

## Chris Austin

---

**From:** Stephen Drake <Stephen@broadcraftconstruction.com>  
**Sent:** Wednesday, September 4, 2019 5:40 PM  
**To:** Chris Austin  
**Subject:** 2020 QAP Public Hearing Comment

Chris,

Good afternoon. I was unable to attend the QAP draft public hearing this year. I do have a concern I will like to bring up as it seems that there are two sections that are in conflict with one another in the current 2020 draft.

Section F / Subsection 2 Credits Per Unit Averaging. This section prompts the developer to attempt to maintain through various means an average cost. If he fails to do so, then he is penalized. There are probably not many that will receive awards without being within 4% of average of their geographic set-aside, and capturing 2 points.

The new 1<sup>st</sup> tier tie breaker gives award to “the project requesting the least amount of federal tax credits per low income unit based on the Agency’s equity needs analysis”. In order to win the tie-breaker, the developer needs to be the most economical he can. This really conflicts with trying to be within 4% of the average at the same time.

I just wanted to express this concern.

Thank you-  
Stephen Drake  
BroadCraft Construction & Development, Inc.  
828-551-6970  
[www.BroadCraftConstruction.com](http://www.BroadCraftConstruction.com)