2018 Draft Qualified Allocation Plan
Public Comment Period April 3, 2018

	Name	Company	Date	Comments
1	**Art Schuldt & Sheila A. Favors**	Housing Solutions Alliance, LLC & Housing Authority of the city of Lake Charles	3/7/2018	Section I.B Redevelopment Project -There are numerous public housing authorities across the state with properties in great need of rehabilitation that are located outside a QCT. LIHTC leveraging is critical to meet redevelopment needs. Most of the PHA properties across the state are 40 to 60 years old. Scoring criteria I.B under Redevelopment Project requires sites to be located in a QCT. The FHEO office of HUD requires housing authorities to construct new units outside a QCT to encourage greater opportunity for lower income families. Please allow PHAs that submit a property meeting the definition of "distressed property" to qualify for these 6 points whether or not in a QCT.
2	**Art Schuldt & Sheila A. Favors**	Housing Solutions Alliance, LLC & Housing Authority of the city of Lake Charles	3/7/2018	Section I.D New Construction Scattered Site - The LHC QAP has for the last 4 or 5 years, only awarded 2 points for new construction scattered site while rehabilitation has been awarded four times that amount. The demand for new construction has risen dramatically across the state. We would like to see new construction better compete with rehabilitation points. At the very least, we suggest giving PHAs 6-8 points for planning a new construction project to replace an existing project with environmental or marketability issues in a new location.
3	**Art Schuldt & Sheila A. Favors**	Housing Solutions Alliance, LLC & Housing Authority of the city of Lake Charles	3/7/2018	Section I.E and I.F Non-Scattered Site Rehabilitation and Scattered Site Rehabilitation - Why should scattered site rehabilitation projects be worth more points than non-scattered site rehabilitation projects? Both are existing developments in need of rehabilitation to remain viable. The completed rehabilitation contributes equally to strengthening neighborhood revitalization.
4	**Art Schuldt & Sheila A. Favors**	Housing Solutions Alliance, LLC & Housing Authority of the city of Lake Charles	3/7/2018	Section III.C.(iii)-Choice Neighborhood - Please remove points for the 2018 QAP as this gives unfair advantage to only 3 cities in the state.
5	**Art Schuldt & Sheila A. Favors**	Housing Solutions Alliance, LLC & Housing Authority of the city of Lake Charles	3/7/2018	Section IV.A Location Characteristics (Rural Sites Only) - Rural projects are unable to compete with the services found in urban areas and therefore are unfairly treated. We suggest expanding the radius to 3 miles as is done in other states for rural sites. In addition, either remove public transportation as a neighborhood characteristic or permit "shuttle service" or "project-provided transportation".
6	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	I. Applying a veteran's set aside to market-rate units in a mixed-income project makes a very difficult to finance project nearly impossible. Why does the LHC have an interest in housing over-income veterans in mixed-income housing? The threshold for housing veterans should be reduced in order to receive these points, or the set-aside should only apply to income-restricted units.
7	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	II. With the reform to a 9% floor, the $750,000/project credit cap is driving projects down toward less sustainable unit counts from a property management perspective, particularly projects receiving a 30% basis boost. b. An incentive should be provided in the QAP to advantage higher unit counts, which are more efficient operationally. An appropriately crafted incentive should be capable of counteracting the effect of the credit cap on reducing unit counts.

8	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	III. The 2017 QAP appeared to communicate an intention by the LHC to fund rural and deeper targeting (<30% AMI) projects through the use of separate funding pools for projects meeting these criteria. However, the use of the QAP scoring as the basis for the two fall CDBG NOFAs did not provide any mechanism to prioritize rural projects, which are inherently disadvantaged in their ability to attract Neighborhood Features points. Developers who sought out rural projects capable of deeper targeting were left without an alternative funding source to seek after the 9% round. The points for matching funding from a unit of local government also disadvantage rural projects from non-entitlement areas. We did a project in Carencro, in which the permit costs for a $2.7mm rehab were less than $11,000. There were no tap fees, impact fees or other government imposed fees that could be waived. If pools are used to preference certain types of projects in the 9% round, these preferences should extend to other funding rounds based upon the QAP either with set-asides in those NOFAs or with realistic point categories sufficient to overcome the scoring disadvantages those project types face
9	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	IV. The 30% AMI Pool only required 10% of the units to be set aside at that deeper targeting level. If the winning projects set aside at this level, a total of 26 extremely low-income households were served by this pool, at an expense of $24mm in tax credits over ten years and $2mm in housing trust fund resources. Setting the threshold for participation in this pool at 30-40% of units would ensure that these funds are better targeted on these lowest-income households by focusing these resources on existing assets with project-based vouchers that are in need of rehabilitation.
10	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	V. The two buckets of De-concentration points should be mutually exclusive. At present, they reward developers for building fewer affordable units in a high-income neighborhood.
11	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	VI. The Redevelopment Project category includes a requirement that the project be in a QCT. There are already points assigned for being in a QCT and a basis boost to QCT projects; these points should be available to projects in any community that is attempting to redevelop a source of neighborhood blight. Further, there is a political opportunity for the LHC to change the perception of affordable housing and its impact on property values in moderate- and upper- income neighborhoods. By improving the ability of affordable housing developers to redevelop distressed sites outside of QCTs, these projects can be seen as a means of bringing blighted property back into commerce (and onto the tax rolls).
12	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	VII. The recent NOFA's inclusion of priority for inclusion of some 50% AMI units is good policy and should be reflected in the upcoming QAP.
13	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	VIII. The TDC per unit limits vary widely by project type. The exclusion of historic syndication proceeds from the calculation of total development costs on historic projects makes it far easier for these projects to receive points for being 10% under the per unit limit.
14	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	IX. Scoring incentives for high vacancy projects discourage existing owners from seeking redevelopment funding until after their properties have become functionally obsolete. Instead, points should be awarded for the ratio of rehabilitation expenditure to acquisition price to encourage the transfer of obsolete properties to new owners willing to make deep investments in improving the quality of the housing for the residents.

15	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	X. The leverage for disability funding point category is unclear. The fact that no minimum amount of support is specified makes this criteria relatively trivial. It seems that the supportive services requirement and points available for building additional accessible units should be adequate to prioritize effectively serving this population, and this category should be dropped.
16	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	XI. The Governmental Priorities section should also include points for projects located in areas designated as Louisiana Main Street Districts (https://www.crt.state.la.us/cultural- development/historic-preservation/main-street/louisiana-network/). Similar to the existing Governmental Priorities point categories, this designation represents a commitment of resources on behalf of a unit of government as part of a coordinated revitalization effort. Points on part with HUD Choice Neighborhoods Planning and Implementation Grant areas should be included.
17	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	XII. The official journals of record in some rural areas are published only once per week making the requirement that notices appear three separate times a significant disadvantage for these projects. This requirement should be amended to allow these notices to appear only once in jurisdictions that publish less than three times per week.
18	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	XIII. There are too many architectural-related submittals for items that there is no reason to specify at the time of the application. a. The application asks for examples of the energy efficient products that will be used, without requiring a construction set of drawings, making those submittals largely meaningless. b. A more appropriate way to require acknowledgement of these requirements is with an applicant certification that they will comply with the requirements of the QAP. c. A more appropriate time for LHC to conduct a product-specific review is once construction drawings have been generated and submitted to staff for review.
19	**David Harms**	Gulf Coast Housing Partnership	3/13/2018	XIV. Projects that front on existing public streets should be exempt from the requirements to provide will-serve letters from utility providers. The underlying goal appears to be addressed through the points for Neighborhood Features, and any additional assurance could be provided by a taxpayer certification submittal that these services will be available.
20	**James Freeman**	Standard Enterprises, Inc.	3/21/2018	<u>Competitive Evaluation:</u> The draft QAP does not seem to allow for a challenge period of preliminary staff scores. Historically the applicant has been allowed to address and clarify issues raised during the staff review of the applications. It does not appear that in the new draft the applicant will have the ability to challenge and/or make an appeal of scoring until after the awards are made. Once awards are made it is too late for the applicant to make an appeal of scoring as the credits will already be allocated and cannot be rescinded. It is not fair that a misunderstanding by staff during scoring should prevent an applicant that has duly earned certain points to not receive an award of credits but rather be placed on a "to be funded" list or given 5 points in the next funding round for submitting the exact same application. This process does not allow for human error. Historically staff has disallowed points, sometimes 10-20%, and after the challenge period the applicant was able to get the points back as they provided clarification as requested. All other states in the Region allow for a challenge, or cure, period to allow applicants to properly represent their case prior to making awards. It is imperative that you make a change to this section to allow a challenge period PRIOR to making final awards. I also request that the challenge/appeal committee be made up of staff and board members.

21	**Jim Sari**	Sari and company	3/26/2018	page 22 d (2) - dsc coverages 1.40 - 1.15 - this doesn't always work, in some cases my deals have little to no debt service as they stack historic credits in addition to low income. this can cause dsc to drop sharply over a 15 year period (if rents are low and there in little to no debt (so you must start with higher dsc than 140) or there is infinite coverage with no debt. this provision needs to add : in the event of no debt deals, project must show a minimum cash flow of x per unit annually (suggest 1k per unit)
22	**Jim Sari**	Sari and company	3/26/2018	page 26 a (11) this needs to be softened to a letter from the state shop saying that the building appears to qualify for the historic credit if proper protocols are followed. it just takes too long to get it listed & the schedules for doing so don't coincide with your schedule. easy hammer is if you get funded, and don't end up with the historic designation by some date (12 months form award?) then your lihtc award is rescinded. part 1 takes too long - letter from shop is fine. this is how NC, SC, others do it.
23	**Jim Sari**	Sari and company	3/26/2018	page 30 2 (b) (2) - waiver should be available in LHC sole discretion for adaptive reuse deals where minimum sizes cant be met (ie and old downtown hotel being converted) - 2 old hotel rooms might only be 680 sf when combined & it doesn't make sense to make a 1br 920 sf (3 rooms) when u are so close on the 2 room combo. just add sole discretion language for scenarios like this.
24	**Jim Sari**	Sari and company	3/26/2018	III D of scoring priorities - add value of historic tax credit equity & awarded FHLB AHP funds as additional financial support items. the federal & state credits add almost 40% equity (based on current pricing) to the game (reducing the amount of low income credit needed) & should be rewarded. ahp is up to a 6 or 700k grant and should also get credit here
25	**Chris Stant**	Olsen Securities Corporation	3/26/2018	1. No Rural Pool
26	**Chris Stant**	Olsen Securities Corporation	3/26/2018	2. Total credits per development increased to $1,000,000.00 a. This will lead to more concentration of low income housing in the rural pool. b. Limits in rural pool should be lower. $550,000
27	**Chris Stant**	Olsen Securities Corporation	3/26/2018	3. QCT. USDA RD does not have many complexes in QCT. Letter of Distress should equal that of a QCT.
28	**Chris Stant**	Olsen Securities Corporation	3/26/2018	4. Elderly Points. Multi Family needs rehab more than Elderly.
29	**Chris Stant**	Olsen Securities Corporation	3/26/2018	5. Location Points. Puts rural deals at a large disadvantage
30	**Chris Stant**	Olsen Securities Corporation	3/26/2018	6. Negative points not in QAP. This was stated at last Board Meeting.
31	**Chris Stant**	Olsen Securities Corporation	3/26/2018	7. Amenities. Amenity comes at the cost of providing good low income housing. Example. Covered Parking.
32	**Chris Stant**	Olsen Securities Corporation	3/26/2018	8. Syndication Efficiency. Not in support of this. a. Letters are not firm with the application b. Rural deals usually have a slightly lower price per credit die to the size of the deals.
33	**Kerry Banks**	Rural Rental Housing Association of La	3/27/2018	Total credits per development raised to 1,000,000 max- We believe that leads to more concentrations of low income housing. We support a lower max credit per project.
34	**Kerry Banks**	Rural Rental Housing Association of La	3/27/2018	Market Studies- we understand that there is a requirement for a market analysis associated with proposed deals. USDA deals have verifiable statistics available to evidence demand through audits and occupancy reports as required by USDA. The LHC a lso has information included in the state-wide housing needs assessment evidencing the need for rural housing. We believe there could be a more cost-effective approach to meeting this requirement using historical statistics and the LHC sponsored state-wide housing needs assessment. With the current requirement for the market analyst to verify the "Location Characteristic" points in the market study, this might not can be avoided this funding round.

