Community Development Committee

Meeting date: June 15, 2015

For the Metropolitan Council meeting of July 8, 2015

Subject: Adopt amendment to the *2040 Housing Policy Plan* and accept public comment report

District(s), Member(s): ALL

Policy/Legal Reference: Minn. Stat. 473.145

Staff Prepared/Presented: Libby Starling, Manager of Regional Policy and Research (651-602-1135) and Tara Beard, Planning Analyst (651-602-1051)

Division/Department: Community Development / Regional Planning

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Proposed Action

That the Metropolitan Council

- Amend the *2040 Housing Policy Plan*;
- Accept the public comment report.

Background

The *2040 Housing Policy Plan* adopted in December 2014 referred to three unfinished areas of work that would be the subject of an amendment this year— criteria for reviewing the housing elements and housing implementation programs of local comprehensive plans, the precise methodology of the Allocation of Affordable Housing Need used in that review, and details to the update of the Housing Performance Scores.

The Metropolitan Council formally released a draft amendment for public comment on March 15, 2015 and held a public hearing to receive comments on May 4, 2015. The public comment period and the public hearing record remained open through May 15, 2015. During the public comment period, the Council received 33 written submissions including comments from:

- 21 cities, with one comment from a local elected official supplementing a staff comment
- 5 counties and county organizations, representing four of the region's seven counties
- 5 organizations, with one letter on behalf of an additional four organizations
- 1 resident

Rationale

This amendment defines the Council's expectations for the housing element and the housing implementation program of local comprehensive plan updates and outlines the Council's strategy for reviewing this portion of local comprehensive plan updates. The Council will include this language in the Local Planning Handbook to be distributed to local governments with System Statements this fall.

Responding to negative feedback from local governments about the late timing of receiving their Allocation of Affordable Housing Need for the 2030 Comprehensive Plan Updates, the Council intends to incorporate the Allocation of Affordable Housing Need for 2021-2030 in the System Statements that will be distributed to local governments in September 2015. Without this amendment, there is no approach for the Allocation of Affordable Housing Need for the 2021-2030 decade.

Based on feedback received through the public comment period, the Housing Policy Plan will no longer include the methodology for the Housing Performance Scores; a separate Guidelines for Priority Funding for Housing Performance will be proposed in a different action item for the Council's adoption. This approach will allow the Council to be more nimble in proposing future refinements to the new methodology without amending the entire *2040 Housing Policy Plan*.

The final version of the amendment also updates data throughout the *2040 Housing Policy Plan* to the most recent available, including the 2009-13 American Community Survey, the Council's building permits survey, and the 2015 update to the regional and local forecasts.

This amendment will not be going to the full Metropolitan Council until July 8 in order to capture any final changes to the forecasts of sewer-serviced households that are scheduled to go to the Environment Committee on June 23.

Funding

The development and implementation of the *2040 Housing Policy Plan* has been a part of the Metropolitan Council Community Development Committee workplan.

Known Support / Opposition

Not all commenters agree with all elements of the language in this proposed amendment, but this language reflects the prevailing sentiments.

PROPOSED AMENDMENT TO THE 2040 HOUSING POLICY PLAN
(pagination reflects the *2040 Housing Policy Plan* available on the Council's website)

Executive Summary, page 1:
Like a diversified ~~stock~~ investment portfolio, a diversity of housing types can increase local government resiliency through changing economic climates.

Executive Summary, page 2:
- **Needs are growing:** Between ~~now~~2010 and 2040, the region will add ~~391,000~~367,000 households; roughly 40% will earn less than 80% of area median income ($63,900 for a family of four).

- **More people will need affordable housing options:** The Council forecasts that between 2020 and 2030, our region will add ~~49,500~~ 37,400 low- and moderate-income households who will need ~~new~~ additional affordable housing. For comparison, in the first three years of this decade, the region added just under 3,000 new affordable units, far under the need.

Executive Summary, page 3:

~~To fully implement this plan, the Council has more work to do to finalize the changes to the Allocation of Affordable Housing Need, the Housing Performance Scores, and the Council's strategy for reviewing the housing element of local comprehensive plan updates. In 2015, the Council will formally amend this plan, including a formal public comment process, to incorporate the final updated methodologies for the Allocation of Affordable Housing Need and the Housing Performance Scores and reflect any other updates.~~

Introduction, page 5:
Like a diversified ~~stock~~ investment portfolio, a diversity of housing types can increase local government resiliency through changing economic climates.

Introduction, pages 6-7:
More people. Over the next 30 years, our region is projected to grow by ~~824,000~~783,000 residents, a gain of ~~29%~~27% from 2010. More births than deaths and longer life expectancies will account for ~~over two-thirds~~ three-quarters of this population growth. People moving here from other parts of the nation and world—attracted by our region's economic opportunities—will account for the remaining ~~one-third~~ one-quarter of this growth. (For more information, see the Metropolitan Council's MetroStats: *Steady growth and big changes ahead: The Regional Forecast to 2040*.)

More housing needed. The region will gain ~~391,000~~ 367,000 new households by 2040. Housing these new households will require ~~over~~ nearly 13,000 new housing

Figure 1: Twin Cities Population (in millions)

1970	1980	1990	2000	2010	2020	2030	2040
1.9	2.0	2.3	2.6	2.9	3.1	3.4	3.6
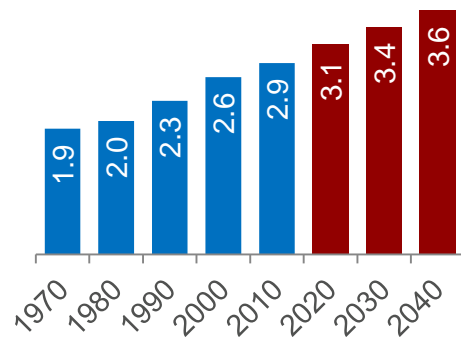
Source: U.S. Census Bureau; Metropolitan Council Regional Forecasts

units a year on average between today and 2040. While this level of housing production is less than the annual average of the last 40 years, it is more than the region produced in the eight years following the housing boom years of the early 2000s.
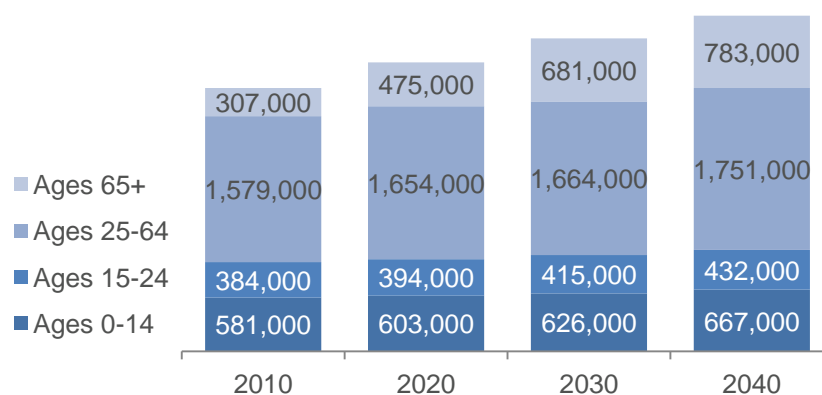
Figure 2: New Housing Units Permitted

Over Nearly 13,000 new units on average per year necessary to house household growth to 2040
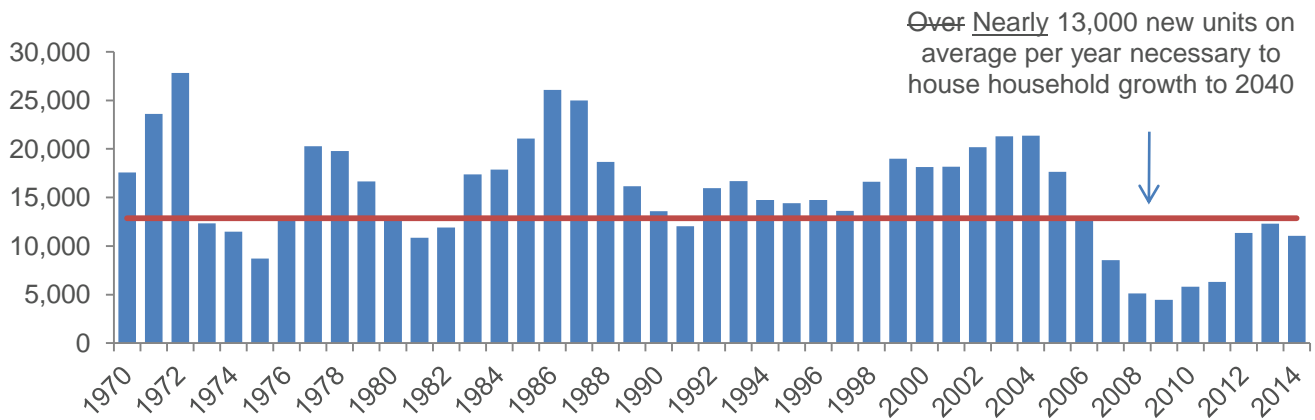
Source: Metropolitan Council Residential Construction Survey

Demographic shifts in age. Our region is aging rapidly. More than one in five residents will be age 65 and older in 2040, compared to one in nine in 2010. Furthermore, ~~three-quarters~~ four-fifths of household growth between 2010 and 2040 will be among older households (those headed by individuals age 65 and older). ~~Conversely, only one in five net new households will include children, and one in three~~ Nearly half of net new households will be individuals living alone. These demographic changes will shape the location and type of real estate needed over the next three decades.

Older households and single-person households ~~without children (whether young or old)~~ are more likely to prefer attached housing in walkable, amenity-rich neighborhoods. While many senior households want to age in place, the massive increase in the senior population will magnify the impact of those seniors who choose to move. Senior households are likely to want smaller, low-maintenance housing products, and easy access to services and amenities. Most senior households live on fixed incomes and have a greater interest in or need for rental housing; this preference for renting increases as seniors age.

Figure 3: Forecasted Twin Cities Population by Age

	2010	2020	2030	2040
Ages 65+	307,000	475,000	681,000	783,000
Ages 25-64	1,579,000	1,654,000	1,664,000	1,751,000
Ages 15-24	384,000	394,000	415,000	432,000
Ages 0-14	581,000	603,000	626,000	667,000

Source: U.S. Census Bureau; Metropolitan Council Regional Forecasts, 2015 update

Over the 20 years from 1990 to 2010, 91% of net household growth was among households in the peak home-buying years of age 35 to 65. In contrast, from 2010 to 2040, ~~74%~~ 80% of net household growth will be among households in the home-downsizing years of age 65 and above. Today, most baby boomers are still in the peak home-buying years. However, by the end of the next decade, the number of baby boomers likely to downsize their homes will be greater than the number of younger buyers looking to move into larger housing. Demand will likely remain high for attached and small-lot housing in walkable and amenity-rich neighborhoods.[i]

Figure 5: Forecasted Twin Cities Households by Age and Size

Legend:
- Age 65+: 2+ person household
- Age 65+: 1 person household
- Under 65: 3+ person household
- Under 65: 2 person household
- Under 65: 1 person household

	2010	2020	2030	2040
Age 65+: 2+ person household	100,000	162,000	229,000	249,000
Age 65+: 1 person household	90,000	134,000	193,000	236,000
Under 65: 3+ person household	418,000	426,000	439,000	462,000
Under 65: 2 person household	280,000	292,000	278,000	289,000
Under 65: 1 person household	229,000	244,000	238,000	249,000

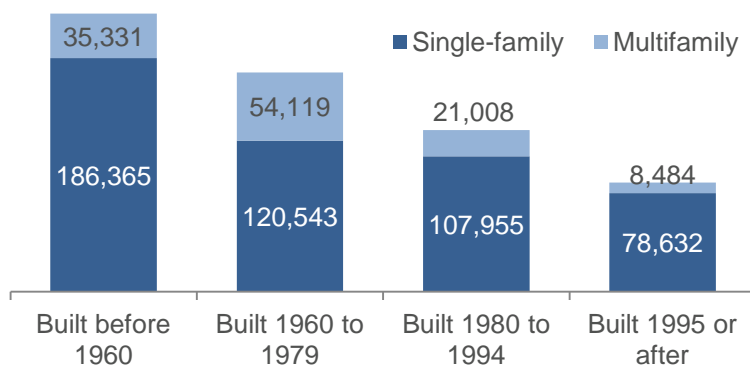*Source: U.S. Census Bureau; Metropolitan Council Regional Forecasts, 2015 update*

Introduction, page 8:

Demographic shifts in race and ethnicity. By 2040, ~~40%~~ 41% of the Twin Cities population will be people of color, compared to 24% in 2010.

