



COMMONWEALTH DEVELOPMENT CORPORATION

2501 Parmenter St., Suite 300B

Middleton, WI 53562

www.commonwealthco.net

February 3, 2025

Alan Rakowski

Indiana Housing & Community Development Authority

30 S. Meridian Street

Indianapolis, IN 46204

Re: 2026-2027 Draft 1 QAP Comments (Via email)

Dear Mr. Rakowski:

Thank you for allowing Commonwealth Development Corporation (CDC) the opportunity to comment on the first draft of the 2026-2027 Qualified Allocation Plan. We offer the following comments and suggested modifications:

Positive Changes:

5.4(F) – The removal of minimum unit sizes and instead defaulting to local code is a positive change.

6.2 (H) – The removal of “disaster affected” and addition of “condemned” is a positive change and will increase the incentive for developers to redevelop unsafe buildings.

6.5 (E) – CORES certification – the removal of points for a CORES certification is a positive change, as it is a costly certification.

6.5 (E) – Onsite Daycare/After School Care/ Onsite Adult Day – The removal of this section of the QAP is a positive change. This is not an effective use of the limited tax credit resources.

Suggestions for modification:

6.2 (F) – Infill – Previous agricultural use should not disqualify a site from qualifying for infill. Infill should require development on multiple sides and utilities in place. Please also provide clarification whether a parking lot that otherwise meets these criteria but is/was not used for commercial or residential purposes would qualify, as well as a formerly industrial site.

6.2(I) – Revitalization Plan AND 6.3 (C) – These scoring metrics cancel each other out, because developments can only receive points for 6.2(I) if QCT and only for 6.3 (C) if not a QCT. The reason for



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this is unclear. Developments that fall into a revitalization plan should receive points regardless of QCT status.

6.2 (K) – High Speed Internet – This scoring metric has become essential to receive funding, and it puts strain on development expenses. Most providers offer low or no cost options for residents, and developments could commit to helping residents obtain access to this rather than covering the cost.

6.3 (G) – Leveraging READI – additional flexibility for programs other than READI should be allowed in this category. Marion County/the Central region does not have any READI funds available. If a developer can identify other sources of gap financing that should earn the same number of points.

Once again, we appreciate the opportunity to provide these comments. Should you have any questions about this please feel free to contact me at 219-730-3754 or c.kimmel@commonwealthco.net.

Sincerely,

Caroline Kimmel

VP of Development

Cc: Dan Kroetz, Senior VP of Development, Commonwealth Development

Matt Rayburn, Indiana Housing and Community Development Authority