

Public Comments Received

ID	Organization	Name
1	City of North Oaks	Michael Robertson
2	City of Plymouth	Kelli Slavik
3	City of Belle Plaine	Chelsea Alger
4	City of Dayton	Bob Derus
5	City of Prior Lake	Frank Boyles
6	City of Newport	Deb Hill
7	City of Crystal	Anne Norris
8	City of St. Louis Park	Michele Schnitker
9	City of Shakopee	Mayor Brad Tabke
10	City of Minneapolis	D. Craig Taylor
11	City of Rosemount	Mayor William Droste and City Council
12	City of Elko New Market	Thomas Terry
13	City of Anoka	Darin Berger
14	City of Robbinsdale	Rick Pearson & Marcia Glick
15	City of Fridley	Paul Bolin
16	City of Rogers	Steve Stahmer
17	City of Burnsville	Heather Johnston
18	City of Apple Valley	Bruce Nordquist
19	City of Shoreview	Kathleen Castle
20	City of Roseville	Paul Bilotta
21	City of Orono	Michael Gaffron
22	City of Brooklyn Park (Mayor & City Manager)	Jeffrey Lunde and James Verbrugge
23	City of Brooklyn Park (Community Development Director)	Kim Berggren

ID	Organization	Name
24	City of Richfield	Steve Devich, Mayor Debbie Goettel, Suzanne Sandahl
25	City of Hampton	Laura Chamberlain
26	City of Brooklyn Center	Curt Boganey
27	City of St. Mary's Point	Laura Chamberlain
28	City of Victoria	Laura Chamberlain
29	City of Ramsey	Tim Gladhill
30	City of Woodbury	Mary Giuliani Stephens
100	City of Saint Paul	Mayor Chris Coleman
101	City of Saint Paul-Department of Planning & Economic Development	Donna Drummond
31	Woodbury Staff	Karl Batalden
32	City of Eagan	David Osberg
33	Washington County HRA	Barbara Dacy
34	Hennepin County	Kevin Dockry
35	Carver County Supplemental	Nate Kabat
36	Dakota County	Thomas Egan
37	Carver County CDA	Cindy Monroe
38	Carver County	Gayle Degler
39	Elected Official	State Representative Diane Loeffler
40	MICAH- Ramsey Chapter	Steve Ficker
41	NAACP of St. Paul	Jeffrey Martin
42	Housing Preservation Project	Tim Thompson
43	Institute for Metropolitan Opportunity	Myron Orfield
44	Metro Cities	Patricia Nauman
45	Catholic Charities	Jessie Sorenson
46	Builders Association of the Twin Cities	Shawn Nelson
47	MICAH	Sue Watlov Phillips

ID	Organization	Name
48	Minnesota State Council on Disability (MSCOD)	Joan Willshire
49	Asamblea	Antonia Alvarez
50	Local Initiatives Support Corporation (LISC)	Tina Homstad
51	Equity in Place	Owen Duckworth
52	ARC of the Greater Twin Cities	Steve Piekarski, Gene Martinez
53	Homes Within Reach CLT	Jeff Washburne, Tim Thompson, Janet Lindbo
54	Metropolitan Consortium of Community Developers (MCCD)	Jim Roth
55	Mid-Minnesota Legal Aid	Jay Wilkinson
56	Asian Pacific Housing Consortium	Jean Lee
57	Council on Asian Pacific Minnesotans	Sai Her
58	Jewish Community Action	Vic Rosenthal
58	Resident	Jeffery Beck
59	Resident	Ray Becker
60	Resident	Tim Brausen
61	Resident	Nancy Eder
62	Resident	Kirt Garrison
63	Resident	Tasoulla Hadjiyanni
64	Resident	Kay Hong
65	Resident	Butch Johnson
66	Resident	Cameron Kruse
67	Resident	Teresa Lambert
68	Resident	Barry LeBlanc
69	Resident	Don Matzen
70	Resident	Donna Neste
71	Resident	Jim Quiring
72	Resident	Priscila Barron Sanchez
73	Resident	Unidentified Commenter at MC 1
74	Resident	Unidentified Commenter at MC 2

ID	Organization	Name
75	Resident	Dale Swanson
76	MN Department of Health	Kristin Raab
77	Minnesota Housing Finance Agency	Margaret Kaplan

Individuals testifying during the public hearings on the Housing Policy Plan

78	One Family One Community	Lamorris Britton
79	Alliance for Metropolitan Stability	Owen Duckworth
80	National Association for the Advancement of Colored People (NAACP)	Jim Hilbert
81	Center of the American Experiment	Katherine Kersten
82	One Family One Community	Maleta Kimmons
83	NAACP	Tim Lippert
84	NAACP	Jeffrey Martin
85	St Paul resident	Yusef Mgeni
86	ISAIAH	Ann Mongoven
87	NAACP	William Moore
88	Metro Cities	Patricia Nauman
89	ISAIAH	Lars Negstad
90	Guardian Church	Cheryl Peterson
91	St Paul resident	Jerry Ransom
92	ISAIAH	Judy Rhein
93	Organizing Apprenticeship Project / NWCC	Nelima Sitati-Munene
94	ISAIAH	Joy Marsh Stephens
95	Institute on Metropolitan Opportunity	Will Stancil
96	Housing Preservation Project	Tim Thompson
97	Metropolitan Interfaith Council on Affordable Housing (MICAH)	Sue Watlov Phillips
98	One Family One Community	DeAndre Weaver
99	St Paul resident	James Wilkinson

Public Comments Received and Metropolitan Council responses

Updated 12/1/14

Commenter	Topic(s)	Comment	Response
14	Allocation of Need	Small inner-ring cities rich in entry level and senior housing have few options for move-up housing	Existing affordable housing (which may include entry level and senior housing) will continue to be a factor in determining the Need.
18	Allocation of Need	"Affordable interest rates" are not considered as addressing a portion of the need	The Allocation of Affordable Housing Need does not include affordable interest rates due to the difficulty of forecasting interest rates. However, mortgage interest rates are included in the Council's annual counting of the affordability of new owner-occupied homes and the existing affordable housing stock.
18	Allocation of Need	Head of household jobs planned for the city (almost 10,000 jobs by 2040) is a viable solution to meeting household affordable housing needs	The Need calculation has and will continue to consider forecasted job growth.
18	Allocation of Need	City wants to draw attention to/support comments by Metro Cities & Dakota County CDA, with the latter recognizing resources will never be sufficient to address the large need	We made changes in Part I that address the lack of resources for affordable housing.

Commenter	Topic(s)	Comment	Response
22	Allocation of Need	Allocation only uses a handful of metrics, method has critical flaws (relative rather than absolute measure of existing units)	We will finalize the methodology for the Need, including adjustments for existing share of affordable housing, in a 2015 amendment to the HPP.
22	Allocation of Need	Formula calculates need as proportion of projected growth while inadequately considering existing housing, penalizing growing communities	We will finalize the methodology for the Need, including adjustments for existing share of affordable housing, in a 2015 amendment to the HPP.
23	Allocation of Need	Allocation should not allocate affordable housing to areas with concentrations of poverty or segregation	We will finalize the methodology for the Need, including adjustments for existing share of affordable housing, in a 2015 amendment to the HPP.
30	Allocation of Need	Homes believed affordable to families earning 80% need to be factored into allocation	We address the change in the Need calculation to include homes affordable at 80% AMI in Part III.
32	Allocation of Need	Not enough new development, infill, or redevelopment acreage to achieve 2040 projections	The Need allocation is based on a community's forecasted growth.
36	Allocation of Need	The proximity to transit adjustment factor negatively affects areas outside the core without highly developed systems; will also harm HPS and limit housing choice	We made changes to Part III that respond to this comment.

Commenter	Topic(s)	Comment	Response
36	Allocation of Need	Support placing new housing where affordable housing is scarce to provide choice and economic integration	We have addressed this comment in Part II.
36	Allocation of Need	Multiple AMI structure should better illustrate need at or below 30%	We anticipate that this will result.
43	Allocation of Need	All proposed methodologies rely on Council's household growth projections which creates a serious risk of artificially inflated targets in central cities and inner suburbs while reducing them in middle/outer suburbs	Comment noted.
95	Allocation of Need	Formula overemphasizes growth and underemphasizes existing housing	We will finalize the methodology for the Need, including adjustments for existing share of affordable housing, in a 2015 amendment to the HPP.
43	Allocation of Need	Using 'fair share' rather than 'the local unit's share' can potentially insulate communities with stable population growth from any need to contribute	Comment noted.
43	Allocation of Need	Using proportional adjustments--increasing or decreasing a fair share target by a percentage guarantees ALL places will be required to add affordable housing even if they already have much greater shares than other parts of the region	Comment noted.

Commenter	Topic(s)	Comment	Response
43	Allocation of Need	Use the fairer and more intuitive method of proportional approach where surpluses or shortages are simply subtracted to or added to fair share targets	We will finalize the methodology for the Need, including adjustments for existing share of affordable housing, in a 2015 amendment to the HPP.
44	Allocation of Need	Support use of adjustments in allocation, but while informal consensus was reached on some factors, outcomes for local communities were not provided, despite requests	We will finalize the methodology for the Need, including local community outcomes, in a 2015 amendment to the HPP that will include a public comment period.
44	Allocation of Need	Model has significant implications for local governments planning for fair share of regional need; formula must be fair, balanced and defensible from policy and technical standpoints	Comment noted.
2, 17	Allocation of Need	The recession is an anomaly and should not be used as the primary basis to provide current or future forecasts of construction activity	Comment noted.
25, 27, 28	Allocation of Need	Are affordability indicators determined by regional metrics or municipal metrics (regional AMI vs. local AMI)?	Affordability measures (Need, Goal, Score) are measured using HUD's Median Income data for the Twin Cities Metropolitan Statistical Area.
29, 36	Allocation of Need	Would like to see demographic breakdown/data under three-band AMI structure	We addressed this comment in Part III.

Commenter	Topic(s)	Comment	Response
42, 60	Allocation of Need	Plan lacks a clearly stated rationale for ratcheting up suburban production, and is silent on gap between suburban and urban production (over last 15 years of LCA goals, central cities met 111% of their goals, while suburbs collectively met 48%)	We have made changes in Part II that address the need for affordable housing in suburban areas.
42, 60	Allocation of Need	Jobs/worker ratio and credits for existing affordable housing should be calculated on same proportional basis to ensure fairer division of need between central cities and suburbs	We will finalize the methodology for the Need, including adjustments for existing share of affordable housing and jobs/worker ratio, in a 2015 amendment to the HPP.
42, 60	Allocation of Need	Plan fails to address conflict between LUPA housing need allocation and LCA housing goals; negotiating goals to give cities sense of ownership worthy goal, but may lead to less ambitious goals than are warranted, even w/ scarce funds	Comment noted.
7, 8, 9, 11, 12, 13, 15, 17, 19, 20, 21, 22, 23, 30, 33, 36, 77, 51, 88	Allocation of Need	Not providing the Need numbers before adoption makes comment difficult and affected communities and stakeholders must be included in refinements	We will finalize the methodology for the Need, including local community outcomes, in a 2015 amendment to the HPP that will include a public comment period.
8	Allocation of Need	Support establishment of Need as separate from "unattainable" goals	Comment noted.
8	Allocation of Need	Various thresholds of affordability a positive, but there is a gap from 80-100% of AMI	Comment noted.

Commenter	Topic(s)	Comment	Response
17	Allocation of Need	Ratio of low-wage jobs as an adjustment factor to affordable housing Need will be skewed unless wages are reflective of <i>full-time</i> jobs	We will finalize the methodology for the Need, including adjustments for jobs/worker ratio, in a 2015 amendment to the HPP.
17	Allocation of Need	Cities have restraints like natural resource conditions, inability to provide services to tall buildings, and lack of control of Homeowners' Associations & funding resources such as CDBG	Comment noted.
18	Allocation of Need	City is opposed to use of adjustment factors in the allocation of housing Need; equity policies must recognize fair share as fair share	Comment noted.
18	Allocation of Need	Determining housing need for suburban cities without addressing mobility in RCAPs and targeting to severe housing cost burdened households is not a fair share formula	Comment noted.
19	Allocation of Need	A city with lesser share of affordable housing than the region should not be required to add affordable housing if there are few low-wage jobs and/or transit is limited	We will finalize the methodology for the Need, including adjustments for existing affordable housing and jobs/worker ratio, in a 2015 amendment to the HPP. We have made changes in Part III that response to the portion of this comment that addresses transit's relationship to the Need.

Commenter	Topic(s)	Comment	Response
19	Allocation of Need	Concern that use of metro AMI not reflective of sub-regional or local median incomes; it's more difficult for cities with median income above metro AMI to attain affordability goals	Comment noted.
15, 17, 19, 21, 29, 30, 33, 35, 36, 37, 42, 43, 54, 77, 100, 101	Allocation of Need	Three-tiered AMI structure is likely to be a positive improvement as it provides more nuanced look at local conditions/needs	Comment noted.
44	Allocation of Need, Housing Performance Scores	Consistent with Plan's notation, Council should continue to work with stakeholders to define and finalize the Need & Score formulas and retain HPPWG participation until plan is finalized	We will finalize the methodology for the Need and Score in a 2015 amendment to the HPP that will include HPPWG participation and a public comment period.
44	Allocation of Need, Housing Performance Scores	The work subgroups established should be convened to ensure full stakeholder input	Comment noted.
40	Comp Plan/Technical Assistance	Minneapolis & St. Paul should use incentives (e.g. density bonuses, reduced parking) to secure additional affordable units with long-term affordability	Comment noted.
36	Comp Plan/Technical Assistance	Council can/should incent cities to remove barriers to development of affordable housing	We have made changes to Part III and Part IV that respond to this comment.

Commenter	Topic(s)	Comment	Response
76	Comp Plan/Technical Assistance	Housing Elements and Implementation Plan comments recognize Need shares but lack specifics on implementation	We will finalize guidance on the housing elements and implementation plans of local communities in 2015.
77	Comp Plan/Technical Assistance	Commitment to technical assistance to local communities while promoting tools such as CURA/HPP and ULI Policy Toolbox should improve environment for development	We address technical assistance in Part III and promoting existing tools in Part II.
9	Comp Plans/Technical Assistance	Changes to Community Designations makes planning difficult and may create housing & transportation conflicts	Comment noted.
10	Comp Plans/Technical Assistance	Support increased Council role in housing as part of series of policy plans and leading up to Systems Statements	Comment noted.
12	Comp Plans/Technical Assistance	As density expectations are not changed in Plan, city will expect to continue to be dominated by single family detached homes	Comment noted.
12	Comp Plans/Technical Assistance	In its Comprehensive Plan Update, city will consider directing medium and high density residential uses in appropriate areas	Comment noted.
12	Comp Plans/Technical Assistance	In support of walkability efforts, city will consider requiring sidewalks on both sides of city streets instead of one	Comment noted.

