



TREASURE COAST REGIONAL PLANNING COUNCIL  
INDIAN RIVER - ST. LUCIE - MARTIN - PALM BEACH

May 30, 2013

Nancy Muller, Policy Director  
Florida Housing Finance Corporation  
227 North Bronough Street, Suite 5000  
Tallahassee, FL 32301

Subject: FHFC Proposed "Limited Development Areas"

Dear Ms. Muller:

This letter is with reference to the proposed Florida Housing Finance Corporation's (FHFC) "Limited Development Areas" in select Florida counties. It is Council's understanding that FHFC staff has developed a methodology to consider relationships between existing FHFC properties, their respective occupancy rates, and potential geographic limitations on future properties to be considered for FHFC funding. Council has reviewed the proposed map for Palm Beach County, and it appears the current Limited Development Area for the County would eliminate four Tri-Rail station areas from consideration for FHFC funding. This is in direct conflict with the adopted planning priorities of the affected local governments, Council, transit agencies, Florida Department of Transportation, and Florida Department of Economic Opportunity as well as federal emphasis on "access to opportunity." The relevant planning documents are noted below for your consideration.

For more than two decades, Tri-Rail has provided the state's only commuter rail service, which includes eighteen stations along the 72-mile South Florida Rail Corridor in Miami-Dade, Broward, and Palm Beach Counties. Premium transit service, such as Tri-Rail, is significantly complemented by the development of affordable housing, especially within a half-mile of station areas. Transit Oriented Development (TOD) refers to the intense, mixed-use pattern of land development that occurs within a half-mile of station areas and includes high quality pedestrian connectivity and mobility. Affordable housing is a key component of transit's success and TOD, with a symbiotic relationship between the affordability of housing and public transit ridership. FHFC has acknowledged the importance of TOD as part of its agency mission, establishing TOD as a funding priority in prior year.

Within Palm Beach County, the Tri-Rail system operates six stations, each of which has been prioritized for TOD generally and affordable housing in particular. This TOD priority has been established at the local, regional, and state level and is documented in the following documents:

- Strategic Regional Policy Plan (Treasure Coast Regional Planning Council)
- Local Government Comprehensive Plans (Palm Beach County, local governments)
- Community Redevelopment Plans (applicable only in Cities of West Palm Beach and Lake Worth)

*"Regionalism One Neighborhood At A Time"- Est.1976*

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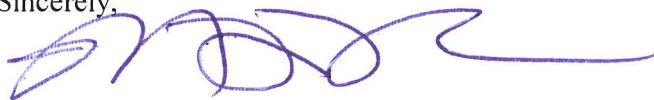
- Long-Range Transportation Plan (Palm Beach Metropolitan Planning Organization)
- Transit Development Plan (South Florida Regional Planning Authority)
- Florida TOD Guidebook (published by Florida Department of Transportation in conjunction with Florida Department of Economic Opportunity)

It should also be noted that the region is actively evaluating the extension of commuter rail service onto the Florida East Coast (FEC) rail corridor, a project known as the “Tri-Rail Coastal Link.” This project will parallel the current Tri-Rail corridor to the east, from northern Palm Beach County into downtown Miami, with several rail interconnections to Tri-Rail’s current service. This supplemental transit corridor, for which intense analysis is underway, will include an additional ten to fifteen premium transit stations. TOD planning is already underway at the local and regional level for these additional stations. Although these future station areas are beyond the scope of Council’s current request, the Coastal Link stations further emphasize the desired intensity of TOD and affordable housing in the eastern portion of the County.

Palm Beach County is also included in the seven-county “Seven50” planning area (from Indian River County to Monroe County) as identified by HUD, USDOT, and EPA, which is a mega-regional planning effort to address long-term economic sustainability at a fifty-year horizon. Connecting and providing access to housing and job opportunities along premium transit corridors, specifically including the Tri-Rail corridor, is a key Seven50 strategy to improve the region’s economic, fiscal, and environmental health, mobility, and quality of life. HUD in particular has placed special emphasis on the proximity of affordable housing opportunities to transit in an effort to promote access to jobs and other opportunities. In Palm Beach County, the Tri-Rail system represents the only premium regional transit service that corresponds to this HUD priority. Accordingly, the proposed Limited Development Areas in Palm Beach County are in direct conflict with this federal priority.

Given the strong planning emphasis on TOD and affordable housing at the Tri-Rail stations in Palm Beach County, Council requests FHFC further analyze each of these four station locations, review the relevant planning documents, and consider establishing half-mile TOD exemptions from the Limited Development Areas for the four stations noted above. Council would be happy to provide additional information or assist in further analysis of this issue if helpful. Thank you for your consideration.

Sincerely,



Michael J. Busha, AICP  
Executive Director

MJB/KD:kd

cc: Jim Wolfe, Secretary, FDOT District IV  
Joe Giulietti, Executive Director, SFRTA  
Bob Weisman, County Administrator, Palm Beach County  
Nick Uhren, Executive Director, Palm Beach Metropolitan Planning Organization