35	**Kerry Banks**	Rural Rental Housing Association of La	3/27/2018	Location Characteristics (Neighborhood Features) a. These heavily weighted points put rural deals at a disadvantage. With the changes to the other points, this is even more of an issue. We understand the importance of desirable locations, but certain point opportunities just don't exist for rural projects. A lower cap for location characteristics would be reasonable with the other point changes proposed in the QAP. b. It was mentioned at the Board meeting that negative points would not be applicable to existing projects. We support this position but did not see this included in the QAP or Selection Criteria.
36	**Kerry Banks**	Rural Rental Housing Association of La	3/27/2018	Project Amenities - When an amenity comes at the cost of providing additional low-income housing units, we are not sure that is a best use of the 2018 credit a llocation. Covered parking is a good example.
37	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	The language on the nonprofit pool is unclear. If $2,000,000 is being allocated to this pool, then the agency should commit to funding at least $2,000,000 from this pool. The current draft language appears to obligate the agency to fund only $1,050,000 in this pool. The language should be revised to commit LHC to fund at least $2,000,000 in this pool.
38	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	What housing priority is being supported through the General Pool? This pool should be eliminated, and projects ineligible to compete in the Nonprofit, Rural and Preservation pools should enter directly to the Statewide pool and be evaluated against projects that were unfunded in each of the three specific priority pools.
39	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Given the challenges new construction projects face under this QAP (See X. below), LHC should include a New Construction set aside.
40	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	How are NHTF resources being allocated? Reference is made to a 30% AMI pool that does not exist. These funds should be made available to projects receiving the maximum eight points in the scoring area for Increased Unit Affordability.
41	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	The schedules of pages 12 and 13 are inconsistent with regard to when market study fees are due. Dates are repeated again on page 19.
42	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Please clarify when Part II approval from SHPO is due on historic projects. The November 30, 2018 carryover date is not realistic for Part II approval with an October 10 reservation date. Will historic projects have until at least June 28, 2019 to receive this approval? (Note that this comment is repeated in the definition of “Historic Property”.)
43	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Is Public Notice due by the earlier or later deadline? In setting this requirement, please be mindful of the fact that the official journals of many rural areas are weekly publications. Projects in these areas must finalize their deals up to four weeks ahead of the application deadline in order for public notice to appear three separate times. Rural projects deserve comparable time to structure their applications after publication of FAQs and finalization of the QAP. If LHC cannot waive the requirement that these notices be published in three separate papers, they should permit two of the three publications to take place after the application deadline for projects in areas served by a weekly paper.
44	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Please provide additional clarification regarding the proposed discretionary limitation on allocation to a single parish of 40%. Does this apply to total credits, total units funded or total low-income units funded?

45	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Please clarify how units will be counted for the Low Income Targeting points. PSH units and 30% AMI units are technically also 50% AMI units (AHP counts them this way), but the Spring NOFA specifically targeted units at 31-50% AMI for their incremental affordability calculation. Similarly, do units set aside under the discretionary Unit Affordability points count toward the 5% of units at 30% AMI referenced on page 8? Units set aside for PSH should count as both 30% AMI units for threshold and 50% AMI units for point scoring. If PSH and 30% units are not counted toward the 50% AMI count, it becomes impossible for a project to maximize scoring in both Project Diversity and Low Income Targeting.
46	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Does the LHC intend to build any new units under this QAP? The proposed limits for hard cost and TDC per unit are insufficient to cover the cost of building the new larger unit sizes with green building certifications, carports, disposals, dishwashers, and in-unit washers and dryers in developments which include playgrounds, basketball courts, computer centers, exercise rooms picnic areas and paved walking paths. As written, this draft QAP is unlikely to build any new construction affordable housing units in the state.
47	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	a. Louisiana would be best served by LHC adopting a tax credits per affordable unit metric in promoting efficient use of this limited resource. This would reward developers who are able to minimize construction costs, but would also reward developers who are able to bring outside resources to leverage their transactions. Since the unit mix and tax credit reservation are set at the time of application, a tax credits per unit evaluation would also be a more reliable means of encouraging efficiency than relying on an application-stage budget to calculate items like deferred developer fee, leverage, equity pricing and construction pricing that are not yet finalized. We respectfully request that the LHC consider a tax credits per affordable unit methodology to promote efficient allocation of tax credits for the 2019 cycle.
48	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	b. If LHC wishes to fund new housing construction in this 9% round, they should either revert to the prior TDC/unit limits or establish a new construction funding pool (See III. above.).
49	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Eligibility for Redevelopment Property points should be expanded to include projects located in Louisiana Main Street Districts. This is a state program with similar goals regarding community revitalization.
50	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Eligibility for the scoring criteria for Redevelopment Project and for Governmental Priorities should be changed from Qualified Census Tracts, to any project eligible for an automatic or discretionary 30% Basis Boost. Prioritizing these categories solely with a basis boost, does not provide them with support in 4% applications or potential NOFAs based upon the QAP.
51	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	LHC should provide a discretionary basis boost to projects in the new Opportunity Zones nominated by the Governor’s office, as a means of leveraging the private investment being prioritized to these areas through the Tax Cuts and Jobs Act.
52	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Why increase minimum unit sizes at a time when median apartment sizes in the market-rate segment are flat to down? This functions to reduce how much affordable housing our state can build/preserve.
53	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	The new $2,500,000 developer fee limit should apply only to deals with competitive 9% credits. The LHC should encourage developers to pursue 4% deals, which are generally only able to absorb the considerable costs of bond issuance at higher unit counts. This fee limit would function to disincentive developers from pursuing 4% deals.
54	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Requiring that projects in 120% and 150% AMI census tracts include market-rate units does not serve the interests of low-income residents of the state. Projects in high-income census tracts should maximize affordable unit count; there is not a need to provide additional incentive to developers to create market-rate housing in high income areas.

55	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Inclusion of Choice Neighborhood planning in the event descriptions for the upcoming QAP sessions is curious given the lack of points for Choice Neighborhoods in the draft QAP.
56	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Prioritizing parishes with the highest proportion of housing built prior to 1980 prioritizes resources to areas with declining economies and a surplus of naturally occurring affordable housing. Statewide resources should prioritize economic mobility by providing housing opportunities that correspond with employment opportunities.
57	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	How is the quality of housing improved by proximity to a post office, police station, fire stations, dry cleaners, places of worship and health clubs?
58	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	The disqualifying negative features include many important sources of employment for our tenants. Additionally, the ½ mile radius for proximity to these services is too far, especially in higher-opportunity urban neighborhoods. The language in the QAP should be amended to disallow new construction adjacent to any of these uses.
59	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	AHP funds and other soft loans should be explicitly included in Additional Financial Support scoring.
60	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Why are infill projects excluded from receiving points for Community Facilities? Given the removal of the Infill Project point category, is this an oversight?
61	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	The inclusion of “covered parking” points prioritizes resources to facilities that serve only tenants with automobiles rather than allocating those resources in the housing units themselves, which would benefit all tenants. This is especially egregious given that our tenants without vehicles are disproportionately elderly and/or disabled. We recently received pricing for a project in Mississippi, whose QAP requires covered parking. The parking added $6,300 per unit to construction hard costs, which then propagates through other soft costs derived from these hard costs. Relative to the one point categories for dishwashers and garbage disposals, these points pull resources out of units and provide them to the subset of tenants with automobiles. These points should be removed.
62	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	Project Amenity Points a. How are project amenity points to be awarded? If a project provides five of the listed amenities, does it receive two points or 3.33 points? It should be the latter in order to encourage projects with logistical issues to provide as many amenities as practical. b. The requirement that these amenities be located on the project site penalizes projects in high opportunity urban neighborhoods with higher land costs, and benefits existing projects with existing amenities that can be cheaply refreshed. This category should allow for amenities to be provided off-site within a ¼ mile of the project site. In addition to leveling the playing field for high-opportunity urban sites, this radius would reinforce the community investment aspect of the LIHTC program around the state.
63	**David Harms**	Gulf Coast Housing Partnership	3/28/2018	The calculation being utilized for the leverage ratio is too coarse. It is functionally almost impossible to reach higher than a leverage ratio of 1:1 with a 9% deal that is 100% affordable. These points are a further prioritization of mixed income projects in urban markets that (at least at this allocation stage) are capable of supporting high levels of permanent debt. There is a meaningful improvement to a 100% affordable 9% deal that brings in $500,000 of AHP funds, but this scoring category is too coarse to prioritize that.

64	**David Miller**	Renaissance Property Group, LLC	4/2/2018	1.8. Redevelopment Project. We note a conflict in this Selection Criterion vis-a-vis the Glossary definition of 11 Redevelopment Project11 in that the Criterion requires that the Project site be located 11 in an area that is a part of a Concerted Community Revitalization Plan, whereas the Glossary merely requires that the Project site be in an area which a local government has targeted for revitalization. We suggest that the Selection Criterion be revised to conform to the Glossary definition, as the CCRP requirement is only satisfied if a locality prioritizes funding for a particular area. This will encompass far fewer properties, meaning that many properties requiring revitalization will not qualify for points.
65	**David Miller**	Renaissance Property Group, LLC	4/2/2018	/.C. High Vacancy. In order to be eligible for the points associated with this Criterion, an applicant must submit a letter from the local jurisdiction, stating that 11the residential unit has been vacant for at least 90 days and is likely to remain vacant because the unit is substandard.11 The problem is that cities do not keep track of occupancy data at properties, so unless a property was obviously vacant (abandoned), a city wouldn't have the knowledge necessary to make the required statement. Additionally, it is unlikely that a city official will opine as to the reason why particular units are vacant, and if in fact reasons other than physical condition are contributing to high vacancy rates, LHC might be well-advised not to commit resources to such a property.
66	**David Miller**	Renaissance Property Group, LLC	4/2/2018	1.0. Construction Type. We note that scattered Site" projects are no longer encouraged in the QAP, and we feel this change is misguided. Scattered Site projects, in addition to being desirable from a resident stand-point, are sometimes the only type of housing that a neighborhood will accept. In order to further LHC's objective of promoting housing in more exclusive neighborhoods or neighborhoods resistant to traditional multifamily housing, we urge LHC to reinstate a preference for Scattered Site development, with a suggested weighting of 4 points.
67	**David Miller**	Renaissance Property Group, LLC	4/2/2018	I.F. Preservation Priority Project. First, we note that there is a disconnect between the projects qualifying for the 11 Preservation Priority" Pool and projects eligible for 11 Preservation Priority Project" points. With the emphasis LHC is placing on the preservation of affordable housing-which is entirely appropriate and a national 11 best practice"-this discrepancy should be resolved by broadening the Selection Criterion to make all Preservation Priority Pool-eligible projects also eligible for the "Preservation Priority Project" points. We would suggest that the percentage of affordable units in a LIHTC project should determine how many points such a project receives. Secondly, further guidance is needed regarding the determination of rental subsidy percentages under this Selection Criterion. Are projects eligible for points based on occupancy by residents holding Housing Choice Vouchers? If so, how will that percentage be established by an applicant (e.g., will a rent roll suffice, and if so, when must be dated and by whom must it be certified?)
68	**David Miller**	Renaissance Property Group, LLC	4/2/2018	V.C. Optional Amenities. We suggest LHC provide clarification as to the number or percentage of parking spaces that must be covered in order to be eligible for points under this Selection Criterion