Commenter	Topic(s)	Comment	Response
13	Comp Plans/Technical Assistance	If the focus on Comp Plans reflects desire to hold more cities accountable to them, this should be transparent and gradual	Comment noted.
17	Comp Plans/Technical Assistance	Dakota County completed a separate study that serves as the backdrop for informing cities and county of the market and needs to guide decision making	Comment noted.
18	Comp Plans/Technical Assistance	Core of Plan is laying the ground work for the 2040 Housing Element of Comp Plans	Comment noted.
18	Comp Plans/Technical Assistance	City welcomes technical assistance but is the technical expert in all development	Comment noted.
18	Comp Plans/Technical Assistance	A Housing Element in the Comp Plan is good planning; however, housing is not a system and not subject to intended requirements of the Plan	Comment noted.
19	Comp Plans/Technical Assistance	While government can assist in meeting regional housing goals, housing is a market driven commodity with demand influencing costs, types, density and location	We address this comment in Part I.
23	Comp Plans/Technical Assistance	Our city has three distinct identities yet is considered one in the Plan	Comment noted.

Commenter	Topic(s)	Comment	Response
30	Comp Plans/Technical Assistance	Provide more detail on "new review criteria" that will be used in conjunction with updated Local Planning Handbook	We will finalize guidance on the housing elements and implementation plans of local communities in 2015.
35	Comp Plans/Technical Assistance	Define the technical assistance the Council expects communities to provide	Comment noted.
35	Comp Plans/Technical Assistance	Inventorying best practices is a good role for Council, but in a way sensitive to local goals, visions, situations and needs	Comment noted.
35	Comp Plans/Technical Assistance	Don't be overly prescriptive and let communities define their own vision	Local governments define their own vision through the development of local Comprehensive Plans.
36	Comp Plans/Technical Assistance	Instead of expanding technical assistance, Council should offer grants to organizations serving this capacity	Comment noted.
42	Comp Plans/Technical Assistance	Support focus on stronger Comp Plan Housing Elements, w/ increased technical assistance	We will finalize guidance on the housing elements and implementation plans of local communities in 2015.
43	Comp Plans/Technical Assistance	Review of local units' fair share efforts for low and mod income housing must be strengthened if the Council is to fulfill its statutory role as regional coordinator	We will finalize guidance on the housing elements and implementation plans of local communities in 2015.

Commenter	Topic(s)	Comment	Response
43	Comp Plans/Technical Assistance	Whatever criteria the review uses is meaningless if the Council won't take action	Comment noted.
44	Comp Plans/Technical Assistance	Technical assistance should be centered on effective communication and consistent information, and on data sharing between Council and local governments	We address technical assistance in Part III.
44	Comp Plans/Technical Assistance	Plan contains numerous references to expanded elements and new review criteria, including how the Council might 'more effectively' review local plans; not clear if these references are encouragements or mandates	We will finalize guidance on the housing elements and implementation plans of local communities in 2015.
44	Comp Plans/Technical Assistance	If Council intend to add new review elements, complexity and increased costs may be added to Comp Plan process and cost-benefit analysis is needed	We will finalize guidance on the housing elements and implementation plans of local communities in 2015.
45	Comp Plans/Technical Assistance	Plan shows preference for voluntary cooperation, negotiated goals, and local incentives, but uncertain whether cooperation/forthrightness of cities will create momentum toward goals	Comment noted.
54	Comp Plans/Technical Assistance	Support guidance for local cities based on best practices to aid in identifying high opportunity sites, districts etc. within transit corridors	Comment noted.
54	Comp Plans/Technical Assistance	Process must ensure land designated for affordable housing actually available for purpose	Comment noted.

Commenter	Topic(s)	Comment	Response
60	Comp Plans/Technical Assistance	Initiating a qualitative review, combined with increased technical assistance will help lead to more affordable units, including more in high income communities	Comment noted.
99	Comp Plans/Technical Assistance	People are beginning to discuss fair housing obligations w/ Council's Comp Plans	Comment noted.
81	Comp Plans/Technical Assistance	Plan tried to compel cities to take on policies through conditional approval of comp plans, tying road funding to housing, and exploiting authority over parks to implement social agenda	Comment noted.
88	Comp Plans/Technical Assistance	59 references are made to Comp Plans; it is unclear what the implications will be for review processes	We will finalize guidance on the housing elements and implementation plans of local communities in 2015.
88, 100	Comp Plans/Technical Assistance	Support Council's role as a convener and provider of technical assistance and best practices	Comment noted.
89	Comp Plans/Technical Assistance	Don't leave a loophole in Plan, Council should set itself up for more effective review and enforcement of Comp Plan reviews	We will finalize guidance on the housing elements and implementation plans of local communities in 2015.
96	Comp Plans/Technical Assistance	Broadening review of Comp Plans to include qualitative assessment can lead to more productive pursuit of goals	Comment noted.

Commenter	Topic(s)	Comment	Response
1, 25, 27, 28	Comp Plans/Technical Assistance	What assistance will Council make available to cities to ease concerns over affordability or density	We have addressed this type of technical assistance in Part III.
32, 33, 43	Comp Plans/Technical Assistance	Plan unclear as to what consequences, if any, are intended to be applied to cities that cannot meet affordable housing Need	Submitted comprehensive plans that do not provide adequate opportunities, including sufficient land use guidance, to support the Need (as is required by the Metropolitan Land Planning Act) will be considered inconsistent with Council policy and will be ineligible for the Council's Livable Communities grant programs.
44, 54, 101	Comp Plans/Technical Assistance	Support intent to increase technical assistance to communities for planning, development, housing choices and preservation tools and sharing best practices	Comment noted.
42, 60	Comp Plans/Technical Assistance, Council/Local Roles	Means for reviewing housing elements and implementation plans (p. 58) should reference earlier list of local roles (29-30) to make clear the scope and range of local activities covered	Comment noted.
5	Council/Local Roles	Do not support expansion of the Council's existing housing role	Comment noted.

Commenter	Topic(s)	Comment	Response
11	Council/Local Roles	Plan should be a guide and not mandate ordinances, licenses, or locally funded incentives which are local government purview	Comment noted.
13	Council/Local Roles	Council role explained (p. 15), but local government role unclear	We have made changes to Part II that explain local opportunities and local responsibilities.
17	Council/Local Roles	Cities need flexibility and should not be disincentivized by not using certain or expected inclusionary housing efforts in targeted areas	Comment noted.
32	Council/Local Roles	City works closely with Dakota County CDA to define and respond to housing needs	Comment noted.
36	Council/Local Roles	Support emphasizing strong local role in continuation of subsidy programs, marketing Section 8 to landlords, providing program info when issuing licenses/performing inspections, and preserving AH by engaging property owners	Comment noted.
101	Council/Local Roles	Support Council intention to serve as a convener and elevate housing dialogue	Comment noted.
101	Council/Local Roles	A stronger recommendation for local role should be added that cities should plan for additional density in their Comp Plans and allow for it through their official controls	We address density and comprehensive plans in Part III.

Commenter	Topic(s)	Comment	Response
101	Council/Local Roles	Recommendation to design high quality projects (pg. 23) would be stronger if it recommended that cities review and adopt official controls requiring high quality projects & neighborhoods	Comment noted.
101	Council/Local Roles	Council and/or local governments could play role in providing improved education to landlords on how to rent to Section 8 Housing Choice Voucher recipients	We addressed this comment in Part II.
101	Council Local Roles	Council should work with Minnesota Housing on improved allocation of tax credits to support affordable senior housing projects	We have made changes to Part IV that address senior housing.
101	Council/Local Roles	Council should add role to provide technical assistance to local governments on best practices to allow supportive service providers to be integrated into housing projects	Comment noted.
101	Council/Local Roles	Council should add role to work with Minnesota Housing to identify means by which to fund supportive services in housing projects	Comment noted.
101	Council/Local Roles	Council should convene a group of regional providers of low- to moderate-income senior housing, local governments, and funders to discuss strategies for provision of this housing type	We have made changes to Part IV that address these and other opportunities for collaboration.

Commenter	Topic(s)	Comment	Response
101	Council/Local Roles	Discussion on placemaking assumes TOD is inherently mixed-income; as this is not the case, a Council role should be to advocate for mixed-income projects in TOD areas through implementation of LCDA-TOD and TBRA-TOD programs	We address Council funding opportunities for TOD in Part II and III.
36	Council/Local Roles	Rather than rights of offer or refusal, better role for Council would be to create a central repository of 'for sale' properties	Comment noted.
38	Council/Local Roles	Support Council role to collect/disseminate standardized datasets related to Plan implementation and for inventorying affordable housing	Comment noted.
53	Council/Local Roles	Plan suggests exploring rights of first refusal or offer, while CLT homeownership already has right of first refusal embedded into the CLT Ground Lease which allows CLT to ensure next homeowner is low to moderate income	We have made changes to Part II that address CLTs and rights of first refusal.
81	Council/Local Roles	Council intends to call the shots while local cities are mere implementers	Comment noted.
88	Council/Local Roles	Plan can better define government and other sectors' roles in developing housing	We have made changes to Part I that respond to this comment, including a Special Supplement on how affordable housing is produced.

Commenter	Topic(s)	Comment	Response
1, 4, 13, 25, 27, 28, 29, 33, 38, 44	Council/Local Roles	Seek clarity on whether local roles are mandates/requirements or suggestions	We have made changes to Part II that explain local opportunities and local responsibilities.
33, 30	Council/Local Roles	Licensing and code enforcement are local issues	We have clarified local opportunities around rental licensing and code enforcement in Part II.
9, 12	Council/Local Roles	Plan states cities <i>must</i> expand rental housing licensing and housing inspections, and acquire land for "inclusionary housing"	We have clarified local opportunities around rental licensing and code enforcement in Part II.
43	Council/Local Roles, Fair Housing	Council roles are timid and reliant on further discussion	Comment noted.
101	Council/Local Roles	Consider adding roles as pertain to brief discussion on accessory dwelling units	We made changes to Parts II and III that respond to this comment.
18	Definitions	The real, severe cost burden is households that pay more than 50% of income on housing costs where limited resources should be prioritized	We address a lack of resources and subsequent need for priorities in Part I.
40	Definitions	Around central corridor, affordability thresholds recommended are 10% of units at 20% AMI and 10% at 30% of AMI for rentals, and 5% at 30% AMI and 5% at 50% of AMI for ownership	Comment noted

Commenter	Topic(s)	Comment	Response
41	Definitions	Council should focus on distributing resources to ensure the 30% of income rule, providing access anywhere individuals and families choose to live, regardless of income	We address affordable housing as 30% of a household's income and the importance of a full range of housing options throughout the region in Part I.
44	Definitions	Plan would benefit from definitions of the public, private, and non-profit sectors in housing	We address the public, private, and non-profit sector's role in housing in more detail in a Special Supplement at the end of Part I.
58	Definitions	Local cities and counties should use a different method for assessing affordability that takes income disparities into account	While local variation in incomes is important, incorporating it could be methodologically complex. Therefore the Plan uses the industry standard method.
58	Definitions	Use of a regional Area Median Income (AMI) leads to definitions of affordable housing that are not truly affordable	Comment noted.
87	Definitions	Use 30% as a core principle, but housing affordability is about access	The Council agrees with this statement.
101	Definitions	Plan should use consistent definition of affordable housing; seems to go back and forth between general definition of housing affordability (30% of gross income) and a set income level (e.g. 50% of AMI)	This way of defining affordability does add complexity, but is typical. We addressed the definition of affordable housing in Part I and the Glossary.

Commenter	Topic(s)	Comment	Response
63	Definitions	Should stress "diverse ways of living" in core definitions	We have made changes to Part II that address cultural sensitivity and diverse ways of living.
63	Definitions	What are the key measures of affordability in the Plan?	We addressed the definition of affordable housing in Part I and in the Glossary.
63	Definitions	Instead of "disability" use "special needs" or other such as limited mobility, hearing, etc.	Disability is the primary term used, consistent with the Olmstead Plan and as most commonly used in the housing industry.
76	Definitions	Instead of "safe, decent," use "safe, quality, affordable housing"	Comment noted.
6, 33	Definitions	Use "unsubsidized" instead of "naturally occurring" to describe private unsubsidized rental housing	We have made changes to Part II that emphasize unsubsidized as the preferred terminology.
12	Demographic Change/Preferences	Not all communities will be alike as pertains % of seniors and attraction of young families	We have made changes to Part II that address the wide variety of housing preferences and communities in our region.
18	Demographic Change/Preferences	Plan understates growing trend of poverty in the suburbs and overstates priority need	Comment noted.

Commenter	Topic(s)	Comment	Response
37	Demographic Change/Preferences	Housing cost burdens in our county are comparable to all others; this supports the need for investment in communities not just along existing/planned transit ways or light rail lines	The Council agrees with this statement.
39	Demographic Change/Preferences	Senior housing references show little understanding; info is provided about aging in place and universal design, but these aren't in key measures or financial priorities	We have made changes to Part IV that address senior housing.
39	Demographic Change/Preferences	References to senior housing seem to assume 55-plus segregated housing even though surveys show most seniors prefer age integrated settings	We have made changes to Part IV that address senior housing.
39	Demographic Change/Preferences	Serving seniors in integrated housing developments will help us avoid the inevitable "what do we do with these failed and empty senior housing complexes" if we overbuild now	We have made changes to Part IV that address senior housing.
45	Demographic Change/Preferences	Barriers are particularly present for persons 55 and older, who are increasingly using homeless shelters and housing programs	We have made changes to Part IV that address senior housing.
46	Demographic Change/Preferences	Consumer preference data refutes policy theme of high density & redevelopment demand	Comment noted.
46	Demographic Change/Preferences	Believe future growth will not follow transit-oriented pattern but a familiar market-oriented pattern with nuanced higher density growth in developed parts of region	Comment noted.

Commenter	Topic(s)	Comment	Response
63	Demographic Change/Preferences	Demography section focuses on age but should be on diversity too--population is aging <i>and</i> becoming more diverse	We have made changes to Part I that address demographic shifts in race and ethnicity.
19, 33, 36, 100	Demographic Change/Preferences	Plan aims to expand choice and livability, but pays too little attention to issues facing seniors	We have made changes to Part IV that address senior housing.
37, 38	Demographic Change/Preferences	Plan largely silent on Council role in responding to aging population; leverage data collection and funding resources to meet needs such as to age in place or move to senior housing	We have made changes to Part IV that address senior housing.
59	Demographic Change/Preferences, Fair Housing	More baby boomers are searching for single level, accessible housing, not just affordable but low income. Many ideas for 'accessible' work for all populations (e.g. lower mounted light switches, higher mounted outlets, lighted counters, showers)	We have made changes to Part IV that address senior housing.
22	Education	Council should facilitate regional conversations about disparities in school system and impact on neighborhoods and housing choice	We have made changes to Part IV that address the relationship between housing decisions and school district decisions.
41	Education	Plan should more explicitly and directly coordinate housing and education policy	We have made changes to Part IV that address the relationship between housing decisions and school district decisions.

