



May 3, 2019

Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Dear Louisiana Housing Corporation,

Thank you very much for considering the following comments on the 2019 Qualified Allocation Plan. Please see our comments regarding the QAP as follows:

- 1) In the 4% and tax exempt bond section, allow the option for other entities to be conduit bond issuers without needing to prove that the project wouldn't be feasible without another issuer. Remove this paragraph (see item 1 on page 17 of the draft): *"4% LIHTCs will only be awarded with the approval and with subsequent closure of tax exempt bonds through the Corporation. LHC may waive this provision provided the development meets the LHC's highest priorities and the development is not feasible without a financing structure that requires tax exempt bond issuance through another entity."*
- 2) Allow for exclusions from the TDC cap calculation for extraordinary cost and additional soft money per HUD's guidance. These caps do not reflect the reality of construction costs today, particularly in urban areas. The high costs of property and construction make remaining under these caps attainable only to projects with significant scale, and/or forces developers to make compromises on developable sites, building quality, energy efficiency measures, providing reasonable amenities, and/or unit sizes.
- 3) Make negative features deduct points again or threshold for adjacent only (and not also for being within ½ mile of a negative). This threshold requirement disqualifies most urban infill sites and will also impact non-competitive 4% LIHTC.

We urge the Louisiana Housing Corporation to consider making these changes to the 2019 Qualified Allocation Plan, and hope the LHC will institute the adjustments to create a better functioning program that will allow more affordable housing developers to apply and take advantage of this funding opportunity. Thank you for considering this request. If you have any questions about this letter, feel free to contact me at 504-224-8301.

Sincerely,

President/Chair, Greater New Orleans Housing Alliance

A Shared Initiative, Inc.
Alembic Community Development
Alliance for Affordable Energy
Asakura Robinson Company
Broadmoor Improvement Association
Committee for a Better New Orleans
Crescent City Community Land Trust
Desire Community Housing Corporation
Dillard University
Enterprise Community Partners
Family Resources of New Orleans
Finance Authority of New Orleans
First NBC Bank
Foundation for Louisiana
GCR Inc.
Global Green USA
Greater New Orleans Foundation
Green Coast Enterprises
GNO Fair Housing Action Center
Greater New Orleans, Inc.
Gulf Coast Housing Partnership
Harmony Neighborhood Development
Home by Hand, Inc.
Housing Authority of New Orleans
Iberia Bank
Iris Development
Jane Place Neighborhood Sustainability Initiative
Jefferson Community Action Programs
Jericho Road Episcopal Housing Initiative
Jerusalem Economic Development Corp.
JPMorgan Chase Bank
LA Association of Affordable Housing Providers
Louisiana Appleseed
Louisiana Association of Nonprofit Orgs.
Louisiana Homebuyer Education Collaborative
Louisiana Housing Alliance
Louisiana Housing Corporation
Lower 9th Ward Homeownership Association
McCormack Baron Salazar
Neighborhood Development Foundation
Neighborhood Housing Services
New Day Homeowner Services
New Orleans Area Habitat for Humanity
New Orleans Redevelopment Authority
Northshore Housing Initiative
Office of Housing Policy & Community Development
Perez, APC
Preservation Resource Center
Project Homecoming
Providence Community Housing
Puentes New Orleans
Rebuilding Together New Orleans
Redmellon
Renaissance Neighborhood Development Corporation
Renaissance Property Group
SBP
Service Providers and Professionals Assoc.
Spottswood CDC
St. John the Baptist Housing Authority
St. Roch Community Development Corporation
Tulane/Canal Neighborhood Development Corporation
Tulane City Center
United Way of Southeast Louisiana
University of New Orleans
Urban Focus
U.S. Department of Housing and Urban Development
Volunteers of America
Wells Fargo
Whitney Bank

cc: Governor John Bel Edwards
Mayor Latoya Cantrell
Senator Wesley T. Bishop
Representative Joseph Bouie
Representative Royce Duplessis
Councilmember-At-Large, Jason Williams
Councilmember-At-Large, Helena Moreno
District A Council Member, Joseph I. Giarusso III
District B Council Member, Jay H. Banks
District C Council Member, Kristin Gisleson Palmer
District D Council Member, Jared C. Brossett
District E Council Member, Cyndi Nguyen
Finance Authority of New Orleans (FANO) President and CEO, Damon Burns
Executive Director, Keith Cunningham
LHC Board Member, Lloyd "Buddy" Spillers
LHC Board Member, Jennifer Vidrine
LHC Board Member, Tammy P. Earles
LHC Board Member, Derrick Edwards
LHC Board Member, Larry Ferdinand
LHC Board Member, Byron L. Lee
LHC Board Member, Willie Rack
LHC Board Member, John M. Schroder
LHC Board Member, Donald B. Vallee
LHC Board Member, Gillis R. Windham