69	**David Miller**	Renaissance Property Group, LLC	4/2/2018	Preservation Priority. First of all, we strongly urge that more LIHTC be set aside for this Priority. Because reasonable minds may differ regarding the comparative importance of the four Pools, we suggest an equal weighting for all. Secondly, there is a technical problem with the Glossary definition of Preservation Property. It appears the definition was drafted at a time when 1999 was the latest year a LIHTC project could have commenced its credit period and be in its Extended Use Period at the time of application. Obviously, that is no longer the case. In order for this definition to embrace all LIHTC projects now outside ofthe initial15 compliance period, the phrase "in which the first year of the Credit Period was 1999 or earlier" should be deleted, leaving "having completed the final year of the Compliance Period" as the controlling language.
70	**David Miller**	Renaissance Property Group, LLC	4/2/2018	Rural Priority. Verbal guidance from LHC staff suggests that the agency's primary objective in establishing this Priority is the preservation of existing affordable housing, particularly properties with RD (USDA) rental assistance and 515 mortgages. We agree with that reasoning as rental assisted rural properties are far more likely to be financially viable than new construction projects (which lack rental assistance); and we suggest that the Rural Priority be tailored to existing RD properties. At any rate, we encourage LHC to monitor the progress of those rural projects already awarded LIHTC pursuant to the Rural Priority, with a view toward assessing which projects may not be viable.
71	**David Miller**	Renaissance Property Group, LLC	4/2/2018	Construction Standards. With regard to the requirement that projects have "all-masonry" exteriors, we strongly suggest this requirement be limited to new construction. Many Preservation projects have vinyl siding which functions satisfactorily, and replacing it would be wasteful at best, and more likely would render many of these projects infeasible. Similarly, the new minimum unit sizes are excessive and we urge that the standards from the 2017 QAP be retained. At a minimum, all Preservation projects should be exempted from the unit size minimums, not the limited subset in which the FHA requests a waiver. As written, the unit size requirements would greatly undermine the Preservation Priority.
72	**David Miller**	Renaissance Property Group, LLC	4/2/2018	Participant Ineligibility. The provisions excluding prospective applicants from participating in LHC's programs have grown excessively broad. We suggest that anyone who is actively appealing a 2530 "flag" or other disqualification should be permitted to participate.
73	**David Miller**	Renaissance Property Group, LLC	4/2/2018	Elimination of Challenge Period. While we understand the impulse underlying the elimination of the applicant "challenge period" regarding disallowed points, we continue to believe that a full airing of applicant grievances yields better (though by no means perfect) outcomes. Given the potential wide-reaching harms that could result iftax credits awards are later determined to have been erroneous, we urge that the challenge period be preserved.
74	**David Miller**	Renaissance Property Group, LLC	4/2/2018	NHTF Funds. Does LHC have NHTF funds available for allocation, or is the reference a holdover that isn't accurate any longer? If any such funds remain, we suggest that they be made available to support 4% LIHTC/tax exempt bond deals, which generally are not viable without a soft subsidy.
75	**Terri B North**	LAAHP	4/2/2018	The scheduled dates on page 12 and page 13 do not match. Why the need for 2 submissions? Is there a challenge period included between the two dates? Please clarify.

76	**Terri B North**	LAAHP	4/2/2018	The competitive evaluation process outlined on page 15 is a great concern. If an applicant is disallowed points, and then after appeal to the LHC the project is found to be deserving ofthe points, the project is put on the top of the waiting list even if the adjusted score would have allowed it to be funded over other projects that received awards. This policy has potential to be unjustly used to favor certain projects/developers over others. LAAAHP strongly recommends that a there be a challenge period BEFORE GRANTING AWARDS and that the results of the challenge will be used in creating the final project ranking and making of awards. LAAHP further recommends that the appeal panel have members outside of LHC staff (possibly the LHC Multifamily Committee?).
77	**Terri B North**	LAAHP	4/2/2018	Regarding the need for a Permanent Supportive Housing (PSH) referral letter: In the recent NOFA round some projects were denied PSH support. lfthere are parameters which make projects ineligible for PSH support then the QAP should evidence the criteria so applicants can know what to expect. These points cannot be subjective without any prior guidance.
78	**Terri B North**	LAAHP	4/2/2018	While LAAHP generally supports the change to using of the HUD cost per unit limits except for studios and 1bedrooms, the prohibition on subtracting other funding sources from the Total Development Cost (TDC) and cost per unit calculation is a serious issue. LAAHP considers it good policy to encourage the leveraging of other sources to offset the additional cost of higher density, urban and neighborhood oriented projects. Without the ability to use outside funding sources to offset TDC and cost per unit, many worthy projects will not meet the threshold requirement to be considered for tax credits.
79	**Terri B North**	LAAHP	4/2/2018	The Leverage Ratio points added in the Selection Criteria is a positive step. LAAHP believes the focus of the LHC should be how many housing units are being created per housing credit, not total development cost or cost per unit. A higher cost project should not be penalized if the developer is able to bring other sources to make the leverage per credit comparable.
80	**Terri B North**	LAAHP	4/2/2018	Dates in the final QAP should be adhered to and not changed unless proper notice is given PRIOR to the date change.
81	**Terri B North**	LAAHP	4/2/2018	LAAHP's members from the investor community are concerned about the QAP incentivizing projects with more than 20% of units as non tax credit units. There is not a significant appetite for such deals in the investor community unless the deals are located in high cost, urban areas.
82	**Terri B North**	LAAHP	4/2/2018	LAAHP appreciates the elimination of penalizing projects for their proximity to bars and lounges. However, we are not in favor of a threshold item which makes a project ineligible for being within amile of a negative neighborhood feature. In rural areas as well in some urban areas, very strong locations that are suitable for development are located near some less than desirable neighborhood features.
83	**Jim Tilley**	Centerpoint Energy	4/2/2018	“Additional Financial Support” Selection Criteria III D notes that this scoring item is intended to maximize credit efficiency. However, the list is limited to those funding sources for which an “award” of funds can be evidenced. There are significant leveraged funds being recognized by Public Housing Agency projects by commissioning and receiving approval to use an Engineered Utility Allowances as opposed to a city-wide utility allowance. Significant savings are also being achieved by a conversion of systems from electric to more efficient natural gas. We propose the recognized contract rent increases available which can be monetized by a commissioned Utility Study be accepted as “Additional Financial Support” in meeting this selection criteria threshold. The increased rents achieved over the contract term with the reduced utility allowances will effectively allow the project to leverage more debt thus also maximizing credit efficiency.

84	**John Sullivan**	Enterprise Community Partners	4/2/2018	**Ke e p the HUD 2017 Unit Total De velopment Cos t Limits but Re ins tate the Provis ion from Pre vious Ye ars , "Governme ntal Grants , His toric Cre dit Syndication Proce e ds and Ce rtain Othe r Funds are not include d in Cos t Limits " to De termine Maximum Unit De velopme nt Cos ts** The change to the HUD 2017 Unit Total Development Cost Limits (HUD TDC limits) is a welcome improvement after several years at the same cost per unit standard. The HUD TDC limits represent a better cost containment standard because it considers differences in construction cost by geography and type of development, and uses cost indexes to account for yearly changes. However, the draft QAP removes the provision from previous years ("Governmental Grants, Historic Credit Syndication Proceeds and Certain Other Funds are not included in Cost Limits.") that exclude other sources of project funding in the cost calculation. In effect, this allowed developers to exceed the maximum per unit costs only if other sources of funding not being provided by LHC were included. This ensured that LHC did not oversubsidize any individua l project with its own sources and credits, but that complex, relatively expensive developments that were a priority for local governments were not excluded from accessing LIHTCs. The cost limits in the draft QAP, considering the inability to exclude other sources of funding from calculation of development costs, are too low and will prohibit development unnecessarily. There are many developments funded in past years, including many that scored highly and were high priorities to local governments, that would be ineligible under the current cost guidelines. It is also worth noting that this is not the standard that HUD uses for public housing. Outside funding sources are not subject to the TDC limit; the limits apply only to public housing funds (please reference Section 4(c) of PIH-2011-38 (HA) which can be found at: https://www.hud.gov/s ites/documents/PIH2011-038.PDF). HUD does not set a hard limit on construction costs, but instead determines the cost efficiency for their own public housing funding. The HUD limits, while an improvement on the prior TDC limits other than for historic rehab development, are still inadequate to build many developments in Louisiana's urban areas and hurricane and flood zones, particularly given the minimum threshold development standards in the QAP and the increased unit size requirements.
85	**John Sullivan**	Enterprise Community Partners	4/2/2018	**The Total De velopment Cos t Limits as Curre ntly Writte n Should Not Apply to Four Pe rce nt De ve lopme nts** If 4% LIHTC deals come in over the total development cost limits (without the benefit of subtracting outside funding sources), there will be a valid reason for doing so. Since these projects will require more funding from outside sources than 9% deals, developers will have less incentive to build more expensively and will be also limited by investors. If a project is over the cost limits it is likely because the project is particularly difficult to develop or rehabilitate or a source of funding requires building techniques or standards beyond LHC's threshold requirements. Also, 4% credits are not limited in quantity, so there is less reason to impose strict cost limits. The TDC limits as currently written should not apply to 4% LIHTCs.
86	**John Sullivan**	Enterprise Community Partners	4/2/2018	**The Total De velopment Cos t Limits Should Not Apply to Major H is toric Re habilitationProje cts** As stated above, major rehabilitation projects may likely have other sources of funding and many will find it impossible to meet the TDC limits. The HUD standards do not consider historic gut rehabs as a development type and projects of this type typically cost significantly more than similar new construction developments.
87	**John Sullivan**	Enterprise Community Partners	4/2/2018	**Four Pe rce nt De velopments Should Not B e Subje ct to a Minimum Score** This year's QAP added a requirement that 4% LIHTC deals score a minimum of 60 points to be considered for funding. We recommend removing this provision since the availability of 4% credits is unlimited.