Commenter	Topic(s)	Comment	Response
42	Education	Encouraged that conversations between housing sector and education sectors, and their mutual effect on each other, are planned for	We have made changes to Part IV that address the relationship between housing decisions and school district decisions.
43	Education	Plan is needlessly timid in discussing interaction between housing and education	We have made changes to Part IV that address the relationship between housing decisions and school district decisions.
43	Education	Instead of direct action linking housing and education, Plan only promises to bring together other groups for unspecified collaboration and convening	We have made changes to Part IV that address the relationship between housing decisions and school district decisions.
43	Education	Institute on Metropolitan Opportunity simulation shows that if Section 8 voucher usage was equalized evenly, 5,531 nonwhite students in predominantly nonwhite schools would be attending a racially balanced school	Comment noted.
43	Education	MLUPA requires Comp Plans to contain statement on effect of plans on affected school districts, and suggests they contain an intergovernmental coordination process for cooperation with school districts generally and siting of public schools in particular	Comment noted.

Commenter	Topic(s)	Comment	Response
72	Education	Plan needs to more directly link housing activities with improved educational outcomes	We have made changes to Part IV that address the relationship between housing decisions and school district decisions.
80	Education	More can be done to improve alignment between housing and education efforts	We have made changes to Part IV that address the relationship between housing decisions and school district decisions.
80	Education	Racial and educational segregation has been exacerbated and Council should show greater leadership and be more active and accountable in this area	Comment noted.
2	Employment	The private sector needs to play an expanded role in providing workers with affordable, quality housing options	Comment noted.
20	Employment	Linkage should be to <i>all</i> wage jobs, not just low wage; concentrations of service jobs may limit opportunity; manufacturing jobs provide better path out of poverty	We will finalize the methodology for the Need, including adjustments for jobs/worker ratio, in a 2015 amendment to the HPP.
20	Employment	Low-wage jobs implies low <i>skill</i> , which isn't always the case, such as some immigrant communities that lack American education and language skills	Comment noted.

Commenter	Topic(s)	Comment	Response
41	Employment	Plan should enhance Council's efforts to provide more opportunities for businesses owned/operated by people of color	Comment noted.
75	Employment	There is a great need in the region for workforce housing	Comment noted.
18	Employment	Transportation and transit mobility supports the workforce that works in the local downtown, even though workers may not need to be housed here	Comment noted.
39	Employment, Funding Priorities	Naturally occurring/unsubsidized rental housing can provide route out of poverty for skilled low income households	We address unsubsidized affordable housing's role in the region in Part II.
2	Fair Housing /Civil Rights	Providing mobility counseling is not possible at local level	Comment noted.
10	Fair Housing /Civil Rights	Commend Council for elevating issue and exploring roles in ending discrimination; support a Council Fair Housing policy	We have made changes in Part II and Part IV that further address fair housing.
10	Fair Housing /Civil Rights	Support effort to determine strategies, roles/responsibilities, and identification of resources to monitor/enforce FHA	Comment noted.

Commenter	Topic(s)	Comment	Response
17	Fair Housing /Civil Rights	Certain statements assume cities are not equitable or providing opportunity for all, which is unfair; all cities operate under fair housing rules and provide opportunities regardless of socio-economic status	We address Fair Housing in Parts II and IV of the plan. The plan does not assign blame but identifies disparities in housing choices between whites and people of color. It identifies strategies, including those that are a part of the Fair Housing Act that will promote equal opportunities to safe, decent, affordable housing regardless of race, gender, age, or any other protected class.
18	Fair Housing /Civil Rights	Support building/sustaining neighborhoods that don't create areas of concentrated poverty	The Council agrees with this statement.
18	Fair Housing /Civil Rights	RCAPs are the primary focus of the Plan and where severe cost burdens exists; program and resource allocation cannot be primarily a capital intensive building of new affordable units in suburban locations	We address investments in Areas of Concentrated Poverty in Parts II and IV.
18	Fair Housing /Civil Rights	City supports the connection of poverty, education, jobs and housing opportunities, through improved mobility in RCAP areas	The Council agrees with this statement.
22	Fair Housing /Civil Rights	Council is required to affirmatively further fair housing through its receipt of HUD dollars	We have made changes in Part II and Part IV that further address fair housing.

Commenter	Topic(s)	Comment	Response
100	Fair Housing/Civil Rights	Plan should contain more robust action steps to address RCAPs and maintaining naturally occurring/unsubsidized affordable rental housing	We address investment in Areas of Concentrated Poverty in Part IV and have made changes to Parts I and II that respond to preserving unsubsidized affordable housing.
23	Fair Housing /Civil Rights	Not adequate attention paid to RCAPs--Council should use CPO as guidance when calculating housing allocation needs and housing performance scores	We will finalize the methodology for the Need, including existing affordable housing and concentrations of poverty, in a 2015 amendment to the HPP. We will finalize the methodology for the Score in 2015 as well.
26, 95	Fair Housing /Civil Rights	If adopted as is, Plan may contribute to <i>more</i> racial and income segregation	Comment noted.
41	Fair Housing /Civil Rights	Language used in regard to discrimination is inappropriately non-committal	We have made changes to Parts II and IV that address discrimination and fair housing.
41	Fair Housing /Civil Rights	Council must use all of its "considerable powers of oversight and its budgetary influence"	Comment noted.
42	Fair Housing /Civil Rights	Reinforce fair housing obligations of local governments by incorporating obligations in Comp Plan Housing Elements guidance and HPS methodology	We have made changes to Parts II and IV that address fair housing and in Part III that address housing elements.

Commenter	Topic(s)	Comment	Response
22, 41	Fair Housing /Civil Rights	MLUPA requires local governments to adopt fair share requirements and Council is obligated to coordinate/ensure follow-through	We have added language to Part III that responds to this comment.
22, 43	Fair Housing /Civil Rights	Plan does not affirmatively further fair housing laws, or help reduce poverty or segregation	We have made changes to Parts II and IV that address fair housing.
41, 42, 60, 97	Fair Housing /Civil Rights	Plan should include stronger position on ending racial discrimination in housing, including racial steering and discriminatory mortgage lending	We have made changes to Parts II and IV that respond to this comment.
42, 60, 79	Fair Housing /Civil Rights	Fair Housing should be restored as a commitment rather than area to explore; language and resources not enough	We have made changes to Parts II and IV that address fair housing.
42, 60	Fair Housing /Civil Rights	Plan is silent on actions by governments that can violate Fair Housing Act (FHA), including actions by local governments that limit housing choice for protected class persons	We address Fair Housing in Parts II and IV of the plan. The plan does not assign blame but identifies disparities in housing choices between whites and people of color. It identifies strategies, including those that are a part of the Fair Housing Act that will promote equal opportunities to safe, decent, affordable housing regardless of race, gender, age, or any other protected class.
42, 60, 99	Fair Housing /Civil Rights	Council can incorporate fair housing in its own policies and expect the same of grantees	We have made changes to Parts II and IV that address fair housing.

Commenter	Topic(s)	Comment	Response
10, 55	Fair Housing /Civil Rights, Parks	Location and accessibility to natural features impacts livability; investments in accessibility and improvements make parks more useful	Further discussion on these issues will occur in the Regional Parks Policy Plan.
18	Fair Housing, Transportation	Transportation and transit is the immediate, underserved need within the RCAP areas; plan should encourage mobility solutions to improve access to places to work, live, and learn	We address the relationship between transportation and housing needs in Part II.
18	Fair Housing, Transportation	A policy position of "improvements to impoverished neighborhoods, such as transit investments, may inflate the cost of housing and displace residents" is counterproductive. Gentrification can be managed in RCAPs	Comment noted.
52	Fair Housing/ Civil Rights	Effort toward Home and Community Based Services (HCBS) will require all state agencies to pitch in to increase housing affordable for persons with disabilities and meeting HCBS standards	Comment noted.
53	Fair Housing/ Civil Rights	CLTs not only require homeowners to take homebuyer and CLT education before purchase, but maintain ongoing trainings and support; CLTs have continued to serve households of color at rates two to three times rate of local communities and recent local studies have shown significantly increased household incomes since time of purchase	We have made changes to Part II that address CLTs.

Commenter	Topic(s)	Comment	Response
54	Fair Housing/ Civil Rights	Embrace notion that residents should be able to succeed in place as well as move to areas of high opportunity	We have made changes to Parts II and IV that address the importance of housing choice and the need to invest in Areas of Concentrated Poverty, respectively.
54	Fair Housing/ Civil Rights	Support working with cultural communities to develop housing that is culturally sensitive	We have made changes to Part II that address culturally sensitive housing.
63	Fair Housing/ Civil Rights	Equity talked about in terms of income, but opportunity is there for dialogue about racial, ethnic, cultural, and religious disparities that link to economic, health and other disparities	Comment noted.
67	Fair Housing/ Fair Share	As a homeowner in Brooklyn Park don't feel the city should be required to provide more affordable housing; Council must demand all cities provide fair share of affordable housing	Comment noted.
68	Fair Housing/ Fair Share	Stop requiring cities like Richfield to concentrate poverty; Plan identifies concentrated poverty but continues to require Section 42 units when city has over 54% affordable housing	The Council does not have the legal or regulatory authority to require Section 42 (Low Income Housing Tax Credit-subsidized) units.
99	Fair Housing/Civil Rights	Plan is missing analysis of how private and government sectors impact housing choice of protected classes	Comment noted.

Commenter	Topic(s)	Comment	Response
94	Fair Housing/Civil Rights	Disappointed that stronger Fair Housing language was stripped out of the draft	We have made changes to Parts II and IV that address fair housing.
22	Fair Housing/Civil Rights	Plan will result in social outcomes detrimental to the local tax base	Comment noted.
26	Fair Housing/Civil Rights	Goals are laudable, but Plan doesn't address concerns about <i>regional</i> fair housing	We have made changes in Part II and Part IV that address fair housing.
39	Fair Housing/Civil Rights	Plan inadequate in addressing needs for those with disabilities; achieving compliance with court-directed housing requirements will require Council's partnership and financing tools	We have made changes to Part IV that address housing for people with disabilities.
39	Fair Housing/Civil Rights	Persons with disabilities are generally in low end of poverty and a discussion regarding affordable housing planning cannot ignore this need	We have made changes to Part IV that address housing for people with disabilities.
34, 39	Fair Housing/Civil Rights	No priority or suggested allocation for disabled population is noted for scattered site Section 8 Housing Choice Vouchers or in Housing Performance Scores	Local efforts to provide accessible housing will be included in the to-be-revised Housing Performance Scores
39	Fair Housing/Civil Rights	Neither the disabled or senior populations are referenced in discussion of "inclusionary" housing which seems focused on race and poverty segregation	We have made changes to Part IV that address senior housing and housing for people with disabilities.

Commenter	Topic(s)	Comment	Response
39	Fair Housing/Civil Rights	Sure "the insiders" (development professionals in both the public and private sectors and some city electeds) have been actively engaged, but general public have not	Outreach and engagement for this Plan began with the Council's extensive outreach before and during the development of <i>Thrive MSP 2040</i> .
42	Fair Housing/Civil Rights	More can be done to promote region-wide mobility for Section 8 voucher holders	We address mobility for Section 8 voucher holders in Part II.
43	Fair Housing/Civil Rights	Plan makes no attempt to reinstitute the more effective approach of previous years where bold and easily-understood policies attacking segregation and income disparity were supported with penalties for areas refusing to meet housing obligations	Comment noted.
43	Fair Housing/Civil Rights	Plan acknowledges challenges but substantive policies barely attempt to reduce disparities	The Plan calls for action on this in a variety of domains including the Score, tying housing to transportation funding decisions, and strategies to increase choice and access. We have made changes to Part II that provide indicators to measure disparities over time as a component of accountability.
43	Fair Housing/Civil Rights	Minimally, government agencies must analyze the impact of new housing on racial concentration in advance of siting new low-income housing	Comment noted.

Commenter	Topic(s)	Comment	Response
43	Fair Housing/Civil Rights	Council not only subject to Sec. 3604's duty to not perpetuate segregation and Sec. 3608's duty to affirmatively further fair housing, but through state statute has a duty to implement a true 'fair share' system for even distribution of housing among region's cities	Comment noted.
43	Fair Housing/Civil Rights	Plan admirably recognizes the importance of housing choice	Comment noted.
43	Fair Housing/Civil Rights	Obligations of Section 3608 are enshrined in federal law and exist regardless of HUD guidance or any "political challenges"	Comment noted.
43, 95	Fair Housing/Civil Rights	Without major revisions, Plan's cursory dismissal of fair housing almost certainly places it in direct violation of the FHA	We have made changes to Parts II and IV that address fair housing.
43	Fair Housing/Civil Rights	1985 Plan measures designed to combat segregation, reduce disparities, and promote fair housing are abandoned in draft	We have made changes to Parts II and IV that address fair housing.
43	Fair Housing/Civil Rights	Council's written response suggested policies were eliminated by implication through non-enforcement, apparently relying on a legal theory in which regulated entities can assume a law has simply evaporated if it goes unmentioned for a few years	The Council took official actions in 1998 and 1999 that removed the 1985 Housing Development Guide from the comprehensive development guide.

Commenter	Topic(s)	Comment	Response
43	Fair Housing/Civil Rights	While acknowledging the harms of concentrated poverty, the Plan never once directly warns of the dangers of concentrating subsidized housing	Comment noted.
43	Fair Housing/Civil Rights	Plan also abandons Policy 35 which gave priority to proposals designed to serve families and proposals to further economic integration	Comment noted.
43	Fair Housing/Civil Rights	Policy 43 stated that "Local governments should adopt plans, policies and strategies for ensuring nondiscrimination in the sale and rental of housing in their communities. These should include affirmative marketing programs and relocation services in areas of low income minority concentration to broaden housing choice for people who have been discriminated against in the sale and rental housing."	We have made changes to Parts II and IV that address fair housing.
43	Fair Housing/Civil Rights	Policy 44 suggested direct remedy (Council will monitor home mortgage finance market and disseminate info on new mortgage types); draft Plan only mentions discrimination in passing	We have made changes to Parts II and IV that respond to some portions of this comment. However, the Council is not well positioned to monitor the home mortgage finance market and looks forward to partnering with other entities.
43	Fair Housing/Civil Rights	Rather than laying out specific strategies, Council promises to collaborate in regional initiatives, though what initiatives are left unspecified	We have made changes to Parts II and IV that address collaboration more specifically.

