



June 11, 2019

Office of Community Development
City of New Orleans
1340 Poydras Street – 10th Floor
New Orleans, LA 70112

Dear Donna Pearson,

The Greater New Orleans Housing Alliance (GNOHA) appreciates this opportunity to provide feedback regarding the 2019 Consolidated Action Plan. This is important to us because, according to HousingNOLA's 2019 Semi-Annual Report, we are still deep into an affordable housing crisis with 61% of our renters cost-burdened. Furthermore, new unit production, housing preservation and voucher utilization are off pace. GNOHA strongly believes, that in order for OCD to refocus and continue its commitment to improve processes that increase production efficiency and organizational capacity amongst itself, government partners, and non-profit organizations, it must Put Housing First and make addressing the city's affordable housing crisis its number one priority.

The following are recommendations for areas that OCD should direct its operations towards:

1. The City should use more of its revenue to fund the creation of more affordable housing opportunities.

It is not likely that the city will be able to dig itself out of the housing crisis without dedicating more of its own revenue toward affordable housing, and utilizing the varieties of funding sources available. New Orleans must create a dedicated source of funding for the Neighborhood Housing Improvement Fund (NHIF) beyond the current sources. The City could still use fees and tax revenue generated by short term rentals to support more affordable housing opportunities.

The City should also consider directing more of its allocation of Community Development Block Grant (CDBG) funding toward housing. We applaud the dedication of CDBG funds to create a soft second program, but more is needed. The City should not use any NHIF funding for things like Code Enforcement.

2. The City should use locally generated city revenue to supplement and leverage federal funds for housing oriented solutions proven to reduce and prevent homelessness.

These should primarily include Rapid Re-housing rental assistance and case management targeted for homeless people. It should also include the creation of a Rapid Resolution Fund so that people having housing crises are prevented from becoming homeless.

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

3. The City should provide more funding for housing and supportive services for New Orleans Fostered and Homeless youth.

Currently, the city does not provide enough funding to help the high number of fostered and homeless youth in New Orleans, and they are often grouped in with other categories of homelessness—stretching already scarce resources. They are the future of our city and we believe that more funding should be dedicated to addressing their needs specifically. They are at a high risk for experiencing the devastating outcomes caused by a lack of support, and this is usually due to circumstances entirely out of their control. We ask the city to make it a priority to provide our fostered and homeless youth with more opportunities to not only survive, but to thrive.

4. The City should advocate for more state and federal funding.

The City should advocate for a state dedicated revenue source for the Louisiana Housing Trust Fund (LHTF), and also continue to advocate for Community Development Block Grant and HOME funding, which have been essential funding sources for affordable homeownership and rental opportunities in New Orleans. The LHTF would help communities meet the growing demand for affordable and accessible housing which would benefit many of Louisiana's hardworking families, seniors, disabled persons, returning veterans and persons experiencing homelessness. New Orleans doesn't receive much state funding, but with 47% cost-burdened for renters and homeowner's, New Orleans ranks second for cost-burdened parishes. The City needs to continue to seek state and federal funding for affordable housing opportunities.

5. The City should aim to coordinate more effectively with the Louisiana Housing Corporation.

The Louisiana Housing Corporation has released the Qualified Action Plan on a consistent basis for the past three years. The City should better coordinate the release of its NOFAs so the process can be more streamlined and efficient for developers. The City should monitor affordability periods from the LHC and work with them to extend the affordability period for developments that are expiring soon. If unable to extend, the city should advocate for the LHC to sell to developers willing to extend or for its own purchase with the intent to extend. While affordability periods are ending, we have to put housing first for residents as the need has not changed.

6. The City should create two NOFAs.

The City should create two NOFA's because developers usually have to wait until the LHC releases the QAP for New Orleans to announce their NOFA's. We understand the reasoning behind this, but every developer doesn't have a development that's tied into tax credits. The City should create a NOFA that's tied to the QAP for developers involved in tax credit deals, and another NOFA for developers that aren't. This allows for more development and opportunities for the city to invest more proactively in developments.

7. The City should commit to provide funding for homeownership opportunities for low and moderate income individuals for the next two years.

The City should commit to funding homeowner assistance programs for at least two years, and identify a dedicated source of revenue for the soft-second mortgage program. We suggest the city should go back to its pre-Katrina budget of \$2 million annually for soft-seconds.

There is also a need for consistent investment in the creation of homeownership opportunities. Last year's \$11 million NOFA excluded homeownership. Construction costs make it almost impossible to build homes and sell them without buyer AND developer subsidy. Soft Seconds could be paired with funding for development projects built for low- to moderate-income residents. It could also be staggered to a point where the city makes the commitment to pay once the units are online instead during the pre-development phase.

8. The City should secure more funding for homebuyer education.

The City should apply for grants to support Homebuyer's Education in New Orleans. It is important that the City continue to provide funding to sustain and build local homeownership programs that will educate and prepare residents for potential homeownership. Homebuyer education is key to helping potential homebuyers better understand the costs, complexities and responsibility of homeownership that will make them successful, long-term owners.

9. The City should work with developers on green infrastructure implementation.

We are thankful that the City is working on its relationship with water and becoming a more resilient city. However, construction costs are up and subsidies as well as additional funding are down, particularly for smaller developers. New Orleans is facing an affordability crisis, so developers who plan to build affordable housing should be better supported in their green infrastructure and energy efficiency implementation. The City should advocate for appraisers to take a proactive approach when valuing homes that have green infrastructure and energy efficiency built in. The City should also work with developers to increase storm water management features. The OCD should work with the Office of Resilience and Sustainability to provide investments and/or allowances for smaller developers to build with resiliency and sustainability in mind.

We thank you for your consideration, and please feel free to contact me at 504.224.8301 or amorris@gnoha.org with any questions.

10. The City should work closely with the Office of Human Rights and Equity to improve its language access plan.

As the Office of Human Rights and Equity assesses, develops, and improves language access materials across city departments to better support our limited English proficiency residents, OCD should work closely with them to ensure that language access is improved as it pertains to housing. New Orleans has a high population of LEP individuals, particularly for Spanish, Vietnamese, and its growing population of Arabic speakers. The city should create goals for translating and transcribing important text that will help all residents navigate New Orleans' affordable housing crisis.

Thank you for your consideration, and please feel free to contact me at 504.224.8301 or amorris@gnoha.org with any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andreanecia Morris".

Andreanecia Morris
President/Chair, Greater New Orleans Housing Alliance

cc: Marjorianna

Ellen Lee, Director of Community and Economic Development