

From: [James Neville](#)
To: [QAP Comments](#)
Subject: 2016 QAP Comments
Date: Thursday, August 13, 2015 9:31:03 AM

To the staff:

I was a little surprised about the additional funding round this year especially with such a short turn around. I am sure you felt like there were some quality projects in the last round that did not get funded. I appreciate that you are only forward committing only half of next year's allocation. Maybe it doesn't even have to be that much. I won't be submitting next month because my plate is full for now. Thank-you for your recent allocation to my new project, G.O. Mondy. Thank-you also for allowing me to offer suggestions.

Jamie Neville

From: [Marjorianna Willman](#)
To: ["Ashley Wilson"](#); [QAP Comments](#)
Subject: RE: Capital Needs Assessment
Date: Wednesday, August 19, 2015 9:07:49 AM

Ashley,

April 5, 2015 is within 6 months (178 days) of the application due date of September 30, 2015. Assuming the CNA meets all of the other requirements of the QAP and the timeline does not change, a CNA dated April 5, 2015 is acceptable. This question will also be added to the list of FAQ questions. I have answered herein due to the time that would be required to obtain a new CNA if it was needed.

Ashley please forward in writing your question relating to diversity points so that the question can be answered through the FAQ.

Thanks,
Marjorianna

From: Ashley Wilson [mailto:awilson@lbcpas.com]
Sent: Tuesday, August 18, 2015 5:41 PM
To: QAP Comments
Subject: Capital Needs Assessment

If a project has a capital needs assessment dated April 5, 2015 will it be accepted as meeting the QAP requirement of being dated no earlier than six months before the application deadline?

Ashley Wilson
Little & Associates, LLC
Certified Public Accountants
805 North 31st Street
Monroe, LA 71201
Phone: (318) 361-9600
Cell: (318) 512-2143
Fax: (888) 520-9614

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From: [Marjorianna Willman](#)
To: ["Michael Bauer"](#)
Subject: RE: 2016 Qualified Allocation Plan Notice of Public Hearing
Date: Tuesday, August 25, 2015 4:23:20 PM

Hi Mr. Bauer,

I have spoken with our tax counsel and he has confirmed that if the initial 15 year compliance period for the building for which a credit allocation is sought ends 12/31/16 and the building is not acquired by the taxpayer prior to 12/31/16, there should be no problem under section 42(e)(7). The original question and response will be included in the upcoming FAQ.

Thank you,

Marjorianna Willman, Esq. | Deputy Administrator
LOUISIANA HOUSING CORPORATION

email@lhc.la.gov | www.lhc.la.gov
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2415 Quail Drive, Baton Rouge, LA 70808
twitter: [@lahousingcorp](#) | facebook: [LouisianaHousingCorp](#)

From: Michael Bauer [mailto:mbauer@providencech.org]
Sent: Thursday, August 20, 2015 10:39 AM
To: Marjorianna Willman
Subject: FW: 2016 Qualified Allocation Plan Notice of Public Hearing

Ms Willman

Thank you for taken a few minutes. My specific question is this; We would be interested in submitting a preservation acq rehab application for credits in the 2016 early round. The project is a current LIHTC community that will be rolling out of its initial compliance period on 12/31/2016. We believe the timing would certainly be fine on the placed in service dates after a substantial rehab taking over a year. However prior to us submitting this application we would like to confirm the timing overlap ability of the initial compliance period exit (completed by 12/31/16) and the new application submission/award/certification (Nov 4th 2015 & June 15th 2016).

May we submit this project in the 2016 early round applications due Sept 30, 2015?

Thank you
Michael

Michael J Bauer - CPM, AMS, CDFS
Vice President of Asset Management & Project Development
Providence Community Housing
504.821.7220 Direct | mbauer@providencech.org

From: Louisiana Housing Corporation [mailto:communications@lhc.la.gov]
Sent: Wednesday, August 12, 2015 2:17 PM
To: Terri North
Subject: 2016 Qualified Allocation Plan Notice of Public Hearing

LHC Logo





SENATE
STATE OF LOUISIANA

FRANCIS C. THOMPSON

State Senator
District 34
P.O. Box 68
Delhi, LA 71232
Phone: (318) 878-9408
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Email: thompson@legis.la.gov

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August 20, 2015

Liza Bergeron
Housing Program Administrator
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Anita Tillman
Director of Policy, Planning & Gov. Affairs
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Re: Tax Credits and Delta Parishes (excluding Ouachita Parish)

Ms. Bergeron and Ms. Tillman,

The Delta Parishes continue to be overlooked for funding and private investment opportunities. However, the need continues to exist. Without adequate affordable housing in these parishes, economic opportunities cannot continue to grow. I am writing today to request your assistance for the Delta Parishes.

Many households in the Delta Parishes struggle to afford a decent, safe place to live. Over the past five years, rents have risen while the number of renters needing affordable housing has increased. These two pressures make finding affordable housing even tougher for Louisiana's poorest households and low income wage workers.

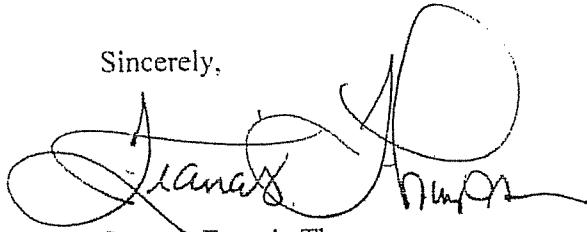
According to the most recent America's Rental Housing report, Tensas Parish, located in my legislative district, has only 48 units for every 100 extremely low income (ELI) renter households. In 2013, the cutoff for an ELI household of four ranged from \$14,400-\$19,400 depending on exact location. Tensas is just one example of the need for affordable housing.

The need for private investment through low income housing tax credits is evidenced by the poverty and rent burden statistics. The projects in these Delta Parishes are harder to make financially feasible without tax credits. These same projects are not able to compete with other areas of the state for points in the Qualified Allocation Plan (QAP). By providing an additional 8 points for the Delta Parishes (East Carroll, Tensas, Madison, Concordia, Franklin, Richland, West Carroll), the Louisiana Housing Corporation would be creating opportunities for housing and economic growth in an area of great need that has long been neglected by the Corporation.

In addition to adding 8 points to the current lightening round QAP for forward 2016 credits and the next 2016 QAP, I am requesting that Louisiana Housing Corporation add an additional 4 points for Delta projects in the fall HOME NOFAs and a priority use of TECAP funding for Delta Parish projects.

Thank you for your time and consideration. Your assistance is urgent to insure that the Delta Parishes receive affordable housing. Should you have any questions, feel free to give me a call.

Sincerely,



Senator Francis Thompson
District 34

FCT/sdg

cc: Governor Bobby Jindal
LHC Board of Directors
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Barry E. Brooks

From: charles.tate@yahoo.com
To: [QAP Comments](#)
Cc: [Brenda Evans](#); [Marjorianna Willman](#); [Louis Russell](#)
Subject: QAP -- LIHTC Management Experience Requirements --
Date: Thursday, August 13, 2015 6:45:26 PM

Should require LIHTC certification, but not 2 years experience. I believe this across the Board for the following reasons, then mention a Plan B.

- 1) Need to permit terrific property managers to progress rather than stifle their ability to do so.
- 2) When some of our most experienced firms got in this business (before us), there were no LIHTCs around -- they did not come about until 1986. Why run off that experience?
- 3) Today 4% credits and 9% credits are more important than before, when Congress actually appropriated HUD and USDA grant funds to care for the less fortunate. Why fault managers (or their residents) when they bear no more responsibility than we or their tenants for shifting statutory winds.
- 4) As it stands now, long-term management companies have every reason NOT to encourage their Owners to pursue 4% Credit and Bond Applications (and LHC fees) when they know they will be fired if successful. (I have seen management companies discourage owners, not on the merits, but for this reason.). Try explaining the virtues of 4% Credits and Bonds in a relatively benign interest rate and inflation environment to a volunteer unsophisticated nonprofit board for even an obvious, when the property manager offers a different opinion.
- 5) The Corporation seeks to encourage more challenging and smaller 4% projects by offering HOME funds in tandem. Such projects are in desperate need of attention, but managed by smaller firms who cannot afford to lose the income. Larger experienced LIHTC managers have little interest in smaller projects needing time and labor intensive relocation, etc. unless they own them. I personally think it would be helpful to have more local owners and managers across the State rather than fewer . . . which is exactly what we have seen.