Commenter	Topic(s)	Comment	Response
43	Fair Housing/Civil Rights	Until it reconsiders past failed policies, Council will be failing in duty to make the Twin Cities more equitable and prosperous	Comment noted.
43	Fair Housing/Civil Rights	Plan in violation of Council's legal obligations to combat racial and economic housing inequality	Comment noted.
45	Fair Housing/Civil Rights	Look forward to Council's response to upcoming federal guidance on housing impediments	We have submitted formal comments to HUD on its Proposed Rule.
45	Fair Housing/Civil Rights	Concentrated poverty kills opportunity--job training, economic development, transit, and affordable housing policies need to work in concert to eliminate it	We address strategies for Areas of Concentrated Poverty in Part IV.
47	Fair Housing/Civil Rights	Strengthen fair housing language, maintain policy 39, add enforcement of inclusionary zoning, testing, and Analysis of Impediments; all these should be requirement in Comp Plans	We have made changes to Parts II and IV that address fair housing.
47	Fair Housing/Civil Rights	Building wealth for minorities and people with limited incomes should occur throughout the region and not just in CAPs	Comment noted.
48	Fair Housing/Civil Rights	Appreciate acknowledgement of the 2013 Minnesota Olmstead Plan and its directive to integrate affordable accessible housing, accessible public transportation, and employment for persons with disabilities	Comment noted.

Commenter	Topic(s)	Comment	Response
48	Fair Housing/Civil Rights	Need clarity on what the Council will do to address broad goals regarding persons with disabilities; questions remain on how those who need it will find accessible housing, how people with disabilities are included in planning processes, increased needs brought on by our aging population, serving Minnesotans with disabilities in rural settings, and what options will be available in terms of space for accessible units	We have made changes to Part IV that address housing for people with disabilities.
48	Fair Housing/Civil Rights	Recommend inclusion of 8 Centers for Independent Living (CIL), more robust data gathering on disability community, and inclusion of persons with disabilities on the HPP committee	We have made changes to Part IV that address housing for people with disabilities.
49	Fair Housing/Civil Rights	Manufactured communities themselves likely meet the threshold of an RCAP; solution must involve engagement with owners to access stability and opportunity and not be displaced	We have made changes to Part II that address manufactured housing.
49	Fair Housing/Civil Rights	Support the comments of Equity in Place	Comment noted.
49	Fair Housing/Civil Rights	Important not just to speak to where new affordable housing should go but acknowledge the struggle Latinos and other communities of color face in their current housing	We address disparities and the need for quality affordable housing in Parts I and II.

Commenter	Topic(s)	Comment	Response
49	Fair Housing/Civil Rights	As there is no current means to change one's immigration status or become a US citizen, access to near all of the opportunities and indicators used by the Council is limited	Comment noted.
50	Fair Housing/Civil Rights	Regional efforts must address three pathways to improve odds for low-income families: build affordable housing in places that lack affordability; preserve affordability where it exists; and connect affordable housing and employment by strengthening regional transit	The Council agrees with this statement.
50	Fair Housing/Civil Rights	Focus on RCAPs has two unfortunate effects: it predisposes a link between race and poverty, and further stigmatizes these communities creating market disincentives	We have made changes to Parts I, II, and IV that address investments in Areas of Concentrated Poverty.
50	Fair Housing/Civil Rights	Regional approach should be collaborative, comprehensive and community driven, bringing together key local players to incubate new solutions	The Council agrees with this statement.
51	Fair Housing/Civil Rights	Continue commitment to deep and real community engagement in RCAPs	We made changes to Part II that address community engagement.
51	Fair Housing/Civil Rights	Council should assume leadership role in securing resources for fair housing testing whether by MN Dept of Human Rights or community-based organizations	The Council has committed to providing resources to support identification of discriminatory practices in its 2015 budget.

Commenter	Topic(s)	Comment	Response
52	Fair Housing/Civil Rights	Center on Medicare and Medicaid Services is implementing new regulations for Home and Community Based Services (HCBS) that will significantly change the way housing services for persons with disabilities receive support through Medicaid	Comment noted.
52	Fair Housing/Civil Rights	Goals of Olmstead include identifying those wanting a more integrated setting, increasing best practice usage, increasing # of affordable units, increase in households who are not cost-burdened; increase in choice and # of persons living in most integrated settings, and pursuing additional federal funding such as Mainstream Vouchers or Section 811	We have made changes to Part IV that address housing for people with disabilities.
52	Fair Housing/Civil Rights	No recognition of goals of persons with cognitive disabilities or needs unrelated to physical accessibility	We have made changes to Part IV that address housing for people with disabilities.
52	Fair Housing/Civil Rights	Federal Judge Donovan Frank rejected Olmstead Plan revisions submitted by MN Department of Human Services for lack of clear goals in implementing numerous goals	We have made changes to Part IV that address housing for people with disabilities.
99	Fair Housing/Civil Rights	Council should seize opportunity to partner with the state on Olmstead planning	We have made changes to Part IV that address housing for people with disabilities.

Committer	Topic(s)	Comment	Response
52	Fair Housing/Civil Rights	Council already serves persons with disabilities through Metro Mobility and should work with partners in state government to create more comprehensive housing goals	Comment noted.
53	Fair Housing/Civil Rights	CLTs have proven a strong tool to address high-income and high-poverty neighborhoods; rehab in purchase process helps stabilize housing in higher-poverty areas and 'de-commoditize' a portion of ownership housing in higher-income neighborhoods	We have made changes to Part II that address CLTs.
54	Fair Housing/Civil Rights	Support moving Fair Housing content back to Section 2, and incorporating fair housing into Council processes, grant decisions, and Housing Performance Scores	We have made changes to Parts II and IV that address fair housing.
55	Fair Housing/Civil Rights	Commend consideration of a Fair Housing Policy for the HRA and coordinating Comprehensive and Consolidated Plans	We have made changes to Parts II and IV that address fair housing.
55	Fair Housing/Civil Rights	It is not suggested Council has enforcement authority, but it does have authority to incorporate fair housing into its operations and its comprehensive development guide	The Council agrees with this statement.
55	Fair Housing/Civil Rights	Council should start with a values statement on Fair Housing, with related policy integrated into Council operations, systems plans and the HPP	We have made changes to Parts II and IV that address fair housing.

Commenter	Topic(s)	Comment	Response
55	Fair Housing/Civil Rights	Each major division of the Council should develop understanding of Fair Housing Policy and incorporate into work plans and policy discussions	We have made changes to Parts II and IV that address fair housing.
55	Fair Housing/Civil Rights	Council staff should have basic understanding and know who they can go to inside the Council to report any potential violations	Comment noted.
55	Fair Housing/Civil Rights	Certain staff should have more responsibility--e.g. HRA staff looking for new/better ways to serve persons with disabilities or immigrant families, and planning staff should know how to identify/respond to land use policies or NIMBY-ism that expands RCAPs or restricts choice	Comment noted.
55	Fair Housing/Civil Rights	Planning & research functions can supply data and leadership to advance equity of Thrive	The Council agrees with this statement.
55	Fair Housing/Civil Rights	Council is required to certify to HUD that it furthers fair housing as a condition of HRA funding, and the Corridors of Opportunity work also entailed responsibilities; at minimum, the Council should take steps to ensure the HRA expands housing choice and that its full range of work is consistent with affirmative furthering	We have made changes to Parts II and IV that address fair housing.
56	Fair Housing/Civil Rights	Change laws and internal policies of MHFA, Met Council and other state agencies that cause disparities and inequities	Comment noted.

Commenter	Topic(s)	Comment	Response
56	Fair Housing/Civil Rights	Compounding charges on interest charged, assessment of unfair fees, and discrimination and unfair/unjust targeting of ethnic owners and renters put households at risk of homelessness	The Council agrees with this statement.
56	Fair Housing/Civil Rights	More focus should be put on laws and policies that create risks or cause homelessness, foreclosure or other adverse conditions such as fees, tax liens, evictions, foreclosure and other penalties for not maintaining a home in good condition	Comment noted.
57	Fair Housing/Civil Rights	Aggregate data on homeownership and income does not capture existing disparity experienced by SE Asian communities, especially new refugees (e.g. Karen and Bhutanese)	Comment noted.
57	Fair Housing/Civil Rights	Concerned about lack of affordable housing for large families, which results in overcrowded housing; other options (e.g.) public housing do not accommodate large families	We have made changes to Part II that address the need for housing for large families.
57	Fair Housing/Civil Rights	There is a geographic mismatch between Asian Pacific population and existing affordable housing options such as public housing and Section 8; this is compounded by language and transportation barriers in suburbs and in the central cities by long waiting lists	Comment noted.

Commenter	Topic(s)	Comment	Response
57	Fair Housing/Civil Rights	Pursue increased participation of homeowners of color (from emerging communities) in programs such as Section 8 and LIHTC	Comment noted.
57	Fair Housing/Civil Rights	Provide more culturally and linguistically accessible technical assistance in areas of community outreach, landlord outreach, and the Request for Proposal (RFP) process for housing voucher, Section 8 and other programs	Comment noted.
60	Fair Housing/Civil Rights	Discussion of private discrimination is well covered but governmental violations of the FHA aren't and need to be acknowledged; Council should ensure not only that resources are committed but help ensure appropriate entities take necessary action to eradicate practices	We have made changes to Parts II and IV that address fair housing and discrimination.
61	Fair Housing/Civil Rights	Safe, quality affordable housing suitable to one's lifestyle is very difficult to find; challenge Council to visit low income housing and not to be afraid of 'bullies' in wealthier suburbs	Comment noted.
63	Fair Housing/Civil Rights	Reader needs more info to understand about culturally sensitive design that is flexible and adaptable to support multiple ways of living	We have made changes to Part II that address culturally sensitive housing.
63	Fair Housing/Civil Rights	Include section on aligning housing with health priorities; while one of the healthiest region's in nation, have some of the widest health disparities between whites and people of color (e.g.	We have made changes to Part I that respond to this comment.

Commenter	Topic(s)	Comment	Response
63	Fair Housing/Civil Rights	Great language, but need more specificity as to who and how	Comment noted.
68	Fair Housing/Civil Rights	Housing opportunities should be free from illegal housing discrimination and exclusionary zoning; promote racially and economically integrated neighborhoods	The Council agrees with this statement.
70	Fair Housing/Civil Rights	Plan has lots of pretty words about how inequitable housing is, but no teeth as to how it will enforce the Land Use Planning Act through withholding funds, for instance	Submitted comprehensive plans that do not provide adequate opportunities, including sufficient land use guidance, to support the Need (as is required by the Metropolitan Land Planning Act) will be considered inconsistent with Council policy and will be ineligible for the Council's Livable Communities grant programs.
70	Fair Housing/Civil Rights	Plan should include fair housing amendment put forth by the Comm. Development Cte.	We have made changes to Parts II and IV that address fair housing.
79	Fair Housing/Civil Rights	Strategies should focus on access to resources, opportunity, including wealth building	We have made changes to Parts II and IV that address this comment.

Commenter	Topic(s)	Comment	Response
71	Fair Housing/Civil Rights	Quit trying to keep people on the plantation; private market good at building what's needed	We address the role of the private market and the public sector in housing in Part I.
76	Fair Housing/Civil Rights	Support statements linking poverty and physical and mental health	Comment noted.
76	Fair Housing/Civil Rights	Request clarity on how crime-free/drug-free lease addendums impact persons who have been previously convicted and are vulnerable in finding someplace to live	Crime-free/drug-free lease addendums primarily make it easier for a landlord to evict a tenant when a crime or drug-related offence occurs on the property being rented. Prior convictions are not components of crime-free/drug-free lease addendums.
84, 87	Fair Housing/Civil Rights	Need to expand affordable, fair housing choice throughout the metro	The Council agrees with this statement.
85	Fair Housing/Civil Rights	When we talk about fair housing, life-cycle, equitable access, people think NIMBY (Not in My Back Yard) and think about how it benefits minorities, single moms, immigrants, etc., but not necessarily about how this impacts a grandma, for instance, that might have to go from the suburbs to the central core or inner suburbs where subsidized housing is available	Comment noted.
85	Fair Housing/Civil Rights	Housing segregation and discrimination hurt white people, too	The Council agrees with this statement.

Commenter	Topic(s)	Comment	Response
84	Fair Housing/Civil Rights	Rampant mortgage lending discrimination and steering need more emphasis in Plan	We have made changes to Parts II and IV that address fair housing and discrimination.
84	Fair Housing/Civil Rights	Financial support for research alone is insufficient as regards fair housing	We have made changes to Parts II and IV that address fair housing.
93	Fair Housing/Civil Rights	People of color want to live where they want to live, nothing wrong with living together, but problem is that there isn't same access to opportunities	The Council agrees with this statement.
84	Fair Housing/Civil Rights	Council can improve economic development in low-income communities by enforcing Women-Owned Business Enterprises and Minority-Owned Business Enterprises (WBEs & MBEs)	We address WBEs and MBEs in Part IV.
91	Fair Housing/Civil Rights	You can't have a fair outcome when the people on the Council don't represent the community, and it cannot make fair decisions with one ethnic group controlling everything	Comment noted.
93	Fair Housing/Civil Rights	Talk about integration refuses to acknowledge systematic barriers that have been created	These issues are explored in depth in the Council's Choice, Place, & Opportunity Report
94	Fair Housing/Civil Rights	Can't be putting people of color into the "school to prison pipeline"	Comment noted.

Commenter	Topic(s)	Comment	Response
94	Fair Housing/Civil Rights	Consequences of letting affluent suburbs off the hook are serious and others (e.g. Brooklyn Park) will have to have more than fair share	We made changes to Part II that address the need for more affordable housing in some suburban locations.
34, 36, 39	Fair Housing/Civil Rights	Plan should address a broader range of disabilities, including mental health, developmental, and other disabilities	We have made changes to Part IV that respond to this comment.
97	Fair Housing/Civil Rights	We need to provide equitable opportunities for homeownership and rental	The Council agrees with this statement.
42, 60	Fair Housing/Civil Rights	Committing to address problems with concentrated poverty is important new emphasis	Comment noted.
45, 51	Fair Housing/Civil Rights	Applaud emphasis on expanding options for low-income households including plan to increase Section 8 Housing Choice Voucher mobility and Section 8 landlord participation	Comment noted.
49, 51	Fair Housing/Civil Rights	More attention should be paid to manufactured housing as it is a major source of non-subsidized affordable housing for Latinos in the suburbs but people of color are disproportionately displaced by manufactured park closure and subject to poor conditions	We have made changes to Part II that address manufactured housing.
84, 90	Fair Housing/Civil Rights	Suburban communities must accept a fair share and Council should enforce goals in every community and combat exclusionary zoning in suburbs	We have made changes to Part II that address the need for more affordable housing in some suburban locations.

