

From: Barry Goldmeier [<mailto:bgoldmeier@gmail.com>]
Sent: Saturday, June 15, 2013 7:44 PM
To: Steve Auger; Kevin Tatreau
Subject: Public Comment 2013 Universal cycle

Dear Stephen & Kevin:

RE:- Modifying the 6 month operating requirement for some stores

I appreciate the opportunity to make this comment which I hope will be given proper consideration. Before settling on the 6 month rule as currently stated the FHFC should consider the following:

- GROCERY- Please expand your definition to include any Wal-Mart with a full grocery market. Wal-Mart is building 100,000 sq. ft. + stores on smaller parcels of land in urban areas. Some even have structured parking. These may not technically be Super Centers but because they have a full grocery section they should also qualify even if it has not been open for 6 months prior to the application date.
- PHARMACY- With the recent proliferation of "pill mills" it has become extremely burdensome to obtain a pharmacy license for a new store. To apply to open a pharmacy the pharmacist must already be licensed and have worked as a full time pharmacist for many years with a clean record. A tax credit applicant will not be capable of meeting those criteria. If the pharmacy has been open selling medicines and healthcare products for 6 months or longer but the license to fill prescriptions has only been issued prior to the date of the application that pharmacy should still be considered to be legitimate because another State agency has designated it to be awarded a license and will continue to oversee its operation.

Because many of the location criteria have carried over from the previous application round there may have been fake stores set up that obtained occupational licenses and bought equipment for the last round or in anticipation of this new round. Those stores may meet the 6 month test but still not be legitimate long term operation. Since nobody has been monitoring these yet unknown stores they may qualify if the only criteria is to have technically been in business for 6 months. Those "faux Stores" are destined to eventually shut down leaving the low income residents without that convenience. The suggestions made above to expand the criteria to include other legitimate operations should be viewed in that context

Please consider this perspective before finalizing the 2013 application and accompanying rules.

--

Barry Goldmeier
[305-984-3595](tel:305-984-3595)