RECOMMENDED APPROACH:

- 1. Require certification only across the Board. Don't worry, lenders, syndicators and investors will say no or require a bond if the incumbent lacks the ability.** (In one case I am aware of, both were okay with the 40 year incumbent manager -- but the QAP said no.)
- 2. Plan B: (1) Require certification only, not 2 years experience, for 4% Projects or (2) in cases where the incumbent manager has operated the property for 2 years. (Personally, I think just the first part, as I know a manager with no LIHTC experience who started her own firm after working for another firm with no LIHTC experience -- terrific at what she does ... saved 3 HOME projects I know, was called into rescue other rundown developments in Acadiana and NO and now wishes to help us preserve these developments. Should her firm really be fired for being conscientious enough to save those developments, then help their owners preserve them? (Me neither!)**

Thanks for listening -- this is really important from where I sit!

Charles

From: [ALMA MCMILLIAN](#)
To: [QAP Comments](#)
Subject: QAP POINTS
Date: Friday, August 21, 2015 12:55:06 PM

Add 8 points to the QAP for both 2016 rounds of funding for priority projects located within the Louisiana Delta Parishes excluding Ouachita. The Delta continues to have the greatest housing and poverty needs. Affordable housing is in great demand in these parishes.

Alma McMillian

Live Well Love Much Laugh Often

From: [Teresa Bowyer](#)
To: [QAP Comments](#)
Subject: Question - Scoring Item I(B) Redevelopment Project
Date: Friday, August 21, 2015 12:00:28 PM

Good afternoon,

Please provide clarity as to whether it is the intent of the LHC to allow a "Distressed Property" located outside of a QCT to be deemed a "Redevelopment Project"?

Thanks,

Teresa Bowyer
Development Director
Herman & Kittle Properties, Inc.
1111 Timbergrove Ln
Houston, TX 77008
(806) 543-8645
tbowyer@hermankittle.com
<http://www.hermankittle.com>

Culture - Community - Commitment

From: [Len Reeves](#)
To: [QAP Comments](#)
Subject: QAP Questions
Date: Monday, August 17, 2015 5:19:02 PM

The following questions are tied to their respective point categories:

Geographic Diversity- What is the preferred source for income calculations by Parish and QCT? (Ex. HUD FY 2015 MFI for income by Parish and FFIEC Census Reports 2015 Est. Tract MFI for income by Census Tract)

Targeted Population- In the event that a developer has shown good faith and effort to lease units to a targeted population type and the unit remains empty, is there a minimum period of time that a developer must wait to open the unit to the general population?

Governmental Priorities- Does LHC use the HUBZone map to determine both eligible HUBZone locations and eligible QCT/DDA locations?

Leverage for Disability Funding- What type of documentation is required from the funding entity? Are there any entity limitations other than non-governmental? Is there a funding minimum required to be awarded the 3 points?

Thanks for your help.

Len Reeves
LENTON DEVELOPMENT, LLC
*2510 Lakeland Terrace
Suite 300
Jackson, MS 39216*

601-720-4029 (cell)

From: [Brenda Evans](#)
To: ["Art Schuldt"](#)
Cc: [Marjorianna Willman](#); [Urshala Hamilton](#)
Subject: RE: 2016 QAP questions
Date: Friday, August 21, 2015 1:29:02 PM
Attachments: [image001.jpg](#)

Thanks Mr. Schuldt,

I want to get with the team so that we can provide appropriate responses.

Best Regards,
Brenda

From: Art Schuldt [mailto:art@sgba.com]
Sent: Friday, August 21, 2015 12:56 PM
To: Brenda Evans
Subject: 2016 QAP questions
Importance: High

Brenda:

I wanted to clarify a few things I found in the draft QAP before we submit any formal comments next Friday. The public hearing notice states that we can send questions directly to you in advance of the meeting.

1. Given the extremely short time period from QAP adoption to the due date, if we resubmit a project that we submitted just months earlier in the 2015 round with no changes, will we be permitted to upload many of the same documentation since they are still current this year?
2. The QAP requires a 35 year rather than a 15 year proforma. Our lenders will typically only provide a 15-20 year term. Will the debt service ratio calculations only apply to a 15-year period?

-
Selection Criteria

1. I.B. Redevelopment Project-with the removal of the 5% resource requirement by local government, a PHA project would qualify for the redevelopment points as a distressed property as long as it proposes more than \$20,000 per unit in rehab and has been placed in service 15 years or more from the application deadline. Would sufficient documentation be a letter from the PHA stating such and referencing the Capital Needs assessment?

Also, the proposed change to the QAP now defines a Redevelopment Property as being located in a "QCT". This was not in the previous definition. There are numerous public housing authorities, some with a new RAD CHAP award that needs LIHTC leveraging to meet critical redevelopment needs. However, many sites are not located in a QCT. Is it the intent of LHC to prohibit "distressed" PHA properties from claiming points as a Redevelopment Project?

2. I.G.(iii) Preservation Priority Project – This section states that to receive 10 points, the development must have project based section 8 for at least 30% of the units or federally

funded rental subsidy (such as PHA) for at least 20% of the units. We read this to mean that a PHA project with its federal rental subsidy for 100% of the units will receive all 10 points. Please confirm your agreement. If it is the Corporation's intent to limit the subsidy to only 20% of the units for 10 points, then this will negatively impact PHA applications. I might also point out that there is already scoring for Project Diversity, so why is this needed?

We know the Corporation has been trying to work with PHAs on their RAD transactions, but some of the above scoring items are working against that. Your input is appreciated as soon as possible!

Thanks!



Art Schuldt, Jr., AIA, President

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DIRECT: 318-213-6502

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From: [Marjorianna Willman](#)
To: [Nolen Aycock](#)
Cc: [QAP Comments](#); [David Strange](#)
Subject: Re: Market Study Fee - Draft 2016 QAP
Date: Wednesday, August 19, 2015 7:38:09 PM

The market study fee will be due September 11, 2015.

Thanks
Marjorianna

On Aug 19, 2015, at 5:36 PM, "Nolen Aycock" <nolen@newhorizongroup.com> wrote:

Good Afternoon,

Under the Program Schedule on Page 11 of the 2016 Draft QAP, the market study fee (if required) is due on September 11, 2015. Then on page 16 under the non-refundable fee schedule, the Market Study Fee is due no later than Friday, October 2, 2015. Can you please clarify what would trigger the market study fee to be due on the earlier date of September 11, 2015?

Thank You for Your Guidance on this Requirement.
Hope All is Well

Nolen Aycock
New Horizon Development, LLC
Financial Analyst & Accountant
Office Phone: 601-932-1674 ext. 102
Fax: 601-932-4926
Cell: 662-202-6171
nolen@nhgms.com

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Vice Chairman

August 20, 2015

Liza Bergeron
Housing Program Administrator
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Anita Tillman
Director of Policy, Planning & Gov. Affairs
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Re: Tax Credits and Delta Parishes (excluding Ouachita Parish)

Ms. Bergeron and Ms. Tillman,

The Delta Parishes continue to be overlooked for funding and private investment opportunities. However, the need continues to exist. Without adequate affordable housing in these parishes, economic opportunities cannot continue to grow. I am writing today to request your assistance for the Delta Parishes.

Many households in the Delta Parishes struggle to afford a decent, safe place to live. Over the past five years, rents have risen while the number of renters needing affordable housing has increased. These two pressures make finding affordable housing even tougher for Louisiana's poorest households and low income wage workers.

According to the most recent America's Rental Housing report, Tensas Parish, located in my legislative district, has only 48 units for every 100 extremely low income (ELI) renter households. In 2013, the cutoff for an ELI household of four ranged from \$14,400-\$19,400 depending on exact location. Tensas is just one example of the need for affordable housing.

The need for private investment through low income housing tax credits is evidenced by the poverty and rent burden statistics. The projects in these Delta Parishes are harder to make financially feasible without tax credits. These same projects are not able to compete with other areas of the state for points in the Qualified Allocation Plan (QAP). By providing an additional eight points for the Delta Parishes (East Carroll, Tensas, Madison, Concordia, Franklin, Richland, West Carroll), the Louisiana Housing Corporation would be creating opportunities for housing and economic growth in an area of great need that has long been neglected by the Corporation.

Liza Bergeron
Anita Tillman
August 20, 2015

Page 2

In addition to adding eight points to the current lightening round QAP for forward 2016 credits and the next 2016 QAP, I am requesting that Louisiana Housing Corporation add an additional four points for Delta projects in the fall HOME NOFAs and a priority use of TECAP funding for Delta Parish projects.

Thank you for your time and consideration. Your assistance is urgent to insure that the Delta Parishes receive affordable housing. Should you have any questions, feel free to give me a call.