Introduction, page 9:

Many of these aging units have become more affordable but may not be viable.[ii]

Figure 4: Units with Serious Maintenance Problems

	Built before 1960	Built 1960 to 1979	Built 1980 to 1994	Built 1995 or after
Multifamily	35,331	54,119	21,008	8,484
Single-family	186,365	120,543	107,955	78,632

Source: U.S. Census Bureau, American Housing Survey ~~2007~~ 2013 Metropolitan Public Use File[5]

Over ~~437,000~~ 490,000 single-family units and ~~over 90,000~~ nearly 119,000 multifamily units have a serious maintenance problem, such as water leaks or holes in the floors. Of particular concern are ~~nearly 180,000~~ roughly 186,000 single-family units and ~~nearly 30,000~~ roughly 35,000 multifamily units built before 1960; many of these units have aged into affordability but are at risk of functional obsolescence. While multifamily units are less likely to have a serious maintenance problem than single-family units, they are important to maintain given the expected preferences of future households.
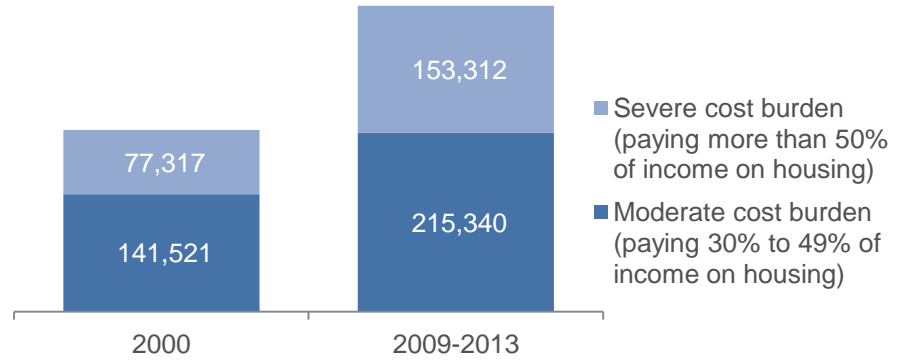
Additionally, there are ~~nearly 53,000~~ over 87,000 newer units (those built in 1995 or afterward) with a serious maintenance problem. Preventing these units from further deterioration will help preserve the housing as it becomes more affordable with age.

Introduction, page 9-10:

As a result, rates of housing cost burden have increased across the region,[iii] particularly between 2000 and the ~~2008-2012~~ 2009-2013 period:

- The number of households experiencing severe housing cost burden doubled between 2000 and ~~2008-2012~~ 2009-2013.

- The number of households experiencing any housing cost burden grew by ~~75%~~ 68% over the same time period.

Figure 5: Rising Housing Cost Burden

- Severe cost burden (paying more than 50% of income on housing)
- Moderate cost burden (paying 30% to 49% of income on housing)

Source: U.S. Census Bureau, Decennial Census and American Community Survey

- By the most recent data period, ~~more than~~ nearly one-third of households in our region were paying at least 30% of their income for housing, and almost one in seven was paying at least 50% of their income for housing. This includes ~~119,000~~ 126,000 metro households earning 50% of area median income or less who are severely cost-burdened.[iv]

- Households of color experience severe housing cost burden at ~~nearly~~ twice the rate, and Black households at nearly 2.5 times the rate, of white, non-Latino households.[v]
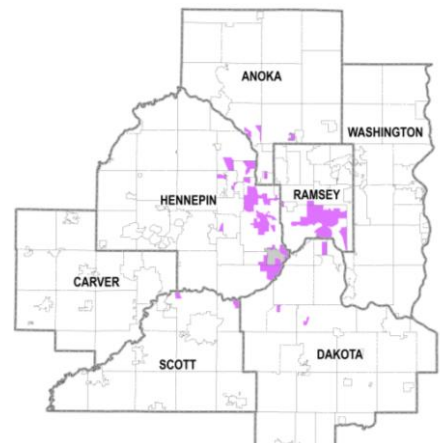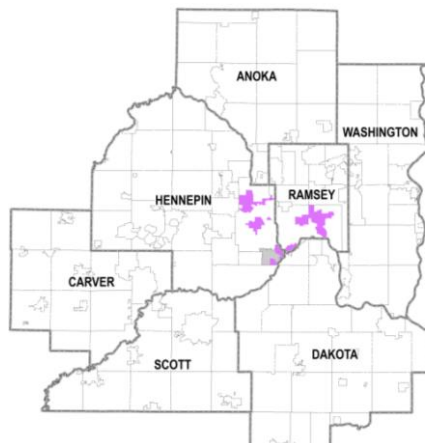
Introduction, page 11:

Figure 6: Areas of Concentrated Poverty in 1990, 2000, and ~~2007-2011~~ 2009-2013
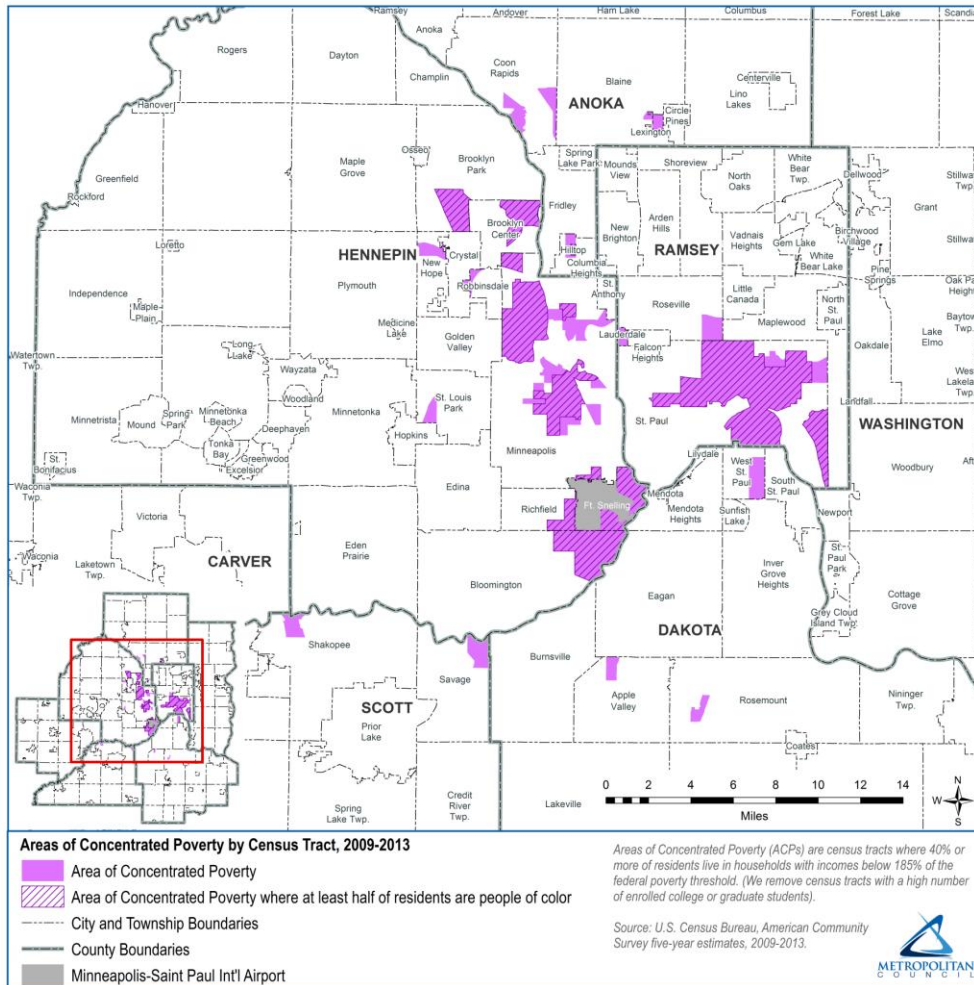
In **1990**, 81~~86~~ census tracts were considered Areas of Concentrated Poverty.

In **2000**, 61~~74~~ census tracts were considered Areas of Concentrated Poverty.

In ~~2007-2011~~ 2009-2013, 112~~106~~ census tracts were considered Areas of Concentrated Poverty.

Introduction, page 12:

Areas of Concentrated Poverty by Census Tract, 2009-2013

- ▮ Area of Concentrated Poverty
- ▨ Area of Concentrated Poverty where at least half of residents are people of color
- ---- City and Township Boundaries
- —— County Boundaries
- ▮ Minneapolis-Saint Paul Int'l Airport

Areas of Concentrated Poverty (ACPs) are census tracts where 40% or more of residents live in households with incomes below 185% of the federal poverty threshold. (We remove census tracts with a high number of enrolled college or graduate students).

Source: U.S. Census Bureau, American Community Survey five-year estimates, 2009-2013.
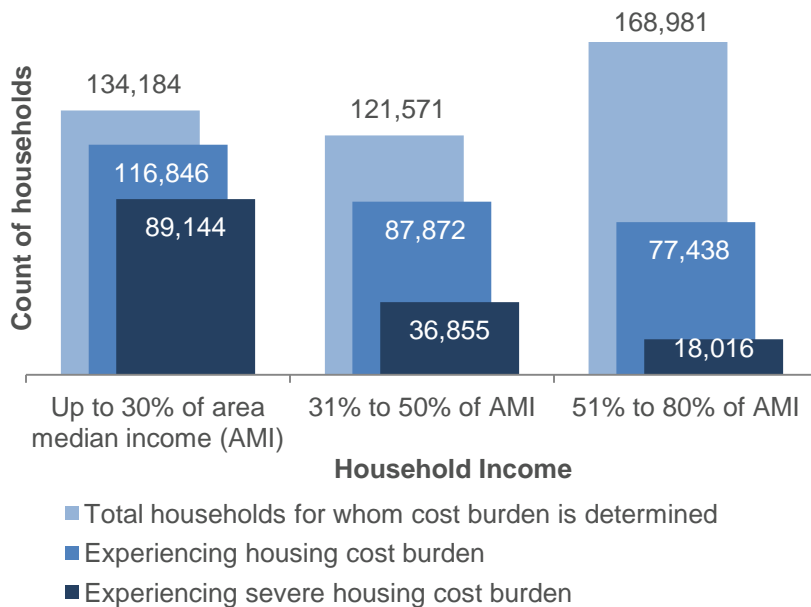
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Introduction, page 13-14:

In addition to the publicly subsidized affordable housing stock, there are also many units of unsubsidized affordable housing—housing whose rents or sale prices make them affordable to low- and moderate-income households. Using an affordability threshold of 80% of area median income, the region has ~~518,000~~ 493,000 affordable owner-occupied units and ~~318,000~~ 340,000 affordable rental units, including both subsidized and unsubsidized.[vi] (There are also approximately 14,000 manufactured homes that are likely to be affordable.) However, many of these housing units are occupied by households earning

Table 1: ~~2014~~ 2015 **Area Median Income (AMI) by household size**
Minneapolis-St. Paul-Bloomington metropolitan statistical area

Household Size:	Extremely Low Income (at or below 30% AMI)	Very Low Income (at or below 50% AMI)	Low Income (at or below 80% AMI)
One-person	~~$17,400~~ $18,200	~~$29,050~~ $30,350	~~$44,750~~ $46,100
Two-person	~~$19,900~~ $20,800	~~$33,200~~ $34,650	~~$51,150~~ $52,650
Three-person	~~$22,400~~ $23,400	~~$37,350~~ $39,000	~~$57,550~~ $59,250
Four-person	~~$24,850~~ $26,000	~~$41,450~~ $43,300	~~$63,900~~ $65,800
Five-person	~~$27,910~~ $28,410	~~$44,800~~ $46,800	~~$69,050~~ $71,100
Six-person	~~$31,970~~ $32,570	~~$48,100~~ $50,520	~~$74,150~~ $76,350
Seven-person	~~$36,030~~ $36,730	~~$51,400~~ $53,700	~~$79,250~~ $81,600
Eight-person	~~$40,090~~ $40,890	~~$54,750~~ $57,200	~~$84,350~~ $86,900

Source: U.S. Department of Housing and Urban Development, FY ~~2014~~ 2015 Income Limits

Figure 7: Housing Cost Burden by Income Level

Count of households

- Up to 30% of area median income (AMI): 134,184 / 116,846 / 89,144
- 31% to 50% of AMI: 121,571 / 87,872 / 36,855
- 51% to 80% of AMI: 168,981 / 77,438 / 18,016

Household Income

- ▉ Total households for whom cost burden is determined
- ▉ Experiencing housing cost burden
- ▉ Experiencing severe housing cost burden

Source: U.S. Census Bureau, ~~2007-2011 Comprehensive Affordablity Strategy Data,~~ 2009-2013 American Community Survey Public Use Microdata Sample.

more than 80% of area median income, increasing the gap in the supply of units affordable and available to lower-income households.

