



County Administration

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May 29, 2013

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

RE: FHFC Proposed "Limited Development Areas"

Dear Ms. Muller:

I am writing you requesting an exemption from the proposed Florida Housing Finance Corporation's (FHFC) "Limited Development Areas" for Tri-Rail station areas in Palm Beach County similar to the TOD exemptions that have been proposed for Sun-Rail stations. I clearly understand the FHFC intent to preserve and protect your investment in affordable housing developments within the identified Limited Development Areas. However, it will have an unanticipated negative impact on the County, Cities, State, and Federal entities housing and transit plans.

As you are aware, Palm Beach County is a very large county with costly housing and transit. Over the last couple of decades, we have strived to develop communities that would reduce housing and transit costs. Palm Beach County has a strong commitment to "transit-oriented development" (TOD), which FHFC has also prioritized in its prior funding cycles. The County Commission has also consistently endorsed the development of affordable/workforce housing adjacent to public transit and this goal is prioritized in the County's long-range plans. Developers are required to construct affordable/workforce housing as a component of larger residential and mixed-use projects, and this requirement is intensified for projects adjacent to public transit. After reviewing the proposed Limited Development Areas map, we have concluded they will prevent us from maximizing our affordable/workforce housing requirements for developers that build adjacent to employment centers along Tri-Rail in Palm Beach County. Staff has identified four Tri-Rail stations (Mangonia Park, West Palm Beach, Lake Worth and Boynton Beach) that would be eliminated from consideration for FHFC funding. This would have a devastating effect on housing and transit plans approved by local governments, Treasure Coast Regional Planning 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:

- 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)
- 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)

Given the strong planning emphasis on TOD and affordable/workforce housing at the Tri-Rail stations in Palm Beach County, we are requesting 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. We would be happy to provide additional information or assist in further analysis of this issue. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, reading "Verdenia C. Baker".

Verdenia C. Baker, Deputy County Administrator

Cc:

Robert Weisman, County Administrator, Palm Beach County
Jim Wolfe, Secretary, FDOT District IV
Joe Giulietti, Executive Director, SFRTA
Kim Delaney, TCRPC