Sincerely,



Representative John F. "Andy" Anders
District 21

JFA/cls

cc: Governor Bobby Jindal
LHC Board of Directors
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Barry E. Brooks



August 18, 2015

Ms. Michelle Thomas
Appointing Authority
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Dear Ms. Thomas:

Louisiana USDA Rural Development (RD) would like to take this opportunity to present items for consideration for development of the 2016 Qualified Allocation Plan (QAP).

In Louisiana, USDA RD has an outstanding affordable housing portfolio of approximately 380 multi-family housing properties consisting of over 12,000 units. This represents an investment by the federal government of nearly \$340 million in rural affordable housing for the state of Louisiana.

RD is committed to working with Louisiana Housing Corporation (LHC) in an effort to achieve the goal of both agencies; that of providing affordable housing which is decent, safe and sanitary to those residents of our state.

Therefore, we are requesting consideration of the following:

1. A statewide RD pool specifically for rehabilitation of existing RD financed properties. LHC has been critical to the mission of our program through the Low Income Housing Tax Credit Program. Funding opportunities with LHC have enabled developers to successfully leverage LHC funds with RD funds or other third party funding to complete necessary rehabilitation.

Rural Development • Louisiana State Office
USDA Service Center, Building B
3727 Government Street • Alexandria, LA 71302
Voice 318.473.7922 • Fax 844-325-6950

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RD is committed to working with LHC in an effort to achieve the goals of both agencies; that of providing affordable housing which decent, safe and sanitary to the residents of our state. In fact, we will be working with Mr. Keith Cunningham and Mr. Todd Folse of LHC to find ways to share compliance data that will be helpful to both agencies. We appreciate the opportunity to share our comments on the development of the 2016 QAP.

Sincerely,

CLARENCE W. HAWKINS
State Director

cc: Brenda Evans ✓

RECEIVED

AUG 20 2015

LOUISIANA HOUSING
CORPORATION

From: [Morrin, Matthew](#)
To: [QAP Comments](#)
Subject: Questions on Draft QAP
Date: Wednesday, August 26, 2015 6:05:47 PM

I have a couple of questions on the 2016 QAP that was just released.

1. Will the QAP criteria be the same for the half of the credit allocation that will be awarded after this funding round, or is there a possibility of a new set of criteria being established for the remaining 2016 credit allocation.
2. Is Selection Criteria I. G. from the 2015 QAP still a part of this 2016 QAP criteria? This criteria was listed as I. G. in the version of the electronic application that I have seen, but not the QAP document itself. This is the criteria where up to 50 points were available in relation to proximity to economic development or industrial development?

Matt Morrin, Development Director, New Orleans

Enterprise Homes, Inc

643 Magazine Street, Suite 202

New Orleans, LA 70130

504.335.2309 | Mobile: 443.896.3172 | Fax: 504.561.0785

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August 27, 2015

Delivery via email only to gapcomments@lhc.la.gov

Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

RE: 2016 QAP, Section V.D.2 Unit Size Limitations

Dear LHC Team,

Subsection a.i. of the above referenced section states, "the minimum bathroom and bedroom size may be waived for an existing project which is being rehabilitated only if a federal program finances the unit and the federal agency administering the program which finances the unit requests a waiver of such limits."

Considering the above latitude given to bathroom and bedroom size, would the LHC approve a waiver of the minimum square footage per unit type as proposed by the federal agency financing the existing project?

Given the impact that this waiver will have on our rehabilitation plans we are respectfully requesting a prompt response.

Thank you for your help with this matter and please contact me by phone at 504-486-8673 or email at scraver@voagno.org if you would like to discuss this further.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stephen Craver".
Stephen Craver
Development Director

Cc: Victor Smeltz, Executive Director

From: [Joan Guillory](#)
To: [QAP Comments](#)
Subject: Written Comments from Advocacy Center Regarding 2016 Draft Qualified Allocation Plan
Date: Thursday, August 27, 2015 2:32:38 PM

Public Comment Submitted by Advocacy Center Regarding the 2016 Draft Qualified Allocation Plan

The Advocacy Center commends the work of those involved in creating and/or expanding affordable housing opportunities for residents of Louisiana. As the statewide protection and advocacy organization for people with disabilities, Advocacy Center recognizes the abundance of possibilities that could be realized through Low Income Housing Tax Credits (LIHTCs).

It is our understanding that the purpose of the 2016 Qualified Allocation Plan (QAP) is to reserve Tax Credits and other Corporation resources for the creation and sustainability of affordable rental housing units for low- and very low- income households in Louisiana. One of the principles and priorities to be furthered is to provide an equitable distribution throughout the state and to provide a reasonable mix of affordable housing projects, both in number of units and the populations served (family; elderly; special needs). This seems to be in line with the following statistics, which Advocacy Center would like to highlight to ensure that the 2016 QAP is inclusive of the needs of all Louisianans.

According to data from the Centers for Disease Control and Prevention, Division of Human Development and Disability, the current prevalence of disability in Louisiana by adult age groups indicates that 12.7% of those ages 18 – 24 have a disability; 27.3% of those ages 45 – 64 have a disability; and 38.9% of those ages 65 and over have a disability. Further, adults with disabilities are more likely than the general population to be unemployed or underemployed and to live in poverty. The latter also is true for the portion of our population that is elderly. So, for these segments of our state's population, finding affordable housing is a high priority, but an enormous challenge. For this reason, we support the Louisiana Housing Corporation's efforts to ensure that Louisiana residents of all abilities and ages are able to take advantage of the housing opportunities within our state.

Low Income Housing Tax Credits and the 2016 Qualified Allocation Plan can be conduits that affect favorable changes for all Louisianans, by ensuring that substantive housing opportunities are available and attainable for residents of all abilities, of all ages, and of all income levels. This could render measurable, affirmative results and afford meaningful, enhanced quality of life outcomes for Louisiana residents with disabilities and residents who are aging. These residents, along with Advocacy Center, applaud the efforts of Louisiana Housing Corporation to optimize the affordable housing opportunities that can be realized through LIHTCs and the 2016 QAP.

We appreciate the opportunity to share these comments.

Joan D. Guillory
Director, HAPP/ROHMP Programs & From Hospital to Home Project
Advocacy Center
8325 Oak Street
New Orleans, LA 70118-2043
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jguillory@advocacyla.org

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From: [Lisa Washington](#)
To: [QAP Comments](#)
Date: Thursday, August 27, 2015 4:03:12 PM

Add 8 points to the QAP for both 2016 rounds of funding for priority projects located within the Louisiana Delta Parishes excluding Ouachita. The Delta continues to have the greatest housing and poverty needs. Affordable housing is in great demand in these Parishes.



Alembic Community Development

Alliance for Affordable Energy

A Shared Initiative, Inc.

Associated Neighborhood Development

Broadmoor Improvement Association

Capital One

Center for Planning Excellence

Committee for a Better New Orleans

Crescent Care

Crescent City Community Land Trust

The Data Center

Enterprise Community Partners

Finance Authority of New Orleans

First NBC Bank

Foundation for Louisiana

GCR Inc.

Global Green USA

Greater New Orleans Foundation

Green Coast Enterprises

Greater New Orleans Fair Housing Action Center

Greater New Orleans, Inc.

Gulf Coast Housing Partnership

Harmony Neighborhood Development

Healthy Start New Orleans

Housing Authority of New Orleans

Iberia Bank

Jericho Road Episcopal Housing Initiative

Jerusalem Economic Development Corp.

JPMorgan Chase Bank

Louisiana Appleseed

Louisiana Association of Affordable Housing Providers

Louisiana Association of Nonprofit Organizations

Louisiana Homebuyer Education Collaborative

Louisiana Housing Alliance

Louisiana Housing Corporation

Lowemine.org

Lower 9th Ward Homeownership Association

Lower 9th Ward NENA

Make It Right

Neighborhood Assistance Corporation of America

Neighborhood Development Foundation

Neighborhood Housing Services

NEWCITY

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New Orleans Redevelopment Authority

NO/AIDS Task Force

Northshore Housing Initiative

Office of Housing Policy & Community

Development

Operation Comeback

Perez, APC

Pontchartrain Park CDC

Practitioners Leveraging Assets for Community Engagement

Preservation Resource Center

Project Home Again

Project Homecoming

Providence Community Housing

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Service Providers and Professionals Association

Southern United Neighborhoods

St. Bernard Project

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UNITY of Greater New Orleans

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U.S. Department of Housing and Urban Development

Volunteers of America

Whitney Bank

Whodata.org

August 27, 2015

Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Re: Recommendations for 2016 Qualified Allocation Plan

Dear Board members:

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 2016 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 2016 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. Energy Efficiency and Green Building

➤ In the future, consider requirements and incentives for performance-based building improvements for energy efficiency.

