

The Foundation for Historical Louisiana
P. O. Box 908
Baton Rouge, Louisiana 70821

November 4, 2014

Fred Tombar, President
Louisiana Housing Corporation
2415 Quail Dr.
Baton Rouge, LA 70808

Dear Mr. Tombar:

We welcome the opportunity to comment on the 2015 Draft Qualified Allocation Plan for the allocation of low income housing tax credits in Louisiana. Our suggestions below are intended to preserve our existing, historic housing stock while we provide housing for low income citizens in Louisiana.

First and foremost we request that the maximum allowable Total Development Costs for historic rehabilitation projects is maintained at the 2014 levels. The proposed limits in the 2015 QAP represent a decrease of approximately 1/3 from previous limits. It is important to realize that a sensitive historic rehabilitation costs more than a cookie-cutter big box apartment complex. However, one thing that should be noted is that dollars spent on historic preservation projects are intensely local. For every \$1,000,000 spent on new construction, 30.6 new jobs are created. For historic preservation projects the number increases to 35.4. Dollars spent on historic preservation projects support the Louisiana economy.

Second, we request that the LHC create a set aside pool of credits for projects that consist of entirely of blighted singles and doubles. From Gretna to Baton Rouge to New Orleans to Lafayette, our state has tens of thousands of badly deteriorated single family homes. We believe that the sensitive restoration of these homes as affordable housing will spur further redevelopment, help rebuild entire neighborhoods, and maintain the cultural treasure that is our stock of historic housing.

Finally, we support the tightening of definitions regarding historic preservation and blighted housing that will make sure developers who

choose “Historic Rehabilitation” will actually rehabilitate their projects in accordance with the Secretary of the Interior’s Standards for Historic Preservation. We support the proposed definitions in the Attached Exhibit A.

If you have any questions please do not hesitate to ask. Thank you very much for your consideration of these requests.

Sincerely,



Doug Cochran
Chair



Carolyn Bennett
Executive Director

Exhibit A

Historic Rehab Definitions and Project Threshold Requirements

Definitions:

BLIGHTED: A building or structure which is not occupied and which is in a state of repair such that any of the following conditions are met:

- A) Exterior wall and/or roof coverings which have become deteriorated and do not provide adequate weather protections, resulting in termite infestation and/or dry rot.
- B) Broken or missing windows or doors which constitute a hazardous condition or a potential attraction to trespassers or which constitute a fire hazard or other condition that is dangerous to the public health, safety, or welfare;
- C) Building exteriors, walls, fences, signs, retaining walls, driveways, walkways, sidewalks or other structures on the property which have been repainted in such a manner that the appearance may be further deteriorated or substantially defaced.
- D) Overgrown, diseased, dead, or decayed trees, weeds or vegetation that are likely to harbor rats, pigeons, vermin, and other nuisances; or substantially detract from the aesthetic and property values of neighboring properties.

HISTORIC PROPERTY: Any property that meets the requirements for a successful Part I application from the LA Office of Cultural Development Division of Historic Preservation, or is determined eligible for designation as Historic by the local governmental historic commission.

HISTORIC REHAB: Rehabilitation of Historic Property performed in accordance with the Secretary of the Interior's Standards for Historic Rehabilitation.

Project Threshold Requirements

Section V. A. 10

Rehabilitation Projects must submit a Capital Needs Assessment which specifically addressing the current FEMA Guidelines. Rehabilitation of an Historic Property in a local historic, state cultural, or National Register Historic District must be rehabilitated in accordance with the Secretary of the Interior's Standards for Historic Rehabilitation.

Section V. A. 11

Historic rehabilitation projects must include in their submission information concerning minimum project requirements, including but not limited to Energy Efficiency requirements, Design Features, Base Flood Elevation requirements and Internet Cable requirements for consideration of applicable waivers at time of application. If a historic structure undergoing substantial improvement (per the NFIP definition) is not being elevated, it must be documented that the historic designation will be maintained when the project is completed. The Corporation's designated architect may grant waivers relating to energy efficiency requirements if the State Historic Preservation Officer determines that strict adherence to the standards would make compliance with the Secretary of the Interior's Standards for historic Rehabilitation impossible or impracticable.