88	**John Sullivan**	Enterprise Community Partners	4/2/2018	**Re move Points for Syndication Efficie ncy** The points for Syndication Efficiency (under Section VI(E) in the Selection Criteria) should be removed because of the uncertainty regarding credit pricing. The Syndication Efficiency is based on the price offered for tax credits at the time of application submittal. However, this price should not be considered reliable since the deal has not been underwritten by the investor at this stage, and prices often are different once the deal is finalized. The price at the application stage is an estimate. Therefore, the syndication efficiency is not a trustworthy measure of cost efficiency for the project since the prices will almost always change from the time of application to the time of deal closing.
89	**John Sullivan**	Enterprise Community Partners	4/2/2018	**Include De bt Se rvice for Soft Se rvice s in the Re quire d De bt Se rvice Ratios** In the section on Underwriting Guidelines under Required Debt Service Ratios on page 22, the draft QAP states, “The maximum debt service ratio for a project is 1.4.” This is a change from the 2017 QAP language, “Debt Service Ratios during the credit period with respect to all debt exceeds 1.4, the excess cash flow must be deposited to the Reserves for Replacement or used to prepay hard debts.” It is unclear if cash flow contingent debt service for soft sources is included in this ratio. If only hard debt is used in this ratio, projects with significant soft sources of debt would have extreme difficulty meeting the 1.4 standard. The excel model used last year did not include debt service for soft sources. Please clarify that cash flow contingent debt service for soft sources is included when calculating the debt service ratio.
90	**John Sullivan**	Enterprise Community Partners	4/2/2018	**Re move Points for Pre s e rvation Priority Proje cts** Since the draft QAP includes a set-aside of $1.8M for Preservation Priority Projects, there should not also be added points in the Selection Criteria (Section I(F)) for these projects.
91	**John Sullivan**	Enterprise Community Partners	4/2/2018	**Ne w De ve loper Clarification** Please clarify is a New Developer as referenced in page 27. It is not clear if this is referring to an entity or individua l.
92	**John Sullivan**	Enterprise Community Partners	4/2/2018	**Ente rpris e Gre e n Communitie s Ce rtification** We appreciate that LHC continues to include Enterprise Green Communities Criteria in the QAP. Please note that the weblink cited on the bottom of page 65 has expired. The current web address for Enterprise Green Communities is https://www.enterprisecommunit y.org/solut ions-and- innovation/ green-communit ies.
93	**Vonda Waskom**	Housing Authority of the city of Bogalusa	4/3/2018	$2,500,000 Developer fee Cap per project. While we understand the desire to limit the developer fees that can be earned under this program, this cap is somewhat redundant as there is already a limitation on the percentage maximum developer fee that can be earned on any given project as noted on page 32. Capping the per project fee will result in restricted project size which will reduce efficiencies in development soft costs that are achieved with larger projects and will also result in a reduction of funds available to the PHA for the continuance of its mission. This would be most detrimental if applied to 4% transactions which are typically much larger than 9% transactions. Encouraging the development of smaller transactions would result in the same amount of rehab or new construction units being achieved with double or triple the costs as well as the time requirements of the LHC and Housing Authority staff.

94	**Vonda Waskom**	Housing Authority of the city of Bogalusa	4/3/2018	"Additional Financial Support" Selection Criteria III D notes that this scoring item is intended to maximize credit efficiency. However, the list is limited to those funding sources for which only an "award" of funds can be evidenced. There are significant leveraged funds being recognized by Public Housing Agency projects by commissioning and receiving approval to use an Engineered Utility Allowance as opposed to a City- Wide utility allowance. We propose the recognized contract rent increases available from the decrease in utility allowances be accepted as "Additional Financial Support" in meeting this selection criteria threshold. The increased rents achieved over the contract term, which can be monetized by a commissioned Utility Study, effectively allow the project to leverage more debt thus also maximizing credit efficiency.
95	**Vanessa Levine**	Renaissance Neighborhood Development Corporation	4/3/2018	Section Ill- Available Sources • Statewide Collapsed Pool (page 7): confirm that all unfunded feasible projects from each pool (Non-Profit/CHDO, Rural,Preservation Priority and General Pool) compete in the Statewide Collapsed Pool with the same score from their previous pool for any remaining funds in a statewide rank order.
96	**Vanessa Levine**	Renaissance Neighborhood Development Corporation	4/3/2018	Section IV- Application Process • The dates listed under the Mandatory Preliminary Submission Requirements and Final Application Submission Requirements headings (Page 12) do not align with the dates contained in the Program Schedule (Page 13). Please clarify the scheduled dates with consistency throughout the QAP. • Program Schedule (Page 13): Add a preliminary LHC distribution of ranking and score to applicants and an applicant challenge period to the Program Schedule ahead of the approval of final rank, scoring and reservation of tax credits. It is likely not feasible for the same project, which should have been awarded points,to apply in a future round with 5 points because of site control cost and other unknown factors. An appeal process should not occur after the reservation of credits so that any project that should have been awarded can be awarded in the same round. We also suggest creating a panel to review the developer challenges that includes members in addition to LHC staff. • Program Schedule (Page 13): will a revised draft QAP be released prior to the Aprill11 adoption of the final QAP? We request the opportunity to review and comment on any changes to the draft ahead of adoption of the final QAP. • Program Schedule (Page 13): Add a preliminary site review submission well in advance of the application deadline to determine if the proposed site will pass the LHC's negative feature requirement before the applicant incurs the majority of the cost of the application and fees. A developer response period should also be added once the LHC returns the findings ofthis initial site review as there is often clarification needed between the developer and analyst on items such as: distance from the Project, definitions and if a specific negative feature may no longer be in operation. • Competitive Evaluation (Page 15): please add challenge period ahead of final rank, scoring and reservation of tax credits • Competitive Evaluation item 15 Final Rank Order (Page 16): this date does not appear to align with the dates contained in the Program Schedule (Page 13). Please clarify what date the developer will receive a reconciliation of their scores. • C. Non Refundable Fee Schedule (Page 19): the Market Study Fee, Threshold Clarifications, Selection Criteria Documents and Application and Analysis Fee deadlines do not match the Program Schedule (Page 13). Please clarify.

97	**Vanessa Levine**	Renaissance Neighborhood Development Corporation	4/3/2018	Section V- Threshold Requirements • Maximum Unit Development Cost (Page 31): in keeping with how HUD calculates TDC limits, do not count other funding sources the developer brings to the project as subject to the TDC limit (eg. CDBG funds, Home Funds,historic tax credits,private donations, private financing). This will encourage leveraging the Low Income Tax Credit with other sources to offset the additional cost of higher density,urban and neighborhood oriented projects with the added amenities and green features desired. In particular,the HUD 2017 Unit Total Development Cost Limits does not take into account the additional cost of historic preservation. Reducing TDC by historic tax credits,and other additional sources, allows for these higher cost, but high impact projects which eliminates blight and preserves housing to be viable applications.
98	**Vanessa Levine**	Renaissance Neighborhood Development Corporation	4/3/2018	Section VII -Selection Criteria • We encourage the LHC to remove or revise this section. As it stands, the "LHC reserves the right not to reserve Tax Credits to any Application of a Project, regardless of a Proposal's score." And,it limits the Tax Credit Reservation to any parish in an amount that would allocate more than 40% of the total units in the 2018 allocation year. This makes the process of evaluating if a tax credit application is viable less clear for developers who will risk the substantial cost of an application without knowing how the awards will be determined by the LHC.
99	**Vanessa Levine**	Renaissance Neighborhood Development Corporation	4/3/2018	Selection Criteria and Evidentiary Materials • Section I. Targeted Project Item C High Vacancy: Confirm points will be allowed in this category for vacant demolished inhabitable units. • Section I.Targeted Project Item C High Vacancy: Allow points for commercial vacancy in historic buildings to encourage the adaptive reuse of blighted historic buildings in rural areas (former school buildings no longer in use) which will reduce blight and strengthen existing neighborhoods. • Section I. Targeted Project Item F Preservation Priority states that these points are not applicable to new construction, however, the definition of Preservation Priority says . that a Public Housing Agency Project is not required to be new construction. Confirm that PHA projects can be new construction and receive points in Preservation Priority. • Section II.Targeted Population Type Items A and B:Confirm that the max points allowed is 11to include Elderly and Special Needs set asides. • Section Ill Priority Development Areas and Other Preferences Item D (i) (ii) and (iii): define, 'total project development costs efficiency' • Selection Criteria Section IV Location Characteristics Item A (ii): We strongly recommend adding deduct points for these features,instead of making it a threshold requirement,as this may disqualify new construction in rural areas close to industrial. If these remain as threshold requirements,please clarify by defining each negative feature clearly in the glossary.

100	**Joseph P. Page**	City of Alexandria Housing Authority	4/3/2018	I) $2.500.000 Deve loper fee Cap per pro ject. Whil e we understand the desi re to limit the devel oper fees that can be earned under this program, this cap is somewhat red undant as there is a l read y a limitation on the percentage maximum devel oper fee that can be earned on an y given project as noted on page 32. Capping the per project fee wi ll result in rest ricted project size which wil l reduce efficiencies in development soft costs that are achieved w ith larger projects and will also result in a reduction of funds availab le to the PHA for the con tinuance of its mission. Th is would be most detrimental if applied to 4% tra nsactions whi ch are typically much larger than 9% transactions. Encou raging the devel op ment of sma ller transactio ns would result in the same amount of rehab or new construction units being achieved w ith doubl e or t riple the costs as well as the ti me req uire m ents of the LHC a nd Housin g Authori ty staff.
101	**Joseph P. Page**	City of Alexandria Housing Authority	4/3/2018	2) "Additiona l F inancial Support" Selection Criteria I I I D notes t hat this scoring item is intended to m ax imize cred it efficiency. However, the list i s limi ted to those fund ing sources for which on ly a n "awa rd" of funds can be ev idenced. There are s ignifica nt leveraged fu nds being recogn ized by Public Housing Agency projects by com missioning a nd recei v i ng approval to use a n Engineered U tili ty A llowa nce as opposed to a City-Wide utility a llowance. We propose the recogn ized contract rent i ncreases avail a ble from the decrease in uti lity allowances be accepted as "Add i tion al Financia l Support" in meeting t his selecti on criteria th reshol d. The increased rents achieved over the contract term, which ca n be moneti zed by a commissioned Util ity Study, effective l y a llow the project to leverage more debt thus a lso maxim izi ng credit efficiency.
102	**Philip Henderson & Dana Bartolomei**	Natural Resources Defense Council & National Housing Trust	4/3/2018	We appreciate that LHC improved green building selection criteria in the 2017 QAP, specifically the requirement to document that a qualified building professional verify projects meet LEED, Enterprise Green Communities, the National Green Building Standard, or EarthCraft criteria. As you develop the 2018 QAP, we encourage you to consider more than upfront cost and Total Development Cost Caps and consider the following recommendations to improve both the physical quality and financial performance of affordable housing in Louisiana through energy and water efficiency:
103	**Philip Henderson & Dana Bartolomei**	Natural Resources Defense Council & National Housing Trust	4/3/2018	1. Require that rehabilitation projects meet minimum energy efficiency requirements to the extent possible. LHC currently does not require rehabilitation projects to meet minimum energy and water efficiency requirements. This should be corrected. Rather than exempting rehabilitation projects from minimum energy efficiency requirements, LHC should adopt minimum energy efficiency requirements that are tailored to, and appropriate for, rehabilitation projects. Consider that many other states encourage, and in some cases require, rehabilitation projects to meet minimum energy efficiency requirements. For example: • The North Carolina Housing Finance Agency requires developers of rehabilitation projects to improve energy efficiency by replacing inefficient doors and windows, adding additional insulation in attics, and upgrading the efficiency of mechanical systems and appliances. Adaptive re-use and rehabilitation projects must also comply with the requirements of ENERGY STAR 2.0, to the extent doing so is economically feasible. • The Florida Housing Finance Corporation requires all new construction and all rehabilitation units to meet specific required Green Building features unless found to not be feasible within the scope of the rehabilitation work as identified in the Capital Needs Assessment. In addition, new construction must achieve certification through LEED, the Florida Green Building Coalition, or ICC 700 National Green Building Standard. Rehabailitation projects must select enough additional Green Building Features listed in the scoring criteria to earn at least 10 additional points.

