

**Economic and Community Development
Services**



June 25, 2013

Florida Housing Finance Corporation
227 N. Bronough Street, Suite 500
Tallahassee, FL 32301

ATTN: Mr. Kevin Tatreau
Director of Multifamily Development Programs
CC: Mr. Steve Auger, Executive Director

RE: Proposed Medium/Small County RFA SunRail TOD Station Preference

Dear Mr. Tatreau,

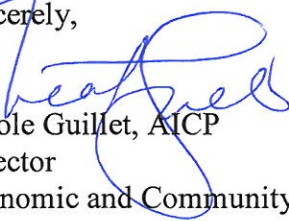
Thank you for the opportunity to comment on the upcoming RFA for the 2014 Housing Credit Allocation. On behalf of the Seminole County Economic and Community Development Services Department, I would like to share the following concerns.

Upon reviewing the Discussion Points for the 2014 Housing Credit Annual Allocation, it has come to our attention that Florida Housing Finance Corporation's ("FHFC") RFA exclusively targets the Longwood SunRail Station in Seminole County for the Transit Oriented Development ("TOD") point preference. As Director of the County's Economic and Community Development Services Department, I strongly urge the FHFC to expand this preference to include the Altamonte Springs and Sanford SunRail Stations. In an effort to spur TOD type development, Seminole County has created an Energy Conservation Overlay future land use designation within its Comprehensive Plan for unincorporated properties within a ½ mile radius of these two SunRail Stations. Within the Energy Conservation Overlay future land use designation the County provides density bonuses, reduced parking requirements, and other development incentives in order to promote walkability, redevelopment of existing sites, and the creation of workforce mixed-income housing. The goal of the Energy Conservation Overlay future land use designation is to reduce urban sprawl and increase the use of multi-modal transportation systems. For the forgoing reasons, I believe it is appropriate that FHFC include the Altamonte Springs and Sanford SunRail Stations, in addition to the Longwood SunRail Station, as eligible for the preference. Furthermore, I recommend that the term "Energy Conservation Overlay" be recognized as an acceptable designation in 5.g.(i) (*page 13*) of the "Discussion Points." As noted above, the Energy Conservation Overlay future land use designation was designed to address not only TOD development the SunRail stations, but also along major transit corridors and at unincorporated urban activity centers. (*Please see the attached policy and map excerpts from the County's Comprehensive Plan.*)

Lastly, I strongly suggest that the FHFC maintain its current distance requirements for housing projects from any given SunRail Station. The current standard provides local governments and the development community the flexibility to properly plan for TOD. In the specific case of the Altamonte Springs Station, Seminole County recently took action in furtherance of higher density development supportive of transit despite the suburban location of this station and the suburban character of the surrounding areas. Any reduction in the allowed TOD radius area would constrain the size, variety and number of possible TOD development activities.

Thank you for the opportunity to comment on the upcoming RFA for the 2014 Housing Credit Allocation and for the FHFC's continued support to ensure that all of Florida's state and local agencies work together to leverage resources and provide affordable housing to Floridian's throughout the state.

Sincerely,



Nicole Guillet, AICP
Director
Economic and Community Development Services Department

safe places to live and create pedestrian connections between uses, in a manner consistent with the definition of Urban Open Space contained within *Policy FLU 4.4 Urban Open Space, On-Site Recreational Amenities and Buffering Performance Frameworks for Infill/Redevelopment Areas* and the Introduction Element;

- 5 Sharing of parking, stormwater facilities, access and signage, to reduce costs, reduce the provision of excess facilities and improve visual appearance;
- 6 Giving special consideration to building setbacks and building heights, and the location, type and size of buffering and landscaping, with attention to transitioning intensity adjacent to surrounding less intensive land uses, in order to preserve neighborhood character;
- 7 Incorporating the principles of Crime Prevention Through Environmental Design throughout the Mixed Development proposal; and
- 8 Emphasizing a compact, walkable development pattern. MXD projects shall not be designed as sprawl or strip developments. Where pedestrian and/or bicycle connections between new and adjacent existing MXD developments are feasible, those connections shall be included in the new proposals. Where a pedestrian and/or bicycle connection is feasible between a new MXD proposal and surrounding neighborhoods in a manner that supports and preserves the character of the existing, surrounding neighborhood, applicants for MXD projects shall be directed to meet with surrounding property owners to explore the feasibility of such connections.

Policy FLU 5.16 Notation of Planned Development Amendments on Future Land Use Development Detail Exhibit in Support Document

Effective July 24, 2007, the development details of density and/or intensity of all new sites designated as “Planned Development” future land use shall be notated on the *Exhibit FLU: FLU Series – Planned Development Future Land Use Development Detail* contained in the Support Document, after adoption of the amendment.

