



Alembic Community Development  
Alliance for Affordable Energy  
A Shared Initiative, Inc.  
Associated Neighborhood Development  
Broadmoor Improvement Association  
Capital One  
Center for Planning Excellence  
Committee for a Better New Orleans  
Crescent Care  
Crescent City Community Land Trust  
The Data Center  
Enterprise Community Partners  
Finance Authority of New Orleans  
First NBC Bank  
Foundation for Louisiana  
GCR Inc.  
Global Green USA  
Greater New Orleans Foundation  
Green Coast Enterprises  
Greater New Orleans Fair Housing Action Center  
Greater New Orleans, Inc.  
Gulf Coast Housing Partnership  
Harmony Neighborhood Development  
Healthy Start New Orleans  
Housing Authority of New Orleans  
Iberia Bank  
Jericho Road Episcopal Housing Initiative  
Jerusalem Economic Development Corp.  
JPMorgan Chase Bank  
Louisiana Appleseed  
Louisiana Association of Affordable Housing  
Providers  
Louisiana Association of Nonprofit Organizations  
Louisiana Homebuyer Education Collaborative  
Louisiana Housing Alliance  
Louisiana Housing Corporation  
Lowermine.org  
Lower 9th Ward Homeownership Association  
Lower 9th Ward NENA  
Make It Right  
Neighborhood Assistance Corporation of  
America  
Neighborhood Development Foundation  
Neighborhood Housing Services  
NEWCITY  
New Orleans Area Habitat for Humanity  
New Orleans Redevelopment Authority  
NO/AIDS Task Force  
Northshore Housing Initiative  
Office of Housing Policy & Community  
Development  
Operation Comeback  
Perez, APC  
Pontchartrain Park CDC  
Practitioners Leveraging Assets for Community  
Engagement  
Preservation Resource Center  
Project Home Again  
Project Homecoming  
Providence Community Housing  
Puentes New Orleans  
Rebuilding Together New Orleans  
Redmellon  
Renaissance Neighborhood Development Corp.  
Renaissance Property Group  
Service Providers and Professionals Association  
Southern United Neighborhoods  
St. Bernard Project  
Tulane/Canal Neighborhood Development Corp.  
UNITY of Greater New Orleans  
Urban Focus  
U.S. Department of Housing and Urban  
Development  
Volunteers of America  
Whitney Bank  
Whodata.org

August 27, 2015

Louisiana Housing Corporation  
2415 Quail Drive  
Baton Rouge, LA 70808

Re: Recommendations for 2016 Qualified Allocation Plan

Dear Board members:

The Greater New Orleans Housing Alliance (GNOHA) commends the efforts of the Louisiana Housing Corporation to maintain outreach and dialogue with members of the housing sector during the creation of the 2016 Qualified Action Plan for the Low-Income Housing Tax Credit Program. GNOHA is a collaborative of non-profit and for-profit affordable housing builders, homebuyer education providers, and community development corporations working together to support the building of workforce housing in the Greater New Orleans area in an ethical and efficient manner. Since its creation in 2007, GNOHA has advocated for the preservation and production of affordable housing with a special emphasis on the needs of the most vulnerable in society - seniors, people with disabilities, veterans, low-wage workers and low-income families. It is with great gratitude towards these efforts that GNOHA submits its recommendations, questions and comments for the 2016 Draft QAP.

#### 1. Project and Developer Limits

##### ➤ **Increase from \$750,000 to \$1,500,000.**

- Allows developers to employ more sustainable design features in their projects.
- Makes historic preservation projects more feasible.
- Makes preservation of existing affordable housing more practical.

#### 2. Energy Efficiency and Green Building

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

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



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

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

We hope you receive these comments constructively as a means to improve the success of the LIHTC Program and the efficiency in which it is implemented. We believe our stated recommendations support the LHC’s goals for the 2016 QAP, including emphasis on quality projects and preservation of existing affordable housing. We look forward to your feedback and further engagement with members of the housing sector.

Sincerely,

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