

**From:** [Charlie Irick](#)  
**To:** [QAP Comments](#)  
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**Subject:** QAP Comments  
**Date:** Tuesday, May 28, 2013 8:06:57 AM

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The Humanities Foundation respectfully submits the following comments for this year's QAP:

Define Infill development - Would 4 acres inside city limits be considered infill development?

Allow new construction Garden Style Apartments as a 10 point item in Section 1 F. New construction garden style apartments are cheaper to build than individual single family homes and thus are a more efficient way of using tax credit dollars. Garden style apartments are arguably more energy efficient (less exterior walls per unit) and require less maintenance on the resident and the project owner. Many local governments prefer the garden style apartments, especially for senior housing where tenants like the security of an apartment complex.

Remove the One Billion Dollar investment requirement from section G. Allow job announcements to come from local governments as well. If the intent of LHC is to push credits towards jobs, then why does the dollar amount or who makes the announcement matter? Developer should just have to prove job growth from letters from local municipalities or job provider.

Sincerely,

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