Policy FLU 5.17 Energy Conservation Overlay

- A **Location.** Seminole County hereby establishes an Energy Conservation Overlay as shown on *Exhibit FLU Energy Conservation Overlay*, consistent with the Central Florida Regional Growth Vision and the provisions of House Bill 697 of 2008, located within the unincorporated Dense Urban Land Area, within ½ mile radius of major urban activity centers and the SunRail commuter rails stations, and within ¼ mile of the right-of-way of major urban transit corridors. The purpose of the overlay is to encourage a phased redevelopment of these areas into a more compact, energy conserving land development pattern that allows for a balance of jobs to housing and the use of multiple modes of transportation, in order to conserve energy and reduce greenhouse gases. A performance framework based on energy criteria, which is contained within this Policy, and score values identified in the Land Development Code (LDC), shall determine how redevelopment can occur. A specific development proposal shall be approved only upon



achieving an 80% or higher score on the Energy Conservation Assessment Performance Framework contained herein, with numerical values assigned in the LDC.

- B **Development Options.** Development in the Overlay shall occur in accordance with one of the following options:

Option 1: Compliance with the underlying future land use designation and the Comprehensive Plan provisions that apply to that designation (such as maximum residential dwelling units, allowable and permitted uses).

Option 2: Commercial, educational, light industrial, office, and residential uses in a compact land use pattern that allows for a range of transportation modes and includes green building techniques in order to conserve energy and reduce greenhouse gases by reducing vehicle miles traveled. Such compact land use patterns may also include buffers in the form of natural areas containing trees that can reduce greenhouse gases through absorption of carbon dioxide.

- C **Energy Conservation Assessment Performance Framework.** Proposed developments requesting approval under Option 2 shall be subject to an assessment by Seminole County to evaluate extent of consistency with the Energy Conservation principles contained in this policy. The assessment shall consist of a point system contained within the LDC that measures and scores a development proposal on the basis of how well it meets several performance criteria, including the following:

- 1 Extent to which proposal creates a complementary mix of uses (residential, commercial, office, light industrial, educational) that allows for a sound jobs to housing balance, encourages multiple modes of transportation and reduces the need for automobile travel. The jobs to housing balance, as defined within the "Plan Amendment Standards of Review" portion of the Future Land Use Element, is measured as a ratio between total County employment divided by total allowable housing units, including those units that may be proposed by the individual development. The intent of the County is to maintain a County standard of 1.0 jobs per housing unit. As that standard is a Countywide standard, a proposal that does not include jobs may still achieve the points necessary to earn approval under Option 2.
- 2 Location relative to existing or proposed public transit service and/or rail station.
- 3 Walkability of proposed development; extent to which paths and sidewalks are proposed and proposed to be shaded; extent to which pedestrian and bicycle links to adjacent developed areas are provided, where possible; use of "complete streets" as part of development proposal.
- 4 Proposal redevelops an existing site that is not developed in an energy-efficient manner.
- 5 Proposal develops an infill area.

- 6 Proximity of proposal to existing development and existing or proposed urban services.
- 7 If a single use is proposed, extent to which the use improves jobs to housing balance in the immediate area and extent to which the use encourages multiple modes of transportation.
- 8 Extent to which proposal makes use of green building techniques and complies with energy efficiency and renewable energy technology requirements of Chapter 553, Florida Statutes.
- 9 Extent to which proposal discourages crime through use of Crime Prevention Through Environmental Design principles.
- 10 Extent to which proposal creates a range of housing options in the immediate area, including Affordable and Workforce housing, allowing for a mixed income area.
- 11 Extent to which proposal preserves existing natural areas, especially those containing trees, or creates wooded areas to serve as carbon sinks.
- 12 Extent to which proposal prevents urban sprawl by absorbing development that might otherwise pressure protected areas such as the East Rural Area, environmentally significant areas such as the Wekiva River Protection Area and other critical environmental assets.
- 13 Extent to which proposed development provides a needed public facility, such as a police substation, transit shelters available to the public, rail station facilities, public recreational area, or public school.

(Remainder of page intentionally blank.)



D **Permitted Development.** Allowable densities and intensities shall be determined using the table below and the proposed development's Energy Conservation Assessment score.

| Percent Score | Density* | | Intensity* | |
|--|--|---------|------------|---------|
| | Minimum | Maximum | Minimum | Maximum |
| 95-100 | 15.00 | 20.00 | .85 | 1.0 |
| 90-94 | 10.00 | 14.99 | .71 | .84 |
| 85-89 | 8.50 | 9.99 | .53 | .70 |
| 80-84 | 7.00 | 8.49 | .36 | .52 |
| Less than 80 | Comply with underlying FLU designation | | | |
| Density is measured in units per net buildable acres | | | | |
| Intensity is measured in floor area ratio (FAR) | | | | |

* All Energy Conservation developments approved pursuant to this Policy shall be consistent with adopted levels of service for potable water, sanitary sewer, drainage, public school capacity and mobility quality standards as shown in the Capital Improvements Element of the Seminole County Comprehensive Plan. With respect to recreational acreage, Energy Conservation developments may satisfy needs either by compliance with the adopted levels of service as shown in the Capital Improvements Element, or by provision of the minimum performance frameworks for on-site recreational amenities consistent with the definition of 'Urban Open Space', as provided in Policy FLU 4.4 Urban Open Space, On-Site Recreational Amenities and Buffering Performance Frameworks for Infill/Redevelopment Areas.