Commenter	Topic(s)	Comment	Response
83	Fair Housing/Civil Rights	Amazing that we still have this problem; the richness of all cultures should not be denied to people living in a distant suburb	Comment noted.
85	Fair Housing/Civil Rights	Need to be talk about access to housing throughout the area for people that already live there and want to stay not flee	Comment noted.
68	Fair Housing/Civil Rights, Education	Ask wealthier cities for fair share; Edina has not built single affordable unit in school system	We have made changes to Part II that address the need for more affordable housing in some suburban locations.
55	Fair Housing/Civil Rights, Funding/Funding Priorities	Denser development can be more affordable and provide greater choice; Council should consider whether sewer investments are going to communities actively pursuing a range of options, and whether investments are sensible in terms of coordination with transit availability and access to jobs, services, & good schools	We address stewardship of resources such as infrastructure in Part II.
53	Fair Housing/Civil Rights, Homeownership	Draft barely mentions a key strategy in closing one of our greatest racial disparities--the homeownership gap--toward which Community Land Trusts can contribute	We have made changes in Part II that address CLTs.

Commenter	Topic(s)	Comment	Response
49	Fair Housing/Civil Rights, TOD	Plan should consider potential impacts of TOD/corridor development on existing affordable housing (subsidized & unsubsidized) to ensure low-income communities and communities of color near station areas are able to remain there to access opportunities transit brings	The Council agrees with this statement.
2	Funding /Funding Priorities	Cost of suburban land makes affordable single family development almost impossible	Comment noted.
8	Funding /Funding Priorities	Various housing initiatives should be coordinated to eliminate duplication	The Council agrees with this statement.
10	Funding /Funding Priorities	Cultivate more active collaboration from partners in retaining/growing programs and funding	We made changes to Part I, II and IV that address collaboration and the need for more resources.
10	Funding /Funding Priorities	Sewer Availability Charge (SAC) proposal lacking detail and may not be effective tool	All further discussion of SAC will be in the Water Resources Management Plan.
11	Funding /Funding Priorities	If SAC is "politically and structurally" challenging, first Council role should be to lobby legislature to make necessary changes to use SAC for affordable housing	All further discussion of SAC will be in the Water Resources Management Plan.
11	Funding /Funding Priorities	Consider expanding SAC proposal to transit supportive facilities as well as housing	All further discussion of SAC will be in the Water Resources Management Plan.

Commenter	Topic(s)	Comment	Response
12	Funding /Funding Priorities	City interested in exploring grant programs to assist in clean-up and/or redevelopment of its downtown area	We welcome applications to Tax Base Revitalization Account.
14	Funding /Funding Priorities	CDBG used to provide funds to small cities but now compete for limited funds	Comment noted.
17	Funding /Funding Priorities	There should be an appeals process to Council funding decisions	Comment noted.
24	Funding /Funding Priorities	Met Council needs to provide tools/resources to rehabilitate existing housing stock	Comment noted.
32	Funding /Funding Priorities	Concern that Plan refers to LIHTC as a subsidy	Comment noted.
33	Funding /Funding Priorities	HRA supports grants for brownfield clean-up and infill redevelopment	Comment noted.
33	Funding /Funding Priorities	Strategic acquisition fund in transit corridors is important in planning housing investments	The Council agrees with this statement.
34	Funding /Funding Priorities	County encourages Council to provide sufficient financial resources to meet housing need	We have made changes to Part I and III that address the Council as a funder of housing.
34	Funding /Funding Priorities	Addressing naturally occurring/unsubsidized will be costly and should be funded by Council	We have made changes to Part I and III that address the Council as a funder of housing.

Commenter	Topic(s)	Comment	Response
36	Funding /Funding Priorities	Preservation of existing stock, particularly publicly subsidized stock, is critical; CDA/County welcomes opportunity to partner in this regard	The Council agrees with this statement.
36	Funding /Funding Priorities	Allocate more funds to the LHIA to provide more gap financing	Additional resources for LHIA are not available without losing resources to the LCDA.
39	Funding /Funding Priorities	Priority must be given to one level living and universal design in ALL subsidized housing	We have made changes to Parts II and IV that address accessible housing and universal design.
39	Funding /Funding Priorities	Despite naturally occurring/unsubsidized providing 60% of affordable rental housing in the area, there is no Council funding suggested for reinvestment in these properties	We have made changes to Parts I and II that address the preservation of existing unsubsidized affordable housing.
39	Funding /Funding Priorities	Too much emphasis on project-based funding and too little on the impact nurturing this segment could have both on capital and operating demands	Comment noted.
39	Funding /Funding Priorities	The naturally occurring/unsubsidized market is private-based and merits public partnership in grants and low interest loans without too many strings	We have made changes to Part II that address unsubsidized affordable housing.

Commenter	Topic(s)	Comment	Response
11, 17	Funding /Funding Priorities	City can support SAC credits to affordable housing so long as it does not increase costs for other SAC customers/do not support use of SAC for affordable housing	All further discussion of SAC will be in the Water Resources Management Plan.
11, 20, 33, 36, 37	Funding /Funding Priorities	Affordable Housing SAC credit should be available to all areas and affordable projects, not just cities with concentrated poverty	All further discussion of SAC will be in the Water Resources Management Plan.
11, 20, 54	Funding /Funding Priorities	Converting grant programs into revolving loan funds might seriously impact/slow local ability to benefit affordable housing	We have made changes to Part V that respond to this comment.
16, 17	Funding /Funding Priorities	SAC credits could be good economic incentive, but is disincentive to cities in charge of own water treatment; expanding to reimburse this would be more fair	All further discussion of SAC will be in the Water Resources Management Plan.
4, 12	Funding /Funding Priorities	Growth communities on region's fringe need resources to meet affordable goals	We have made changes to Part I that address the need for more resources for affordable housing.
6, 10, 33, 88	Funding /Funding Priorities	Financial resources for housing, and local control of financing tools are inadequate in meeting the affordable need; Plan should emphasize this	We have made changes to Part I that address the need for more resources for affordable housing.
6, 8, 12, 33, 37	Funding /Funding Priorities	LCDA useful, but not an adequate affordable finance tool; additional funding needed, possibly thru Local Housing Incentives Account (LHIA) & Inclusionary Housing Account	We have addressed the Council's commitment to explore funding sources for the Inclusionary Housing Account in Part III.

Commenter	Topic(s)	Comment	Response
79	Funding /Funding Priorities	Appreciate focus on preserving housing opportunities near transitway investments	Comment noted.
14	Funding/ Funding Priorities	Plan is onerous for a small fully-developed first-tier suburb with limited resources	Comment noted.
22	Funding/ Funding Priorities	SAC credit for affordable housing means higher cost for businesses	All further discussion of SAC will be in the Water Resources Management Plan.
30	Funding/ Funding Priorities	City notes its partnership with Habitat for Humanity--applying finance model and multiplying by decennial need would cost \$137M	Comment noted.
35	Funding/ Funding Priorities	SAC is a barrier to affordable development regardless of concentrations of poverty	All further discussion of SAC will be in the Water Resources Management Plan.
35	Funding/ Funding Priorities	County requests support in working with state agencies and non-profits to develop/preserve housing in rural centers as well as elsewhere	We address collaboration to create the full range of housing options throughout the region in Parts II and IV.
36	Funding/ Funding Priorities	CDBG and other sources like HOME should not be emphasized given their historic lows	These are not overly emphasized in the Plan, though their utility as gap financing or for an array of uses under CDBG merit their inclusion.

Commenter	Topic(s)	Comment	Response
36	Funding/ Funding Priorities	Emphasize importance of cities creating disabled units and providing/expanding choice for this population	We have made changes to Part IV that address housing for people with disabilities.
36	Funding/ Funding Priorities	Council should partner with Department of Human Services, counties and cities to help facilitate Olmstead Plan implementation	We have made changes to Part IV that address housing for people with disabilities.
36	Funding/ Funding Priorities	Council should consider a 0% deferred loan program for communities to acquire sites without capturing appreciation; consider forgiveness if LIHTC development materializes	Comment noted.
37	Funding/ Funding Priorities	Creating new construction affordable rental requires substantial subsidy in the county	We have made changes to Part I that address the need for more resources for affordable housing.
38	Funding/ Funding Priorities	Regional housing plan and investments must be attentive to local dynamics by providing investment strategies and options that fit all community types	The Council agrees with this statement.
42	Funding/ Funding Priorities	Work raising the bar on local efforts in housing is reinforced by commitment to fund Inclusionary Housing Account, as well as plan to collaboratively determine how best spent	We have addressed the Council's commitment to explore funding sources for the Inclusionary Housing Account in Part III.
51	Funding/ Funding Priorities	Waive SAC in conjunction with Inclusionary Housing Account funding, in line with statute	All further discussion of SAC will be in the Water Resources Management Plan.

Commenter	Topic(s)	Comment	Response
51	Funding/ Funding Priorities	Add focus on community land trusts and expanding opportunity through homeownership	We have made changes to Part II that address CLTs.
11, 18, 20	Funding/ Funding Priorities	Small businesses would also benefit from a SAC credit	All further discussion of SAC will be in the Water Resources Management Plan.
36, 37	Funding/ Funding Priorities	Since there is no state funding for producing affordable senior housing Council should work w/ affordable partners to develop legislation creating a program/dedicated funding source	We have made changes to Part IV that address senior housing.
42, 60	Funding/ Funding Priorities	Council should explore waiving SAC for developments under the Inclusionary Housing Account, consistent w/ priorities of the Plan, and where local matching is made	All further discussion of SAC will be in the Water Resources Management Plan.
42, 60	Funding/ Funding Priorities	Inclusionary account should emphasize benefit to extremely low income households	Comment noted.
42, 60	Funding/ Funding Priorities	Plan should better promote homeownership opportunities including CLTs	We have made changes to Part II that address CLTs.
42, 60	Funding/ Funding Priorities	Plan can only deliver if prioritized in Council's budget process	Comment noted.
8, 10, 12	Funding/ Funding Priorities	Support emphasis on preserving/improving existing stock including naturally occurring/unsubsidized affordable rental housing	Comment noted.

Commenter	Topic(s)	Comment	Response
30	Funding/ Funding Priorities, Allocation of Need	Subsidies for affordable housing are so scarce the needs may appear unrealistic and be dismissed as irrelevant	The Plan calls for identification of new resources as well as new technical assistance and planning strategies to help communities meet the need.
54	Funding/ Funding Priorities, Parks	Support investing in increased amenities in high poverty areas, including parks	Comment noted.
36	Funding/Funding Priorities	Agree to preserve/invest in naturally occurring, but additional resources needed and focus should be on efforts to facilitate ownership and/or management change when needed	Comment noted.
84	Funding/Funding Priorities	Need to expand supply of safe, affordable housing, both rental and homeownership	The Council agrees with this statement.
34	Funding/Funding Priorities	Allocate additional funding resources to support affordable development in non-RCAPs	We address lack of sufficient funding resources and the need for more affordable housing in the region in Parts I and II.
44	Funding/Funding Priorities	Plan focuses on LCA and SAC, but neither is a primary source for housing; public resources at state and federal levels of government should be more clearly identified	We have made changes to Part I that address resources for affordable housing across all levels of government.

Commenter	Topic(s)	Comment	Response
44	Funding/Funding Priorities	Concerned about potential use of a SAC waiver for affordable housing or other objectives; using it in these ways creates inequities for ratepayers and compromises the program with respect to its statutory purpose and cost-of-service basis	All further discussion of SAC will be in the Water Resources Management Plan.
44	Funding/Funding Priorities	Plan should acknowledge need for effective partnerships to advocate for securing resources	We have made changes to Part I that address the need for more resources for affordable housing.
46	Funding/Funding Priorities	The HPP does not directly address major cost-drivers affecting housing affordability	Comment noted.
46	Funding/Funding Priorities	Support priorities for preserving existing stock and promoting environmental sustainability	Comment noted.
46	Funding/Funding Priorities	The primary obstacle to greater affordability and housing access are the hidden, unnecessary, and duplicative regulatory costs, especially for those seeking their first home	Comment noted.
46	Funding/Funding Priorities	Regulatory footprint and Common Interest Community (CIC) policy items are missing in draft	We have made changes to Part IV that address CICs.
46	Funding/Funding Priorities	Nearly 30% of the final price point of a home is attributable to regulation, making this the largest threat to housing affordability in the region	Comment noted.

Commenter	Topic(s)	Comment	Response
101	Funding/Funding Priorities	Council must ensure that its funding guidelines and criteria align with goals outlined in the measures and desired direction table	Comment noted.
46	Funding/Funding Priorities	Dayton administration's recent mandate of sprinklers in single family homes carries a \$10,000 price tag and places homes out of reach to over 20,000 homebuyers	Comment noted.
46	Funding/Funding Priorities	Developers are hesitant to build multifamily projects for sale, and when they do it is at higher cost due to litigation and risk management costs associated with CICs; urge the Council to directly address this issue and devise possible remedies	We have made changes to Part IV that address CICs.
47	Funding/Funding Priorities	SAC credits due to demo of blighted units should only be applied to affordable units on single or mixed-income sites	All further discussion of SAC will be in the Water Resources Management Plan.
51, 96	Funding/Funding Priorities	Fund the Inclusionary Account as a way to incentivize cities to adopt inclusionary and other innovative policies; funds should be used to reach the lowest income households	We have addressed the Council's commitment to explore funding sources for the Inclusionary Housing Account in Part III.
54	Funding/Funding Priorities	Support interest in strategic acquisition along transit	Comment noted.

Commenter	Topic(s)	Comment	Response
54	Funding/Funding Priorities	Support interest in collaborating to better align resources and provide the most coordinated funding process possible to lower holding costs and stretch scarce resources further	The Council agrees with this statement.
54	Funding/Funding Priorities	While unsubsidized/naturally occurring affordable housing should be in the Plan, it does not adequately address quality, condition, and at times location of these properties	We have made changes to Part II that address unsubsidized affordable housing.
54	Funding/Funding Priorities	Use caution if pursuing 4d as an incentive for naturally occurring affordable housing as this could cause long-term rent restricted 4d benefits to be brought back up for legal review	Comment noted.
54	Funding/Funding Priorities	Applaud references to Green Communities and universal design but can't have green construction, universal design, AND low initial per-unit construction costs	Comment noted.
56	Funding/Funding Priorities	Fund each minority non-profit in the process of becoming 'HUD approved' counseling agencies or serving Asian and Pacific veterans with at least 2 full-time equivalents	Other federal or state entities may be more appropriate to serve in this funding role.
56	Funding/Funding Priorities	Low-income seniors, the disabled and vulnerable need help with required repairs/maintenance of their homes, especially homeowners	The Council agrees with this statement.