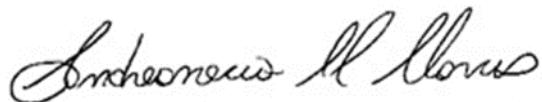
- Require energy audits for rehabilitation projects with a description of how the results will inform the selection of measures.
- Encourage comprehensive, whole-building retrofits by awarding points to rehabilitated buildings that demonstrate overall increases in energy efficiency over a pre-construction baseline.
- Reward all projects that commit to benchmarking energy use over the 15-year compliance period of the tax credits or consider adding to compliance.

➤ **Expand definition of “Green Building”**

- Expand definition of Green Building to include all green certification types as long as they adhere to Energy Star Version 3. Since developers are recognizing the advantages of green building more and more, a larger variety of certification types are being utilized and should be supported.

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 support the LHC’s goals for the 2016 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,



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



Louisiana Association of Affordable Housing Providers

August 27, 2015

Ms. Michelle Thomas
Chief Administrative Officer
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Dear Ms. Thomas:

We have reviewed the draft 2016 Qualified Allocation Plan and offer the following comments:

1. Given that LAAHP's Annual Conference is scheduled for September 30, 2015 we request that the application deadline be extended to at least October 2, 2015 but preferably to October 6, 2015.
2. The schedule footnote on page 11 is confusing. The footnote indicates that site information is due September 11 but that applicants will not receive direction regarding what to submit until September 18. We recommend that the September 11 date be revised.
3. We note on page 12 that the in-person challenge review has been eliminated. We recommend that LHC reconsider this as we believe it provides an opportunity for applicants to clarify questioned submittals.
4. Regarding the proposed change on page 18 requiring 35 year pro-forma cash flows rather than 15: LAAHP strongly objects to this change as it serves no practical purpose. The industry standard is 15 years. The end of the low income housing tax credit compliance period is 15 years. Transactions beyond the 15 year compliance period are likely to be refinanced. A subsequent refinancing, for example, 21 years into the 35 years requested, cannot be captured in the QAP application as constructed. And we question of what value a guess regarding interest rates and loan terms 21 years from now is to any underwriting.
5. The Scattered site revised definition on page A-23 seems to preclude contiguous lots as "scattered sites". We are befuddled by this. LHC has presented this as an opportunity to promote homeownership. We see no correlation between homeownership and contiguity. Non-contiguous scattered site transactions are difficult to manage. In fact, we believe that contiguous scattered sites (such as a subdivision or multiple adjoining lots in an urban location) are a preferred product type. Regardless, we recommend that the proposed added language be deleted.
6. We'd like clarification on the definitions in the glossary regarding "Redevelopment Projects" and "Redevelopment Areas". We are interpreting that a Redevelopment Project is only in a QCT. Is

that the agency's intent? Can a Distressed Property, for example, in a non QCT earn the Redevelopment Project points under Selection Criteria?

7. And we have one question regarding the non-profit pool: If a project(s) gets funded in the non-profit pool with the total credits awarded less than \$750,000 but more than the required 10% (\$500,000) will the remaining credits collapse to the general pool?

We note that we discussed briefly in our meeting with you on August 20, 2015 the Texas fair housing related legal ruling as to how it may impact the QAP. In our discussion it was mentioned that it will take some time for the impact of the ruling to filter down to the agency level and then any adjustments will be incorporated at that time. Can you advise if it's LHC's intent to revise the draft QAP given the ruling?

We appreciate the opportunity to provide these comments for consideration by LHC.

Sincerely,



Laura White
President



August 27, 2015

Delivery via email only to gapcomments@lhc.la.gov

Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

RE: 2016 QAP Public Hearing Comments & Questions

Dear LHC Team,

Below are our comments and questions related to the 2016 Draft Qualified Allocation Plan:

- Amount of Housing Credit Available (page 6)
 - Is it reasonable to assume that the total 2016 credit ceiling is approximately \$10.5M (i.e. same as 2015) and that the pools will be allocated in the same percentages as in 2015? If so, the next round's pools are approximated below:
 - Non-Profit/CHDO - \$300,000 (\$1,050,000 - \$750,000)
 - General - \$5,200,000 (\$9,450,000 - \$4,250,000)
 - Total - \$5,500,000 (next round)
- Program Schedule (page 11)
 - The footnote states that the site information is due on Sept. 11th but that details of what needs to be submitted won't be provided until Sept 18th. Please clarify.
- Competitive Evaluation (page 12)
 - We request that the opportunity to meet with staff/review committee during the Challenge Period not be deleted from section 5.
- Pro Forma Cash Flows (page 18)
 - Extending the projections from 15 to 35 years will likely not reflect a reasonable statement of operations given the probable need to recapitalize the project during this timeframe.
- Veterans Households (Selection Criteria, page 5)
 - Please clarify what is sufficient documentation to "evidence commitment to the project from the Veterans Administration".
- Leverage for Disability Funding (Selection Criteria, page 9)
 - Please clarify what is to be calculated in regards to "calculations supporting the selection must be included in the application submission".

Thank you for the opportunity to provide our feedback and please contact me by phone at 504-486-8673 or email at scraver@voagno.org if you would like to discuss these further.

Sincerely,



Stephen Craver
Development Director

Cc: Victor Smeltz, Executive Director
Vanessa Levine, Development Manager



James Freeman
Vice President

Development • Construction • Management

August 28, 2015

Ms. Brenda Evans
Program Administrator
Louisiana Housing Finance Agency
2415 Quail Dr.
Baton Rouge, LA 70808

Re: 2016 Qualified Allocation Plan

Dear Brenda:

Please accept the following comments relative the draft 2016 QAP:

1. It appears the LAAHP conference and the Novogradic conference is the same week as the proposed application deadline. To allow participation in both events we request the application deadline be extended 2 weeks until October 14, 2015.
2. Page 11- program schedule. The project site information is due September 11 but specific details regarding submission will not be made available until September 18. Please clarify.
3. Page 12- It appears the chance to meet with staff during the challenge period has been removed. I feel this is an excellent time to explain your project details should there be questions. We request the right to meet with staff remain part of the challenge process.
4. Scattered site definition- There seems to be a slight change to the scattered site definition. The words "when non-contiguous" was placed in the definition leading one to believe that the intent was to change the meaning of scattered site to various partials scattered about an area. Is the intent not to allow single family/duplex subdivision type developments anymore? As discussed at your last BOC meeting the intent of this QAP was to promote home ownership. Home ownership and contiguity has nothing to do with each other. Projects that are spread out over an area or areas, are not only hard to manage but increase operating cost. Furthermore, if it is the intent to change the definition of scattered site to non-contiguous sites it will delete any chance of having new construction single family units, or duplexes in a contiguous setting. The TDC limitations of non-scattered site units are to low to support single family units or duplexes. I urge the LHC to make an adjustment in the TDC limitations for single family or duplex type units should it be the intent to change the definition of scattered site projects.



Thank you for the opportunity to provide these comments. Please contact my office should you have any questions.

Sincerely,

James Freeman
Vice President

From: [Steve Brooks](#)
To: [QAP Comments](#)
Cc: [Brenda Evans](#); [Rhett Holmes](#); [Steve Brooks](#)
Subject: Comments to 2016 Draft QAP
Date: Friday, August 28, 2015 11:33:07 AM

We would like to submit the comments below to the Draft QAP. We appreciate the time the staff and Board take to review these comments.

- On page of 23 Section B 1 requires that audited financial statements be submitted with an Acquisition / Rehab project. We would ask that if the prior owner didn't have the project audited but had a Compiled Financial Statement that this would suffice and not cause a threshold failure.
- In Appendix A the definition of Infill Project needs to be clarified. The definition states the project must be in an "existing urban area". We feel that this needs to be clarified as to whether these points can be claimed on a Rural Area Project or not.
- In Appendix A the definition of Redevelopment Area needs to be clarified. A suggested revision would be to remove the QCT and state "An area or areas which is specified by a local government unit as requiring revitalization as evidenced by documentation from the local governing authority." The projects in a QCT would still be empathized under the existing definition of a "Redevelopment Properties". If this changed isn't made the definition of Redevelopment Project and Redevelopment Property will be one and the same thing. Another suggestion would be to include DDA's in the definition,
- It was suggested by others that LHC should consider giving points to developments who previously submitted an application. We feel this would not be a good decision unless it was limited to the top 1 or 2 deals that we're wait listed in the last round. If the intent is to just find those deals then we wouldn't need another round but just fund the deals on the wait list.

We appreciate your consideration of these comments.

