

Sanders
Pines

Immokalee Non-Profit Housing, Inc.

Timber
Ridge



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November 7, 2007

VIA EMAIL AND FEDERAL EXPRESS

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:

In 1985, our organization was formed to provide rental housing for farmworking families in Immokalee. In 1992, we constructed Sanders Pines, a 40 unit multifamily development and in 1995 we completed Timber Ridge, which consists of 34 single family homes. Both of these rental projects were financed utilizing LIHTC proceeds and SAIL loans and both have 80% farmworker occupancy requirements.

The Board of Directors of Immokalee Non-Profit Housing, Inc. ("INPH") has recently approved the acquisition of a parcel of land in Immokalee to develop another housing complex for low and very low income families. We anticipate making application for financing in the 2008 Universal Cycle.

However, we were disappointed to learn of the October 18, 2007 modification to Part II (A)(1) of the Instructions for the Universal Application which proposes to delete the following language:

“the Farmworker/Commercial Fishing Worker Demographic at
Part III.D of the Application.”

The net effect of this proposal would be to eliminate an applicant's ability to combine SAIL and 9% LIHTC for farmworkers. As stated above, this is the very financing strategy that we utilized in both of our prior applications.

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As one of the few small non-profit developers who has made it successfully to year 15 with a farmworker project, especially in a county with a high median income such as Collier, we are saddened to learn how the FHFC rules have changed over the past 12 years to favor large for profit developers. Rather than rehash many of the specific issues, I refer you to Mr. Steve Kirk's fine summary of same in his letter to you of October 30, 2007. May I simply state that even though the number of applications in the special needs set asides are very few, FHFC's actions make the probability of these applications being successful even lower.

Rhetorically, I ask:

- What is the benefit of limiting SAIL to \$70,000 per unit in special needs categories?
- Instead of proposing the above referenced modification to the Instructions, why not do the opposite – grant SAIL funds automatically to successful LIHTC applicants in the special needs categories; and
- Is it healthy for any affordable housing governing body to discourage the participation of small non-profit providers? The residents of our communities for the past 15 and 12 years respectively would certainly not support such a premise.

We would sincerely appreciate serious consideration being given as to how FHFC might expand the role that small non- profits could play in developing special needs housing in the State of Florida.

Thank you for the opportunity to express my position on these issues.

Very truly yours,



Carl J. Kuehner
Board Member

CJK/vmm
cc: Derek Helms
Nancy Muller