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February 6, 2025

Director of Real Estate Allocation
Indiana Housing & Community Development Authority
30 S. Meridian Street, Suite 900
Indianapolis, IN 46204

RE: Comments on 2026-2027 Qualified Allocation Plan – Draft #1

Dear Mr. Rakowski

Thank you for affording partners the opportunity to comment on the draft QAP. We applaud IHCD for the changes and revisions made from prior QAP as these will help simplify the application and project execution process. Which will hopefully lead to quality and competitive applications statewide.

Section 4: Set-Aside Categories

- 4.1: Qualified Nonprofit- added language about required capacity, independence, and activities of the nonprofit organization

TTG DEVELOPMENT RESPONSE: We strongly applaud IHCD efforts made to ensure that true nonprofit developers and community organizations are given an equal and fair opportunity to compete for funding opportunities.

- 4.3: Development Location- updated population definitions for Large City vs. Small City

TTG DEVELOPMENT RESPONSE: We would encourage IHCD to reconsider the sizeable jump in population size for the Small City Set-Aside. Increasing the threshold definition number by nearly 20,000 will increase the number of communities statewide that qualify under the set-aside substantially. Far more communities qualify under this set-aside than Large City. Which will make it much more competitive, especially given many of these communities struggle to compete given the lack of resources available at the local level to contribute to projects.

Section 6: Scoring Criteria

- 6.2(F): Infill New Construction- reworked scoring category

TTG DEVELOPMENT RESPONSE: Given that the QAP scoring categories of Opportunity Index and Housing Needs Index tend to favor more suburban and rural underdeveloped areas, continuing to exclude former agriculture land from points under infill Development does not make sense. This categorical exclusion impacts rural development and suburban development potential statewide and doesn't seem relevant to today's development practices.

As always, if you have any questions or would like to discuss any comments further, please do not hesitate to contact me directly.

Sincerely,



A handwritten signature in black ink, appearing to be 'ET' with a long horizontal stroke extending to the right.

Evan C Thie
Principal + Owner