Commenter	Topic(s)	Comment	Response
56	Funding/Funding Priorities	State agencies should seek new funding for rehab and explore bulk purchasing on materials	We have made changes to Part I that address the need for more resources for affordable housing.
56	Funding/Funding Priorities	Partnership/help is needed to eliminate discrimination and disparities faced by Asian Pacific non-profits and communities they serve	Comment noted.
57	Funding/Funding Priorities	Increase funding for Housing Choice Voucher rental assistance to expand consumers' choice	The Housing Choice Voucher program is federally funded and dependent on the action of the US Congress.
57	Funding/Funding Priorities	Increase funding for short-term rent assistance programs to help families achieve financial stability and stable housing	Comment noted.
57	Funding/Funding Priorities	Produce more sustainable housing accommodating large families; maintain affordability	We have made changes to Part II that address the need for housing for large families.
61	Funding/Funding Priorities	Need to preserve/improve over-55 housing in Metro	The Council agrees with this statement.
61	Funding/Funding Priorities	Try to ensure that affordable housing exists in all cities in the Metro area	The Council agrees with this statement.
71	Funding/Funding Priorities	Housing options only valid if multifamily housing is less expensive than single family homes	Comment noted.

Commenter	Topic(s)	Comment	Response
73	Funding/Funding Priorities	Provide affordable gap financing to non-profits specializing in housing and help folks slightly outside AMI thresholds	We address the Council's funding role in housing in Part III.
74	Funding/Funding Priorities	Preserve or create a housing mix, including aging stock in areas in the urban core; strategy for adjustments in those communities is needed	Comment noted.
76	Funding/Funding Priorities	Plan should emphasize energy efficiency to reduce costs of renting/ownership	We have made changes to Part II that address energy efficiency.
77	Funding/Funding Priorities	Support emphasis on preservation, which is a strategic priority for the Agency	The Council appreciates this comment.
51	Funding/Funding Priorities, Fair Housing	Council should be more explicit about allocation of resources to support community engagement of traditionally underrepresented constituencies	We have made changes to Part III that address public engagement.
3	Housing Performance Scores	Seek clarity on how Housing Performance Scores (HPS) will play out in funding decisions for areas not served by transit	The Regional Solicitation was released in October 2014. At the conclusion of this funding round, the criteria will be evaluated.
8	Housing Performance Scores	Cities should get more recognition when administering programs meeting needs of lowest income households	We will finalize the methodology for the Score in a 2015 amendment to the HPP.

Commenter	Topic(s)	Comment	Response
14	Housing Performance Scores	Concerned limited/sporadic access to CDBG and lack of replacement income streams will negatively affect Housing Performance Score	We will finalize the methodology for the Score, including consideration of available resources, in a 2015 amendment to the HPP.
15	Housing Performance Scores	Glad to see naturally occurring/unsubsidized rental & preservation of existing housing stock in the Scores	Comment noted.
24	Housing Performance Scores	Score does not provide adequate points for preexistence of affordable housing or rehab of existing units	We will finalize the methodology for the Score, including consideration of existing affordable housing, in a 2015 amendment to the HPP.
29	Housing Performance Scores	Ensure ability to access Livable Communities Act (LCA) funds is not diminished by policy or Housing Performance Score changes	We will finalize the methodology for the Score in a 2015 amendment to the HPP.
29	Housing Performance Scores	The method for HPS should include a provision to normalize across multiple years to account for market fluctuations	We will finalize the methodology for the Score in a 2015 amendment to the HPP.
33	Housing Performance Scores	Include county's score with HPS when evaluating projects through the Regional Solicitation	The Regional Solicitation was released in October 2014. At the conclusion of this funding round, the criteria will be evaluated.
34	Housing Performance Scores	Unclear how or if RCAPs will be addressed in revised HPS	We will finalize the methodology for the Score in a 2015 amendment to the HPP.

Commenter	Topic(s)	Comment	Response
34	Housing Performance Scores	Concerned full impacts of using HPS in the Regional Solicitation have not been evaluated	The Regional Solicitation was released in October 2014. At the conclusion of this funding round, the criteria will be evaluated.
36	Housing Performance Scores	Encourage inclusion of: preservation/substantial rehab; land banking, using tax forfeiture, site prep/cleanup for AH; housing that serves special needs, large families, and the homeless; purchase price should be adjusted by bedroom size	We will finalize the methodology for the Score in a 2015 amendment to the HPP.
43	Housing Performance Scores	There is a very strong statistical correlation between a city's HPS and nonwhite population	Comment noted.
43	Housing Performance Scores	Scores have potential to reduce concentrations of poverty and promote fair housing, and appear to be a vestige of Policy 39, which required Council to review funding priorities and withhold state and federal funds on basis of local efforts in low/mod income housing	The Council agrees with this statement
43	Housing Performance Scores	Scores in current iteration are likely to worsen problems as they are not used to prioritize all, but only some, LCA funding	Comment noted.
43	Housing Performance Scores	To reduce rather than exacerbate disparities, the Plan must apply HPS to a wider range of funding, including non-housing metropolitan systems	We will finalize the methodology for the Score in a 2015 amendment to the HPP.

Commenter	Topic(s)	Comment	Response
44	Housing Performance Scores	Support recognition of local tools and city activities in affordable housing, as well as maintaining a housing diversity category in the HPS	Comment noted.
44	Housing Performance Scores	Concerned about over-applicability of HPS and use of score assessment tools in Comp Plans	We will finalize the methodology for the Score in a 2015 amendment to the HPP.
47	Housing Performance Scores	A minimum score of 90% of housing points and 90% of equity points should be required for projects under system plans	Comment noted.
54	Housing Performance Scores	Hope HPS will better show actions recently undertaken and tools employed; currently some have tools but are reluctant to use	We will finalize the methodology for the Score in a 2015 amendment to the HPP.
60	Housing Performance Scores	Changes to Housing Performance Scores can sharpen the effectiveness as a means to incent local governments to prioritize affordable housing; this will only be true if the scores matter to communities, which means applying them to transportation too	We will finalize the methodology for the Score in a 2015 amendment to the HPP. The Regional Solicitation was released in October 2014 and included the use of the Score. At the conclusion of this funding round, the criteria will be evaluated.
96	Housing Performance Scores	Using Scores to incent activities for new affordable housing is critical, as is tying them to all of the funding the Council dispenses (e.g. transportation)	We will finalize the methodology for the Score in a 2015 amendment to the HPP.

Commenter	Topic(s)	Comment	Response
95	Housing Performance Scores	Scores too heavy on placing affordable development along transit which is mostly in core	We will finalize the methodology for the Score in a 2015 amendment to the HPP.
22, 23	Housing Performance Scores	Developed areas should get credit in the Scores for protecting existing affordable housing, stabilizing low-income neighborhoods, and building social capital	We will finalize the methodology for the Score in a 2015 amendment to the HPP.
101	Housing Performance Scores	More nuanced means of calculating Scores should give communities more attainable and measurable ways ascertain progress	The Council agrees with this statement.
22, 43	Housing Performance Scores	Scoring criteria (current & proposed) heavily emphasize preexisting affordable housing and recent progress in creating it; the ultimate effect is to give highest priority scores to cities with concentrations of housing and frequently poverty and segregation	We will finalize the methodology for the Score in a 2015 amendment to the HPP.
8, 13, 15, 17, 33	Housing Performance Scores	Cities should receive credit in the Scores for retaining/maintaining existing affordable housing, including naturally occurring/unsubsidized	We will finalize the methodology for the Score in a 2015 amendment to the HPP.
8, 9, 11, 13, 15, 17, 22, 36, 77, 88	Housing Performance Scores	Not providing revised Score criteria makes comment difficult; affected communities and stakeholders must be included in refinements	We will finalize the methodology for the Score in a 2015 amendment to the HPP that will include a public comment period.

Commenter	Topic(s)	Comment	Response
42	Housing Performance Scores	Support using Council's funding to incent local governments, particularly through HPS	Comment noted.
54	Housing Performance Scores	Housing Performance Scores should be integrated into the Regional Solicitation and other systems if applicable	The Regional Solicitation was released in October 2014. At the conclusion of this funding round, the criteria will be evaluated.
4,16	Housing Performance Scores	Do not support use of Housing Performance Scores in Regional Solicitation	The Regional Solicitation was released in October 2014. At the conclusion of this funding round, the criteria will be evaluated.
51	Housing Performance Scores, Comp Plans	Encourage and appreciate retention of the following: achieving more affordable units by making HPS more meaningful and effective; applying HPS to transportation and LCA investments; and reviewing housing elements in all Comp Plans for conformance	Comment noted.
9	Housing Performance Scores, Transportation	Using "equity" points in the Regional Solicitation for Transportation funding will result in geographic inequity in fund distribution	Comment noted.
38	Housing Performance Scores, Transportation	The TPP does not define how Regional Solicitation will incorporate HPS	This comment is not relevant to the Housing Policy Plan.
42, 62, 100, 101	Housing Performance Scores/Transportation	Support applying HPS to transportation funding	Comment noted.

Commenter	Topic(s)	Comment	Response
7	Infill/Redevelopment	Even if a city wants to make redevelopment happen (and guides land), it can't compel property owners to sell	Comment noted.
12	Infill/Redevelopment	Support the strategy to extent possible and/or feasible	Comment noted.
46	Infill/Redevelopment	Redevelopment and infill emphasis is unrealistic	Comment noted.
46	Infill/Redevelopment	Council should rewrite to emphasize market demand and deemphasize redevelopment	Comment noted.
74	Infill/Redevelopment	Support use of infill and preservation to renovate neighborhoods	Comment noted.
76	Infill/Redevelopment	If demoing affordable housing, it should be replaced at 1-to-1 ratio	Comment noted.
19	Infill/Redevelopment	Development in fully-developed suburbs is infill and redevelopment, which is more expensive due to a number of costs and requires additional funding resources	We address infill development and redevelopment in Part II.
24	Infill/Redevelopment	Impossible for fully developed cities to meet needs/goals without substantial redevelopment activities; Council should advocate and/or provide resources	We address infill development and redevelopment in Part II and lack of resources in Part I.

Commenter	Topic(s)	Comment	Response
46	Infill/Redevelopment	The costs, neighborhood resistance, and lack of demand for centrally located redeveloped housing make reliance on redevelopment and infill flawed policy	Comment noted.
7	Infill/Redevelopment, Zoning	No way to know which potential redevelopment sites will actually end up redeveloped	Comment noted.
35	Measures	Need better articulation of who is accountable and how measures were determined; Plan should provide an appeals process	Comment noted.
39	Measures	Senior housing is not referenced in performance measures and no baseline on one-level units or universal design is established on which to measure progress	Comment noted.
39	Measures	As a guide to establish priorities and measure progress it needs an analysis of impact of various alternative levels; if this has occurred it should be reflected; if not, it needs to occur	Comment noted.
47	Measures	Request a significant expansion of measures that is responsive to peoples' input, perceptions, and housing needs, including ongoing public dialogue	We have made changes to Part II that address measures and indicators.
51, 79	Measures	Move beyond directional arrows and use numerical goals where possible	We have made changes to Part II that address measures and indicators.

Commenter	Topic(s)	Comment	Response
52	Measures	Plan is inadequate on actual goals for increasing opportunities for those with disabilities	We have made changes to Part IV that address housing for people with disabilities.
53	Measures	Opportunity exists to measure the increasing number of 'perpetually affordable homeownership opportunities' or a positive percentage goal of increasing the number of new and preserved shared-equity homeownership opportunities	Comment noted.
63	Measures	Include Resiliency measure in case Plan does not full address community engagement	Comment noted.
66	Measures	Urge 'adequate' means for holding cities accountable, otherwise goals will just be lip service	Comment noted.
66	Measures	A look at results of housing plans in various cities make clear the lack of significant penalties when cities ignore stated commitments to affordable housing	Comment noted.
101	Measures	Data-driven approach to measuring progress is strongly supported	Comment noted.
76	Measures	A good additional measures would be # of units developed to a sustainable or green building system standard	Comment noted.

Commenter	Topic(s)	Comment	Response
97	Measures	Only one page on accountability, and while housing not a system, all policy plans should talk about housing needs, there should be a minimum Housing Performance Score in plans, and minimum equity points for comp plan approval	Comment noted.
97	Measures	The citizens are the accountability	Comment noted.
92	Measures	Every city must be held accountable, so Plan needs more teeth	Comment noted.
94	Measures	Council must use regulatory tools and investments and demand accountability	Comment noted.
96	Measures	Hard work doesn't end with adoption, it depends on how the Plan is implemented	Comment noted.
94	Measures	Goals should be integrated into other Council systems/policy plans	We address integration among Council policy and systems plans in Part II.
42, 60	Measures	Insufficient clarity about what is the baseline against which to compare the measures (e.g. previous year, baseline years, other?); better to measure against numerical goals	We have made changes to Part II that address measures and indicators.
75, 86, 90	Measures	Plan needs more accountability standards	We have made changes to Part II that address accountability.

Commenter	Topic(s)	Comment	Response
39	Measures	Totally inadequate data and specificity on timelines, measures of success, and priorities	We have made changes to Part II that address measures and indicators.
39	Measures, Funding Priorities	Small scale, naturally occurring affordable housing needs to be a key component of meeting current and future affordable needs so must be in measures & financial priorities	We address unsubsidized affordable housing in Part II.
81	Miscellaneous	Best approach is to let developers construct a wide range of housing with a minimum of regulatory burden	Comment noted.
30	Miscellaneous	Oppose blanket requirement to license rental properties	We have clarified local opportunities around rental licensing and code enforcement in Part II.
63	Miscellaneous	Communities can attract tourism, cultivate/strengthen identity beyond mixed-use and TOD	The Council agrees with this statement.
64	Miscellaneous	Change definitions, zoning, building code and statutes to allow use of 'tiny houses' in region, could help seniors, tax base, small inner city areas or on region's edge, farmers, environment	Comment noted.
75	Miscellaneous	Construction and land use sector is active, aggressive and lobby ready	Comment noted.