Even with the existing supply of affordable housing, more than ~~265,000~~ 282,000 low- and moderate-income households in the region are paying more than 30% of their household income on housing costs, and ~~nearly 140,000~~ 144,000 of those are paying more than half their income on housing.

Furthermore, construction of new affordable housing has been dropping significantly. In 2006, the Metropolitan Council projected that the region should add 51,000 new units of affordable housing between 2011 and 2020 to accommodate the forecasted growth in low- and moderate-income households. (Note that this ignores the need for affordable housing that existed in 2010, that is, the ~~60,000~~ 144,000 households paying more than half of their income on housing—much less the additional ~~190,000~~

138,000 who are paying between 30% and 50% of their income on housing. These are the low- and moderate-income households that currently experience housing cost burden.) Over the first three years of the decade the region added 2,993 new affordable units, meeting just over 5% of the decade-long need. At this pace, it will take the region more than four decades to meet only one decade's need for affordable housing.

Introduction, page 14:

Looking ahead, the Council forecasts that between 2020 and 2030, our region will add 49,500 37,400 low- and moderate-income households who will need new affordable housing options.[vii] Even if we are successful at addressing today's housing cost burden, the challenges will continue to increase with the region's ongoing population growth.

Part II: Outcomes (Prosperity), page 39:

- Expand viable housing options by investing in and encouraging new additional affordable housing in higher-income areas of the region, particularly in areas that are well connected to jobs and opportunity.
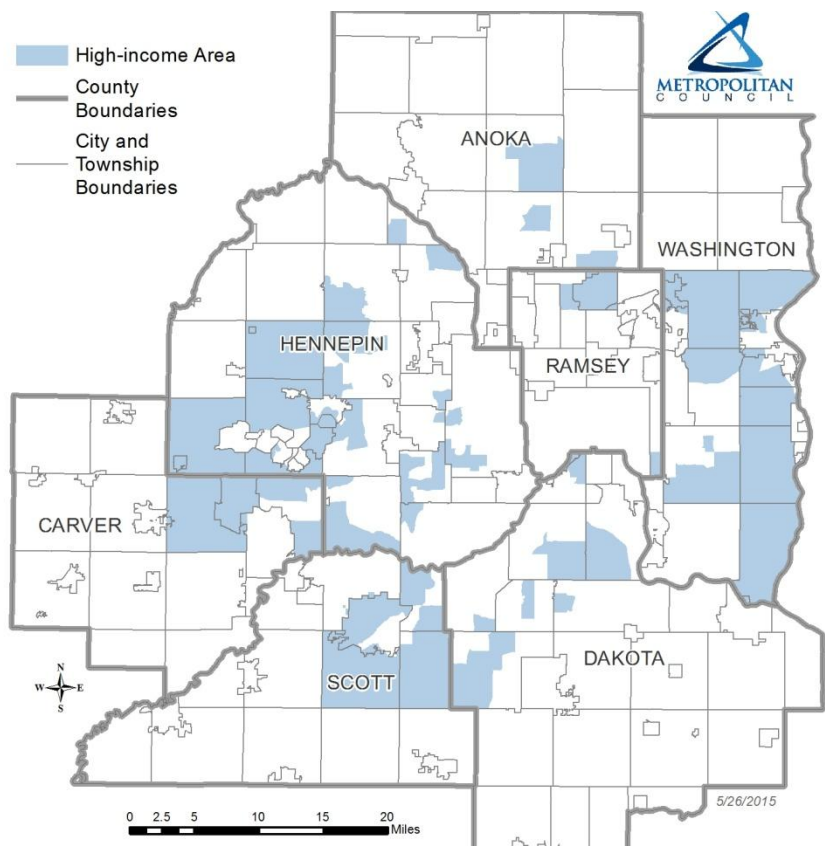
Part II: Outcomes (Equity), page 45:

- Expand viable housing options by investing in and encouraging new additional affordable housing in higher-income areas of the region, particularly in areas that are well connected to jobs and opportunity.

Part II: Outcomes (Equity), page 47:

- Allocating each growing city its share of the region's need for new additional affordable housing.

Figure 8: High-income census tracts

Part II: Outcomes (Equity), page 48:

While access to transit can expand household transportation choices particularly for low-income households, access to transit should not constrain where ~~new~~ additional affordable housing is constructed. Even among the lowest income households—those earning less than $30,000 a year—64% of all trips are by automobile.[30]

Part II: Outcomes (Equity), pages 50-51:

In July 2013, HUD issued a proposed rule on Affirmatively Furthering Fair Housing. As of ~~November 2014~~June 2015, HUD has not released a final version of the rule. Moreover, in January 2015, the Supreme Court heard oral arguments on Texas Department of Housing and Community Affairs v. The Inclusive Communities Project, Inc., ~~has agreed to hear~~ a case that will refine the legal extent of the Fair Housing Act. The Supreme Court is expected to issue a decision in June 2015. At this time, federal guidance is in flux.

Established in 2002, the region's Fair Housing Implementation Council (FHIC) provides a venue for local entitlement communities[viii] to voluntarily cooperate to develop a regional response to the HUD-required Analysis of Impediments (AI) to fair housing choice and to leverage their use of federal CDBG and HOME funds to affirmatively further fair housing. The current signatories to the 2012-2015 FHIC Cooperative Funding Agreement are the Anoka County Housing and Redevelopment Authority, Dakota County, Hennepin County, Ramsey County, Washington County, and the cities of Coon Rapids, Woodbury, Minneapolis and Saint Paul~~, and the Metropolitan Council~~.

In developing an AI, jurisdictions examine the impediments or barriers to fair housing, housing choices, and the availability of housing choice that affects protected classes[1] within a geographic region. The essential components of an AI include:

- Reviewing the state's or the entitlement jurisdiction's laws, regulations and administrative policies, procedures, and practices.
- Assessing of how those laws affect the location, availability, and accessibility of housing.
- Evaluating of conditions, public and private, affecting fair housing choice for all protected classes.

Figure 18: Jurisdictions participating in ~~or considering participation~~ in the 2014 Regional Analysis of Impediments to Fair Housing Choice

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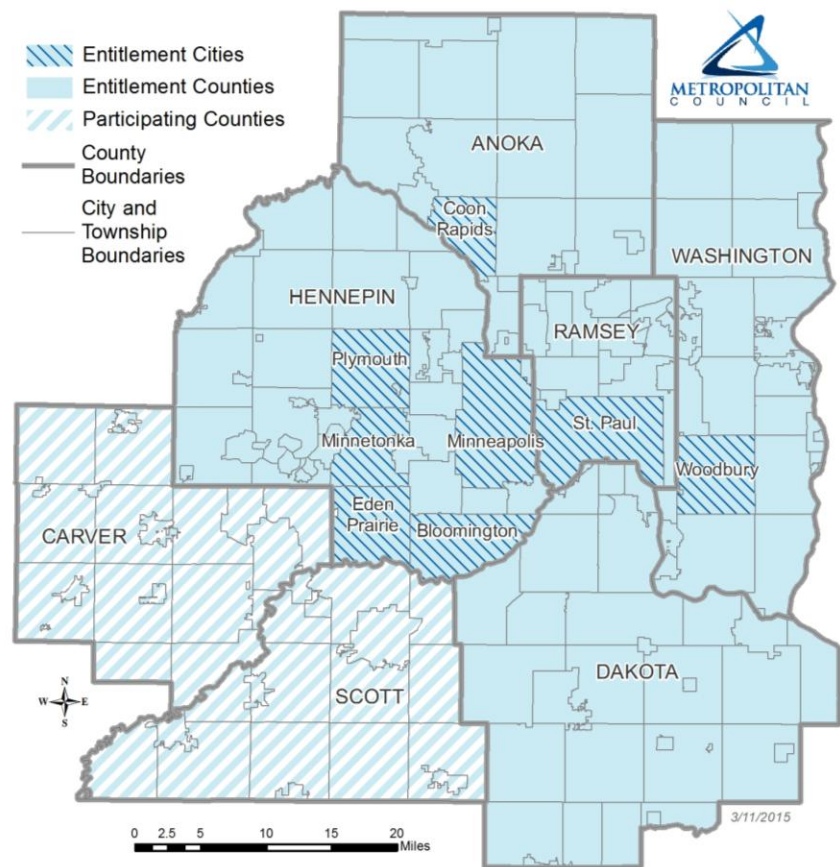
[1] As detailed above, protected classes under Minnesota law are race, color, religion, sex, disability or handicap, familial status, national origin, creed, sexual or affectional orientation, marital status, and receipt of public assistance.

- Assessing of the availability of affordable, accessible housing in a range of unit sizes.

The FHIC has produced an AIs in 2001, and 2009, and is preparing the 2014 AI2015 (for 2014). As prepared, the The 2014 AI is expected to covers the jurisdictions receiving direct funding from HUD—that is, the cities of Bloomington, Coon Rapids, Eden Prairie, Minneapolis, Minnetonka, Plymouth, Saint Paul and Woodbury, as well as Anoka, Dakota, Hennepin, Ramsey and Washington counties. In addition to the thirteen entitlement jurisdictions, the Carver County Community Development Agency, the Scott County Community Development Agency, and the Metropolitan Council participated in and helped fund the AI to ensure that the process encompassed all seven counties of the metropolitan area. (The Council itself does not receive either CDBG or HOME dollars and is therefore not required to complete an AI. However, the Council contributes funding, participation, and technical support to the work of the FHIC to identify and develop strategies that address impediments to fair housing in the region.) To date, the Carver and Scott Community Development Agencies have also expressed interest in their counties signing onto the 2014 AI to create a complete seven-county area regional perspective.
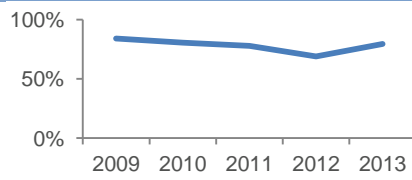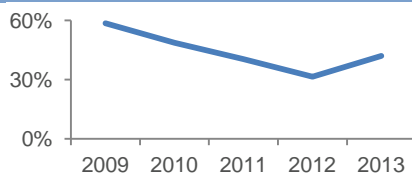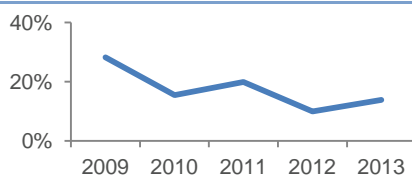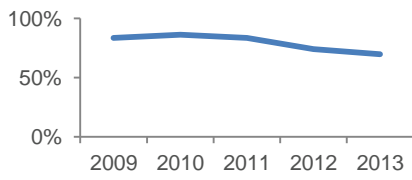
Part II: Outcomes (Livability), page 54:

Communities throughout the region recognize the significance of housing quality, choice, and affordability. The region is expecting 391,000 367,000 new households by 2040.

Part II: Outcomes (Livability), page 54:

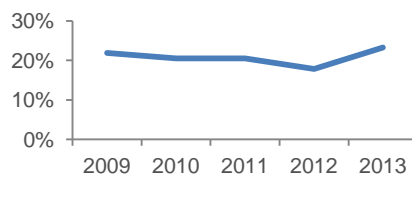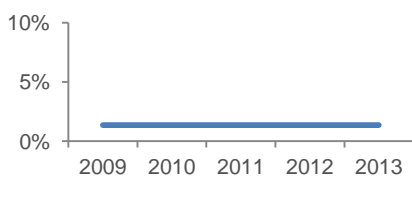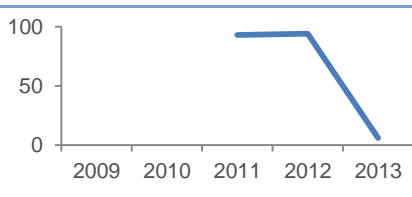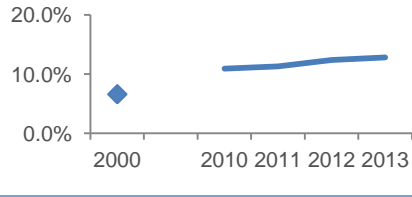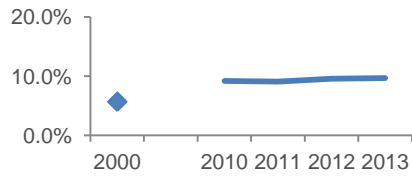Together, Minneapolis and Saint Paul have more than nearly 4 in 10 of the region's multifamily units.

