

# WENDOVER

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Mr. Steve Auger  
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Steve:

We request FHFC and its staff to consider the following alterations to the SunRail TOD Funding Preference found in the most current drafts of the Request for Applications (RFA's):

1. **The overall minimum Transit Score to meet the SunRail TOD Funding Preference should be increased from the current 5 points to 5.5 points.** This equates to a .5 mile radius or less from a station being considered for funding via the SunRail TOD Preference as discussed at the July 30 Workshop. This is consistent with State of Florida statutes, FDOT's Guidebook for TOD, and standard urban planning practices.
2. **FHFC should consider inserting an additional priority for Funding Selection to those Applications that are eligible to meet the SunRail TOD Funding Preference. This priority should be the highest Transit Score to help ensure that a selected SunRail TOD project is located nearest a station to encourage a compact, walkable development.** If two or more Applications have the highest possible Transit Score, then the projects would both be on equal footing entering into the existing Funding Selection process and/or lottery.
3. **Transit Score for the SunRail TOD Preference should be calculated by utilizing a site proximity point as already defined and covered by footnote (2) on page 55 of the Surveyor Certification Form.** The proximity point utilized by applicants must be within 100 ft. from the building to be constructed or within 100 ft. of the building with the most units for a Scattered Site development. This effectively eliminates "gaming" by applicants who would potentially find a sliver of non-contiguous land to better their transit score. Further existing backstops to prevent "gaming" as it applies to the SunRail TOD Funding Preference are already found on page 30 (SunRail Station TOD Minimum Housing Credit Request Amount) and pertain to a minimum credit request for the TOD preference. This number could be increased to a higher percentage if so desired.

Thank you for your consideration on these points.

Sincerely,



Ryan von Weller