Steve Brooks
IDP Housing, LP

Sent from my iPhone

Proposed Changes to Louisiana's 2016 Qualified Allocation Plan

1. Under (I)(B) Redevelopment Project, projects are awarded 6 points for being located in a Redevelopment Area as defined in the glossary of the QAP. In response to recent court rulings directly impacting the development of low-income housing in areas with high concentrations of poverty, we suggest removing the requirement that Redevelopment Areas be in a QCT. Instead, we request the definition found in the glossary should be changed to require that Redevelopment Projects be located in Redevelopment Areas for which there is a revitalization plan that has been formally adopted by the local government. To qualify, there must be evidence of public input in the development of the plan, and the plan must have affordable housing as one of its policy goals. In order to receive points, applicants must submit a letter from the local government stating that the proposed development furthers the goals set forth in the revitalization plan. Comprehensive plans, consolidated plans and land use plans will not qualify.
2. Currently, two sections of the QAP offer points for scattered site projects: (I)(D) New Construction Scattered Site Project (maximum of 4 points) and (I)(F) Scattered Site Rehabilitation/or Infill Project (maximum of 10 points). We propose a move away from the emphasis on scattered sites by either reducing the number of points available or completely eliminating points.
3. Take out points **for (VI)(B) Project's TDC per unit is at least 10% below the maximum TDC/unit.** This is easily manipulated in the application and could also cause problems if costs rise during the construction phase.
4. Award points on a sliding scale for deals that are located within local government boundaries that haven't received a 9% tax credit allocation recently. Maximum points would be given for areas that haven't had an allocation of credits in the past ten funding cycles, with slightly fewer points given for areas without an allocation in the past five funding cycles. Include under III. Priority Development Areas and Other Preferences.
5. Provide points for developments that are part of a phased development if at least one phase has already received an allocation of credit within the past 5 years.
6. Allow parishes to designate one deal per year as the project that best serves its housing goals. If the parish designates more than one development, no points will be awarded for that parish. Add under (III)(C.) Government Priorities.
7. Increase the points available for (III)(E) Governmental Support by increasing percentage of total cost reduction: 5 pts. available for support of 10% or more total development cost reduction; 6 pts. for 15% or more total development cost reduction.
8. Keep the basis boost for projects in areas that have not received an allocation of credit in 10 years or more.

If these changes cannot be made in time for the September 2015 round, we respectfully request that they be incorporated into the QAP for the Spring 2015 round.



August 28, 2015

Brenda Evans
Louisiana Housing Finance Agency
2415 Quail Drive
Baton Rouge, Louisiana 70808

Re: Louisiana Draft 2016 Qualified Allocation Plan

Dear Ms. Evans:

The National Housing Trust is a national nonprofit organization formed to preserve and revitalize affordable homes to better the quality of life for the families and elderly who live there. The National Housing Trust engages in housing preservation through real estate development, lending and public policy. Over the past decade, NHT and our affiliate, NHT-Enterprise Preservation Corporation, have preserved more than 25,000 affordable apartments in all types of communities, leveraging more than \$1 billion in financing.

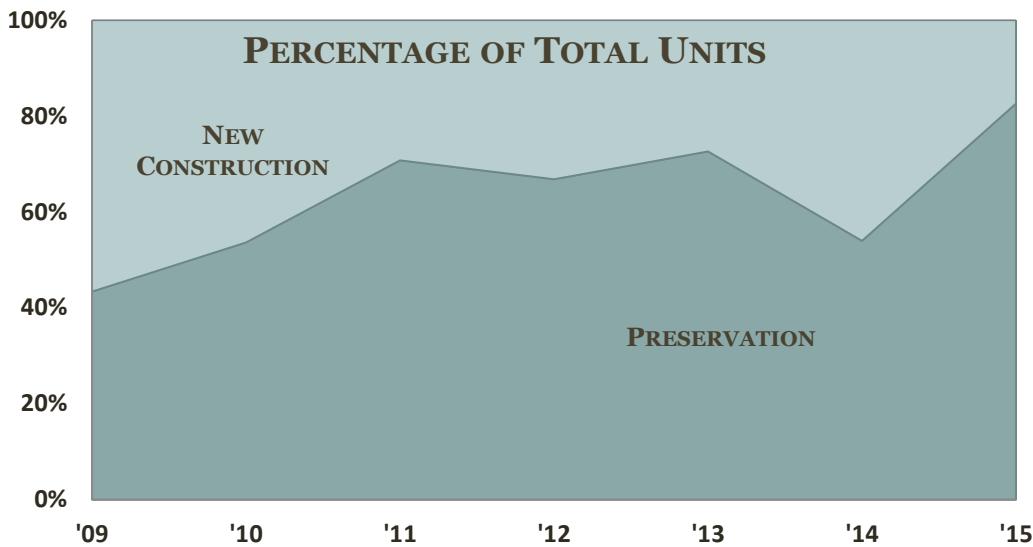
We are committed to this work because saving affordable housing is the essential first step in addressing our nation's housing dilemma. **Preservation is integral to building and maintaining sustainable, economically vibrant and healthy communities.**

We appreciate the opportunity to submit comments on Louisiana's draft 2016 Low Income Housing Tax Credit Qualified Allocation Plan. The Trust would like to commend you on several aspects of your draft QAP:

- Points given to projects with existing Federally Subsidized Units;
- Continuing commitment of points for projects near community benefits, specifically for projects near public transit.

Louisiana has an impressive track record regarding preservation efforts using Low-Income Housing Tax Credits. As *Figure 1* indicates, in each of the past seven allocation periods, over 40% of the units that received credits were preservation, in four of these years over 60% were preserved units. With that in mind we would like to offer comments on areas that we believe will help LHFA maintain this strong record of preserving at-risk housing units in Louisiana.

Figure 1.



Source: NHT Research Low-Income Housing Tax Credit Allocations

Balanced Incentives for Investing in Areas of High Opportunity and Preserving Existing Housing in Low-Income Neighborhoods. The Supreme Court's recent ruling in "Texas Department of Housing and Community Affairs v. Inclusive Communities Project" has affirmed the importance of "two reasonable approaches a housing authority should follow in the sound exercise of its discretion in allocating tax credits for low-income housing." These approaches include investing housing credits in areas of high opportunity and using them to preserve existing affordable housing in low-income neighborhoods. As Justice Kennedy wrote in the Opinion of the Court, "The Fair Housing Act (FHA) does not decree a particular vision of urban development; and it does not put housing authorities and private developers in a double bind of liability, subject to suit whether they choose to rejuvenate a city core or to promote new low-income housing in suburban communities."

As you continue to develop language considering fair housing issues in Louisiana, we encourage you to maintain a balance between incentives for projects in areas of high opportunity and those that preserve existing housing in low-income communities. There are many examples of opportunity language in state QAPs: for instance, Arizona offers points for projects located near high performing schools, while Maryland utilizes an index that considers economic, educational and health factors. Other states use set-asides, such as Pennsylvania's reservation of three projects in areas of long-term economic growth. A truly balanced approach would match such incentives with consideration of preservation in low-income communities. For example, both Ohio and Mississippi exempt preservation projects from some or all of their opportunity housing incentives. This incentivizes housing in geographic areas with strong schools or job markets, while not putting the preservation of existing housing at a disadvantage. We urge you to balance incentives for investing in areas of high opportunity and preserving housing in existing communities in a way that makes sense for Louisiana.

Energy Efficiency. We also note for your consideration that NHT has partnered with the Natural Resources Defense Council (NRDC) and others to create the Energy Efficiency for All initiative, the purpose of which is to increase the amount and effectiveness of energy efficiency investments in affordable multifamily housing. Increasing energy efficiency in affordable,

multifamily housing is a great investment – it delivers value to customers and the utility in the form of a more efficient system, creates healthier living environments for residents, lowers residents' utility bills, reduces owner operating expenses, which can free-up capital for building improvements, and sustains affordable housing. We have had the opportunity to review comments from the Natural Resources Defense Council, and we are supportive of their comments as related to energy efficiency and clean energy.

Conclusion

As you consider these recommendations, you can explore how other states are approaching each of these issues in their Qualified Allocation Plans by searching PrezCat (www.prezcat.org), an online catalog of state and local affordable housing preservation policies. We would be also be happy to work with you to flesh out some of these ideas, and identify options that work best for the preservation of affordable housing in Louisiana.

It is important for housing choice that LHFA maintains a balanced allocation of tax credits between new construction and preservation/rehabilitation. In addition to helping preserve and revitalize existing communities, preservation is significantly more cost-efficient and environmentally friendly than new construction. The National Housing Trust applauds the Louisiana Housing Finance Agency's continuing support for the preservation of Louisiana's existing affordable housing and supports maintaining its points for preservation in the final 2016 QAP.