Part II: Principles (Accountability), pages 71-73:

Measure and strategy being measured	2000	2008	2009	2010	2011	2012	2013	
3. Balance of low-income households and affordable housing: Create and maintain housing choices across the region								
3a. Percent of communities lacking sufficient affordable housing options[2] for their households with income at or below 30% of AMI	N/A	N/A	~~73%~~ 84%	~~71%~~ 81%	~~72%~~ 78%	~~69%~~ 69%	~~69%~~ 80%	
3b. Percent of communities lacking sufficient affordable housing options[2] for their households with income at or below 50% of AMI	N/A	N/A	~~55%~~ 59%	~~35%~~ 49%	~~43%~~ 40%	~~28%~~ 31%	~~32%~~ 42%	
3c. Percent of communities lacking sufficient affordable housing options[2] for their households with income at or below 80% of AMI	N/A	N/A	~~27%~~ 28%	~~14%~~ 15%	~~16%~~ 20%	~~10%~~ 10%	~~11%~~ 14%	
4. Balance of low-income households and affordable housing in transit station areas[3]: Ensure a mix of housing affordability along the region's transit routes and corridors								
4a. Transit station areas lacking sufficient affordable housing[2] for their households with income at or below 30% of AMI	N/A	N/A	~~93%~~ 84%	~~89%~~ 86%	~~86%~~ 84%	~~85%~~ 74%	~~84%~~ 70%	

Measure and strategy being measured	2000	2008	2009	2010	2011	2012	2013	
4b. Transit station areas lacking sufficient affordable housing[2] for their households with income at or below 50% of AMI	N/A	N/A	27% 22%	22% 21%	26% 21%	21% 18%	22% 23%	
4c. Transit station areas lacking sufficient affordable housing[2] for their households with income at or below 80% of AMI	N/A	N/A	0% 1%	0% 1%	0% 1%	0% 1%	0% 1%	

6. New affordable housing units in higher-income areas: Encourage new affordable and mixed-income housing in higher-income areas of the region

	2000	2008	2009	2010	2011	2012	2013	
Number of new affordable units in higher-income areas	N/A	N/A	N/A	N/A	79 93	88 94	N/A 6	

7. Share of region's population living in Areas of Concentrated Poverty: Increase wealth, increase income diversity, and expand housing options for people with lower incomes to reduce the share of the population living in Areas of Concentrated Poverty

	2000	2008	2009	2010	2011	2012	2013	
7a. Share of population living in Areas of Concentrated Poverty	6.6%	N/A	N/A	11.5% 10.9%	12.0% 11.3%	13.1% 12.4%	N/A 12.8%	
7b. Share of population living in Areas of Concentrated Poverty where at least half of the residents are people of color	5.7%	N/A	N/A	9.3% 9.2%	9.2% 9.1%	9.8% 9.6%	N/A 9.7%	

8.Share of Section 8 Housing Choice Voucher holders living in Areas of Concentrated Poverty: Promote greater Section 8 mobility for voucher holders and greater participation in Section 8 among property owners across the region								
8a. Share of Section 8 Housing Choice Voucher holders living in Areas of Concentrated Poverty	21.0%	N/A	N/A	N/A	N/A	~~37.7%~~ <u>35.3%</u>	~~N/A~~ <u>37.5%</u>	
8b. Share of Section 8 Housing Choice Voucher holders living in Areas of Concentrated Poverty where at least half of the residents are people of color	17.9%	N/A	N/A	N/A	N/A	~~30.1%~~ <u>29.2%</u>	~~N/A~~ <u>30.0%</u>	

Part III: Council Policies and Roles, page 79:

The Need attempts to provide the most objective, accurate prediction possible of the number of new low- and moderate-income households that will need affordable housing without considering the cost of, resources available, for, or barriers to building that housing. Looking ahead, the Council forecasts that between 2020 and 2030, our region will add 37,400 low- and moderate-income households that will need new affordable housing. [ix] (For more information on the calculations, see Appendix B.) The Need measures future affordability demand and does not incorporate existing unmet demand for affordable housing. It is determined every 10 years as a precursor to the decennial comprehensive plan updates.

Over the last three years, resources distributed through the Consolidated Request for Proposals have supported the seven-county development of:

- 2012: 763 new multifamily rental affordable housing units
- 2013: 422 new multifamily rental affordable housing units
- 2014: 1,182 new multifamily rental affordable housing units (including units funded with the Housing Infrastructure Bonds that Minnesota Housing received in 2014)

Multifamily rental units funded through the Consolidated Request for Proposals are generally affordable to households earning 50% of AMI with some units reserved for households earning 30% of AMI. While not all new affordable rental units in the region receive funding through the Consolidated Request for Proposals, these numbers provide some sense of scale—fewer than 2,500 new affordable rental units over three years.

Looking at projects selected to receive funding in 2014, overall per-unit total development costs varied from $110,000 for single-room occupancy facilities such as the proposed Catholic Charities Higher Ground St. Paul to $259,000 for family townhomes such as the proposed Morgan Square Townhomes in Lakeville. Excluding single-room occupancy facilities and recognizing the range of pro formas, the average subsidy—including tax credit equity and public grants—is $185,000 per affordable unit. This suggests that meeting the 2021-2030 need for housing units affordable to households earning 50% of AMI and below would require over $5 billion in subsidy over the decade or over $500 million a year, far less than the available resources.

As currently deployed, existing state and federal funding sources are inadequate to subsidize the regionwide need for new housing for low- and moderate households. While local governments can and do support affordable housing development through financial contributions, fee waivers, and policies such as density bonuses, the Council does not expect local governments to underwrite the unmet need for additional affordable housing.

Local governments are responsible for guiding adequate land at minimum densities necessary to allow affordable housing development to meet their share of the region's Need. The availability of land that can support affordable housing gives developers a variety of geographic choices to consider for a affordable housing development; developers building affordable housing across the region gives low- and moderate-income households viable options as to where they live.

Part III: Council Policies and Roles, page 80:

Overview of allocation methodology

Appendix B provides a detailed methodology to the Allocation of Affordable Housing Need for 2021-2030. This updated methodology has three main steps:
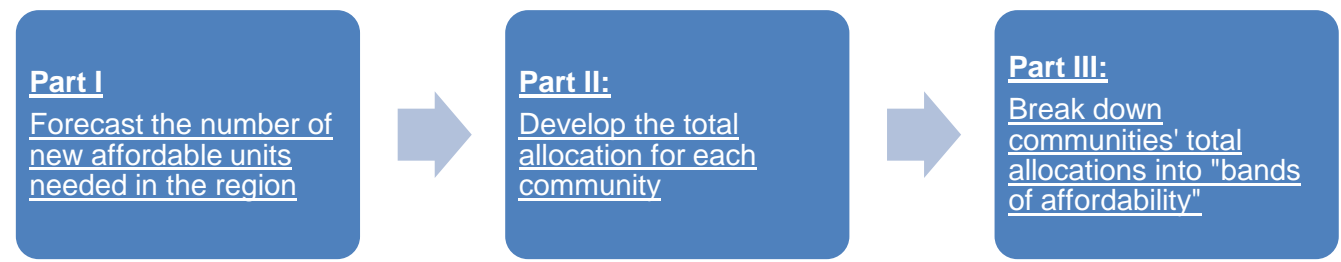
- Part I forecasts the proportion of 2021-2030 net growth in households that will need affordable housing, resulting in a regional Need of 37,900 new affordable housing units:
  - 18,900 housing units for households earning at or below 30% of AMI
  - 9,450 housing units for households earning from 31% to 50% of AMI

- o 9,550 housing units for households earning from 51% to 80% of AMI (assuming a 5% vacancy rate).
- Part II allocates that regional Need to each community in the region with sewer service in alignment with the Council's policy of limiting growth in areas without sewer service. Additional adjustment factors allocate relatively more new affordable housing where the housing will help expand housing choices the most.
- Part III distributes each community's adjusted allocation into the three bands of affordability. Each community's share of existing affordable housing within each band of affordability affects how much of its Need is distributed into each band.

- *Adjustment factors*

In addition to allocating a Need that is distinguished by levels of affordability, the Council will make certain adjustments that will place relatively more new affordable housing where the housing will help low-income families the most.

Figure 19: Allocation methodology overview

Part I	Part II:	Part III:
Forecast the number of new affordable units needed in the region	Develop the total allocation for each community	Break down communities' total allocations into "bands of affordability"

Rather than allocate a Need number to communities that is simply the same share of their total forecasted growth as the overall Need for the region, two specific key adjustment factors will be are used to better reflect unique characteristics of each city that impact the Need:

- **Ratio of low-wage jobs to low-wage workers:** The ratio of low-wage jobs in the community to low-wage workers who live in a community indicates whether a community imports low-wage workers to fill its low-wage jobs and could therefore use more new additional affordable housing for those workers.
- **Existing affordable housing:** Placing new additional affordable housing in communities where existing affordable housing is scarce expands choice for low-income households.

The existing affordable housing stock has twice the impact on a community's allocation as its ratio of low-wage jobs to low-wage workers because the existing housing stock is a more stable and place-based indicator; workers are more likely to move than is housing stock.

Table 6: Adjustment factors to the Allocation of Affordable Housing Need

Adjustment factors	Need is increased for communities that have:	Need is reduced for communities that have:
Ratio of low-wage jobs to low-wage workers	Relatively more low-wage jobs than low-wage workers living in the community	Relatively more low-wage workers living in the community than low-wage jobs
Existing affordable housing	Lesser share of existing affordable housing than the	Greater share of existing affordable housing than the

So that local jurisdictions can plan toward a stable number in developing their local comprehensive plan updates, the Council does not presently plan to revise the Need numbers for 2021-2030. However, the Council adjusts the Allocation of Affordable Housing Need for individual communities when the Council revises household forecasts as a result of either comprehensive plan updates or amendments. If unforeseen shifts in the landscapes of population growth and/or affordable housing need occur, the Council will consider an update to the Allocation of Need for 2021-2030.

~~The threshold for housing affordability and the adjustment factors for determining the Need provide a framework for determining a community's share of the Need. This framework will be the basis for a detailed methodology for determining the Need that the Council will develop in partnership with affordable housing stakeholders as a part of the implementation of this plan.~~

Council actions:
- ~~Use the above-defined framework to define a detailed methodology for determining the Allocation of Affordable Housing Need for 2021-2030.~~
- ~~Amend the *Housing Policy Plan,* including a full public comment process, to incorporate the final methodology prior to the distribution of Systems Statements to local governments in late 2015.~~
- Distribute the local Allocation of Affordable Housing Need to each jurisdiction with System Statements in fall 2015.
- Review 2040 local comprehensive plan updates and subsequent amendments to verify that each community is guiding an adequate supply of land to accommodate their share of the region's need for low- and moderate-income housing, i.e., the Allocation of Affordable Housing Need.

Part III: Council Policies and Roles, page 81:

As mentioned previously, the Need and the Goal are frequently confused. Where the Need is a proxy for demand for ~~new~~ additional affordable housing that should be addressed in local comprehensive plans, the Goal is a mechanism for participants of the Livable Communities Act to show their commitment and effort to produce affordable and life-cycle housing. With their Goal expressing a desire to expand housing choices, the LCA-participating communities are aided and rewarded by access to the LCA funding discussed on page 84. The two measures are products of different legislation with different purposes and requirements. One of the desired outcomes of this *Housing Policy Plan* is to improve the understanding of the roles of these measures in the regional housing conversation.

