

WENDOVER

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Thank you for an opportunity to comment on the Discussion Points for the 2013 RFA's.

As was the case in the 2011 Universal Cycle, stated preference should be given to fund TOD projects with close proximity to a qualifying rail station. Accessibility and proximity to the rail platform itself are the primary driving forces as to which TOD projects should ultimately be constructed. In the current version of the discussion points, an applicant only needs to achieve 5 transit points to qualify as a TOD along with other specific criteria. This indicates that a project only needs to be within 0.75 miles of a rail station to be eligible. As the instructions are currently constructed, it makes little difference whether a TOD project is located right at a station or .75 miles away, as proximity is now simply a threshold item.

The FDOT actually designates 0.25 miles as the preferred SunRail TOD development threshold:

*By encouraging walkable, compact, and infill development **within ¼ mile of transit** (approximately 5 minute walk), TODs produce a variety of benefits. In general, people living and working in TODs walk more, use transit more, and own fewer cars. TOD households are twice as likely to not own a car and own roughly half as many cars as the "average" household. People who live in a TOD are five times more likely to commute by transit than other residents. **Locations next to fixed guideway systems, such as Commuter Rail Transit and Light Rail Transit, maintained their land value during the recent recession.***

<http://business.sunrail.com/uploads/assets/tod/TOD%20Sketchbook%202011%20Update%20Section%201.pdf>

One solution to this problem could be a stated preference to fund a project within 0.25 miles of a SunRail station in each the Large County and Medium/Small County RFA's, similar to the 0.125 mile preference in 2011's Universal Cycle. Another solution could be the first tiebreaker for TOD developments being transit score and/or distance from the Station.

These suggestions all ultimately cure the same issue, which is the potential for sites far removed, isolated by major arterial roads, and unwalkable from SunRail stations being selected for funding. The point of having a TOD preference in the FHFC RFA's is to promote compact development and transit access immediately surrounding the stations. As it stands now, there is the possibility that this goal will not be met.

Thank you for your consideration.

Sincerely,



Jonathan Wolf
Wendover Housing Partners