Thank you for the opportunity to comment on this important issue in the State of Louisiana.

Sincerely,



Michael Bodaken
President



August 28, 2015

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

Via mail and email to gapcomments@lhc.la.gov

Dear Ms. Thomas,

The Natural Resources Defense Council (NRDC) respectfully submits these Comments on the (proposed) 2016 Qualified Allocation Plan for your consideration.

NRDC is a national, non-profit environmental organization with more than 1.4 million members and activists. Since 1970, our lawyers, scientists, and other environmental specialists have worked to protect the natural resources, public health, and the environment of our nation and the world. NRDC has long advocated for policies that help to create a clean energy future, including through greater energy efficiency in buildings, including multifamily residential buildings.

We also note for your consideration that NRDC has partnered with the National Housing Trust (NHT) and others to create the Energy Efficiency for All initiative, a project to increase the amount and effectiveness of energy efficiency investments in affordable multifamily housing. Energy Efficiency for All is working closely with partners in Louisiana, including The Greater New Orleans Housing Alliance (GNOHA), Green Coast Enterprises, and the Alliance for Affordable Energy.

Increasing energy efficiency in affordable housing is a great investment – it delivers value to the utility and its customers in the form of a more efficient utility system, creates healthier living environments for residents, lowers residents' utility bills, reduces owner operating expenses, which can free-up capital for building improvements, and sustains affordable housing.

We appreciate the opportunity to comment on Louisiana's draft 2016 Qualified Allocation Plan, and we look forward to working with LHC to achieve these outcomes.

We commend the Louisiana Housing Corporation (LHC) for taking steps to improve the energy efficiency of affordable housing in Louisiana by requiring specific energy efficient design features and awarding points for green building. However, we encourage LHC to consider additional requirements and incentives to bring the benefits of sustainable affordable housing to rehabilitation projects supported through the allocation of tax credits.

NATURAL RESOURCES DEFENSE COUNCIL

1152 15TH STREET NW | WASHINGTON, DC | 20005 | T 202.289.6868 | F 202.289.1060 | NRDC.ORG

Specifically, we recommend LHC consider incorporating the following into the QAP:

1. Require that rehabilitation projects adhere to minimum energy efficiency requirements to the extent possible. Energy efficiency improvements can deliver significant health, environmental and financial benefits. Consider that many other states are increasingly encouraging, and in some cases, requiring rehabilitation projects to meet minimum energy efficiency requirements. For example:

- The **North Carolina Housing Finance Agency** requires new construction projects to comply with all applicable Energy Star standards. Adaptive re-use and rehabilitation projects must comply to the extent doing so is economically feasible.
- The **Florida Housing Finance Corporation** requires new construction projects to include certain green building features including low or no-VOC paint and finishes, Energy Star appliances, and low-flow water fixtures. Rehabilitation projects are required to include as many of the required green building features as are structurally and financially feasible within the scope of the rehabilitation work.
- **Georgia's Department of Community Affairs** requires both new construction and rehabilitation projects to achieve a minimum standard for energy efficiency and sustainable building practices, including requirements for bathroom fans, lighting, plumbing fixtures, finishes, water heaters and appliances.

2. Require an energy consultation or audit as a condition of eligibility for tax credits for rehabilitation projects. An audit can reveal many repairs and improvements that are cost-effective – meaning they will reduce energy expenses in an amount greater than the cost. The development team should be required to consult an energy efficiency professional or complete an energy audit in order to identify and consider all cost-effective energy savings opportunities to be included in the property's rehabilitation scope. This approach has been taken in several states, including:

- The **Missouri Housing Development Commission** requires multifamily rehabilitation projects over 12-units seek an energy audit to help owners identify and consider all cost-effective energy savings improvements that could be incorporated into the property's rehabilitation scope.
- The **Kansas Housing Resources Corporation** requires an energy audit be conducted by a pre-approved home energy rater prior to the preparation of the final work rehabilitation order.
- The **Maryland Department of Housing and Community Development** requires an energy audit to identify energy conservation measures and requires all measures with a Savings to Investment Ratio of 2.0 or greater, or those measures that will result in an overall energy savings of 15% or greater over pre-retrofit levels, to be included in the project scope.

3. Adopt points to encourage performance-based energy savings in rehabilitation projects that seek an allocation of tax credits. In order to encourage comprehensive retrofits, LHC should consider incentives for applicants that demonstrate that they will achieve a certain level of

energy savings above a pre-retrofit baseline. This will encourage developers to combine technologies and optimize the performance of the building as a whole. For example:

- The **Maryland Department of Housing and Community Development** requires an energy audit and requires all energy conservation measures with a Savings to Investment Ratio of 2.0 or greater to be included in the project scope. In addition, DHCD awards additional points to rehabilitation projects that will result in an overall energy savings of 20-30% greater than pre-retrofit levels.
- The **California Tax Credit Allocation Committee** awards points to rehabilitation projects that improve energy efficiency over the current usage based on the following scale: 10 points – 30% improvement over current; 7 points – 25% improvement over current; 5 points – 20% improvement over current; or 3 points – 15% improvement over current.

4. Consider requirements or incentives that reward projects that commit to benchmarking the energy use of the property for the life of the applicable tax credits and report to LHC.

Energy is often the highest variable operating cost in affordable housing, materially affecting both owners and residents. Benchmarking the energy performance of buildings helps the owner to obtain a read on the relative performance of the building and to track performance. Moreover, a requirement to report benchmarking results to LHC allows LHC to track energy efficiency investments to see if measures have realized their expected energy savings, identify energy efficiency improvements, and make adjustments to its energy efficiency policies in the future.

Benchmarking results help owners (and LHC) make the business case for improving the energy efficiency and sustainability of the housing in which LHC invests, by loans, operating adjustments, or via the allocation of equity.

These properties need to stand the test of time. That means the properties must, on a continuous basis, meet debt service, reserves and other essential expenses. Adding incentives for benchmarking can help ensure cost-effective energy savings and maintain LHC's interest and its own investments. Consider, for example:

- The **New Jersey Housing and Mortgage Finance Authority** awards additional points in its QAP to developers who commit to participate in its benchmarking initiative. Developers are eligible to receive the points if they submit a signed energy benchmarking utility release form for all common meters (gas, oil, and electric, etc.), provide certain project data (square footage per building, mechanical systems installed, etc.), and signed energy benchmarking utility release forms for a minimum of 75% of tenants.
- The **Michigan State Housing Development Authority** has launched a utility tracking pilot to monitor electricity use in 72 developments. The pilot uses online benchmarking software to track both site and tenant-paid utilities to identify opportunities to lower operating expenses. In addition, owners are motivated to participate because the software is being used to accurately and automatically calculate the developments' utility allowances based on actual consumption data, greatly reducing owner administrative costs to perform these calculations.

5. LHC should coordinate with Louisiana utilities, which have programs to support efficiency investments in affordable housing.

We strongly encourage LHC to begin and to maintain regular collaboration with utility companies in the state to help affordable housing owners access energy efficiency programs and incentives and to assure programs are accessible to LHC-supported properties. Many utilities have efficiency programs designed to help owners invest in efficiency repairs and improvements, yet they often lack the capacity or expertise to effectively reach the community of affordable housing owners and developers. LHC is well-positioned to help Louisiana to improve how their programs reach LHC-supported housing, and state housing finance agencies across the country are increasingly working with utility companies to improve energy efficiency programs and help owners access utility-sponsored energy efficiency resources. For example,

- **Minnesota Housing** requires developments seeking tax credits to submit an Energy Rebate Analysis with their application, detailing a list of utility-sponsored, local, regional, or federal energy efficiency rebate programs for which the property is eligible.
- The **Maryland Department of Housing and Community Development** is providing financial assistance to owners through the Multifamily Energy Efficiency and Housing Affordability program which is funded by the state's investor-owned utilities.
- The **Wisconsin Housing and Economic Development Authority** awards points to developers who participate in a Focus on Energy Consultation to review the proposed development for possible energy savings and incentives. Focus on Energy is Wisconsin utilities' energy efficiency and renewable resource program.
- The **Connecticut Housing Finance Agency** requires applicants to submit an Energy Conservation Plan that includes information regarding the applicant's efforts to pursue other energy efficiency-related funding opportunities including utility-sponsored incentive commitments.

We have had the opportunity to review comments of the Greater New Orleans Housing Alliance, and we are supportive of their comments as related to energy efficiency and clean energy.

The Natural Resources Defense Council appreciates the opportunity to comment on LHC's 2016 draft Qualified Allocation Plan. We commend the Louisiana Housing Corporation for its support of sustainable communities. We urge LHC to continue this work by improving energy efficiency criteria in the 2016 QAP and encouraging collaboration between utilities and housing developers.