E **Energy Conservation Development Agreements.** Development within the Energy Conservation Overlay shall comply with applicable provisions of the Land Development Code, but shall also be subject to a Development Agreement with Seminole County to ensure effective implementation of energy conservation principles while furthering and supporting other important Comprehensive Plan Goals, Objectives and Policies. Each Agreement shall be uniquely crafted, based upon the location, type, density and intensity of the proposal. However, all Agreements shall address the following areas of concern:

- 1 **Compatibility.** The development shall be compatible with adjacent uses, particularly residential neighborhoods outside of Energy Conservation Overlay urban activity centers and transit corridors. Methods of achieving compatibility may include, but are not limited to: landscape buffers with Florida-friendly trees to remove greenhouse gases from the air and native vegetation to reduce need for irrigation; construction of transitional uses and/or lot size transitioning on lots abutting the adjacent uses; placement of parking, delivery, storage and solid waste management facilities away from abutting properties; building height restrictions; and use of residential architectural features on facades of nonresidential structures abutting outside neighborhoods.

- 2 **Public Facilities.** Developments shall make efficient use of existing public facilities, such as potable water and sanitary sewer, with no need for expanded treatment plant capacity. Florida-friendly landscaping shall be used to minimize demand for irrigation water and reuse water shall be used for necessary irrigation. On-site septic disposal shall not be permitted. All stormwater management facilities shall comply with any federal requirements to limit Total Maximum Daily Pollution Loads.
- 3 **Mobility and Access.** Developments shall be designed to be transit-ready, whether current service is available or not. Internal mobility corridors shall be complete streets. Vehicular entry to a development via connections to arterial roads shall be held to a minimum. Developments along major transit corridors shall provide external transit shelters and sidewalks that link to internal pedestrian and bicycle paths within the development. Cross access points to neighboring developments, including pedestrian and bicycle access, shall be provided wherever possible.
- 4 **Parking.** Minimum parking standards shall be lowered in the Land Development Code for proposals located along major transit corridors or within ½ mile of SunRail stations. On-site parking shall emphasize centrally located, green building structured parking “wrapped” with other uses (such as retail shops, restaurants, offices and townhouses). Any such use located on the ground floor shall also be accessible from external pedestrian walkways. In general, parking areas should not be visible from main roads, with the exception of on-street parking that may be permitted where it can be done safely. Surface parking shall also be primarily centrally located and shall feature a number of spaces on stabilized, permeable surfaces. Any surface parking shall contain grade separated, well-lighted pedestrian walkways and drainage features that include Florida-friendly vegetation and trees; surface parking areas shall also feature Florida-friendly vegetated buffer areas and planting areas. Both structured and surface parking shall contain recharging stations for electric and hybrid vehicles. Employment uses shall provide bicycle lockers.
- 5 **Energy Conservation.** All developments will comply with the energy efficiency technology provisions and other energy requirements of Chapter 553, Florida Statutes, shall incorporate green building techniques including solar energy and other measures that reduce the need for artificial heating, cooling and lighting, and shall include or preserve forested areas to serve as carbon sinks. Any condominium or homeowner association established to manage buildings and common areas within Energy Conservation Overlay developments shall be required to include in its rules the procedures whereby a property owner can receive permission to install solar panels, solar collectors, energy-efficient and storm hardened windows and doors, green roofs, outdoor security lighting, temporary hurricane shutters, and temporary clothes lines.