Part III: Council Policies and Roles, pages 82-83:

Emerging from this *Housing Policy Plan* will be a new set of scoring criteria the Council will ~~create~~ use to develop local Scores annually. This methodology replaces the Guidelines for Housing Performance developed in 2002 and updated in 2012. ~~Jurisdictions vary widely in their fiscal, technical, and human resource capacity, existing built environments, cost and availability of land, and existing level of developer interest. The Housing Performance Scores should recognize these differences. For the legitimacy of the Scores, all cities and townships should believe they have a real possibility of achieving a high Housing Performance Score. Additionally, the Housing Performance Scores can serve as a platform for the Council and cities to inventory programs and activities, and contemplate new means of addressing local housing needs given available resources. Framework for developing new Housing Performance Scores~~ The goals of the revisions to the Housing Performance Scores are to:

- Better recognize local variations in their fiscal, technical, and human resource capacity, existing built environments, cost and availability of land, and existing level of developer interest.
- Provide all cities and townships a real possibility of achieving high Housing Performance Scores if they are active in providing affordable housing or related services.
- Make the scoring process more transparent.
- Minimize the administrative burden on cities by leveraging information from sources such as applications to the Consolidated Request for Proposals and county housing investments.
- ~~Use the following broad categories for the Scores:~~
    - ~~Tools available at the local level~~
    - ~~Tools or resources used in the last five~~ ten ~~years~~
    - ~~Number of affordable housing units or affordable housing opportunities created in the last five~~ ten ~~years~~
    - ~~Existing stock of affordable housing~~
    - ~~Local participation in state, regional, or county housing programs, whether as an administrator, lender, funding allocator, pass-through entity, or funding applicant~~
    - ~~Applications (whether funded or unfunded) submitted to the Consolidated Request for Proposals (the "Super RFP"), county-issued RFPs, or other major competitive funding processes~~
- ~~Align counts of existing affordable housing (including unsubsidized affordable housing) with the 30%, 31-50% and 51-80% of area median income levels defined in the Need.~~
- ~~Expand the list of scoring opportunities to reflect the full and evolving range of housing activities, programs, and tools used by local jurisdictions, including new elements such as:~~
    - ~~Strategies to preserve unsubsidized affordable housing~~
    - ~~Fair Housing and Equal Opportunity efforts~~
    - ~~Efforts to recruit landlords to accept Section 8 Housing Choice Vouchers~~
    - ~~Foreclosure prevention, counseling, mitigation, and remediation~~
    - ~~Energy, water, and other resource conservation~~
- ~~Use the mechanisms of the Affordable Housing Production Survey and Housing Performance Score process to refer jurisdictions to best practice resources, technical toolkits, and funding opportunities.~~
- ~~Evaluate the potential utility of using the housing element and implementation program components of local comprehensive plans as an assessment component under the Scores.~~
- ~~Plan for the transition from the existing scoring system to the new Housing Performance Scores developed under this plan.~~
- ~~Institutionalize local government review and comment on their preliminary Housing Performance Scores and create a formal structure for local governments to provide the Council additional information.~~

The Council expects that these refinements to the Scores will lead to both a better ability to evaluate local performance on expanding affordable housing and also a greater opportunity to help cities connect tools, ideas, and resources with development opportunities, potential partners, and a larger pool of funding and technical options.

Council actions

- Use the approach ~~defined~~ outlined above and detailed in a separate policy to ~~update~~ calculate the Council's ~~calculation of~~ Housing Performance Scores annually ~~beginning in 2015~~.
- Discontinue the calculation of county Housing Performance Scores and embed county activities into city and township Housing Performance Scores.

- Review the methodology for the calculation of the Housing Performance Scores every two years, starting in 2016.
- Implement the transition from the 2002 Housing Performance Scores methodology to the 2015 Housing Performance Scores methodology with a hold harmless that no city will receive a 2015 score lower than 80% of the average of their 2010-2014 Housing Performance Scores.
- Use the mechanism of collecting data for the Housing Performance Scores to refer jurisdictions to best practices, technical tools, and funding opportunities.
- Institutionalize local government review and comment on their preliminary Housing Performance Scores and create a formal structure for local governments to provide the Council additional information.
- ~~Amend the *Housing Policy Plan,* including a full public comment process, to incorporate the final methodology for Housing Performance Scores.~~

Part III: Council Policies and Roles, pages 86-87:

The SAC system is a complex structure governed by state statutes and administrative procedures. As a result, it is both politically and ~~structurally~~ financially challenging to leverage SAC to promote affordable housing. Through ~~its~~ outreach and engagement~~, and policy development~~ ~~on the *2040 Water Resources Policy Plan, to be adopted*~~ in 2015, the Council will determine if there is a viable opportunity to promote affordable housing production through its handling of SAC. ~~The *2040 Water Resources Policy Plan* will conclude this conversation that began in the development of this *Housing Policy Plan*; any proposal that is subsequently adopted in the *2040 Water Resources Policy Plan* will be included in a future amendment to this *Housing Policy Plan.*~~

Council actions to leverage the Sewer Availability Charge structure to expand affordable housing

- Collaboratively explore opportunities to promote affordable housing production through its handling of SAC, and, if any are identified, include those in the Sewer Availability Charge Procedure Manual. ~~Consider including an "Affordable Housing SAC Credit" in the *2040 Water Resources Policy Plan* to be adopted in 2015.~~

Part III: Council Policies and Roles, page 89:

~~Review of~~ Housing Requirements for *Local Comprehensive Plans*

Cities, townships, and counties in the seven-county area prepare local comprehensive plans as required by the Metropolitan Land Planning Act. These plans must include a housing element and a housing implementation program. Local governments will begin this decade's round of local comprehensive plan updates following Council adoption of *Thrive MSP 2040* and the systems~~ and policy plans (including this *Housing Policy Plan*) and the ~~anticipated~~ September 2015 distribution of Systems~~ Statements. Comprehensive plan updates must be submitted to the Council in 2018. The Council assists local governments to create consistent, compatible, and coordinated local comprehensive plans that achieve local visions within the regional policy framework.

The Council reviews updated local comprehensive plans based on the requirements of the Metropolitan Land Planning Act and the comprehensive development guide (*Thrive MSP 2040* and the system and policy plans). The Council considers each local comprehensive plan's compatibility with the plans of other communities, consistency with adopted Council policies, and conformance with metropolitan system plans. If the Council finds that a community's local comprehensive plan is more likely than not to have a substantial impact on or contain a substantial departure from metropolitan system plans, the Council can require the community to modify its local plan to assure conformance with the metropolitan systems~~ plans (Minn. Stat. 473.175).
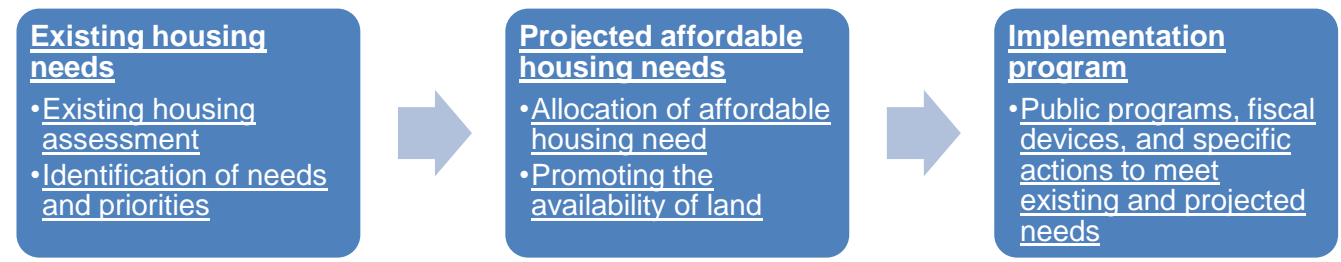
Under the Metropolitan Land Planning Act, local comprehensive plans must include a housing element that:

- Contains standards, plans, and programs for providing adequate housing opportunities to meet *existing* local and regional housing needs;
- Contains standards, plans, and programs for providing adequate housing opportunities to meet *projected* local and regional housing needs; Aacknowledges the community's share of the region's need for low- and moderate-income housing (the Need); and promotes the availability of land for the development of low- and moderate-income housing; and
- Includes an implementation section identifying the public programs, fiscal devices, and official controls, and specific actions the community will use to address their existing and projected needs Need (Minn. Stat. 473.859, subd. 2 and 4).

With the development of this *Housing Policy Plan*, the Council has identified an opportunity to improve the consistency and quality of the housing elements and implementation programs of local comprehensive plans. While communities are now guiding enough residential land at densities to support affordable housing development to address their Need, the Council had not previously provided specific guidance to local communities on other housing element requirements in the Metropolitan Land Planning Act. comprehensive plans could do more to strengthen the connection. For example, comprehensive plans could identify sites (or the characteristics of sites) that offer the best opportunities for affordable or mixed-income housing. In addition, local governments can improve the likelihood of new affordable housing by expressing what types and locations of new affordable or mixed-income housing they would support or finance.

Figure 20: Components of the housing element of local comprehensive plans

Existing housing needs	**Projected affordable housing needs**	**Implementation program**
•Existing housing assessment •Identification of needs and priorities	•Allocation of affordable housing need •Promoting the availability of land	•Public programs, fiscal devices, and specific actions to meet existing and projected needs

Existing housing needs

Under the Metropolitan Land Planning Act, local comprehensive plans must include a housing element that addresses existing housing needs in the community—in other words, the need for increased affordability for the people who already live (and already vote) in the community. The existing housing assessment serves as the starting point to determine a community's existing housing needs. Complete housing elements analyze the existing housing assessment through the lens of local knowledge and priorities, identifying clear, specific housing needs to be addressed in the housing implementation program. Housing elements must contain an assessment of existing housing, including at minimum:

- Number of existing housing units within the three bands of affordability:
  - 30% or less of Area Median Income (AMI)
  - Between 31% and 50% AMI
  - Between 51% and 80% AMI
- Split of rental and ownership housing
- Split of single-family and multifamily housing

- Units of publicly subsidized housing
- Number of existing households at incomes at or below 80% AMI that are experiencing housing cost burden
- A map of owner-occupied housing units identifying their assessed values, differentiating the values above and below what is affordable to a family of four at 80% AMI (see Table 8)

This minimum information is both easily available and informative about existing housing needs. While the Council will provide communities with basic data for their existing housing assessments, the Council encourages communities to include any additional reliable data that enhance their existing housing assessments.

Table 7: Home prices by household income (2013)

Household Income Threshold	Household Income for a family of four (2013)	Affordable Home Price[x]
115% of area median income	$94,650	$325,000
80% of area median income	$64,400	$217,000
50% of area median income	$41,150	$133,000
30% of area median income	$24,700	$74,000

Projected affordable housing needs

The Council provides the projected affordable housing needs for each community through the Allocation of Affordable Housing Need, described earlier in Part III. Allocating future need within the three bands of affordability allows communities to focus on the kinds of affordable housing that are most needed in their community. These future needs must be considered as communities guide future land uses in their comprehensive plan updates. The Metropolitan Land Planning Act specifically states that housing elements contain "land use planning to promote the availability of land for the development of low and moderate income housing." (Minn. Stat. 473.859, subd. 2(c))

Land availability is measured in comprehensive plans by having enough land guided at high enough densities to support the creation of affordable housing sufficient to meet a community's Need. Higher density promotes the availability of land for affordable housing in several ways:

- Increased density correlates with reduced costs of developing new housing by reducing the per-unit cost of land and fixed infrastructure. With limited resources for developing affordable housing, mechanisms that reduce development costs promote new affordable housing.
- Increased density creates more housing units overall. New market-rate or luxury units can still promote the availability of affordable housing by increasing the supply of all housing units.
- Sites with higher density signal to affordable housing developers where communities are more likely to support affordable housing proposals.

For context, of the multifamily affordable units built between 2003 and 2013 in developments with at least four units affordable at 60% AMI or less, the average project density was more than 49 units per acre. The Council recognizes that flexibility is an important component of housing elements and that the minimum densities provided below are significantly lower than that average of 49 units per acre. The Council strongly encourages communities to consider densities higher than these minimums. The Council will provide technical assistance to local governments to demonstrate what different densities

can look like in different kinds of communities. With the right design, higher density development can fit well in almost any community.

Communities should guide an adequate supply of land at appropriate *minimum* densities to meet their Allocation of Affordable Housing Need. Communities have two ways to address the need for the 2021-2030 decade:

- Option 1: Guide sufficient land at a minimum density of 8 units/acre to meet the community's total Need.
  OR
- Option 2: Guide sufficient land at a minimum density of 12 units/acre to meet Need at 50% or less of AMI (that is, the two lower affordability bands) and a minimum density of 6 units/acre to meet need at 51%-80% AMI.

These options allow communities flexibility in how they guide land use to meet statutory requirements within the range of community characteristics. Only enough land sufficient to address the Need must be guided—for example, a Need of 100 units could be addressed by 12.5 acres guided at 8 units/acre, or 2.5 acres guided at 40 units/acre.

Additionally, communities that choose Option 2 and have a *demonstrated* history of creating affordable units at densities lower than 6 units/acre may guide land at lower minimum densities (as low as 3-6 units/acre) when promoting land availability at the 51%-80% band of affordability.

Communities that do not guide an adequate supply of land at appropriate densities to meet their Allocation of Affordable Housing Need—that is, communities that are not fulfilling their statutory role to plan for their share of housing affordable to low and moderate income households—will be considered inconsistent with Council policy and therefore will not be eligible to participate in, and receive funding from, the Livable Communities Act programs. The Council fully acknowledges that land guided at higher densities may develop at higher price points. (Communities that are not meeting their Goal for affordable and lifecycle housing remain eligible to receive funding from the Livable Communities Act programs and will continue to receive priority in selection for funding from the Local Housing Incentives Account.).

In addition to meeting the requirements of the Metropolitan Land Planning Act, these minimum densities help create opportunities across the region for new affordable housing rather than only in the older parts of the region that have higher densities.