Sincerely,



Philip Henderson

Natural Resources Defense Council

From: [Len Reeves](#)
To: [QAP Comments](#)
Subject: 08/28 Public Hearing
Date: Monday, August 31, 2015 2:12:55 PM

I enjoyed attending the public hearing last week. I wanted to offer a response to a couple of the comments made:

1. I disagree with the gentleman that spoke first and requested priority for applications that lost the last round. Giving an advantage to losing applications prevents the best projects from winning. The timing of the September round should be enough of an advantage for last year's participants.
2. There was a CPA/developer that spoke about there being too much emphasis on rehabs vs. new construction and also mentioned there was a couple of scoring methods in question. I agree with the comments requesting an even playing field for new construction. If the scoring section reads the same as last year, I'll assume that no changes will be made with regard to scoring methods.

I look forward to the 2016 rounds.

Thanks,

Len Reeves
LENTON DEVELOPMENT, LLC
*2510 Lakeland Terrace
Suite 300
Jackson, MS 39216*

601-720-4029 (cell)

From: [Kim Vu-Dinh](#)
To: [QAP Comments](#)
Subject: Fwd: QAP Comments from MQVN CDC
Date: Sunday, August 30, 2015 2:31:01 PM

From: **Kim Vu-Dinh** <yudinhk@gmail.com>
Date: Fri, Aug 28, 2015 at 4:04 PM
Subject: QAP Comments from MQVN CDC
To: QAPcomments@lhc.com

To the Board Members of the Louisiana Housing Corporation:

My name is Kim Vu-Dinh and I am writing on behalf of the Mary Queen of Vietnam Community Development Corporation (MQVN CDC). We are a non-profit based in New Orleans East. We own and operate a clinic that serves the community in three languages (English, Spanish, and Vietnamese) and provide extensive social service and case management services and programming. Please accept the following comments to the 2016 LIHTC QAP:

1. Brownfields Point Allocation

Despite the numerous commercial, light industrial, and industrial sites left after Hurricane Katrina, there has been no significant public funding dedicated to bring these lots back into commerce. While there are EPA dollars available to remediate such, those funds are only granted where there is a development plan in place, and with no development dollars allocated to this, the sites will continue to go undeveloped, causing a hazard to neighboring properties and the city as a whole. Please create an allocation of points to projects remediating environmental/brownfield hazards that is commensurate with the level of difficulty of doing so; our suggestion is a minimum of 10 points.

2. Support new construction where there was a permanent supportive housing project, a Brownfield or extenuating circumstances, or there is no historic value to the building.

The state's current stock of historic/rehabilitatable, infill, and scattered site properties is being adequately taken care of by the private sector, as demonstrated by the success of property auctions that have been occurring in the past 2 years. The state should assist developers who are interested in rebuilding in areas outside the urban core in order to catalyze re-development outward from the already thriving urban core. We recommend that LHC incentivize new construction where it makes sense, and some conditions we've identified are 1) where there is no structure of historic value, 2) where there is a brownfield, or 3) replacement of pre-existing supportive services. Our suggestion is 8 points where one or more of these are present in a new construction development.

3. Increase the point allocation for elderly developments

Prior Hurricane Katrina there were 65 senior housing developments in the New Orleans area. Since then, only approximately 26 have re-opened, and only about

14 of these are low-income. There is a rapidly growing number of need for elderly low-income housing which is not adequately reflected in the point allocation to the elderly. Please consider increasing that allocation from 8 to 10 points given the slowness in which elderly housing units have been re-built.

4. Revise the 35 year pro forma requirement and reinstate the 15 year requirement

The 35 year pro forma seems to be an academic exercise as best and, like many of my colleagues, I recommend this requirement be dropped and remain at 15 years.

Thank you for your consideration.

Sincerely,
Kim Vu-Dinh

Kim Vu-Dinh, Esq. // Funding & Compliance // Kim Vu-Dinh, LLC // [504.939.5279](tel:504.939.5279)

HOUSING AUTHORITY OF THE CITY OF LAKE CHARLES

“Providing safe, decent, affordable housing to low income families”

Commissioners:

Lollion Elmer
Margaret Jackson
Pastor Charles Robertson
Robert Shannon
Joseph Thomas

S. Benjamin Taylor, JR.
Executive Director

August 25, 2015

Ms. Brenda Evans
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Re: Comments for 2016 Draft QAP

Dear Ms. Evans:

Please accept the following comments and questions on behalf the Lake Charles Housing Authority, the state NAHRO organization of public housing authorities. We have had a chance to review the draft and find a couple proposed changes from the last QAP actually reduce the ability of our PHA applicants to compete with non-PHA projects.

Applications for Non-contiguous sites

Currently, a non-scattered site project is prohibited from submitting a single tax credit application for non-contiguous sites. Many PHAs have multiple sites under a single AMP (Asset Management Project). It would be extremely cost efficient to allow PHAs to submit non-contiguous sites in a single application. As an example, one PHA has 79 units on two contiguous sites and 10 units on a third non-contiguous site. It is cost prohibitive to do a separate 10-unit tax credit application. Please consider an exception for PHA project sites that fall within a single HUD designated AMP to allow a single application for non-contiguous sites.

Selection Criteria

- I.B Redevelopment Project-the draft QAP defines a Redevelopment Project as being located within a Redevelopment Area and requires the site to be located within a QCT. Any housing authority project can meet the definition of a Redevelopment Project as a “Distressed Property”, but there are numerous public housing authorities with sites located outside a QCT. These PHAs, some with a new RAD CHAP award, require LIHTC leveraging to meet critical redevelopment needs. Is it the intent of LHC to prohibit PHA properties from claiming points as

a Redevelopment Project? If so, we request the QAP permit an exception for the QCT requirement by PHA projects.

- I.G.(iii) Preservation Priority Project – This section states that to receive 10 points, the development must have project based section 8 for at least 30% of the units or federally funded rental subsidy (such as PHA) for at least 20% of the units. We read this to mean that a PHA project with its federal rental subsidy for 100% of the units will receive these 10 points. However, if it is the Corporation's intent to limit the subsidy to only 20% of the units for 10 points, then PHAs are at a scoring disadvantage. In this case, we request to leave the scoring as it was in the previous 2015 QAP. We might also point out that there is already scoring for Project Diversity, so why is this needed?

Many of the public housing developments in the state are 50 to 70 years old and have tremendous rehabilitation needs and in some cases, demolition and new construction. There is only one option open to these public authorities when it comes to redevelopment. That option is to leverage tax credits with both public and private financing techniques. Your assistance with the above will help PHA applications to be more competitive with private sector applications.

Sincerely:



S. Benjamin Taylor Jr.,
Executive Director

LOUISIANA HOUSE OF REPRESENTATIVES

P. O. Box 8
806 Louisa Street, Suite B
Rayville, LA 71269
Email: chaneyb@legis.la.gov
Phone: 318.728.5875
Fax: 318.728.5876



Agriculture, Forestry, Aquaculture, and
Rural Development
Appropriations
Natural Resources and Environment
House Committee on Enrollment
Joint Legislative Committee
on the Budget

CHARLES R. "BUBBA" CHANEY
State Representative ~ District 19

August 20, 2015

Liza Bergeron
Housing Program Administrator
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Anita Tillman
Director of Policy, Planning & Gov. Affairs
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Re: Tax Credits and Delta Parishes (excluding Ouachita Parish)

Ms. Bergeron and Ms. Tillman:

Once again, the Delta Parishes consisting of East Carroll, Tensas, Madison, Concordia, Franklin, Richland and West Carroll continue to be overlooked and underfunded from both governmental and private investment entities. The need for additional capacity and affordable housing in these parishes is evident and the likelihood of continued economic development will be greatly diminished unless this issue is addressed.

The need for private investment through low income housing tax credits is evidenced by the poverty and rent burden statistics. The low income housing projects in these Delta Parishes are harder to make financially feasible without tax credits.

Accordingly, I am requesting your consideration of the following action plan:

1. Provide for an additional 8 points for the outlined Delta Parishes captioned above from the Qualified Allocation Plan (QAP) in the current lightening round QAP for forward 2016 credits and the next 2016 QAP.
2. Additionally, I am requesting that Louisiana Housing Corporation add an additional 4 points for Delta Projects in the fall HOME NOFA's.
3. Finally, we are requesting the priority use of TECAP funding for these Delta Parish projects.

Page #2

Tax Credits and Delta Parishes (excluding Ouachita Parish)

Your immediate and urgent assistance to our area in this matter would be very much appreciated by the citizens of the affected parishes. If you have any further questions please do not hesitate to contact my office.

