

Louisiana Trust

for HISTORIC PRESERVATION

November 3, 2014

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

Re: Comments to 2014 Draft QAP

Dear Mr. Tombar,

Please accept the following recommendations for modifying the 2014 Draft QAP as it relates to Historic Rehabilitation Projects.

- 1) The current Draft of the QAP needs tighter definitions regarding blight and historic rehabilitation. Historic Buildings should be renovated in accordance with the Secretary of the Interiors Standards for Historic Preservation. The definitions listed in "Exhibit A" to this letter, if included in the QAP, will ensure that historic buildings are appropriately renovated.
- 2) Bonus points should be awarded for developers who choose to take on projects that are 100% blighted but historic single family and two family homes. Neighborhoods will be better served by 100 units of blighted singles and doubles renovated as affordable housing than by another 100 unit apartment block. This applies to cities and towns across the state. The QAP should incentivize developers to tackle these projects so that neighborhoods are revitalized while the historic character of these neighborhoods are maintained.
- 3) The energy efficiency requirements embodied in the most recent version of Energy Star were never intended to comply with the Secretary of the Interiors standards for historic preservation. Please allow the Architect for

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the LHC to grant waivers for historic buildings when considering energy efficiency minimum standards. The proposed language in the attached Exhibit A would allow this waiver only when recommended by the State Historic Preservation Office and we think this requirement is reasonable.

- 4) Finally, please increase the maximum allowed development costs for historic rehabilitation projects. Across the state of Louisiana and across the spectrum of building types, (whether it is Offices, old schools, housing, or a municipal theater) sensitive historic rehabilitations cost more than the dollar amounts allowed in the Draft 2014 QAP. We respectfully ask that the Agency return to a per unit maximum Total Development Cost limit and retain the levels from 2013. It is our understanding that the current proposed levels represent a decrease of over 1/3 from last year.

We appreciate your consideration of these requests.

Sincerely,



Michael Echols
Louisiana Trust for Historic Preservation
President



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 REHABILITATION PROJECT: Rehabilitation of Historic Property performed in accordance with the Secretary of the Interiors Standards for Historic Rehabilitation.

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Project Threshold Requirements

Section V. A. 10

Rehabilitation Projects must submit a Capital Needs Assessment which specifically addressing the current FEMA Guidelines. Rehabilitation of a 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.