

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 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
 Renaissance Neighborhood Development Corporation
 St. Bernard Project
 UNITY of Greater New Orleans
 University of New Orleans, Department of Planning and Urban Studies
 Volunteers of America (VOA)
 Wells Fargo Home Mortgage
 Whitney Bank

October 1, 2014

Frederick Tombar, III
 Executive Director

Louisiana Housing Corporation
 2415 Quail Drive,
 Baton Rouge, LA 70808

Re: Recommendations for 2015 Qualified Allocation Plan

Dear Mr. Tombar:

Please find below our preliminary recommendations prior to the release of the 2015 Qualified Allocation Plan (QAP). We plan to follow up with any additional specific comments after the draft QAP is released in October. Going forward we encourage the LHC to **create a predictable and dependable published process and schedule** for drafts, comments, submission of applications, award letters, and board confirmations. We recommend that any significant changes to points associated with special populations (such as PSH or Veterans) include meaningful input from developers and advocates before the QAP is released.

Our specific recommendations for the 2015 QAP are based on the following three macro policy objectives:

- 1. Geography/Location**
- 2. Populations Served/Affordability Level**
- 3. Leverage/Efficiency**

1) Geography/Location:

It is immaterial whether a physical project is new construction, rehab, historic, or scattered site as long as the following location preferences are achieved.

- **Account for population projections, rather than current demographics, in the QAP.** Examples include proximity to prospective jobs and associated population growth and investment. As another example, 2020 population projects indicate an elder boom where low and very low income elderly persons will need additional support to age in place.
- **Target areas for de-concentration in high-opportunity neighborhoods located in census tracts in excess of 80% AMI** by awarding an appropriate number of points to these developments. Create more affordable housing in these areas to allow low-income families and Special Needs individuals to have access to resources that could greatly improve their quality of life such as education, public transportation, health care, healthy food, open space, and employment opportunities.
- **Minimize the urban/rural conflict by utilizing a weighted system that takes into account the relative impact and quality of the services.** Create two separate weighted systems including different criteria for urban and rural areas that would better account for the differences between communities. Consider the established infrastructure when determining points to deduct for disagreeable adjacent uses. For example, in urban areas any development will have more disagreeable as well as agreeable adjacent uses than in a rural area where there will be fewer of both.
- **Increase the number of points awarded to developments located in neighborhoods with a meaningful community plan.** A meaningful community plan may be developed by the city, other public or quasi-public agency, such as redevelopment authorities or housing authorities.

2) Populations Served /Affordability

Balance the relative needs of the various populations to be served including workforce, senior, disabled, special needs, homeless, and veterans.

- Create a set-aside, award points, or provide a basis boost for developments that include a certain percentage of units for people with Special Needs and/or utilize Section 811. This will ensure that more projects will include set asides for special needs residents in integrated settings. We further recommend using a definition of

Special Needs that includes homeless persons, persons with intellectual, developmental, or physical disabilities, persons with mental illness, and veterans.

- Establish defined credit pools for various types of populations to be served. Affordability is tied to populations served. Generally, Homeless, Special Needs and Disabled populations will require deep affordability. Seniors and lower wage workforce residents can be served at 60% AMI and below. Mixed income typically serves a wider variety of working households.

3) Leverage/Efficiency

Encourage cost effectiveness, efficiency in unit design and energy efficiency of buildings.

- Establish cost limits per Net Residential Square Foot appropriate to the type of construction based on current construction pricing. The 2014 Special Interim QAP requires “minimum square footage...per unit type” but does not define the calculation for “Square Footage.” This creates an opportunity for unit size to be inconsistently calculated.
- Encourage efficient use of tax credit financing by determining and awarding points to projects that produce the highest number of affordable units per dollar of tax credit awarded.
- Award additional points for projects that leverage other resources, whether local, state, federal, private and other investment sources.
- Provide incentive points for projects that exceed existing energy codes by 15%, or incorporate water efficiency measures, reducing the cost burden on tenants and owners over the years.

We hope you will consider our recommendations. Please do not hesitate to contact us at (504) 821-7235, if you have any questions.

Sincerely,

The Greater New Orleans Housing Alliance