Figure 21: Options for guiding land to meet projected need for affordable housing

Option 1:
Guide sufficient land at a minimum density of:
- **8 units/acre** to meet a community's total need

Option 2:
Guide sufficient land at a minimum density of:
- **12 units/acre** to meet need at 50% or less AMI (combines the two lower affordability bands)
- **6 units/acre** to meet need at 51%-80% AMI
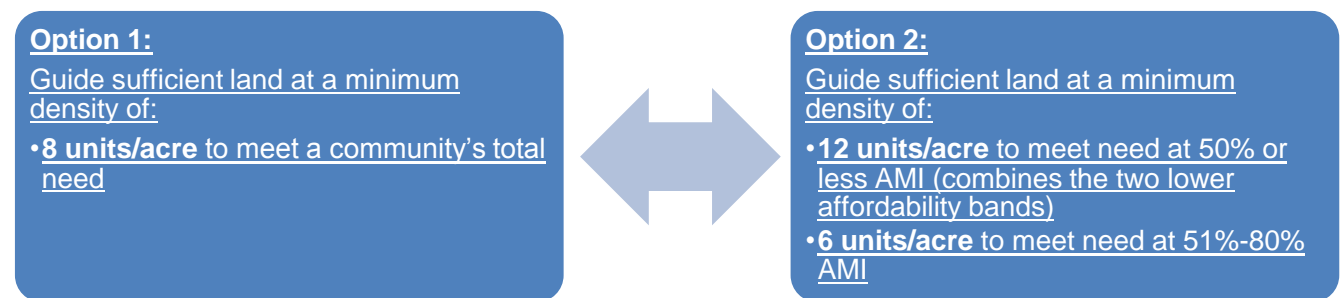
Implementation program

Communities have a variety of additional tools at their discretion to encourage, incent, and even directly create affordable housing opportunities; guiding land at higher densities alone is insufficient to meet the existing or projected needs for affordable housing. Complete housing elements must not only identify a community's "programs, fiscal devices and other specific actions" (Minn. Stat. 473.859, subd. 4) available to meet housing needs as stated in statute, but also clearly and directly link which tools will be used, and in what circumstances, to explicitly address the needs previously identified.

The Council recognizes that this is a more robust application of the statutory language than in the last round of comprehensive plan updates. The Council will ensure that technical assistance is available to help communities identify and direct their resources. Complete housing elements do not have to commit every available tool to meet housing needs, but must identify and consider all reasonable resources.

The Council will provide local planners a list of reasonable tools and resources to support affordable housing development through the Local Planning Handbook. The Council will neither recommend specific tools nor comment on a community's explanation of why they will or will not use specific tools. By providing a list of tools that many communities successfully use, the Council hopes that local comprehensive plans will be clear, transparent policy documents that provide road maps to address housing needs for planners, local leaders, developers, and citizens alike. In addition to meeting the statutory requirements of the Metropolitan Land Planning Act, these comprehensive plans will signal to developers of where communities are likely to support affordable housing and thereby make affordable housing development a less risky proposition.

Council actions to review comprehensive plan updates to expand housing choices
- ~~Work with local governments and other appropriate stakeholders in the first quarter of 2015 to determine how to strengthen and more effectively review the housing element and implementation program in local comprehensive plans in preparation for the 2018 round of local comprehensive plan updates.~~
- ~~Include local responsibilities connected to housing in the 2015 update of the Local Planning Handbook.~~
- ~~Incorporate new~~ Include updated housing requirements and review criteria in ~~into~~ the 2015 update of the Local Planning Handbook.
- Provide technical assistance to communities desiring more detailed discussion about ~~new~~ requirements and review criteria.
- Provide communities basic data to inform their existing housing assessments.
- Provide technical assistance to communities desiring support identifying and understanding available tools to meet existing and projected affordable housing needs.
- Review the housing element of 2040 Comprehensive Plan updates for completeness with ~~new~~ updated requirements ~~review criteria~~.
- Provide technical assistance to communities desiring ways to get the most out of their housing element beyond minimum requirements, both in the Local Planning Handbook and in direct assistance if requested.

Renumbering and data updates:
Page 65: Table ~~7~~ 8

Page 91: Table ~~8~~ 9

Part IV: Opportunities for Collaboration, page 101:

Over one-third of households with a householder age 65 or older—~~73,000~~ more than 74,000 households—pay more than 30% of their income on housing. Cost burden for seniors is particularly severe among those who rent; nearly two-thirds of renter households with a householder who is age 65 or older pay more than 30% of their income on housing.[xi]

Figure ~~19~~ 22: Forecasted growth in households headed by seniors
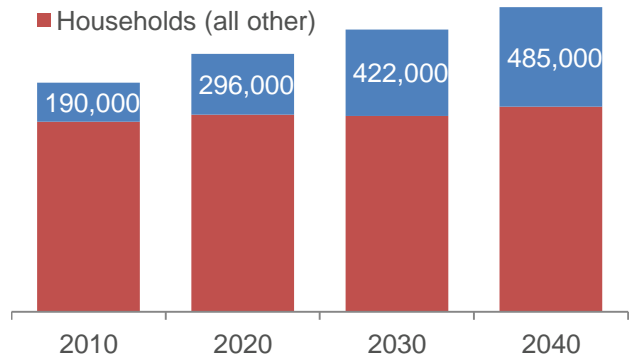
Source: U.S. Census Bureau; Metropolitan Council Regional Forecasts (2015 update)

Part IV: Opportunities for Collaboration, page 102:

Providing high-quality, accessible housing options for people with disabilities is a challenge for housing development and especially affordable housing development. As our population grows and ages, the availability of quality, accessible housing options for people with disabilities will be increasingly important. In the seven-county region there are ~~approximately 250,000~~ nearly 260,000 residents with a disability, accounting for ~~nearly~~ 9% of the regional population.[xii] ~~Nearly half (48%)~~ More than four-tenths (44%) of the region's non-institutionalized residents aged 75 or older experience difficulty with vision, hearing, mobility, personal care, or independent living, and ~~14%~~11% have moderate to severe memory impairment.[xiii] Given the significant recent and forecasted growth in these older age cohorts, there is likely to be additional growth in the number of people with disabilities due to aging and longer life expectancies.

Part IV: Opportunities for Collaboration, page 103:

Figure ~~20~~ 23 Growth in older age cohorts
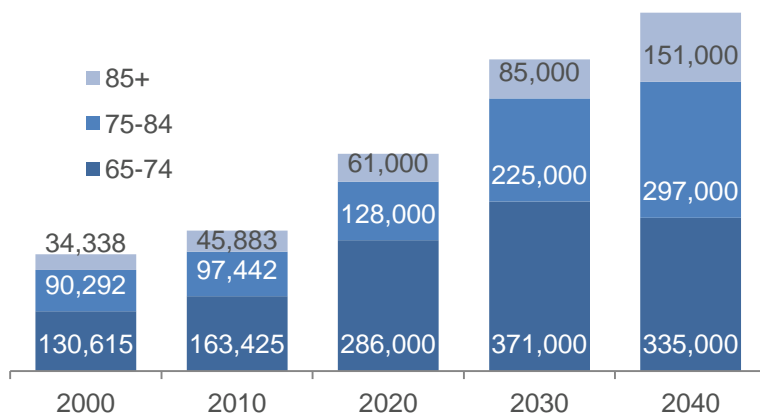
Source: U.S. Census Bureau; Metropolitan Council Regional Forecasts

Part IV: Opportunities for Collaboration, page 104:

Housing affordability is a particularly important issue for people with disabilities. More than half of households with disabilities in the region experience housing cost burden, compared to less than one-third of households without disabilities.[xiv] Because of the typically low income of households with one or more members with disabilities, publicly funded housing often connects housing investments and people with disabilities. For example, in the region's project-based Section 8 properties, 20% of units are occupied by households with a non-elderly person with a disability.[xv] Similarly, 20% of people in the region's households with a Section 8 Housing Choice Voucher ~~include a person with~~ have a disability. In public housing, the rate is even higher—with ~~34% of households in~~ one-third of public housing ~~have a person with~~ residents having a disability.[xvi] The disproportionate residency of ~~households with a person with a disability~~ people with disabilities in publicly-subsidized housing results from several factors, including:

- The high rate of poverty for persons with a disability;
- A lack of accessible or highly affordable units provided by the private market;
- Possible discrimination faced by households in the private market.~~; and~~

Part V: Next Steps, page 113:

~~This document has repeatedly referenced additional work needed to implement this plan and to clarify concepts that need more conversation and definition. Changes to the established Council roles in housing—including the Allocation of Affordable Housing Need, the Goals for Affordable and Life-cycle Housing, the Housing Performance Scores, and expanded roles in technical assistance—are examples of the Council's next steps to refine and implement this plan. Note that in 2015, the Council will formally amend this plan, including a formal public comment process. The amendment will incorporate the final updated methodologies for the Allocation of Affordable Housing Need and the Housing Performance Scores, and reflect any other updates.~~

With the amendment to this plan in 2015, the Council is now moving its focus from developing housing policy to implementing housing policy in collaboration with local units of government.

Priorities through 2015 and the issuance of Systems Statements

- ~~Finalize the methodology for the 2021-30 Allocation of Affordable Housing Need and the Housing Performance Scores.~~
- ~~Determine how to more effectively review the housing element and implementation program in preparation for the 2018 round of local comprehensive plan updates, and incorporate new comprehensive plan review criteria into the Local Planning Handbook.~~
- Identify indicators to measure how Council-supported projects advance equity.
- Adopt a fair housing policy.
- Analyze the impact of using the Housing Performance Scores as a prioritization factor and evaluation measure in transportation investments.
- Align, to the extent possible, the priorities for the Livable Communities Act funding with the policies in this plan.
- ~~Refine and, if appropriate, implement the proposal to create a Sewer Availability Charge Affordable Housing Credit.~~ Collaboratively explore opportunities to promote affordable housing production through its handling of Sewer Availability Charge, and, if any are identified, include those in the Sewer Availability Charge Procedure Manual.
- Plan and facilitate, in coordination with the Equity in Place coalition, a series of public engagement sessions in specific communities where more prominent disparities exist in our region.

Addition to Appendix A after p. 118:

Three working groups were convened to advise the Council on the development of the Housing Performance Score methodology, the Allocation of Affordable Housing Need methodology, and the requirements for housing elements of local comprehensive plans. The first two groups continued work begun in subgroups of the original Housing Policy Plan Work Group (HPPWG), supplemented with additional participants. The Council invited additional participants to add perspectives that were lost when some original HPPWG members did not reengage beyond their initial commitment, which ended when the original Housing Policy Plan was adopted in December 2014. The third group was new and consisted of some original HPPWG members (all members were invited to participate) and a significant addition of technical staff from our partners in the local government community, particularly those with expertise and experience in the comprehensive planning process.

Each of the three groups met a total of three times during January and February of 2015, contributing a wealth of information, questions, and perspectives to consider in the drafting of this amendment. Participants in the three workgroups are identified below:

Members of the Housing Performance Scores Workgroup	Organization
Cathy Bennett	Urban Land Institute Minnesota / Regional Council of Mayors
Emily Carr	City of Brooklyn Park
Theresa Cunningham	City of Minneapolis
Barbara Dacy	Washington County HRA
Darielle Dannen	Metropolitan Consortium of Community Developers
Kevin Dockry	Hennepin County
Owen Duckworth	Alliance for Metropolitan Sustainability
Mayor Debbie Goettel	City of Richfield
Chip Halbach	Minnesota Housing Partnership
Jill Hutmacher	City of Arden Hills
Margaret Kaplan	Minnesota Housing
Jake Reilly	City of Saint Paul
Elizabeth Ryan	Family Housing Fund
Nelima Sitati Munene	Organizing Apprenticeship Project
Jamie Thelen	Sand Companies
Tim Thompson	Housing Preservation Project
Charlie Vander Aarde	Metro Cities

Members of the Allocation of Affordable Housing Need Workgroup	Organization
Karl Batalden	City of Woodbury
Kim Berggren	City of Brooklyn Park
Jack Cann / Tim Thompson	Housing Preservation Project
Jessica Deegan	Minnesota Housing
Owen Duckworth	Alliance for Metropolitan Stability
Steve Juetten	City of Plymouth
Haila Maze	City of Minneapolis
Patricia Nauman / Charlie Vander Aarde	Metro Cities
Michele Schnitker	City of St. Louis Park
Angie Skildum	Family Housing Fund
Mark Ulfers	Dakota County CDA

Members of the Comprehensive Plan Requirements Workgroup	Organization
Chelsea Alger / Holly Kreft	City of Belle Plaine
Cathy Bennett	Urban Land Institute Minnesota / Regional Council of Mayors
Doug Borglund	Consultant
Kathleen Castle	City of Shoreview
Brenda Lano	Carver County CDA
Patricia Nauman / Charlie Vander Aarde	Metro Cities
Lars Negstad	ISAIAH
Rick Packer	Mattamy Homes
Melissa Poehlman	City of Richfield
Jamie Radel	City of Saint Paul
Mark Ulfers	Dakota County CDA
John Rask	Hans Hagen Homes/ Builders Association of the Twin Cities
Joyce Repya	City of Edina
Bryan Schafer	City of Blaine
Brian Schaffer	City of Minneapolis
Cindy Sherman	City of Brooklyn Park
Nelima Sitati Munene	Organizing Apprenticeship Project
Barb Sporlein	Minnesota Housing
Tim Thompson / Jack Cann	Housing Preservation Project
Bryan Tucker	City of Savage
James Wilkinson	Mid Minnesota Legal Aid
Eric Zweber	City of Rosemount

Appendix B: Methodology of the Allocation of Affordable Housing Need

Definitions and Concepts

The following definitions and concepts are important for understanding the methodology behind the allocation of affordable housing need in the Twin Cities region between 2021 and 2030.