Commenter	Topic(s)	Comment	Response
97	Miscellaneous	Need stronger coordination in Consolidated Plans between the state, counties, and cities	We have made changes to Part II that address consolidated plans.
79, 93	Miscellaneous	Need to thoughtfully consider place-based strategies and investments	We address placemaking in Part II.
93	Miscellaneous	People need opportunities, not to be moved around to other areas	We have made changes to Part IV that address investments in Areas of Concentrated Poverty.
81	Miscellaneous	Transit causing shortage of land for single family development, people will leapfrog out of area	Comment noted.
81	Miscellaneous	Segregation is illegal and Council ignores why people want to live close to their families	Comment noted.
93	Miscellaneous	Need to emphasize that this is about people's lives; Plan needs to be people-focused	Comment noted.
77	Mixed-Income, TOD/Transportation	Alignment of high density mixed-income housing with regional transit is consistent with Minnesota Housing's focus on location efficiency	Comment noted.
8	Mixed-Income/Inclusionary Policy	Support the Council in addressing investor and lender concerns for developing mixed-income projects	Comment noted.
10	Mixed-Income/Inclusionary Policy	More positive framing is needed for reducing barriers to mixed income; exploration of inclusionary strategies; and building wealth and expanding investment in CAPs	We have made changes to Part IV that address mixed-income housing and investment in Areas of Concentrated Poverty.

Commenter	Topic(s)	Comment	Response
12	Mixed-Income/Inclusionary Policy	How "mixed income" may be promoted in local cities needs clearer articulation	We have made changes to Part IV that address mixed-income housing.
17	Mixed-Income/Inclusionary Policy	Barriers to mixed-income should also include mixed-income neighborhoods; Heart of the City is a successful New Urbanism design successful because entire neighborhood is mixed-income	We have made changes to Part IV that address mixed-income housing.
23	Mixed-Income/Inclusionary Policy	Council should provide grants to establish higher-valued housing in areas with concentrated low-value housing	Some Livable Communities Act accounts can be used to fund this type of development.
33	Mixed-Income/Inclusionary Policy	Consider deleting/changing potential strategies to reduce impediments language	We have made changes to Part IV that address the Analysis of Impediments.
33	Mixed-Income/Inclusionary Policy	Provide data on mixed-income that show the risk is not greater or lesser than market rate	We have made changes to Part IV that address mixed-income housing.
33	Mixed-Income/Inclusionary Policy	Support convening local investors and lenders to identify where they see risk	Comment noted.
36	Mixed-Income/Inclusionary Policy	Mixed-income difficult financially; smaller, fully subsidized projects may be more practical	We have made changes to Part IV that address mixed-income housing.

Commenter	Topic(s)	Comment	Response
44	Mixed-Income/Inclusionary Policy	Support plan to identify barriers and use voluntary approaches to inclusionary housing	Comment noted.
53	Mixed-Income/Inclusionary Policy	There is an ability to tie CLT benefits to higher-density incentives at local level; for example, in exchange for higher density in a condo development, for example, the developer could be incented to create affordable ownership units or to fund an 'in lieu' account	We have made changes to Part II that address CLTs.
53	Mixed-Income/Inclusionary Policy	There is both a Council and Local role near corridors to create affordable homeownership opportunities through existing homes or by tying affordability incentives to newly proposed higher-density developments; both can be served by CLTs and smart inclusionary zoning tied to affordable homeownership	We have made changes to Part II that address CLTs.
54	Mixed-Income/Inclusionary Policy	Support proposal to reduce barriers & finance mixed-income	Comment noted.
54	Mixed-Income/Inclusionary Policy	Support funding Inclusionary Housing Account to assist cities adding inclusionary strategies to local ordinances; Council might consider collection and dissemination of best practices	Comment noted.

Commenter	Topic(s)	Comment	Response
60	Mixed-Income/Inclusionary Policy	Funding Inclusionary Account can help lead a region-wide effort to examine how and where inclusionary policies can be implemented; use of these funds should be targeted to extremely low-income households	We have addressed the Council's commitment to explore funding sources for the Inclusionary Housing Account in Part III.
63	Mixed-Income/Inclusionary Policy	Inclusionary should be put in context and approached in plural not singular; implies exclusion	Comment noted.
65	Mixed-Income/Inclusionary Policy	Question why formulas for mixed-income housing have market rate for a majority of units and some affordable projects don't even allow a portion at market rate; what if projects were 80% affordable and 20% market rate?	We have made changes to Part IV that address mixed-income housing.
74	Mixed-Income/Inclusionary Policy	Seek clarity on how Met Council will create affordable housing in higher income areas	We have made changes to Part II that address the need for more affordable housing in high-income areas.
18, 46	Mixed-Income/Inclusionary Policy	Inclusionary requirements should be local initiatives for including more affordable housing in developments, not part of a mandatory regional housing strategy	The Council agrees with this statement.
22	Need, Goals, Scores	The Allocation, Need, & Scores all disadvantage inner-ring suburbs	We will finalize the methodology for the Need and Score in a 2015 amendment to the HPP.

Commenter	Topic(s)	Comment	Response
43	Need, Goals, Scores	Each of the proposed 'triumvirate' of measures is severely flawed in design or implementation	We will finalize the methodology for the Need and Score in a 2015 amendment to the HPP.
43	Need, Goals, Scores	The measures separately and together represent powerful sources of authority to promote fair housing	Comment noted.
60	Need, Goals, Scores	To encourage necessary production in suburbs will require coordination from the Allocation to LCA goals to Housing Performance Scores and comp plan reviews	Comment noted.
8	Negotiation of Goals	Need clarity on affordable housing goals negotiation process	The current LCA goals will remain in place until 2020. The Council will address updates to the LCA goals as part of the implementation of this plan.
18	Negotiation of Goals	In establishing community housing goals, respond to marketplace demand (not just needs) for affordable housing, as just one of many housing market segments that make up a Suburban livable community	The current LCA goals will remain in place until 2020. The Council will address updates to the LCA goals as part of the implementation of this plan.
22	Negotiation of Goals	LCA goals are determined politically not quantitatively, with many suburbs negotiating reduction of 40% or more	The current LCA goals will remain in place until 2020. The Council will address updates to the LCA goals as part of the implementation of this plan.

Commenter	Topic(s)	Comment	Response
40	Negotiation of Goals	Minneapolis & St. Paul should increase affordable goals to match the need, especially for households at or below 30% of area median income	The current LCA goals will remain in place until 2020. The Council will address updates to the LCA goals as part of the implementation of this plan.
95	Negotiation of Goals	Having LCA goals negotiated down and central goals going up compared to previous progress in meeting goal is backwards	The current LCA goals will remain in place until 2020. The Council will address updates to the LCA goals as part of the implementation of this plan.
43	Negotiation of Goals	Negotiated goals have exhibited extremely worrying trends, with most communities having goals adjusted downward by 30% or more	Historically Goals have been lower than Need numbers to reflect the lack of existing financial resources to address the Need. The current LCA goals will remain in place until 2020. The Council will address updates to the LCA goals as part of the implementation of this plan.
51	Negotiation of Goals	Concerned that negotiation of goals gives wrong signal as concerns the Need	We addressed the differentiation in intent and requirements for Goals and Need in Part III.
60	Negotiation of Goals	Plan still fails to address conflict between LUPA Need allocations and LCA housing goals; if Council negotiates LCA goals below the need, it inevitably undercuts LUPA	We addressed the differentiation in intent and requirements for Goals and Need in Part III.

Commenter	Topic(s)	Comment	Response
89	Negotiation of Goals	It is "absurd" that housing needs are negotiated down to goals	We addressed the differentiation in intent and requirements for Goals and Need in Part III.
12	Opportunities for Impact/Work Plan	Approach and timing of work items is unclear, hence uncertainty whether these items will need addressing in Comp Plan updates	We have made changes to Part V that address work plan and next steps.
33	Opportunities for Impact/Work Plan	HRA suggests a 'broader' approach to Section IV, discussing building partnerships and collaborative evaluation of a spectrum of ideas	We have made changes to Part IV that respond to this comment.
54	Opportunities for Impact/Work Plan	Applaud Council for looking for new/innovative way to support affordable housing	Comment noted.
44	Outreach/Engagement	Support Council's intent to convene regional and sub-regional dialogues on housing issues	Comment noted.
54	Outreach/Engagement	Membership organizations are deeply embedded in communities with concentrated poverty and welcome opportunity to work together to make positive change	Comment noted.
54	Outreach/Engagement	Support Plan's stated interest in prioritizing wisdom of low-income communities of color in shaping their vision	Comment noted.
79	Outreach/Engagement	A pathway to equity is engagement; institutions need to engage and be accountable to under-represented communities	We have made changes to Part II that address public engagement.

Commenter	Topic(s)	Comment	Response
56	Outreach/Engagement	Affected stakeholders including minority organizations and communities should be actively involved in development of plans rather than just engaged to comment on developed work	We have made changes to Part II that address public engagement.
79	Outreach/Engagement	For CPO, Thrive, and HPP, discussions were set in an academic, white environment, need to shift conversation to one that engages with communities of color	We have made changes to Part II that address public engagement.
63	Outreach/Engagement	How was the process different from how traditionally done? What is considered success at community level?	Staff attended over 30 meetings off-site between April and October to present on the plan and seek feedback. Nearly one third of these meetings were hosted by housing, civil rights, and community organizing advocates. These meetings were in addition to more traditional engagement tools such as a diverse advisory committee, social media and the public comment period. Community engagement in regional housing policy is an ongoing commitment and does not end with the adoption of the Housing Policy Plan.

Commenter	Topic(s)	Comment	Response
93	Outreach/Engagement	Council can set a high bar for community engagement and demonstrate to local communities	We have made changes to Part II that address public engagement.
72	Outreach/Engagement	Disturbed to see Council Members apparently sleeping during testimony	Comment noted.
72	Outreach/Engagement	At the public hearing, none of the comments addressing flaws in the system, the Plan, or response to unaddressed needs was met with more than a thank you	Council leadership and staff are extremely grateful for all public input received on the Housing Policy Plan draft, including testimony at the public hearing. Responses to official public comments are provided within this document after comprehensive analysis and discussion of all public comments is completed to ensure accurate, consistent, final information about if and how comments were incorporated into the final document.
63	Outreach/Engagement	Do our increased diversity and core long-standing minority groups merit new ways of engagement and outreach?	We have made changes to Part II that address public engagement.
9	Plan (General)	Support provision of evidence that affordable housing does not negatively impact surrounding property values	Comment noted.
11	Plan (General)	The Plan should provide for being more "nimble"	Comment noted.

Commenter	Topic(s)	Comment	Response
		given its long time frame	
15	Plan (General)	Overall, Plan is fairly well done and is likely to work in a city with major transitways and with a large supply of affordable housing	Comment noted.
15	Plan (General)	Referencing Agnew study in discussing concerns/realities about affordable housing is tenuous (not peer reviewed and relies on East Coast data)	We have made changes to Part I that respond to this comment.
101	Plan (General)	While Opportunities for Impact strategies are heavily supported, an important missing piece is that there are no initiatives identified to lobby the federal or state governments to assist in achieving these goals; real change must come from policy makers in higher office	Comment noted.
17	Plan (General)	Explanations of affordable housing needs, Livable Communities Act, and performance scores are helpful, as is technical assistance for cities that need it	Comment noted.
17	Plan (General)	Suggest postponing adoption to allow comment on final draft	The Council has responded to this request by postponing adoption and building in a process for additional comment.

Commenter	Topic(s)	Comment	Response
17	Plan (General)	The tone of the HPP implies cities do not want or need affordable housing	We have made changes to Part I and II that acknowledge many cities want and need affordable housing.
18	Plan (General)	Public policy opportunity is being missed to provide all families with access to communities (cities or suburbs) with high quality of life and solid platform for upward mobility over time	These are key outcomes and principles of the Housing Policy Plan and Thrive MSP 2040.
18	Plan (General)	Remove comments that suggest there would be more affordable housing available if higher income individuals were not residing in it	We made changes to Part II that respond to this comment.
18	Plan (General)	Plan is silent and should fully credit programs of Dakota CDA, St. Paul, Minneapolis, Washington HRA and Scott HRA for addressing severe cost burden needs	Comment noted.
20	Plan (General)	Generally supportive of intent, but have questions about implementation tools	Comment noted.
20	Plan (General)	Supportive of changes suggested by Metro Cities	Comment noted.
24	Plan (General)	Plan was not adequately circulated, discussed and vetted	The Plan went through several iterations, was put out for formal public comment but was also released and discussed in a variety of venues and with a diverse array of stakeholders.

Commenter	Topic(s)	Comment	Response
24	Plan (General)	Use the word "quality" before affordable housing	Comment noted.
30	Plan (General)	Plan should be delayed until the final allocation of need is included	We will finalize the methodology for the Need in a 2015 amendment to the HPP that will include a public comment period.
33	Plan (General)	Support discussion of diversified housing stock and its benefits; add data/research on positive impact on family health	We have made changes to Part I that address the relationship between housing and health.
101	Plan (General)	Would be helpful if all demographic information were brought to the front of the Plan rather than being placed within subsections (particularly the info in the Livability section)	Comment noted.
101	Plan (General)	Too much information in certain sections; consolidating some of the detail into an appendix might make the Plan more readable	We have moved a significant amount of detail to the Appendices.
34	Plan (General)	Premise of overall policy priority statement is generally consistent with County's overarching goals of self-sufficiency and livability	Comment noted.
101	Plan (General)	Plan should include a more detailed discussion of how the Council and local governments can work toward providing a sufficient strategy for low and moderate income senior housing	We have made changes to Part IV that address senior housing.

Commenter	Topic(s)	Comment	Response
35	Plan (General)	Council should consult w/ cities in all stages of development when developing policies	We have welcomed participation from all cities in the development of the Housing Policy Plan
36	Plan (General)	Plan's stated purpose reflects the work of the CDA	Comment noted.
36	Plan (General)	Given timeline to review/comment it seems input will have limited impact final Plan	The Council postponed the adoption of the plan twice to allow for additional feedback and changes to the plan.
38	Plan (General)	Concurrent planning processes are resulting in policy plans that lack clear connection to Thrive and each other	The Council strives for these to be complementary and continues to look for opportunities for alignment and integration.
101	Plan (General)	For naturally occurring/unsubsidized housing, the Plan should have strategies tailored for single family and multifamily housing to ensure this housing is adequate	We have made changes to Part II that address unsubsidized affordable housing.
38	Plan (General)	To maximize clarity, all policy plans should follow the HPP's alignment with Thrive's Outcomes & Principles (SPELSICA)	Comment noted.
39	Plan (General)	Disappointed by lack of balance in attention to all populations with affordable housing needs; Plan needs more balance, integration, data driving and accountability	We have made changes to Parts II and IV that respond to these comments.

