

Tara Hall

From: James Maides <JamesMaides@csbenc.com>
Sent: Thursday, October 9, 2025 12:53 PM
To: Tara Hall
Cc: Mark McCloskey
Subject: EXTERNAL: QAP comments

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Tara, thank you for the opportunity to comment on the draft 2026 QAP

The maximum 20 points score under the secondary amenity section requires a site to be located within the maximum distance of two miles (3.5 miles in small towns) for each amenity category. We would like to propose that the maximum for secondary amenities be decreased to 17 points to allow sites to qualify for the maximum points with four out of the five categories. The need to be in close proximity for a senior project seems unnecessary for development targeting a population of 55+ residents. If you did not want to change the points, maybe another alternative would be to increase the distance to three miles for this section only instead of two miles.

Under Section IV. A.1b(iii) Site Suitability- Please consider alternative language or clarification regarding site visibility with consideration that normal traffic patterns may not necessarily be a main thoroughfare in the town. There are many excellent sites across the state that might be tucked away but still visible from a public road where people normally drive. Please also consider that our industry is not dependent on “drive by” traffic. I would like to suggest that this section be reworked to require that a site to be visible from a public maintained road. Please also consider the post construction visibility as well as future roadway expansions that will increase daily drive by traffic long after a project is placed in service. A three-story apartment building would likely be highly visible once built whereas the site might not have been.

Small towns-

Consider increasing the small-town population threshold up to 50,000.

It is helpful that the distance for small towns is proposed to increase to 3.5 miles, however in some cases these smaller towns simply just do not have an amenity for every category within their community.

Once again thanks for taking comments and I am available to answer any questions that you might have.

James E. Maides
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