- *Low-Income Household*: In this process, a household is considered "low income" if its annual income is at or below 80% of the Area Median Income (AMI) for the 13-county Minneapolis-Saint Paul-Bloomington metropolitan statistical area, as determined by the U.S. Department of Housing and Urban Development. Approximately 39.5% of the region's households are "low income" under this definition.[1]

- *Household Growth*: The methodology relies on Metropolitan Council forecasts of growth in sewer-serviced households between 2020 and 2030. A given community's growth in sewer-serviced households could be different from its growth in all households if some households in the community are not connected to regional or municipal sewers. Exhibit 1 provides a map of forecasted net household growth for sewered communities.

- *Existing Affordable Housing Stock*: The methodology increases the Need allocation for communities with a lower share of existing affordable housing than the average sewered community and decreases the Need allocation for communities with a higher share than that average. We then estimate the share of a community's housing units that are affordable to households with income at or below 30% of AMI, between 31% and 50% of AMI, and between 51% and 80% of AMI—including ownership housing,[2] rental housing,[3] and manufactured homes.[4] These estimates cover all housing units, whether they are publicly subsidized or unsubsidized. Exhibit 2 provides a map of existing affordable housing shares for sewered communities.

- *Balance of Low-Wage Jobs and Workers*: The methodology increases the Need allocation for communities that are relatively large importers of workers in low-wage jobs and decreases the Need allocation for communities that are relatively large exporters of workers in low-wage jobs. We estimate this for each community by examining the ratio of low-wage jobs to residents who

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[1] Source: U.S. Census Bureau, 2009-2013 American Community Survey Public Use Microdata Sample.

[2] Source: 2013 and 2014 MetroGIS Regional Parcel Datasets. We examined the 2013 assessed market value for homesteaded units and classified them as affordable at or below 30% of AMI if the value was $74,000 or less; affordable between 31% and 50% of AMI if the value was between $74,000 and $133,000; and affordable at 51% to 80% of AMI if the value was between $133,000 and $217,000. These are the values at which estimated monthly mortgage payments—including principal, interest, property taxes, and insurance—are no more than 29% of the monthly income for a family of four at these income levels. We then adjusted the resulting counts to better match the Council's 2013 estimates of housing units and the tenure distribution in the 2013 American Community Survey.

[3] Source: U.S. Census Bureau, 2007-2011 Comprehensive Housing Affordability Strategy (CHAS) data. This data provides counts of units that are affordable to households with income at or below 30% of AMI, between 31% and 50% of AMI, and between 51% and 80% of AMI. ("Affordable" in this context means that the combined cost of rent and utilities is no more than 30% of the monthly income of a household that could live in the unit without overcrowding. The specific threshold for affordability thus varies by unit size and AMI threshold.) We adjusted the resulting counts to better match the Council's 2013 estimates of housing units, the tenure distribution in the 2013 American Community Survey, and the affordability distribution of rental units in the 2013 American Community Survey Public Use Microdata Sample.

[4] Source: Metropolitan Council, 2013 Manufactured Housing Park Survey. We assume that all manufactured homes are affordable to households with income at or below 30% of AMI.

work in low-wage jobs for all areas within five miles of the community's geographic center.[5] Using this five-mile radius rather than jurisdictional boundaries balances the need to have a reasonably "local" measure with the fact that labor markets cross jurisdictional boundaries. Exhibit 3 provides a map of low-wage job/worker balance for sewered communities.

Specific Steps in the Methodology

The allocation process has three main steps, shown below in Figure B-1. In Part 1, we forecast the proportion of 2021-2030 net household growth that will require additional affordable housing, resulting in a regional Need of 37,900 new affordable housing units. In Part 2, we allocate that regional Need to each community in the region with sewer service, making adjustments that allocate relatively more additional affordable housing where the housing will expand housing choices the most. In Part 3, we distribute each community's adjusted allocation into three "bands of affordability."

Figure B-1. Overview of Allocation Process

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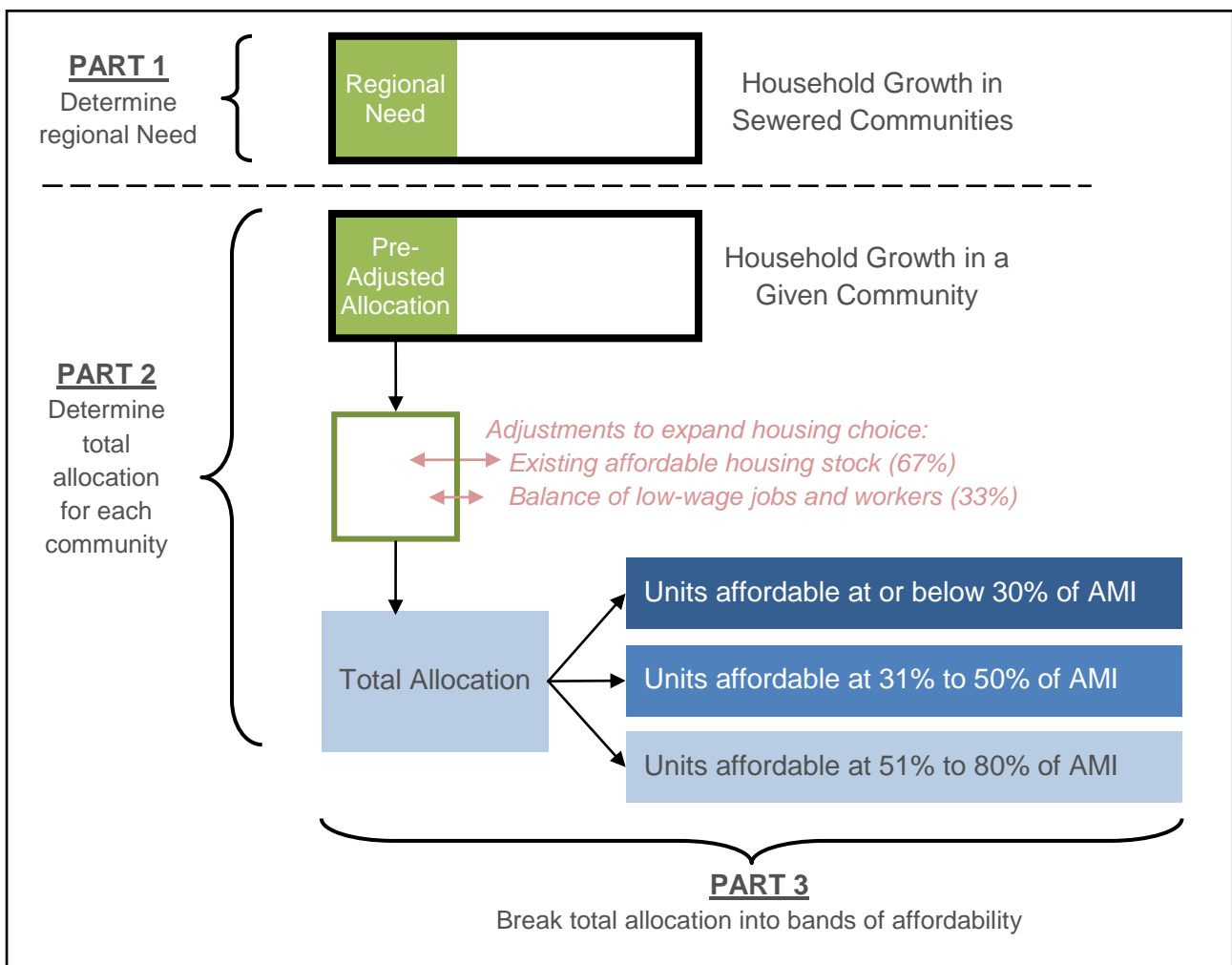
[5] Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics (LEHD) Origin-Destination Employment Statistics (LODES), 2011. "Low-wage jobs" are those paying $3,333 or less per month (equivalent to $40,000 or less per year). "Residents who work in low-wage jobs" are people whose primary job is a low-wage job. We also examined ratios based on areas within five miles of the community's *population* center; results were very similar.

The following explains the detailed calculations behind the Need allocation. Exhibit 4 provides a map of the allocated Need for sewered communities; tables showing calculations are available in Exhibits 5 and 6.

Part 1: Forecast the Number of New Affordable Units Needed in the Region

Figure B-2. Overview of Regional Need Calculations

Step 1: Determine forecasted household growth	Step 2: Determine income levels	Step 3: Determine how many households at each income level need additional affordable housing units (Total = 37,400 households)	Step 4: Ensure healthy vacancy rate (51-80% band only)	
119,000 more households in 2030 than in 2020	*Income at or below 30% of AMI (20,400)*	**18,900 households**	**18,900 units**	**Total Allocation = 37,900 units**
	Income at 31% to 50% of AMI (16,550)	**9,450 households**	**9,450 units**	
	Income at 51% to 80% of AMI (19,450)	**9,050 households**	**9,550 units**	
	Income above 80% of AMI (62,600)			

- *Step 1: Determine forecasted household growth.*
  The Metropolitan Council's March 2015 regional forecast shows that the region will have 1,258,000 households in 2020 and 1,377,000 households in 2030—a net growth of 119,000 households.

- *Step 2: Determine the proportion of growth constituted by low-income households.*
  Of the 119,000 additional households the region is expected to add between 2020 and 2030, 17.2% (20,400) will have incomes at or below 30% of AMI, 13.9% (16,550) will have incomes between 31% and 50% of AMI, and 16.3% (19,450) will have incomes between 51% and 80% of AMI. This is a total of 56,400 households. These projections come from historical income distribution patterns, applied to the 2020 and 2030 household forecasts.[6]

- *Step 3: Determine how many low-income households will need additional affordable housing units.*
  Not all low-income households will need additional affordable housing units. Some will be low-income seniors who already own their home free and clear without experiencing housing cost burden. Filtering out those households, there will be a total of 37,400 low-income households needing additional affordable units—18,900 households with income at or below 30% of AMI, 9,450 households with income between 31% and 50% of AMI, and 9,050 households with income between 51% and 80% of AMI.[7]

- *Step 4: Calculate how many housing units will be needed to accommodate these low-income households.*
  Housing units in the 51-80% band are likely to be supplied by the private market rather than governmental subsidies. If the region added only 9,050 housing units to accommodate the net growth in new low-income households needing additional units in that band, the market for affordable housing in that band would become increasingly tight. To ensure the 5% vacancy rate that fosters a healthy housing market, the region needs 9,550 total housing units to house the net growth in low-income households with income between 51% and 80% of AMI. We do not apply this vacancy rate adjustment to the 0-30% band or the 31-50% band because those units are likely to be publicly subsidized and less subject to the upward pressure on housing prices resulting from low vacancy rates. Adding those 9,550 units in the 51-80% band to the 18,900 units in the 0-30% band and the 9,450 units in the 31-50% band yields a total regional Need of 37,900 units.

Part 2: Develop the Total Allocation for Each Community

The 37,900 total affordable units should be allocated across the region's communities in a way that places relatively more affordable housing units where they will expand housing choices the most. Recognizing that Council policies do not encourage development beyond sewer-serviced areas, we allocate Need only for the 124 communities with sewer service.

The following steps, visualized below in Figure B-3, provide more detail on the method for allocating Need across these 124 communities. Exhibits 5 and 6 following this report indicate the results of these calculations for each community's share of the regional Need.

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[6] Source: U.S. Census Bureau, 2009-2013 American Community Survey Public Use Microdata Sample and Metropolitan Council's March 2015 update to the regional forecast.
[7] Source: Metropolitan Council staff estimates based on U.S. Census Bureau, 2009-2013 American Community Survey Public Use Microdata Sample.