104	**Philip Henderson & Dana Bartolomei**	Natural Resources Defense Council & National Housing Trust	4/3/2018	2. Require an energy consultation or audit as a condition of eligibility for Housing Credits for rehabilitation projects. A building assessment by a professional can reveal many repairs and improvements that are cost effective – meaning they will reduce energy expenses in an amount greater than the cost of the work. The term “audit” generally refers to an assessment conforming to ASHRAE standards. In certain projects, a less thorough assessment and report by a certified professional can identify cost-effective measures. We appreciate that LHC encourages single-family projects to conduct an energy audit. We encourage LHC to require multifamily rehabilitation project teams to consult an energy efficiency professional or complete an energy audit 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 Georgia Department of Community Affairs requires rehabilitation projects to conduct energy audit to identify energy conservation measures that would result in an overall energy savings of 20% or greater over pre-retrofit levels, or have a Savings to Investment Ratio (SIR) of 2.0 or greater. In addition to identifying efficiency opportunities at the outset, LHC should consider commitments from owners to improve the efficiency of properties throughout the life of the property. The Pennsylvania Housing Finance Agency requires developers to certify that when existing equipment, appliances and products are replaced they will be replaced with Energy Star labeled equipment, when such equipment exists.

105	**Philip Henderson & Dana Bartolomei**	Natural Resources Defense Council & National Housing Trust	4/3/2018	3. LHC should coordinate with Louisiana electric, gas, and water utilities to take advantage of programs to support efficiency investments in affordable housing. Many Louisiana utilities operate programs to help owners of single and multifamily housing invest in efficiency repairs and improvements. They do this because reducing energy waste delviers value to all of the utility's customers. We strongly encourage LHC to collaborate with utility companies to assure alignment that will help affordable housing owners use energy efficiency programs and incentives and to assure programs are accessible to LHC-supported properties. Utilities often lack the capacity or expertise to effectively reach the community of affordable housing owners and developers. LHC is positioned to connect developers to utilities at the time projects are in development. Note that Entergy Louisiana, Entergy New Orleans, Cleco and Swepco offer utility incentives to support and reduce the cost of energy efficiency improvements. For example, Entergy New Orleans offers incentives for certain energy efficiency projects through the Energy Smart program, including a program targeted to low-income multifamily buildings, as well as programs of general application such as incentives for high-efficiency heat pump air conditioners. LHC is well-positioned to help owners to connect with ENO and all utilities to assure LHC-supported housing benefits from these programs. 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: • The Connecticut Housing Finance Agency, Minnesota Housing, and the Pennsylvania Housing Finance Agency require developments seeking Housing 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 for inclusion in the capital stack. • The Maryland Department of Housing and Community Development provides financial assistance to owners through the Multifamily Energy Efficiency and Housing Affordability program which is funded by the state's investor-owned utilities.

106	**Philip Henderson & Dana Bartolomei**	Natural Resources Defense Council & National Housing Trust	4/3/2018	4. Require WaterSense plumbing products and Energy Star qualified clothes washers. A well-regarded report by Fannie Mae examined utility usage in multifamily housing and found that the least efficient properties use over six times as much water per unit (or per square foot) as the most efficient properties. 1 Water efficiency improvements can deliver substantial savings, especially when including the associated savings in wastewater charges. Whether water utility charges are paid directly by occupants, or as is more common, paid by the building owner, improving water efficiency is a key strategy for preserving housing affordability. We recommend LHC consider three changes to the QAP related to water efficiency. (A)LHC should consider requiring WaterSense-labeled showerheads, lavatory faucets, and toilets, to avoid unnecessary water and hot water consumption and its associated utility costs. WaterSense- labeled plumbing products achieve water savings while being no more expensive to purchase and install than less efficient products.2 (B) We appreciate and support LHC’s existing requirement that owners install Energy Star qualified clothes washers, but LHC should clarify that it applies to machines installed in units and in common area laundry rooms. Common area laundry rooms, in particular, are important because owners often outsource the operation of the machines and the high cost of energy and water is passed on to residents. There are good mechanisms for owners to use to assure high-efficiency machines are installed.3 For more information, see the report titled: Efficiency Opportunities in Multifamily Common Area Laundry Facilities. (C) LHC should extend the requirements related to high efficiency washers to all rehabilitation projects. Clothes washing is responsible for about 20% of all indoor residential water use, and a new Energy Star washer can cut water use in half compared to the most common types of washers in use today. Moroever these machines use substantially less electricity and hot water, meaning savings accrue across multiple utility bills. Energy Star criteria apply to both water and energy consumption, so all qualified products will be very water-efficient. They are available in a variety of formats, including ADA compliant units. The Natural Resources Defense Council and the National Housing Trust very much appreciate the Louisiana Housing Corporation providing this opportunity to offer our recommendations. Please do not hesitate to contact us if we can offer any more information for answer any questions about these comments.
107	**Christine Adams**	Bunch Development Services	4/3/2018	I'm hoping I can get some clarification on the submission deadlines for the next LIHTC application round. I realize that the QAP will be finalized and then questions will be accepted until April 25, however. In planning with my clients, however, I'd like to try and eliminate some confusion now if at all possible. In the QAP draft, submission deadlines on pages 12 and 13 (Program Schedule) differ so: 1. Is it possible to clarify the preliminary and final deadlines, yet? or does this have to be discussed at the April 11 meeting before it can be shared? (Page 12 states June 4 and July 16 while Page 13 states June 21 and July 23.) 2. Is it possible to clarify the Letter of Support requirement? The Criteria say that the letters must be requested no late than 14 days prior to the application due date. Does that refer to the preliminary due date or the final due date?
108	**Ashley E. Huber**	Marq Building Consultants	4/3/2018	1. We agree with comments made today that there should be no minimum score required for 4% bond transactions.
109	**Ashley E. Huber**	Marq Building Consultants	4/3/2018	2. 4% Bond deals should not be subject to a developer fee limit. These projects have a higher risk and receive less LIHTC. The developer fee for these deals becomes crucial to close the funding gap.

110	**Ashley E. Huber**	Marq Building Consultants	4/3/2018	3. A challenge period was very beneficial in years past. We suggest reinstatement of the challenge period in the 2018 round.
111	**Charles Tate**		4/3/2018	1. Pages 7-8 of 44. (Pages #7-8) Additional thought should be given to how the Targeted and General Pools are to function. Currently proposed are a targeted Qualified Nonprofit/CHDO Pool, a Rural Pool, a Preservation Pool, and a General Pool under which all Targeted Pool runners up compete against each other and General Pool (only) applicants. If the draft QAP were not changed prior to adoption, this would mean that a Nonprofit who proposes to do a Rural Preservation Project leaves its odds of success largely to chance. (And certainly Louisiana's statewide affordable housing production outcomes should not be left to chance!) So strenuous debate is recommended and should be invited on this key question. Perhaps thought should be given to permitting at least all 2018 LIHTC nonprofit applicants to check more than one target pool. Logistically, if Staff thinks it would be helpful, perhaps the QAP could implement some sort of a waterfall, maybe in this order: Nonprofit Pool, Preservation Pool, Rural Pool, General Pool. This way the highest scoring Nonprofit Applications would be funded until that Pool is exhausted, and then otherwise eligible Nonprofit Applications would be scored against other Preservation Pool applications; then against other Rural Pool applications; and then against General Pool applications. If the same waterfall methodology were to be adopted for for-profit applications, those applications of course could not compete in the Nonprofit Pool, but could compete in the other Pools for which their applications are otherwise eligible.
112	**Charles Tate**		4/3/2018	2. QAP page 29. Many rural newspapers are only published weekly. Please require only one Public Notice prior to Application, and two (2) after, at least for communities with weekly publications. Otherwise Rural Applicants are operating at an unnecessary disadvantage. (Or you extend this rule to all Applicants.)
113	**Charles Tate**		4/3/2018	3. Page 33 of 44. (Page #33). "Scattered Site Projects in Urban Areas" are permitted to identify only street addresses for each separate site. This definition overlooks the fact that street addresses are available for all "Municipally Incorporated Areas" – and perhaps even in unincorporated rural sites that now have "911 addresses." Clearly, a street address is far easier to provide than a legal description when it comes to LIHTC Applications. The question is what the LHC substantively intends by whatever language is used. There should be no doubt that the draft definition should at least be changed or refined to include all "Municipally Incorporated Areas," so that applicants proposing to improve Scattered Site housing in nonmetropolitan communities such as Ferriday, Ville Platte, Ponchatoula, Hammond, Franklin, and Killian, like their friends in New Orleans, Baton Rouge, Shreveport and other large municipalities can use street addresses rather than legal descriptions. In fact, "911 street addresses" are generally available everywhere, which was not the case a generation ago. Bottom line: perhaps permit Applications to only specify Street Addresses (regardless of where the Scattered Site property is situated), with a property description or plat requirement only where street addresses are not available.

114	**Charles Tate**		4/3/2018	4. Pages #45 and #74. “Redevelopment Project” and “Redevelopment Properties.” Strike the requirement that either be situated in a Qualified Census Tract (QCT). The LHC’s objective should be to preserve the dwindling supply of project based rent subsidized affordable housing for households of modest income, not just in the poorest QCT neighborhoods, but wherever they are found. (Some would argue especially in more affluent areas where jobs are more likely found). By and large, new Federal Project Based Rental Assistance has not been made available in decades. Bricks and mortar money is not enough to keep the lights turned on for our poorest citizens without rental assistance. Only about 25% of households known to be eligible receive such rental assistance. Hence, ALL such housing must be preserved, wherever it is, or the net effect is that units serving Louisiana’s most vulnerable citizens will be lost. Besides there is Federal jurisprudence encompassing Louisiana’s territorial limits that suggests that such LIHTC resources should not be steered from more affluent areas, which is precisely the effect of the definitions requiring QCT status in order to score otherwise laudable Redevelopment Project points. Scoring Criteria, Page #45, “B.”
115	**Charles Tate**		4/3/2018	5. Page # 72. “Preservation Property.” Add the word “or” after each semicolon to clarify that each of the project types qualifies for “Preservation Property Status.” (Might be a little redundant, but only a little redundant.)
116	**Charles Tate**		4/3/2018	6. Amend (b) to state that as a follows: “Have a loan initially made … any of the following or similar government subsidized loan programs . . . .” I am not sure whether an exact year (1985) needs to be used.
117	**Charles Tate**		4/3/2018	7. Scoring Criterion IV.A.(ii). QAP page 48. Negative (actually Disqualifying) Neighborhood Features for New Construction. As noted at the March Workshop, virtually all Rural New Construction projects could be disqualified due to their ½ mile proximity to a number of Features, such as Wastewater Treatment and Distribution (?) Facilities and Electrical Utility Substations.
118	**Charles Tate**		4/3/2018	8. Scoring Criterion V.B. “Community Facilities.” QAP page 48. Scattered Site/Infill Projects are tough enough. They not be penalized 2 Points for not providing a Community Facility Separately, both New and Rehab Projects should be credited for the ability to access an existing Community Facility provided it is of adequate size and quality.
119	**Charles Tate**		4/3/2018	9. Scoring Criterion V. C (iv) “Covered Parking.” QAP page 49. Either delete this Criterion given the cost, or award this one point to applicants who provide Covered Parking for Physically Handicap parking spaces only.
120	**Charles Tate**		4/3/2018	10. Scoring Criterion, Deferred Developer Fee points, VI. C., QAP page 50, seem punitive, especially in the context of larger Rehab projects. (“You never know what you are going to find behind them walls” – other than enormous risk!)
121	**Charles Tate**		4/3/2018	11. Scoring Criteria, Leverage Ratio and Syndication Efficiency points, VI., D and E, QAP page 51. The 2018 QAP or its Glossary should contain very realistic examples of both so that Applicants have a clear understanding of the standards by which they will be judged.
122	**Charles Tate**		4/3/2018	12. Please issue Index of Closing Documents with LIHTC Conditional Commitment Letters.