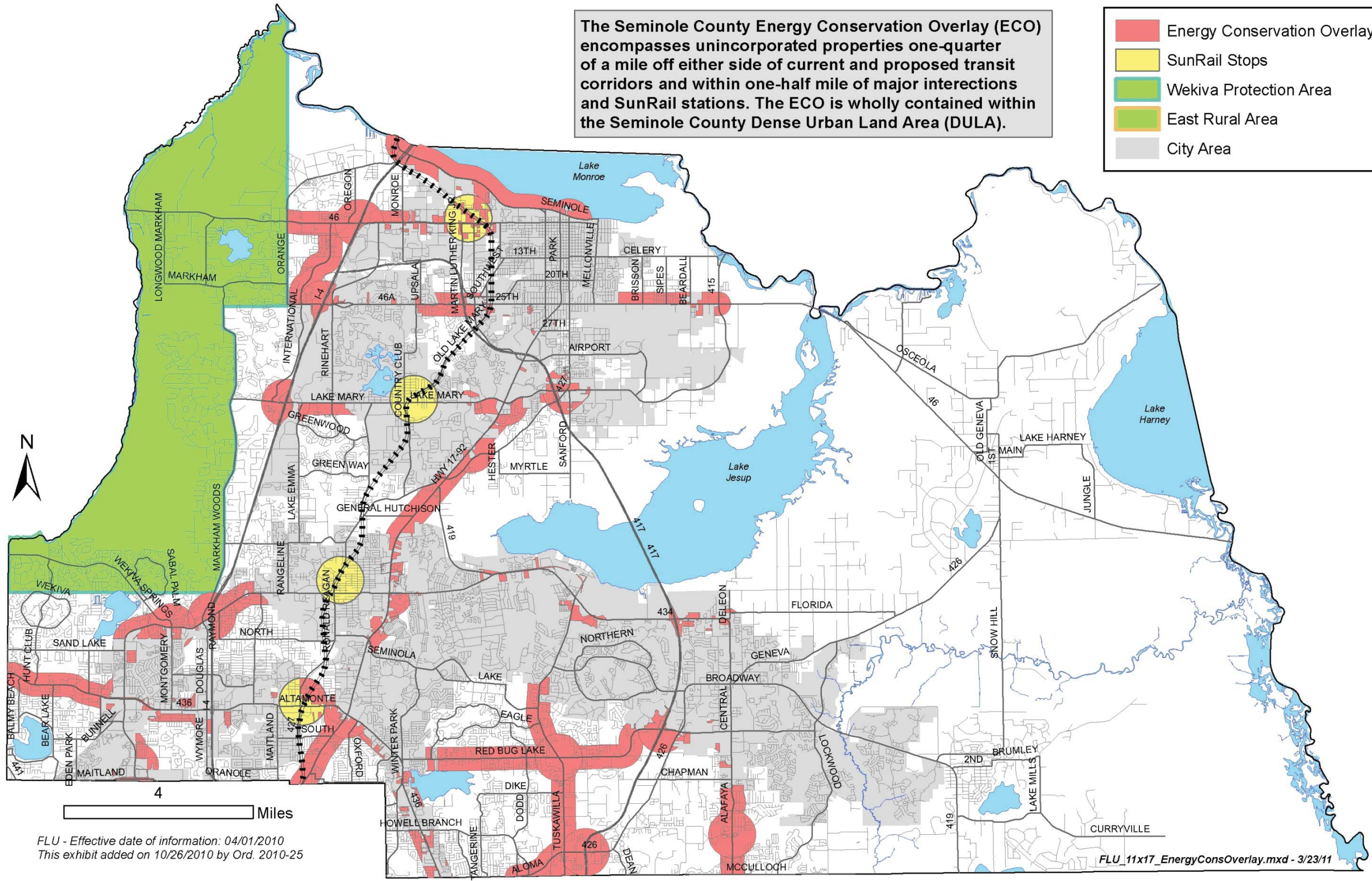
- 6 **Green Infrastructure, Open Space and Related Amenities.** All developments shall include “Green Infrastructure” areas set aside for landscaping, open space, preservation of existing Florida-friendly trees and vegetation, wetlands, passive recreation for residents and/or employees, and other amenities that create a sense of place, naturally sequester carbon dioxide and reduce the heat island effect in urban areas. Related amenities that are encouraged include green roofs, green walls, indoor planting areas, outdoor Florida-friendly vegetated planting beds and community gardens.
- 7 **Crime Prevention.** In addition to features that create an attractive, inviting place to live, shop, work and play, the development shall incorporate design features that reduce the threat of crime. These features include choices in lighting, fencing, landscaping, building design and site design that avoid creating dark hidden areas, and the location of pathways and public gathering places within view of a building’s interior. These features work together to build a sense of community and ownership that discourages criminal activity and fosters a safe environment for the legitimate users of a site to live, work, shop and play.



ENERGY CONSERVATION OVERLAY

The Seminole County Energy Conservation Overlay (ECO) encompasses unincorporated properties one-quarter of a mile off either side of current and proposed transit corridors and within one-half mile of major interections and SunRail stations. The ECO is wholly contained within the Seminole County Dense Urban Land Area (DULA).

- Energy Conservation Overlay
- SunRail Stops
- Wekiva Protection Area
- East Rural Area
- City Area



FLU - Effective date of information: 04/01/2010
 This exhibit added on 10/26/2010 by Ord. 2010-25

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