

Sanders  
Pines

# Immokalee Non-Profit Housing, Inc.

Timber  
Ridge



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December 6, 2007

**VIA EMAIL (Steve.Auger@floridahousing.org)**

Mr. Stephen P. Auger  
Executive Director  
Florida Housing Finance Corporation  
227 North Bronough Street  
Suite 5000  
Tallahassee, FL 32301-1329

Re: Rulemaking for the Universal Cycle

Dear Mr. Auger:

I wrote to you on November 6<sup>th</sup> to outline some of the concerns of a small non-profit which has owned and managed farmworker housing for approximately 15 years. The purpose of this letter is to suggest that a compromise position, concerning the ability of applicants to combine 9% credits with SAIL financing in Counties with high AMIs, would be to restrict this financing combination to non-profit applicants only. Recent actions within the Florida development community serve to accentuate the fact that even large non-profit organizations have trouble surviving in today's challenging affordable housing environment.

The second reason for this correspondence is to protest the following addition made on Page 89, subparagraph 5(b) of the November 29<sup>th</sup> draft:

"For purposes of this tie-breaker, an Application requesting Competitive HC for a proposed Development located in a county deemed by the Corporation to have an AMI of \$44,000 or less will be deemed to be an Application not requesting Competitive HC."

Although I understand that FHFC would like to give priority to lower income counties, this provision is, in my opinion, not justifiable. Although Immokalee is located within Collier County, its residents certainly do not enjoy the average economic characteristics associated with this municipality. Farmworker's incomes simply do not increase as a function of the median income of the county in which they are employed. Consequently, to provide priority to counties with an AMI of \$44,000 or less, is simply inappropriate for farmworker applications.

Therefore, I respectfully suggest that the newly proposed addition be deleted, or at a minimum an exception be made for Farmworker/Commercial Fishing Worker applications.

Unfortunately, I will not be able to attend the Rule Development Workshop in Orlando tomorrow, however, if you deem it advisable, I would sincerely appreciate your advancing the proposals described above.

I can be reached at (239) 434-6001, or my email address is [retcjk@aol.com](mailto:retcjk@aol.com), if you would care to discuss these issues with me in greater detail.

Thank you.

Very truly yours,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Carl J. Kuehner  
Board Member