123	**Charles Tate**		4/3/2018	13. Comments Applicable Longer-Term, per LHC Board Chair Recommendation. Rural Communities (and presumably urban communities) could use more Scattered Site single family housing, both new and rehab, in addition to preserving the dwindling supply of Rent Subsidized housing addressed elsewhere. If the Board agrees, then it should provide communities and interested parties Multi-Year advance notice, deep Technical Assistance, and abundant Incentives. There are reasons this vital work has yet to take place. These reasons are as obvious as the need to revitalize the core of our communities, where public investments 80 years ago (think New Deal and Huey Long) were made in street, drainage, water, sewer, electricity, schools, police and fire stations, hospitals, etc.
124	**Charles Tate**		4/3/2018	Multi-Year Advance Notice. From personal experience, there are enormous time delays and expenses that accompany Scattered Site Developments (Redevelopments) that do not hinder Multifamily Development, from Site Control through Title Clearing and Site Acquisition; through Environmental Clearance; through application and construction inefficiencies (numerous surveys versus one; four exterior walls versus two; individual driveways versus large parking lots) – and that's before you get into long-term exterior and lawn maintenance). LHC could perhaps explicitly telegraph, and telegraph NOW, that the tedious front end work of such vital reinvestments will be rewarded, for at least the next 3 years to come, and even if to the exclusion of all other LIHTC applications other than Preservation Rehabs, so that individuals and communities across the state can know that they will not be wasting their precious resources and time to do the front end work required to undertake a large scale single family scattered site rental project (Land Banking, staff time, etc).
125	**Charles Tate**		4/3/2018	Abundant Incentives. Second, abundant incentives must be given to such work if that is really where the LHC board wishes to take this State, and these abundant incentives should be made known now given the long lead times communities face even after they agree to buy into such undertakings. Without Developers (or at least Co-Developers), this work will not be done, just as it has not been done to date. Likewise this work will not be done without robust Development Incentives (or at least lack of Disincentives). Developers can always do Market Rate work, but LMI households cannot afford to live in Market Rate housing. That's why LHC, Low Income House Tax Credits, and Affordable Housing Developers exist.)
126	**Charles Tate**		4/3/2018	Developer Fee caps should be generous for such tedious work and, in the case of single family rentals, raised to 20% for new construction of the first $100,000, and the greater of $15,000 or 25% for single family rehabs for the first $100,000.
127	**Charles Tate**		4/3/2018	Technical Assistance. Affordable Housing Development is a complicated business, especially when a community chooses to work tirelessly and for years to reverse its decline by aggressively seeking the resources required to recapitalize its affordable single family housing stock. LHC should perhaps consider offering detailed Technical Assistance to local communities and leaders who are brave enough to take those first steps forward on their long journey. We can continue to pretend it ain't so, but we do so at the risk of ignoring the facts that stare us in the face: this truly valuable valuable work will not be done, and our communities will continue to suffer and squander generations of prior public investment, if LHC does not issue unambiguous multi-year guidance to municipalities and offer them in-depth Development Assistance in order that they can begin their renewal process now. (If not LHC, who? If not now, when?)

128	**Steve Perry**	KWL Properties, LLC	4/3/2018	• On Page 8, under National Housing Trust Funds, it states that these funds will be available to the highest scoring projects competing in the Thirty Percent AMI Pool. Since there is not a Thirty Percent AMI Pool which pool will be awarded these funds?
129	**Steve Perry**	KWL Properties, LLC	4/3/2018	• Please clarify what date the Application & Analysis Fees are due. On Page 12 it says June 4th but on Page 19 it says July 16th.
130	**Steve Perry**	KWL Properties, LLC	4/3/2018	• We are very pleased that you have deleted the Choice Neighborhood Selection Criteria. We feel that was a very good decision and appreciate you taking that out for this round.
131	**Carrie L. Castille**	United States Department of Agriculture (USDA)	4/3/2018	Louisiana USDA Rural Development (RD) would like to take this opportunity to present an item for consideration for development of the 2018 Qualified Allocation Plan (QAP). In Louisiana, USDA RD has an outstanding affordable housing portfolio of approximately 375 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. A survey of our Section 515 owners in January 2017 revealed that approximately 90 properties with 3,000 units were in need of rehab. Since this survey was conducted, only 12 RD properties with 427 units received assistance to complete the needed rehab. This consisted of 7 properties which were awarded 2017 tax credits and 5 properties which received RD Multi-Family Housing Preservation and Revitalization (MPR) funds in Fiscal Year 2018. RD is committed to working with Louisiana Housing Corporation (LHC) in an effort to achieve the goal of both agencies; that of providing affording housing which is decent, safe and sanitary to those residents of our state. Therefore, we are requesting consideration of the following: 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.
132	**David R. Aming**	LHP	4/3/2018	1. Continue to encourage the preservation of Section 8 properties. Louisiana's Section 8 portfolio is 35-40 years old and most properties have never benefited from a substantial rehab to address deferred capital needs and replace major building systems. Section 8 project-based rental assistance leverages a federal resources and serves the lowest income households, including elderly and disabled. We support the proposed change to award more points to projects with a higher percentage of project based rental assistance, and recommend the highest points be awarded to projects with 99-100% PBRA.
133	**David R. Aming**	LHP	4/3/2018	2. Allow less than 7% vacancy in underwriting projects with project-based rental assistance based on historical occupancy rates.

134	**David R. Aming**	LHP	4/3/2018	3. Support the increase of Total Development Costs (TDC) limit to HUD maximum. Consider eliminating the points for projects with TDC per unit below the maximum. The increased TDC limits in the draft 2018 QAP will help make Section 8 substantial rehab projects viable. The multifamily market has seen historically low cap rates and high sales prices making it impossible to acquire properties at fair market value in an arms-length transaction and still satisfy the architectural, energy and amenity design requirements of the QAP on top of whatever required structural, mechanical and other capital repairs are required at a 30-40 year old asset. Please consider eliminating the points for projects with TDC/unit below the maximum. Though well-intentioned to encourage the efficient use of LIHTC resources, giving points for projects with TDC/unit below the maximum could actually have a negative impact on the overall scope and quality of construction especially on substantial rehab projects.
135	**David R. Aming**	LHP	4/3/2018	4. Increase the Acquisition Fee from 8% to 15%. 15% is the industry standard acquisition fee for rehab projects in the many states in which our firm operates, particularly for true, third-party/arms-length transactions where buyer and seller are not related parties. Increasing the acquisition fee to the industry standard of 15% generates more tax credits and private equity to make acq/rehab projects financially viable.
136	**David R. Aming**	LHP	4/3/2018	5. Reduce the scoring priority for De-concentration and Scattered Site projects. While mixed-income and scattered site projects seek laudable goals, they are generally not an option for existing affordable housing projects in need of preservation and recapitalization. Additionally, mixed-income and scattered site projects create additional financial challenges in an already challenging and unstable debt and equity market. The priority for such projects should be reduced, or at least applied only to new construction projects. Existing Section 8 and other PBRA projects are penalized by not being able to offer the same income diversity due to existing federal income restrictions.
137	**David R. Aming**	LHP	4/3/2018	6. Remove the scoring priority for PSH houselwlds or include it in the nonprofit set-aside. In our experience, other states that have incentivized integrated housing for intellectually and developmentally disabled persons have run into financial and operational challenges because applicants "chase the points" without the experience or funding sources to provide appropriate, sustainable services for the intended population. Supportive housing for persons with physical and mental disabilities should and can be integrated into larger affordable housing developments; however, it should be done so with careful consideration given to qualified service providers and the long-term commitment of appropriate resources. We believe such social services are most efficiently and successfully provided by qualified nonprofits focused on supportive housing for persons with disabilities.
138	**David R. Aming**	LHP	4/3/2018	7. Support of Project Amenities Options. By providing an assortment of equally weighted project amenities, developers are able to select amenities that might better suit the specific resident demographic at the proposed development. Having choices also helps make providing project amenities more financially feasible for existing projects without exceeding the LHC TDC limits.
139	**David R. Aming**	LHP	4/3/2018	8. Reconcile scoring. As a general note, the stated "maximum points allowed" in some scoring criteria does not match the individual points available for certain project characteristics/elections.

140	**David R. Aming**	LHP	4/3/2018	9. Apply discretion and flexibility in the 4% LIHTC I Tax-Exempt Bond program. Consider increasing the developer fee for non-competitive LIHTC projects from 15% to 20% or 25% to generate additional tax credits and private equity. The increased portion of the developer fee may be deferred and paid from available cash flow from operations. Other states such as TN, OH, KY and SC have implemented this strategy and dramatically stimulated new development through use of the 4% credits that otherwise wouldn't have happened. Consider waiving certain competitive underwriting and design criteria in the QAP for bond projects. Continue to allow existing LIHTC properties that are coming out of their initial 15-year compliance period to be released from the existing use restriction agreement and prior LIHTC commitments in order to be re-syndicated and preserved using new 4% LIHTC and tax exempt bonds.
141	**Ashley Wilson**	BGC Advantage, LLC	4/3/2018	We were not certain if it was the intention of the LHC to rehab projects ONLY, but new construction projects do not score very well under this QAP. This is a rehab heavy pointed QAP. IF this is not the intention of the LHC then you should consider adding some type of new construction points.
142	**Ashley Wilson**	BGC Advantage, LLC	4/3/2018	1) $2,500,000 Developer fee Cap per project. Capping the per project fee will result in restricted project size which will reduce efficiencies in development soft costs. The developer fee is used as a gap filler in many projects. If the developer fee is capped there is a reduction in soft funds and projects would need more HOME or CDBG from LHC. Leaving the developer fee uncapped means more deferred developer fees available for the project (more soft funds from project and less funds from LHC). This would support the QAP's intent to leverage more funds for the project. This cap would be most detrimental as applied to 4% transactions which are typically much larger than 9% transactions. Encouraging the development of smaller transactions by capping the fees would result in the same amount of rehab or new construction units being achieved with double or triple the costs as well as the time requirements of the LHC and Housing Authority staff. Developments would be forced to be in phases or divided into smaller projects which would drive up the fixed costs (i.e.. bond issuance and legal fees) per unit. Capped developer fees also impact funds that equity investors analyze as "available" for the project incase of cost overruns or issues that arise. The investors use this fee as potential funds during underwriting. The developer fees are USED in the transaction as gap fillers in many cases to make the project viable. Limiting them would limit he amount of feasible projects