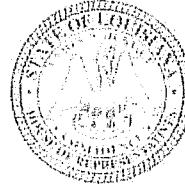
Yours truly,

Charles R. Chaney

CHARLES R. CHANEY
STATE REPRESENTATIVE
DISTRICT 19

cc: Governor Bobby Jindal
LHC Board of Directors
Chairman Mayson Foster
Vice-Chairman Malcolm Young, Jr.
Michael Airhart
Dr. Daryl Burckel
Larry Ferdinand
Treasurer John N. Kennedy
Ellen M. Lee
Matthew P. Ritchie
Willie Spears
Guy T. Williams, Jr.
Michelle L. Thomas
Barry E. Brooks

LOUISIANA HOUSE OF REPRESENTATIVES



Andy Anders
Chairman

Committee on Agriculture, Forestry, Aquaculture and Rural Development

P. O. Box 44486 Baton Rouge, LA 70804-4486
(225) 342-2411
Fax: (225) 342-0464

Bob Hensgens
Vice Chairman

August 20, 2015

Liza Bergeron
Housing Program Administrator
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Anita Tillman
Director of Policy, Planning & Gov. Affairs
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Re: Tax Credits and Delta Parishes (excluding Ouachita Parish)

Ms. Bergeron and Ms. Tillman,

The Delta Parishes continue to be overlooked for funding and private investment opportunities. However, the need continues to exist. Without adequate affordable housing in these parishes, economic opportunities cannot continue to grow. I am writing today to request your assistance for the Delta Parishes.

Many households in the Delta Parishes struggle to afford a decent, safe place to live. Over the past five years, rents have risen while the number of renters needing affordable housing has increased. These two pressures make finding affordable housing even tougher for Louisiana's poorest households and low income wage workers.

According to the most recent America's Rental Housing report, Tensas Parish, located in my legislative district, has only 48 units for every 100 extremely low income (ELI) renter households. In 2013, the cutoff for an ELI household of four ranged from \$14,400-\$19,400 depending on exact location. Tensas is just one example of the need for affordable housing.

The need for private investment through low income housing tax credits is evidenced by the poverty and rent burden statistics. The projects in these Delta Parishes are harder to make financially feasible without tax credits. These same projects are not able to compete with other areas of the state for points in the Qualified Allocation Plan (QAP). By providing an additional eight points for the Delta Parishes (East Carroll, Tensas, Madison, Concordia, Franklin, Richland, West Carroll), the Louisiana Housing Corporation would be creating opportunities for housing and economic growth in an area of great need that has long been neglected by the Corporation.

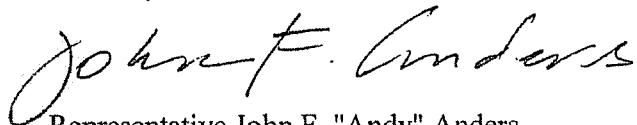
Liza Bergeron
Anita Tillman
August 20, 2015

Page 2

In addition to adding eight points to the current lightening round QAP for forward 2016 credits and the next 2016 QAP, I am requesting that Louisiana Housing Corporation add an additional four points for Delta projects in the fall HOME NOFAs and a priority use of TECAP funding for Delta Parish projects.

Thank you for your time and consideration. Your assistance is urgent to insure that the Delta Parishes receive affordable housing. Should you have any questions, feel free to give me a call.

Sincerely,



Representative John F. "Andy" Anders
District 21

JFA/cls

cc: Governor Bobby Jindal
LHC Board of Directors
Chairman Mayson Foster
Vice-Chairman Malcolm Young, Jr.
Michael Airhart
Dr. Daryl Burckel
Larry Ferdinand
Treasurer John N. Kennedy
Ellen M. Lee
Matthew P. Ritchie
Willie Spears
Guy T. Williams, Jr.
Michelle L. Thomas
Barry E. Brooks

Proposed Changes to Louisiana's 2016 Qualified Allocation Plan

1. In response to recent court rulings directly impacting the development of low-income housing in areas with high concentrations of poverty, we suggest removing the requirement that Redevelopment Areas be in a QCT. Instead, require that Redevelopment Projects be located in Redevelopment Areas for which there is a revitalization plan that has been formally adopted by the local government. To qualify, there must be evidence of public input in the development of the plan, and the plan must have affordable housing as one of its policy goals. In order to receive points, applicants must submit a letter from the local government stating that the proposed development furthers the goals set forth in the revitalization plan. Comprehensive plans, consolidated plans and land use plans will not qualify.
2. Move away from the emphasis on scattered sites.
3. Take out points for projects that are 10% below the maximum TDC/unit. This is easily manipulated in the application and could also cause problems if costs rise during the construction phase
4. Award points on a sliding scale for deals that are located within local government boundaries that haven't received a 9% tax credit allocation recently. Maximum points would be given for areas that haven't had an allocation of credits in the past ten funding cycles, with slightly fewer points given for areas without an allocation in the past five funding cycles.
5. Provide points for developments that are part of a phased development if at least one phase has already received an allocation of credit within the past 5 years.
6. Allow parishes to designate one deal per year as the project that best serves its housing goals. If the parish designates more than one development, no points will be awarded for that parish.
Add under (III)(C.) Government Priorities.
7. Increase the points available for Government Support by increasing percentage of total cost reduction: 5 pts. available for support of 10% or more total development cost reduction; 6 pts. for 15% or more total development cost reduction.

LOUISIANA HOUSING COUNCIL, INC.

CHAPTER OF NAHRO

P. O. Box 1347
Crowley, LA 70527-1347
Phone (337) 783-8521
Fax (337) 783-8520
crowpha@bellsouth.net

August 25, 2015

Ms. Brenda Evans
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Re: Comments for 2016 Draft QAP

Dear Ms. Evans:

Please accept the following comments and questions on behalf the Louisiana Housing Council, the state NAHRO organization of public housing authorities. We have had a chance to review the draft and find a couple proposed changes from the last QAP actually reduce the ability of our PHA applicants to compete with non-PHA projects.

Applications for Non-contiguous sites

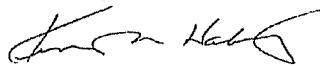
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Sincerely:



LHC President

From: [Ashley Wilson](#)
To: [QAP Comments](#)
Subject: Online Application
Date: Tuesday, September 01, 2015 9:59:38 AM

Will LHC post a revised QAP prior to the board meeting next week? Also when can we start working in the online system?

Ashley Wilson
Little & Associates, LLC
Certified Public Accountants
805 North 31st Street
Monroe, LA 71201
Phone: (318) 361-9600
Cell: (318) 512-2143
Fax: (888) 520-9614

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TENSAS PARISH POLICE JURY

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Woodrow Wiley, Jr.

Vice-President
Carol Olds, Sr.

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St. Joseph, LA 71366

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Waterproof, LA 71375

District 5

RODERICK "Rod" D. WEBB
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District 6

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Waterproof, LA 71375

District 7

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P.O. Box 33
Waterproof, LA 71375

"This institution is
an equal opportunity
provider."

August 28, 2015

Ms. Brenda Evans
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Dear Ms. Evans:

Tensas Parish is in great need of affordable housing. As the port in Tensas Parish continues to attract new business and has unprecedented growth, the need for affordable housing grows. The port is an economic driver in Tensas Parish, but the lack of safe, decent, affordable housing hinders the workforce development aspect of the economy. The port authority and the Tensas Police Jury are in the middle of negotiations for additional high growth businesses that are seeking to locate in Tensas Parish. The additional businesses would create direct jobs and the support companies would create indirect job growth. These companies and support companies will have the need for targeting workers at the 40-60% area median income. Housing supply is needed for this targeted income.

Tensas parish has economic and housing plans that work together in a holistic manner to address the community needs. Tensas Parish has a goal to revitalize targeted areas within our qualified census tracts. The housing revitalization that is needed in Waterproof, Newellton, and St. Joseph would be met by the plans to develop infill housing and rehabilitation by Macon Ridge and Bennett Group Consulting's Tensas Parish affordable housing development.

Please consider this letter our support as the local government that is requiring housing revitalization plans that target rehabilitation/infill of housing in Tensas Parish. This affordable housing growth in Tensas Parish will help revitalize our targeted communities and neighborhoods as well as support the continued economic growth.

SECRETARY
SANDRA SMITH

TREASURER
CATHY DARDE

We appreciate the support of Louisiana Housing Corporation for affordable housing development in Tensas Parish. Please feel free to call with any questions.

Sincerely,

Woodrow W. Wiley Jr.

Woodrow W. Wiley, Jr.
President

RECEIVED

SEP 03 2015

LOUISIANA HOUSING
CORPORATION