
HUDSON

HOUSING CAPITAL

ALLAN SCHNIER
VICE PRESIDENT

VIA EMAIL

August 31, 2007

Steve Auger
Executive Director
Florida Housing Finance Corporation
227 North Bronough/Suite 5000
Tallahassee, Florida 32301

RE: **Comments on 2008 Universal Cycle**

Dear Steve,

Good afternoon; I trust you had a great summer. The purpose of this correspondence is to present a couple of comments to the above subject. While I do not submit an application for consideration, I am interested in how my home state implements its affordable housing programs. The Corporation is to be commended. Over the years Florida has been an industry leader, and at the forefront in promulgating affordable housing programs. However, in the attempt to perfect the universal cycle application via the curing period, the Corporation has made it attractive to submit multiple applications with the intention of playing the lottery ball game. Philosophically I do not have a problem with multiple applications provided they're not shell applications. It is unfair to the mid-size developer; a smaller developer; and non-profit developer, who do not have the resources to submit multiple applications. Shell applications have other effects:

- 1) diminish the value of the application; and
- 2) unnecessary work for staff.

Possible solutions to mitigate the proliferation of shell application are:

- a) a purchase and sale agreement; a deed; or a long term land lease must be submitted at the initial due date of Universal Cycle Application; and
- b) the property should also be properly zoned by the initial due date of the Universal Cycle Application.

Another comment I have is regarding proximity to schools, supermarket, and medical facilities. I am herein suggesting that property located in appropriately designated Community Redevelopment Area (CRA), property owned by a Public Housing

Mr. Steve Auger Letter
August 31, 2007
Page 2

Authority, and property where a farmworker development is being proposed, the proximity to schools, supermarket, and medical facilities be extended to 1.5 miles. This might allow for more opportunities to provide needed affordable housing.

Thank you for the opportunity to comment of the 2008 Universal Cycle.

Regards,


Allan Schnier

cc: Vicki Robinson