143	**Ashley Wilson**	BGC Advantage, LLC	4/3/2018	2) “Additional Financial Support” Selection Criteria III D notes that this scoring item is intended to maximize credit efficiency. However, the list is limited to those funding sources for which only an “award” of funds can be evidenced. There are significant leveraged funds being recognized by Public Housing Agency projects by commissioning and receiving approval to use an Engineered Utility Allowance as opposed to a City-Wide utility allowance. We propose the recognized contract rent increases available from the decrease in utility allowances be accepted as “Additional Financial Support” in meeting this selection criteria threshold. The increased rents achieved over the contract term, which can be monetized by a commissioned Utility Study, effectively allow the project to leverage more debt thus also maximizing credit efficiency.
144	**Ashley Wilson**	BGC Advantage, LLC	4/3/2018	3.) Every funding round needs to include an appeal process. It is imperative that the challenge period occur BEFORE GRANTING AWARDS and that the results of the challenge should be used in creating the final project ranking and making of awards.
145	**Ashley Wilson**	BGC Advantage, LLC	4/3/2018	4.) PSH. If the state is divided into service areas by the state entities, all areas of the state should have the opportunity to received housing and supportive services. LHC should consider omitting the request for PSH. If LHC wants to support partnering for services, then allow developments to take the points and have the responsibility to coordinate referrals from the nearby agency. (when working in Tensas there was no : active agency, but we reached out to the agency to give referrals and they were so excited to possibly have this housing a resource in their service area. They had never had a PSH referral because they had never worked on a project for their area.) LHC is being limited by deciding where and what areas get the PSH points. If the project can target 20% and 30% AMI then they should able to self designate they will serve the PSH referrals. (MS was researched as idea state when LHC staff attend conference. In MS they self select the points and have the responsibility for coordinating with Mental health service provider to get referrals to fill these units.
146	**Ashley Wilson**	BGC Advantage, LLC	4/3/2018	5.) What are the new high opportunity areas going to be and how is LHC going to incorporate those into this QAP? Will this complement the geographic diversity? Will we know what those new opportunity zones areas are before the final QAP? Are they do at the end of April? We think that LHC should offer the discretionary basis boost be afforded to projects being developed/rehabbed in these opportunity areas.
147	**Ashley Wilson**	BGC Advantage, LLC	4/3/2018	6.) Allow rental assistance to be used as a additional financial support. In previous QAPs it was allowed. This will help lower income rent areas and rural communities with rental subsidy gain leverage support points. 7% of total project costs is a lot to leverage for a small rural deal that is about $12 Million (TDC). That would mean a project in Newellton with $12 Million TDC would have to leverage $840,000 in funding outside of counting a HAP contract. (Tax abatement and other leverage finance).
148	**Ashley Wilson**	BGC Advantage, LLC	4/3/2018	7.) If the QAP wants to give points for areas with no tax credits in a certain period of time, then why not give the points for new construction to go along with the areas with no tax credits. How would you find the projects to rehab if there hasn't been anything built?
149	**Ashley Wilson**	BGC Advantage, LLC	4/3/2018	8.) Market study. Allow the developer to order their own market study. It would save the LHC time and effort and developers can determine if bedroom mix and AMI targets are in line with market need. Additionally, if the project is an RD project there are specific items that RD requires which are not being provided in the market studies being ordered by LHC thus requiring the project to incur additional costs in having the studies revised or completely redone to meet these requirements.

150	**Ashley Wilson**	BGC Advantage, LLC	4/3/2018	9) Minimum Scoring for a 4% Transaction. We are not in support of ANY minimum scoring requirement for these non-competitive transactions. If there must be a minimum we strongly recommend that the 60 point minimum be evaluated in lieu of eligible points in this funding round and reduced.
151	**Ashley Wilson**	BGC Advantage, LLC	4/3/2018	10) Syndication Efficiency Scoring. We are NOT in support of these points. The market is going to dictate the price. These points will invite developers to make commitments they can never live up to. Will there be any follow up as the projects close?
152	**Ashley Wilson**	BGC Advantage, LLC	4/3/2018	11) Debt Service coverages of 1.40 to 1.15. This doesn't always work. In some cases deals have very low rents in comparison to operating costs which can cause DSC to drop sharply over a 15 year period. You MUST start with a DSCR higher than 1.40 to stay above a 1.15 through the entire compliance period. These deals often require soft sources of funding which will be paid at higher cash amounts in the period of higher DSCR and lower payments as the calculation trends down. An average over the period is a much better gauge of project stability.
153	**Ashley Wilson**	BGC Advantage, LLC	4/3/2018	12) The Selection Criteria scoring item IA(ii) in the draft currently REQUIRES that any project being awarded points for a high income census tract have at least 40% market rate units. We are NOT in support of this requirement. There is already a selection criteria item that a developer can choose if they feel a mixed income project is the best choice for a particular project location. If the market study supports the number of affordable units in a proposed project location we ask that LHC accept this determination rather than mandate a specific number of market rate units. This requirement would be most detrimental in a rural market that would not likely be able to achieve "market" rents high enough to finance that portion of the project not eligible to deliver tax credits. This would in turn require that a project have a substantial amount of soft funds which are scarce in a rural market.
154	**Jim Daniels**	Partners South	4/3/2018	1. Tax-Exempt Bond Financing and 4% Housing Credit a. The minimum score of sixty (60) points for 4% bonds deal should be deleted. Minimum threshold requirements have been established within the QAP. These threshold requirements should be the only benchmark to qualify for 4% credits.
155	**Jim Daniels**	Partners South	4/3/2018	2. Developer Fees a. Developer fees should not be capped for 4% bond deals. The cap has been established within the QAP at 15%. b. Developer fees should not be capped for 4% bond deals utilizing soft funds such as CDBG
156	**Jim Daniels**	Partners South	4/3/2018	3. Choice Neighborhood (CNI) a. The 2018 QAP proposes the complete elimination of the scoring category for proposed, LIHTC developments within the CNI areas; The 2017 QAP included ten (10) points. LHC should include CNI points (at some level) to continue to support LIHTC developments within CNI areas in recognition of additional funding and leverage created by Federal, state and local resources. b. While there are three, CNI areas located within the State, all developers (both market and affordable) have the opportunity to participate in various development opportunities created by this community redevelopment designation. Therefore, the CNI scoring category and subsequent points does not unfairly advantage or exclude participation from other LIHTC developers.

157	**Jim Daniels**	Partners South	4/3/2018	4. Developer Experience – New Developer a. The proposed, “new developer” threshold requirements should be deleted. Partners Southeast is an experienced developer with multiple communities developed in partnership with LHC; however, LHC should encourage greater participation for credible, development organizations willing to partner to provide affordable housing throughout the State. This new threshold creates a barrier that did not previously exist. The tax credit equity provider or syndicator will thoroughly vet and underwrite the developer to properly assess and mitigate risk associated with tax credit development. Therefore, it would be duplicative and prohibitive for LHC to impose additional, threshold criteria for potential affordable housing partners.
158	**Rachel M Thomas**	CREA, LLC	4/3/2018	Category D: The Leverage Ratio appears to be a selection criterion that is incentivizing/prioritizing transactions that either contain a more diverse financing stack (soft sources, increased DDF, etc.) or those that have a higher hard debt leverage. In addition, this calculation would result in more points for developments
159	**Rachel M Thomas**	CREA, LLC	4/3/2018	Category E: The Syndication Efficiency ratio selection criterion appears to be incentivizing/prioritizing projects that have a more bridged equity structure and higher PPC for equity submitted with the application. The primary issue with incentivizing PPC contained within an application with points is how this point category will be maintained through placement with an investor. Pricing is always subject to current investor market conditions. PPC could fluctuate from the point of application to award to closing. How will this point category take this variability into account? While I agree with the underlying motivation behind these two changes, I do feel there is a middle ground to be discussed that allows for an effective functioning of the investor market and fiduciary responsibility of LHC.
160	**Chase Dudley**	Barron Lane, LLC	4/3/2018	1. Section III E. – 30% Basis Bump Up Determination for Rural Area Projects/Developments was highlighted as a change at the latest board meeting. I have two comments to better implement this strategy to allow developments to be funded outside of QCTs and DDAs. 1) Consider allowing those Rural Area Projects that qualify for a basis bump to also qualify for Selection Criteria Item 1.B. Redevelopment. In previous years only QCTs qualify and if you want developments outside of QCTs funded in these rural areas, I believe this change is needed. Without those points, a development in a non-QCT Rural Area will not score competitively. Also, this should benefit those Parishes under the Selection Criteria III C. Gov Priorities since most of those parishes lack QCT coverage. 2) Consider removing the 2018 added language for Redevelopment Projects to also ‘be located in a Concerted Community Revitalization Plan’, again if you are trying to fund more Rural Area developments throughout the state it will be very difficult to find a small town, city, or community that has the resources to have a Concerted Community Revitalization Plan.
161	**Chase Dudley**	Barron Lane, LLC	4/3/2018	2. Consider adding more items to V. Project Characteristics D. Project Amenities. Possibly add Gazebo, covered bike rack area, Site WiFi, Outdoor Fireplaces, Outdoor Ping Pong Area, Outdoor Dog Park area with vinyl fence, etc

162	**Chase Dudley**	Barron Lane, LLC	4/3/2018	3. VI. C. – I would discourage deferring developer fee. Investors want to see the deferral paid back within the compliance period and this must come from the operating costs / rents if not paid by investor equity. The idea in tax credit equity is to take the burden off the tenant and this has the reverse effect.
163	**Chase Dudley**	Barron Lane, LLC	4/3/2018	4. VI. E. – This is an interesting section and I would advise against doing something like this. What is the repercussion if the credits are not sold for what was promised? Yes, we and you would like to see more dollars for the tax credit, but the risks may outweigh the reward. The market has been so inconsistent since 2007, would hate to see investors mid-way through construction pull out because of a changing market and unbearable promises. Also, this could be subject to manipulation by covering more of the syndicators expenses. In Tennessee, THDA limited developers to a max of $85 cents per credit this year due to all the highs and lows of Tax Credit Market. $0.85 equals 2pts of a 6-point item. I warn against this scoring item.
164	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	1. The NHT funds are stated to be applicable to projects competing in the 30% AMI pool but there is no such pool. Please make these available to the highest scoring application that meets the criteria for B (i) (a).
165	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	1. We recommend allowing a challenge period once applications are rated as has been done previously,
166	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	2. We recommend allowing points for projects located in a Choice Neighborhood Implementation area as these are priorities for both the federal and local governments and rely on LIHTC funding to complete the program obligations to HUD.
167	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	3. We recommend including Infill housing as a criteria for points as has been done in the past and allowing new construction on urban vacant lots to be treated as blighted areas worthy of points.
168	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	4. We recommend that 1 point is deducted from each negative neighborhood feature as opposed to prohibiting the development of a project that is in the vicinity of such feature. Some features listed as negative may in fact be well built and operated and offer employment to residents. All are not automatically a deterrent to quality housing.
169	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	5. We recommend that the developer fee is allowed as provided by code as opposed to placing a cap on the fee.
170	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	6. We applaud the increase in the credit cap and believe it will be especially helpful for the development of new housing in urban areas.
171	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	7. We recommend that low income loans, grants, historic tax credits, and other sources of financing be exempt from the TDC calculation just as HUD exempts non-housing authority funding from its calculation. Only LITHC funds should be considered in this equation.
172	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	8. We recommend allowing points for community facilities and amenities that are in close proximity to the development and for those that are uniquely provided for the development as in the case of being built in a prior phase the a multi phase development. It is not cost efficient to provide community facilities in multiple phases of a project when facilities and amenities can be shared.
173	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	9. We recommend adding a criteria to award points for new construction and an even higher number of points if the new construction will return under-utilized or blighted property to commerce; replace demolished affordable and public housing and complete a multi-phase project.