Commenter	Topic(s)	Comment	Response
43	Plan (General)	Plan is insufficient, in need of amendment, suffers from critical lack of focus, appears to pursue every conceivable policy priority at once; would benefit from cleaner and more comprehensible structure and greater willingness to set out priorities and specific policies	Comment noted.
44	Plan (General)	Expectations for this policy is that it strive to serve all sectors involved in housing policy, funding, and production, and focus on identifying issues and options, best practices, tools, and resources for housing, as well as effective technical assistance to local governments.	Comment noted.
44	Plan (General)	Intent to address full scope of housing needs is articulate and supported, but Plan lacks much of the necessary analyses and information to support needs and goals	We have made changes to Part II that address measures and indicators.
44	Plan (General)	Note several examples of policy goals requiring further analysis, including options for seniors, balancing preservation and affordability, and strategies for mixed-income housing	We have made changes to Part IV that address senior housing and mixed-income housing.

Commenter	Topic(s)	Comment	Response
44	Plan (General)	Housing Policy Plan Work Group review was in tightly compressed timeframe that left insufficient time to thoroughly vet the document before release	The Council attempted to address this in several ways: by delaying adoption to allow more time for review, by attending any and all events available to get feedback, and by committing to ongoing and inclusive revision to the Need and Score.
44	Plan (General)	Housing is not a regional system, and it is not entirely clear how the Council intends to integrate housing into regional systems; these will require local input	We have made changes in Part II that address the integration of the HPP with other Council systems and policy plans.
45	Plan (General)	Value regional perspective and leadership in finding effective ways to use public resources to increase availability of affordable housing	Comment noted.
45	Plan (General)	Creating a thriving region requires both growth AND equity, with a focus on meeting the needs of the most vulnerable, and creating opportunities for all to prosper	The Council agrees with this statement.
45	Plan (General)	Affordable housing must be located where families and individuals have access to employment, education, and services	The Council agrees with this statement.

Commenter	Topic(s)	Comment	Response
46	Plan (General)	Plan has little to offer for housing policy outside of the affordable, subsidized housing arena	The Plan does address in several sections private market and unsubsidized housing activity. The relative focus on affordable housing owes to the extremely difficult challenge of creating housing opportunities to support regional growth.
47	Plan (General)	Support increased involvement in technical assistance; other statutorily required plans need to be coordinated; the HPP needs to be directly linked to the other systems	We address technical assistance in Part III and integration with other Council systems and policy plans in Part II.
47	Plan (General)	Plan needs to be understandable and readable for those not in the housing profession	We have made changes throughout the document to improve its clarity and readability.
50	Plan (General)	Appreciate the difficult undertaking to frame a regional housing policy	Comment noted.
50, 96, 93	Plan (General)	Support Council's alignment of housing policy with regional systems plans and planning	Comment noted.
62	Plan (General)	Plan's preference to core cities unhealthy and possibly unconstitutional; significant overreach of Council powers	Comment noted.
63	Plan (General)	Appreciate Plan's focus on equity and diversity	Comment noted.

Commenter	Topic(s)	Comment	Response
63	Plan (General)	Consider adding a section on cultural sensitivity	We have made changes to Part II that address cultural sensitivity.
63	Plan (General)	Support for creating a new comprehensive housing plan	Comment noted.
64	Plan (General)	Plan needs more cutting edge ideas	Comment noted.
69	Plan (General)	Plan is nothing short of something that would be expected coming out of Moscow; how dare the Council infringe on people's rights; Plan is pathetic at best	Comment noted.
75	Plan (General)	Plan is so vacuous and vague it appears the product of either profound naiveté or ignorance	Comment noted.
75	Plan (General)	Small part of cooperation & collaboration language may be worth while	Comment noted.
81	Plan (General)	Plan is condescending and presumes situation will be improved in non-white people are living next to white people; belief that "dropping" people into the suburbs will end entrenched poverty is delusional and hope in this regard is unfounded	Comment noted.
81	Plan (General)	"Mammoth Plan" is ideologically pushing social agenda beyond Council's statutory powers	Comment noted.
88	Plan (General)	Plan should address the diversity of communities and avoid one-size-fits-all policies	Comment noted.

Commenter	Topic(s)	Comment	Response
88	Plan (General)	Complement Council on stated goals, comprehensive attempt to guide housing policy and the inclusion of stakeholders in the Plan's development	Comment noted.
89	Plan (General)	Regionalism shouldn't not mean appeasement of suburbs and defense of status quo	Comment noted.
97	Plan (General)	Pages 76-77 should be used as the executive summary	We have added an executive summary.
92	Plan (General)	Commend Council for wanting to adopt a Housing Policy Plan, but concerned the document has been compromised/watered down	Comment noted.
96	Plan (General)	Plan shows desire to move needle on housing; draft does that but can be strengthened	Comment noted.
13, 44, 47, 81, 88	Plan (General)	An Executive Summary would make the document stronger	We have added an executive summary.
2, 11	Plan (General)	Support the Plan's recognition of local diversity and variety	Comment noted.
2, 7, 9, 18, 81	Plan (General)	Housing is not a regional system and is better handled by private market	We addressed this comment in Part I.
22, 23	Plan (General)	Policies 39 (concerning Council review of all local applications for state and federal funding), 35 and 23 were 'removed' by the Council in the current plan	We made changes to Part III that respond to this comment.

Commenter	Topic(s)	Comment	Response
26, 89	Plan (General)	Leadership on housing issues is appreciated	Comment noted.
33, 88	Plan (General)	Support overall policy priority to create housing options giving people in all life stages and of all economic means viable choices for safe, stable, and affordable homes	Comment noted.
42, 60	Plan (General)	Applaud Council for taking on the long overdue task	Comment noted.
42, 51, 60	Plan (General)	Plan should offer guidance on how housing will be incorporated into Council's systems plans	We address the integration of the HPP with other Council policy and systems plans in Part II.
54, 77	Plan (General)	Support increasing the variety of housing types and costs across the region	Comment noted.
17	TOD/ Transportation	Proposed one-size-fits-all urban TOD design may not be appropriate in suburbs. Density criteria should be proportional and not require urban densities in suburbs	We made changes to Part II that address TOD and density.
19	TOD/ Transportation	Policies that support the integration of higher density and/or affordable housing and transit are supported but implementation becomes difficult due to limited transit options available and planned in suburban and outlying communities	We have addressed or made changes to Parts II and III that respond to this comment.
29	TOD/ Transportation	Appreciates focus on policy and investment in station areas, but it is important to invest in all	Comment noted.

Commenter	Topic(s)	Comment	Response
		forms of transportation	
35	TOD/ Transportation	Include development around existing park-and-rides that have good track record when considering funding allocations	Comment noted.
43	TOD/Transportation	Plan considers transit a primary--if not THE primary, consideration in siting housing	We have address transit's relationship with housing in Parts II and III.
43	TOD/Transportation	Transitways pass through high as well as low income areas, but without proactive efforts to ensure affordable housing is well-sited, TOD often goes to low-income neighborhoods where it generates the least political resistance	Comment noted.
45	TOD/Transportation	Research shows Housing and Transportation ("H+T") is directly related to success/sustainability of vibrant communities; data-driven strategy that examines effectiveness of housing policies will demonstrate importance of providing transportation options near where residents live	We addressed combined housing and transportation costs in Part II.
46	TOD/Transportation	Like Thrive, HPP assumes and incents a denser, more transit-oriented growth pattern reliant on large-scale redevelopment	Comment noted.

Commenter	Topic(s)	Comment	Response
51	TOD/Transportation	Focus development around transit, while proactively working to preserve housing affordability near station areas	We have made changes to Part II to address affordability near transit.
51	TOD/Transportation	Call for Met Council and cities along transit corridors to put in place policies to ensure affordable housing gets produced and preserved along these corridors	We have made changes to Part II to address affordability near transit.
53	TOD/Transportation	CLTs and shared equity housing create opportunity for one-time affordability investment that can assist multiple families upon resale; this is especially effective where housing values have increased faster than average housing costs, such as around a transit corridor	We have made changes to Part II that address CLTs.
54	TOD/Transportation	Support focus on non-displacement of low-income residents in areas of transit investment	We have made changes to Part II that address displacement near transit investment.
67	TOD/Transportation	Where in the transportation policy plan are goals for affordable housing?	Language that better integrates the Housing Policy Plan has been added to the Transportation Policy Plan.
101	TOD/Transportation	Council should convene the transit service providers to identify ways to connect affordable housing options in the CAPs and RCAPs and job opportunities in the greater region	Comment noted.

Commenter	Topic(s)	Comment	Response
81	TOD/Transportation	Plan aiming for regional densification remaking our spread out metro along expensive fixed-rail transit and to build ridership by pushing people into "stack and pack" housing	Comment noted.
36, 43	TOD/Transportation	Plan fails to acknowledge the potentially harmful effects of concentrating affordable housing on transit lines, which tend to be near the urban core	We have made changes to Parts II and III that address affordable housing and transit.
95	TOD/Transportation	There is a .59 correlation between transit access and poverty and transit has a negative correlation to school performance	Comment noted.
12	TOD/Transportation	Highway investments aren't prioritized, but are a top priority of some local governments	Comment noted.
12	TOD/Transportation	Integration of housing and transitway planning will be considered in next Comp Plan update	Comment noted.
17	TOD/Transportation	The inclusion of specific approved uses exceed policy guidance and may conflict with zoning ordinances and local needs	The Housing Policy Plan contains no policies that specify what land uses local governments can approve.
17	TOD/Transportation	TOD criteria are more detailed than typical in a policy document and seem more fitting for a zoning ordinance. Criteria call for prohibition of auto-related uses	The Housing Policy Plan describes TOD but doesn't contain any policies or criteria that are exceedingly detailed or suggest prohibiting auto-oriented uses.

Commenter	Topic(s)	Comment	Response
17	TOD/Transportation	By tying LCA to transit investment in TODs or sustainability the Council is making a voluntary program a mandate and altering the intent of the LCA	We address the Livable Communities Act in Part III.
18	TOD/Transportation	Any housing development in transit locations requires sufficient financial resources and private property owner cooperation which may or may not exist	Comment noted.
20	TOD/Transportation	Transportation to higher wage employment sometimes more challenging than low end	Comment noted.
24	TOD/Transportation	Continued policy of constructing new affordable housing closer to jobs and transit will continue concentration of affordable housing	We have made changes to Part III that address the proximity of affordable housing to jobs and transit.
24	TOD/Transportation	Policy of constructing new affordable housing closer to transit is more reasonable for light rail, BRT and ABRT, but investments in infrastructure and amenities are needed	We have addressed or made changes to Parts II and III that respond to this comment.
35	TOD/Transportation	Request text change from "existing infrastructure investments" to "existing and planned infrastructure investments"	Comment noted.
35	TOD/Transportation	Policy and development around transit stations should include SouthWest Transit	Comment noted.

Commenter	Topic(s)	Comment	Response
36	TOD/Transportation	Strongly disagree with Plan's position on TOD	Comment noted.
36	TOD/Transportation	Creating connected multimodal environments should be an important amenity but not threshold requirement for workforce affordable housing	The Housing Policy Plan includes no requirements for the siting of workforce affordable housing.
36	TOD/Transportation	Quality of and access to schools, jobs, services, and community amenities should be given strong consideration in addition to mere access to transit	Comment noted.
38	TOD/Transportation	Council should recognize existing/planned Park & Rides in suburban edge areas as eligible	Park & Rides with sufficient transit frequency may be eligible for Council resources that support TOD.
39	TOD/Transportation	Persons with disabilities and seniors should be a priority for inclusion in transit-associated housing and is key for persons with disabilities working in competitive employment	We have made changes to Part IV that address senior housing and housing for people with disabilities.
40	TOD/Transportation	Council data show increase in affordable housing need of 37% over next decade; as urban housing growth will largely be met by Central Corridor, 37% of corridor should be affordable	Comment noted.
40	TOD/Transportation	Homeowners with low income must be protected from property tax-oriented displacement	Comment noted.
40	TOD/Transportation	Demolished affordable units within 1/2 mile of corridor should be replaced at 1-to-1 ratio	Comment noted.

Commenter	Topic(s)	Comment	Response
36, 37, 38	TOD/Transportation	Document overly influenced by belief that affordable housing should be adjacent to transit	We have made changes to Part III that address affordable housing and transit.
18	TOD/Transportation, Fair Housing	A focus only on housing in transit areas fails to recognize commercial uses and may cause new concentrations of poverty	We have made changes to Part III that address affordable housing and transit.
43	TOD/Transportation, Fair Housing	Plan admits excessive alarm over gentrification may be an obstacle to equitable housing distribution	Comment noted.
55	TOD/Transportation, Fair Housing	Environmental and transit justice factors were much discussed in Corridors of Opportunity work, which are closely connected to Fair Housing; transportation should be evaluated as to whether it strengthen communities, increase choice and reduce segregation	Comment noted.
1, 6, 9, 13, 19, 38, 25, 27, 28, 33	TOD/Transportation, Funding	When cities do not have major transit corridors, Council will need to identify resources for affordable development in non-transit invested communities	We have made changes to Part III that address affordable housing and transit.

Commenter	Topic(s)	Comment	Response
4	Zoning	Housing and land use decision-making is a local decision	While land-use planning is fundamentally a local issue, the availability of housing is a matter of regional importance. Furthermore, the Metropolitan Land Planning Act and Livable Communities Act authorize a Council role in the housing elements of comprehensive plans and in funding the creation of new housing.
7	Zoning	Council is using high density as proxy for affordability, turning an affordability requirement into a density mandate	We will finalize guidance on the housing elements and implementation plans of local communities in 2015.
7	Zoning	More practical to designate redevelopment <i>areas</i> rather than sites, then developers can assess market and conditions in area	Comment noted.
1, 5, 7, 9	Zoning	All local land is platted, built out, or otherwise restricted (including natural preservation, tribal land)	Comment noted.
46	Zoning	National Association of Home Builders found that the cost of housing in cities that adopted inclusionary zoning increased about 2-3% faster than cities that did not	Comment noted.

Commenter	Topic(s)	Comment	Response
53	Zoning	Inclusionary housing and zoning are worth continued exploration and implementation; with a CLT component there is increased community and household benefit that could be applied to each strategy listed	Comment noted.
56	Zoning	Some cities engaging in rezoning for better use of existing, remodeled or redesigned homes to accommodate more people including multi-generational and larger extended families	We have made changes to Part II that address local roles in providing the full range of housing options.
56	Zoning	Changes can be made to support live-learn, live-work, and incubators for entrepreneurs and start-ups, and zoning can allow for reduced housing and lot sizes in housing seniors, students, the homeless, and others who need low or no maintenance housing	We have made changes to Part II that address local roles in providing the full range of housing options.