

**Advanced Housing Corp.**  
**250 Catalonia Avenue**  
**Suite 606**  
**Coral Gables, FL 33134**  
Tel: 305-461-2330 Fax: 305-461-2346

November 15, 2007

Ms. Gayle White  
Florida Housing Finance Corp.  
227 North Bronough Street  
Suite 5000  
Tallahassee, Florida 32031-1329

RE: Request for change in grocery store tie breaker

Dear Ms. White:

In large urban counties with established public transportation systems, having two adjoining ethnic grocery stores, each smaller than 4,500 sq ft, that combined meet all of the resident's grocery shopping needs and be larger than 4,500 sq ft, should qualify for FHFC maximum grocery store tie breaker points.

Adjoining grocery stores located directly next to each other, sharing a common wall, in the same building that provides the shopper with a full range of groceries between them should be viewed together as if they were a single grocery store. If for example, one establishment provides dry goods and the adjoining establishment located immediately next door in the same building provides the fresh meat, fish and vegetables then both should be taken together in awarding grocery store location tie breaker points.

The only difference is that rather than walking to the fresh meat and vegetable sections within a supermarket, the shopper will have to walk outside and visit a market that is immediately adjacent to obtain these items. The availability and access may even be closer than in a large mega store and more appealing since it is a more traditional "Main Street" type setting where different specialized food purveyors are next to one another.

After all, it is the intent of the FHFC is that groceries be readily available at reasonable prices. If the 2 adjoining establishments fulfill the FHFC's intent, then FHFC's, grocery store requirement should be considered to have been fulfilled.

Please consider allowing adjacent stores in the same building that together meet the minimum requirements to be allocated maximum tie breaker points.

Yours truly,

Barry Goldmeier