174	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	10. We recommend adding a criteria to allow points for building subsequent phases of housing that complement and complete a multi-phase project with prior LIHTC awards.
175	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	11. We recommend that one point is awarded to each Project Amenity as opposed to awarding 2 points per 3 amenities. We also recommend adding tot lots, gazebos, small pocket parks and other green amenities to the list. The list now is weighted toward sites with large acreage and excludes developments planned on small parcels of land.
176	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	12. We recommend that new construction of public housing units that are built to replace previously demolished public housing units qualify for Preservation Priority Project points. In some cases PHA's have an obligation or commitment to HUD to replace demolished public housing units. These are as much a preservation of affordable housing effort as those efforts allowed for existing units identified in the draft QAP.
177	**Judith Jones Moran**	McCormack Baron Salazar, Inc.	4/3/2018	13. We recommend that the minimum unit sizes remain unchanged from the 2017 QAP. Projects that can afford to build larger units are not penalized for doing so while the requirements of the draft 2018 QAP create a hardship for developing new units given the TDC constraint, green building requirements and other factors.
178	**Kerry Banks**	Rural Rental Housing Association of La	4/3/2018	• Redevelopment Project o There is added language requiring that a "Distressed Property" be located in an area that is part of a Concerted Community Revitalization Plan. There are no such Concerted Community Revitalization Plans in the rural areas that we serve. These Concerted Community Revitalization Plans are typically associated with urban areas/communities. We would request the LHC consider keeping the same requirements for the Redevelopment Project as 2017. Attached are the comparisons.
179	**Trey Williams**	Integral	4/3/2018	• The draft QAP is heavily weighted towards the rehabilitation of existing housing stock. In addition to a set-aside, there are at least three different scoring categories that award points solely to existing properties. While some existing housing should be preserved, some is functionally obsolete, and it is more efficient to replace it with new construction. In addition, new construction can be used to maximize density and provide more affordable units that an existing property. o Include replacement of functionally obsolete housing as a 4 point category under I.D. o Affordable units can be preserved through new construction if the new construction is specifically built as replacement units for existing units that are to be demolished. New construction should be eligible for points under I.F. o Points should be returned for new infill projects that bring additional affordable housing units while utilizing existing infrastructure.
180	**Trey Williams**	Integral	4/3/2018	• 4% Deals should be required to meet threshold without needing to reach a minimum score
181	**Trey Williams**	Integral	4/3/2018	• Developer fee in 4% deals should not be further capped than previously

182	**Trey Williams**	Integral	4/3/2018	• The CNI points should be reinstated as the CNI requires strong community involvement and commitment, and can leverage additional resources to combine with those of LHC. Although there are currently only three cities that would benefit, others have the ability to apply and may be incentivized to do so with the re-insertion of these points. There are other points that are only available to some communities in the 2018 draft QAP.
183	**Chris Clement**	HRI Properties	4/3/2018	1. In regards to Section V.(D.) (2.)(a.) "Minimum Square Footage and Full Bathrooms Per Unit Type," we offer the following: Minimum Square Footage and Full Bathrooms Per Unit Type Maintain the 2017 QAP's Minimum Square Footage per Unit Type for the 2018 QAP. Increasing the minimum square footage per unit type for the Draft 2018 QAP would require larger unit areas than are supp01ted by demand in the housing market. Mandating larger minimum unit areas reduces the financial and physical design efficiencies of a project while arguably providing little benefit in terms of fulfilling unmet market needs to offset or justify the increased costs.

184	**Chris Clement**	HRI Properties	4/3/2018	2. In regards to Section V.(D.) (2.)(c.) "Maximum Unit Development Cost," we offer the following: Maximum Unit Development Cost Reintroduce the 2017 QAP's "Maximum Average TDC per Unit by Development Type," for applicable TDC limits and the exclusion of "Government Grants, Historic Syndication Proceeds and Certain Other Funds," in TDC calculations for the 2018 QAP. In lieu of the "Maximum Average TDC per Unit by Development Type," through which recent QAP's have set development cost limits, the Draft 2018 QAP establishes its TDC limits based on the HUD 2017 Unit Total Development Cost Limits. Further departing from recent QAP standards, the Draft 2018 QAP does not allow for calculation of the TDC as adjusted to exclude, from both TDC and basis calculations, governmental grants, historic tax credit proceeds, and certain other funds. Not representing a direct and comparable translation of the TDC limits from HUD's program administration to that of the general LIHTC program, these changes to TDC and TDC limits create prohibitively low cost limits likely to preclude adherence by most development types. The HUD 2017 TDC Limits are applied to HUD funded projects and restrict only the HUD/public housing funding sources spent per public housing unit in a development so are not intended to dictate maximum costs when including additional sources of private and other government funds in TDC calculations. Applying the HUD TDC limits to the unadjusted TDC of a LIHTC project would create an artificial and unrealistic standard against which any comparison would be inconsistent at best. Similar to the applicability and intent ofHUD's TDC limits to maximize leveraging ofHUD funds used in HUD projects, reintroducing the adjusted TDC calculation allowed by previous QAP's offers LHC a means to ensure a desired level of housing production resulting from the State's LIHTC resource while also acknowledging that the procurement of additional funding sources should not be penalized by restrictive cost constraints, but rather facilitated by TDC calculations that allow for maximum leveraging of each LIHTC dollar to create projects of the highest quality, service, and benefit to the tenants and communities in which they reside.

185	**Chris Clement**	HRI Properties	4/3/2018	3. In regards to Sections V.(D.) (4.)(c.) "Profit Limits," we offer the following: Profit Limits Remove the fee limit capping developer fee at $2,500,000 per project. By setting an arbitrary limit on developer fee, the Draft 2018 QAP establishes a restriction that may be considered redundant given other QAP policy and perhaps punitive to certain development types. In defining LIHTC project limits and TDC limits per unit, the QAP generally dictates a typical range of project type and scale for that specific funding cycle. Placing an additional limit on allowable developer fee in effect establishes a maximum project TDC upon which fee can be generated so appears to similarly dictate project type and scale, but in doing so discourages developers from maximizing leverage of LHC resources to undertake larger projects with more affordable housing production or those addressing public policy goals in addition to housing (economic development, historic preservation, energy efficiency, etc.). Limiting allowable developer fee does not acknowledge that with projects of greater scale, costs, and/or public benefit comes also greater effort, financial exposure, and long-lasting personal/corporate guarantees. Restricting developer fee to below that otherwise permissible as standard (15% of Developer Fee Base plus 5% or 8% of Acquisition Cost Base) removes incentive built in to the LIHTC program to attract developer participation while providing for no additional cost control tool that isn't already included elsewhere in the QAP.

186	**Chris Clement**	HRI Properties	4/3/2018	4. Within Selection Criteria and Evidentiary Materials, Section I.(D.), we propose the following: Selection Criteria I.(D.): Construction Type Increase the point selection for "(ii) Historic Preservation" in keeping with required consideration for such project types under Section 42(m). To establish the required priority, increase available points for Historic Preservation to ten (10) points. Section II.(A.): "Requirements of the QAP" confirms the Section 42(m) required Selection Criteria preference in consideration of "Historic properties." As cunently drafted however, Selection Criteria I.(D.) allows the same score selection for Historic Preservation project types as it does for potentially similar, but not Historic, project types. By providing for equal or potentially greater scoring incentives to projects that are non-historic, Selection Criteria I.(D.) deemphasizes the value of preserving a certified historic property so does not ensure Historic Preservation priority for developments that may be otherwise identical.

187	**Chris Clement**	HRI Properties	4/3/2018	5. Within the Selection Criteria and Evidentiary Materials, Section I.(F.), we propose the following: Selection Criteria I.(F.): Preservation Priority Project- Revise the Selection Criteria to restore consistency with the referenced definition of "Preservation Property." As prescribed by the QAP definition of Preservation Property, LIHTC developments, in or beyond the last year of the Compliance Period, should be included within the same scaled scoring used for units with federal rental subsidy or Project Based Section 8 based on percentage of affordable units provided and preserved. A development selecting points as a Preservation Priority Project must meet the QAP definition for Preservation Property. Through this definition, the QAP specifically identifies development types which accomplish preservation of affordable housing and affitms that such developments, "Will receive a preference in funding ("Preservation Priority"). Specified by the QAP as a Preservation Property type and thus entitled to this funding preference are those that: "Have a previous allocation of low-income housing tax credits in which the first year of the Credit Period was 1999 or earlier and be in or have completed the final year of the Compliance Period for all buildings within the development." [QAP Glossary: Preservation Project; Pg. A-19] Absent inclusion of all the development types identified by the QAP as Preservation Properties which are thus entitled to "Preservation Priority," the Selection Criteria I.(F.) contradicts the QAP's stated preference and intent to incentivize the preservation of certain affordable housing types.

188	**Chris Clement**	HRI Properties	4/3/2018	6. Within the Selection Criteria and Evidentiary Materials, Section IV.(A.)(ii), we propose the following: Selection Criteria IV.(A.)(ii): Negative Neighborhood Features Revise the QAP with one or more of the following: (a) establish very specific definitions for each of the Negative Neighborhood Features; (b) provide a mechanism to identify, discuss, and appeal any finding of potential negative features prior to application submittal; or (c) eliminate the disqualification of an application if determined by the market analyst to be within Yz mile radius of a negative feature. Given the severity of consequences under this threshold, the subjective nature of determining negative features as cunently defined, and the timing of identifying negative features within the application process, the implementation of this new policy, while well-intentioned, may create confusion, inequity, and disagreement within the QAP process.
189	**Chris Clement**	HRI Properties	4/3/2018	7. Within the Selection Criteria and Evidentiary Materials, Section III.(C.), we propose the following: Selection Criteria III.(C.): Government Priorities Add an additional project location priority "(iv)" for projects located in a Parish identified as one of the Great Floods of 2016 "HUD Most-Impacted" Parishes: Acadia, Ascension, East Baton Rouge, Lafayette, Livingston, Ouachita, St. Tammany, Tangipahoa, Vermillion, and Washington. To acknowledge and address the ongoing affordable housing needs in Parishes most impacted by the Great Floods of 2016, the addition of this Governmental Priority two (2) point selection is consistent with the other Priority Parishes identified and prioritized by the Draft 2018 QAP as those with specific affordable housing needs.

190	**Chris Clement**	HRI Properties	4/3/2018	8. Within the Selection Criteria and Evidentiary Materials, Section VI.(E.), we propose the following: Selection Criteria VI.(E.): Syndication Efficiency Revise the Selection Criteria to narrow the ranges of Efficiency for each of the scoring selections. To better reflect cunent post tax reform credit pricing, nan·owing the ranges of Syndication Efficiency selections from $1.00 increments to $0.50 increments would refine the differentiation of Syndication Efficiencies to be consistent with the range of actual credit pricing likely to be available. This revised scale could read as follows: (i) Less than $8.00 (ii) $8.00 to $8.50 (iii) $8.51 to $8.99 = 0 points = 1 point = 2 points (iv) $9.00 to $9.50 (v) $9.51 to $9.99 (vi) $10.00 or more = 3 points = 4 points = 5 points
191	**Rene Crescionie**		4/3/2018	My question is what year would be would considered an existing LIHTC property. 11-15 yr, 16 , or any year up to it's extended affordability agreement? (to receive the 8 points)