1. Project and Developer Limits

➤ **Increase from \$750,000 to \$1,500,000.**

- Allows developers to employ more sustainable design features in their projects.
- Makes historic preservation projects more feasible.
- Makes preservation of existing affordable housing more practical.

2. Cost Containment Guidelines

➤ **Increase the cost per square foot limits, particularly in the Historic Preservation/Rehabilitation category.**

- Many 9% tax credit projects calculate above these cost containment limits and may not be feasible under this QAP.

➤ **Add cost per common space square footage in addition to cost per dwelling unit square footage.**

- This will account for the *real construction cost* of conditioned circulation space prevalent in many New Construction Multi-Family and most Multi-Family Rehabilitation and Historic Preservation/Rehabilitation projects.

- **Clarify sources for the cost per square foot, and elevator and sprinkler upward adjusters.**
 - Does the \$11/square foot upward adjuster for an elevator double to \$22/square foot if 2 passenger elevators serve the same floor?

3. Qualified Basis Language

- **Allow for projects that utilize a financing structure that does not require a reduction in Historic Credit Syndication Proceeds from Qualified Basis.**

- Remove “and for the purpose of calculating maximum qualified basis of a building or Project.” from Section II C.
- Add “Governmental Grants, Historic Credit Syndication Proceeds and Certain Other Funds are not included in Cost Limits. The costs of a development funded by a governmental grant, proceeds from syndicating historic credits philanthropic donations, Federal Home Loan Bank or Private Investors funds are excluded from the total development costs for the purposes of establishing the project costs and for the purpose of calculating maximum qualified basis of a building or Project.”

4. Tax Credit Assistance Program (TCAP):

- **Remove the preference for this funding to go to Rent Burdened areas within the Delta Parishes.**

- As with the decision to use a General Pool, we believe it is best for the LHC to continue its focus on quality projects regardless of location, which could be hindered when focusing on a specific location that doesn't have much competition for this additional funding.

5. Appendix B Selection Criteria -Preservation Priority Project:

- **Section I.F -Add (v): “Developments with Project Based Section 8 or were previously financed with housing tax credits that are located in high opportunity neighborhoods located in census tracts in excess of 80% AMI 10 points.”**
 - This will preserve affordable housing within improving and heavily gentrifying neighborhoods.
- **Section I.H (ii)-Clarify “Developments that include at least three previous housing tax credit developments that have passed their initial 15-year period”**
 - We are unclear what this means.

6. Appendix B Selection Criteria - Scattered Sites and Infill Projects:

- **Section I.F. – include “new construction” under i & ii as in the 2014 Special Interim QAP**
 - Many infill and scattered site projects are new construction.

7. Appendix B Selection Criteria- Special Needs Households

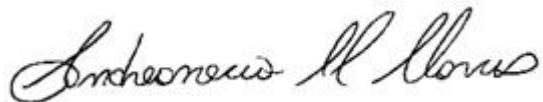
- **Section II A.- Add (iv) Veterans**

8. Deadline for questions.

- **Clarify Dates**
 - Section C states “Wednesday, December 17, 2014 by 10:00 AM” but the Program Schedule on page 10 states “December 14, 2014”.

We hope you receive these comments constructively as a means to improve the success of the LIHTC Program and the efficiency in which it is implemented. We believe our stated recommendations better support the LHC's goals for the 2015 QAP, including emphasis on quality projects and preservation of existing affordable housing. We look forward to your feedback and further engagement with members of the housing sector.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrianecia M. Morris".

Andrianecia M. Morris
GNOHA Board of Governors, Chair
(504) 821-7227