Mr. Rakowski,

Following are my comments regarding the QAP draft.

Section 4 – Set aside Categories.  While the need is great across many demographics, those most in need are the homeless and unstably housed.  That category, Supportive Housing, should receive a higher allocation than 12.25% of the LIHTC available.  Indiana saw a 10% increase in homelessness from 2022 to 2023  (Indiana University)  Supportive housing is well known to be the most successful and cost effective program addressing homelessness.

Page 28 – Wetlands.   A blanket prohibition of a site containing Zone A or B is not reasonable.   Site topography can vary greatly.  A site plan illustrating that wetlands are unaffected by the development should suffice.  If the FIRM indicates wetlands, a delineation report should be required.

Page 47 – Accessibility requirements.    The draft is pasted below.

*E. Accessibility Requirements for Age-Restricted Developments and Housing First Set-aside: In addition to the minimum accessibility requirements in Part 5.4(D) above, the following additional accessibility requirements apply to all age-restricted (55+ or 62+) developments and to all supportive housing developments competing in the Housing First set-aside. • For New Construction: o All common areas must be accessible. o 100% of the units must be Type A or Type B units in accordance with Chapter 10 of the ICC A117.1. Exception: for integrated supportive housing developments in the Housing First set-aside, the percent of Type A or Type B units must equal or exceed the percent of supportive housing units.*

Here is my interpretation of this rule:   Example:   For a 40 dwelling unit integrated housing development project with 10 supportive units and 30  LIHTC units, all the supportive units must be Type A or B units and a total of 10 LIHTC units must be Type A or B units, leaving 20 LIHTC units that are not Type A or B units.

Page 48 – Reduce square footage requirements, but have some requirements.

Page 68  Infill New Construction.  Are these two statements in conflict?

*Infill new construction is defined as developing vacant or underused parcels of land within areas that are already*

*largely developed or previously developed.*

*The site must have had a previous residential or commercial (non-agricultural) use.*

Particularly in small and medium sized cities and towns you will find land that is surrounded by development, yet has never been developed.   Therefore, it has never had a previous use.  Maybe just delete the previous use sentence.

Also page 68, if a site needs to extend existing utilities a short distance along an existing road/right of way, is that still considered using existing utilities?  There could be many instances where it makes sense to do a short extension to best serve the development.

Page 74 Sustainable Development Characteristics.    Certification from the design professional /architect of record the project was designed to meet the stated standard and that to the best of their knowledge and belief was constructed in accordance with the plans and specifications should suffice.

Page 97 – Previous Supportive Housing Institutes.   Only 3 points for participating in the Institute?   Really?   Should be at least double that amount.

Thank you

Brent Martin