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To: Steve Auger; Vicki Robinson  
CC: mike cox <mcox@biscaynehousing.com>; Genie Anderson <ganderson@biscaynehousing.com>  
Sent: Wed Sep 19 09:44:54 2007  
Subject: 2008 Cycle

Please consider the following recommendations:

#### CAP ON APPLICATIONS FROM ONE DEVELOPER.

This concept does not provide any practical solution to FHFC goal of providing housing to Florida residents. It will actually hurt some smaller markets where, if the cap were to be enforced, developers with alternative developments sites will not longer be able to submit applications to serve such markets, as they will be forced to choose the best financially feasible site. In addition, these markets will be receiving less quality product, as the competition will not longer be present as a natural force to enhance quality in areas such as design, construction enhanced features, leasing criteria etc.

Lastly, the more likely scenario is that this cap will be unenforceable. There is only so much FHFC can enforce regarding private economic arrangements that might be created in order to circumvent this provision.

#### A LOCATIONS

FHFC should review market conditions very regularly. Overbuilt markets should be detected early on, otherwise, including soft markets in A Locations once vacancies are really high is not only already too late, but will impact developments already in underwriting for those markets as well as the State as a whole from the Equity providers and lenders perspective, as they measure their investment portfolio in general markets rather than submarkets. FHFC should closely monitor markets as Hillsborough and Duval for overbuilding, as well as the Southwest and Southeast for increased affordable housing need.

#### PHA'S AND LOCAL GOVERNMENT CONTRIBUTION

FHFC has specific rules regarding what is and who can provide the required Local Government contribution. If a specific County has designated their local PHA as the provided of the contribution, and any other developer who is required to provide this contribution will received their commitment from the local PHA, then FHFC should accept

this contributions as the local government contribution. Otherwise, PHA funding should not be considered as the local contribution.

#### FOUR STORY DEVELOPMENTS AS MID-RISE

Many communities across Florida are addressing the housing crisis with what is known as "density bonus" for affordable housing units. Four story buildings with elevators are one of the common variations. This is a situation that FHFC needs to address, as that the development community can not take advantage of these local community efforts because of the current leveraging system.

Four stories developments with elevator are as costly as a five or six story building with elevator (on a per unit basis). It should therefore be treated as a midrise for FHFC leveraging purposes.

It is recommended that FHFC include four stories development with elevator, where at least 75% of the units are included in 4 story buildings as mid rises for leveraging purposes. This will prevent a development from having one four story building and the other half of the units in three story buildings

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