Figure B-3. Overview of the Total Allocation
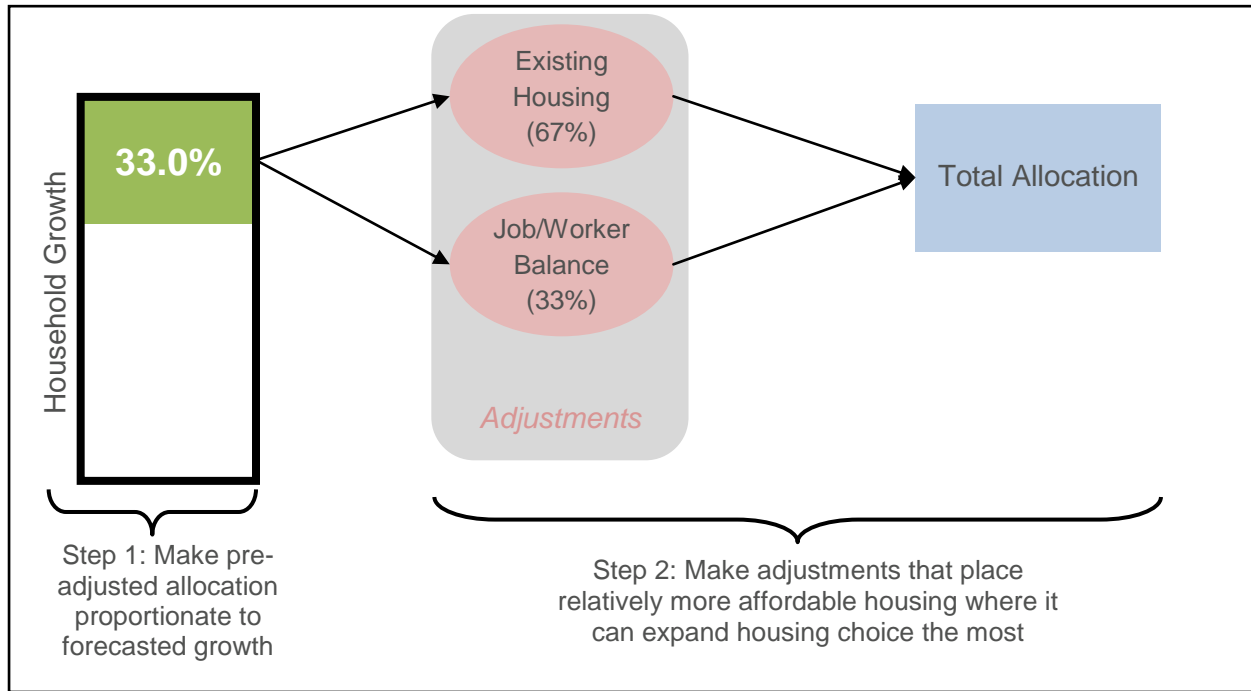
- *Step 1: Calculate pre-adjusted allocation proportionate to forecasted household net growth.* A community's initial, "pre-adjusted" allocation is proportionate to its forecasted household growth: the more households it is expected to add, the higher its allocation will be. Specifically, the pre-adjusted allocation is 33.0% of each community's forecasted household net growth.[8] This percentage comes from dividing the regional Need (37,900) by the forecasted household growth across all sewer-serviced areas (114,790).

  For example, Chanhassen and Maplewood both have forecasted net growth of 1,900 households and thus a preliminary allocation of 627 housing units (33.0% of 1,900), as Table B-1 shows.

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[8] Source: Forecasts developed by Metropolitan Council Environmental Services with input from Council Research staff, and supplemented by Council Research estimates of growth in municipal-serviced areas. In some communities where the sewer network expands to cover existing households, these numbers produce higher net household growth than the total growth forecast. In these cases, we used the total growth forecast to avoid conflating changes in household growth with changes in the sewer network.

Table B-1. Calculation of Pre-Adjusted Allocation

	(A) Forecasted Sewer-Serviced Households, 2020	(B) Forecasted Sewer-Serviced Households, 2030	(C) Forecasted Net Growth in Sewer-Serviced Households (B − A)	(D) "Equal Share" Factor	(E) Pre-Adjusted Allocation (C × D)
Chanhassen	9,170	11,070	+1,900	33.0%	627
Maplewood	16,540	18,440	+1,900	33.0%	627

- *Step 2: Adjust the pre-adjusted allocation upwards or downwards according to the balance of low-wage jobs and workers and the existing affordable housing stock.*
  The pre-adjusted allocation is adjusted as follows:
  - *Existing affordable housing stock:* A community's allocation is increased if its existing affordable housing share is less than that of the average community with sewer service. A community's allocation is decreased if its existing affordable housing share is greater than that of the average community with sewer service. This is measured by the proportion of existing housing units that are affordable, as described above.
  - *Balance of low-wage jobs and workers:* A community's allocation is increased if it imports workers in low-wage jobs to a greater extent than the average community. A community's allocation is decreased if it imports workers in low-wage jobs to a lesser extent than the average community. This is measured by the ratio of low-wage jobs to residents working in low-wage jobs, as described above.

Because the jobs/workers ratios (which range from 0.21 to 2.88) and the existing affordable housing shares (which range from 3% to 100%) have such different scales, any adjustments based on the raw measures could unintentionally let one adjustment have more influence over the final allocation than the others. We address this by standardizing these raw measures, also known as converting them into Z-scores, with the formula: $= (X - \bar{X}) \div SD$.

That is, we subtract the average for all sewered communities from each community's measure and divide by the standard deviation.[9] The specific formulas for determining the Z-scores for each community are:

- $Z_{Housing} = (Community's\ Affordable\ Housing\ Share - 0.66) \div 0.25$
- $Z_{Job/Worker\ Balance} = (Community's\ Job/Worker\ Balance\ Ratio - 1.08) \div 0.52$

These Z-scores can be positive (if the community has a higher-than-average ratio or proportion) or negative (if the community has a lower-than-average ratio or proportion). Values of Z-scores represent how many standard deviations each community is from the average ratio or proportion, which is represented by a Z-score of 0. For example, a community with a Z-score of

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[9] Like the mean, the standard deviation is a statistic that summarizes a set ("distribution") of numbers. Where the mean represents the *average score*, the standard deviation represents the *average distance of communities from the mean*. Higher standard deviations indicate that a distribution has more "spread," rather than being tightly clustered around the average score.

+2.0 has a substantially higher ratio or proportion than average, and a community with a Z-score of -2.0 has a substantially lower ratio or proportion than average.

Next, we rescaled both sets of Z-scores to percentages so that the pre-adjusted allocation would not be increased by more than 100% or decreased by more than 100%.[10] This simply changes the scale of the standardized scores; it does not change their distributions.

The result is a set of adjustment factors that can be weighted as desired to achieve the intent of the policy. For example, weighting each adjustment factor at 50% would allow existing affordable housing and job/worker balance to affect the adjustment step equally.

We weight the affordable housing adjustment at 67% and the job/worker balance adjustment at 33%, allowing affordable housing to have twice as much influence on the allocation as job/worker balance. We do this because the existing housing stock is a more stable and place-based indicator; workers are more likely to move than housing units are.

Table B-2 shows these calculations for Chanhassen and Maplewood. For example, 32% of Chanhassen's existing housing units are affordable to low-income households—lower than 66%, the average share for all sewered communities. This is reflected in the Z-score of +1.37 for Chanhassen's housing measure. (The actual Z-score is -1.37, but we reverse the sign because the original measure does not go in the desired direction: communities with *lower-than-average* existing affordable housing shares have their allocations adjusted *upwards*.) Maplewood's affordable housing share of 85%, though, is higher than the average of 66%; it receives a Z-score of -0.74.

If we multiplied the pre-adjusted allocation by the standardized scores in Column C to calculate the adjustments, some communities' allocations could be negative or more than their forecasted growth. The rescaled standardized scores described above avoid this problem: Chanhassen's rescaled housing score is +0.40, while Maplewood's is -0.21.

Applying weights (Column E) to the rescaled Z-scores (Column D) yields the final adjustment factors (Column F): +27% for Chanhassen and -14% for Maplewood.

The jobs adjustment factors work identically, although the sign of the Z-score is not flipped because the original measures goes in the desired direction (communities with *higher-than-average* job/worker balance ratios have their allocations adjusted *upwards*).

Note that both communities are farther from the average community with respect to existing affordable housing than job/worker balance (the Z-scores are farther from 0), and the weighting further increases the influence that housing has on the allocation.

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[10] To do this, we divide the Z-scores for affordable housing and job/worker balance by 3.44, the standardized score with the highest absolute value.

Table B-2. Calculation of Adjustment Factors

		(A) Original Measure	(B) Average Community	(C) Measure Converted to Z-score	(D) Z-score rescaled (C ÷ 3.44)	(E) Weight	(F) Adjustment Factor (D × E converted to %)
Housing	Chanhassen	32%	66%	+1.37	+0.40	67%	+27%
	Maplewood	85%	66%	-0.74	-0.21	67%	-14%
Jobs	Chanhassen	1.22	1.08	+0.27	+0.08	33%	+3%
	Maplewood	0.87	1.08	-0.40	-0.12	33%	-4%

While this method of creating adjustment factors is more complicated than simply relying on the raw measures, it produces adjustment factors that more accurately reflect the policy intent of the *2040 Housing Policy Plan.*

Finally, we multiply the pre-adjusted allocation by the adjustment factors to calculate the numerical adjustments for job/worker balance and existing housing stock. Summing the pre-adjusted allocation and the numerical adjustments yields the adjusted allocation.[11] Table B-3 carries out this math for Chanhassen and Maplewood.

Table B-3. Implementing Adjustments for Overall Allocation

	(A) Pre-Adjusted Allocation	(B) Adjustment Factor for Housing	(C) Adjustment Factor for Jobs	(D) Change in Allocation for Housing (A × B)	(E) Change in Allocation for Jobs (A × C)	(F) Adjusted Allocation (A + D + E)	(G) Final Allocation[11] (F × 99.3%)
Chanhassen	627	+27%	+3%	+168	+16	811	805
Maplewood	627	-14%	-4%	-90	-24	513	509

Part 3: Break Down Communities' Total Allocations into "Bands of Affordability"

Low-income households have a wide variety of needs and preferences for the types and locations of their housing. To provide nuance and flexibility for local planning for homeownership and rental housing across a range of incomes and housing types, the Council is allocating Need within three bands of affordability:
   o   Need for housing units affordable to households with incomes at or below 30% of AMI (49.9% of the regional Need);
   o   Need for housing units affordable to households with incomes between 31% and 50% of AMI (24.9% of the regional Need); and
   o   Need for housing units affordable to households with incomes between 51% and 80% of AMI (25.2% of the regional Need).

Figure B-4. Share of Regional Need in Each Band

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[11] Under our methodology, the adjusted allocations for all communities add up to 38,166. This is higher than the regional Need of 37,900, so we adjust all allocations proportionately downward to achieve the regional Need.
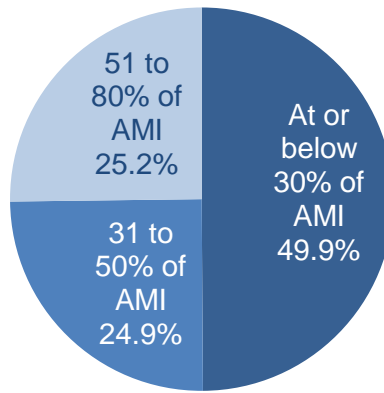
Applying these regional shares to each community's adjusted allocation does not reflect the diversity within communities' existing housing stock. For example, one community might have a higher-than-average share of housing in the 51-80% band and lower-than-average shares of housing in the other two bands. To expand housing options and choice, we reduce this community's allocation in the 51-80% band and increase its allocation in the other two bands.

The method for Part 3 is diagrammed below in Figure B-5. We start with the regional shares of the Need, adjusting them as outlined in the previous paragraph. Those adjustments are developed in Step 1, where we compare each community's shares of affordable units in each band to the average shares for all sewered communities. In Step 2, we combine those adjustments with the "equal share" factors, resulting in each community's share of its allocation that goes to each band. Finally, in Step 3, we apply those shares to the total allocation to calculate the number of units in each band.

Note that Part 3 does not change the overall allocation for communities developed in Part 2. Rather, we are simply assigning different shares of each community's allocation to different bands. Accordingly, we are no longer examining differences across communities in the *overall* level of affordable housing, but differences in affordability *within* each community's set of affordable units.

Figure B-5. Overview of the Breakdown of the Total Allocation into Bands of Affordability
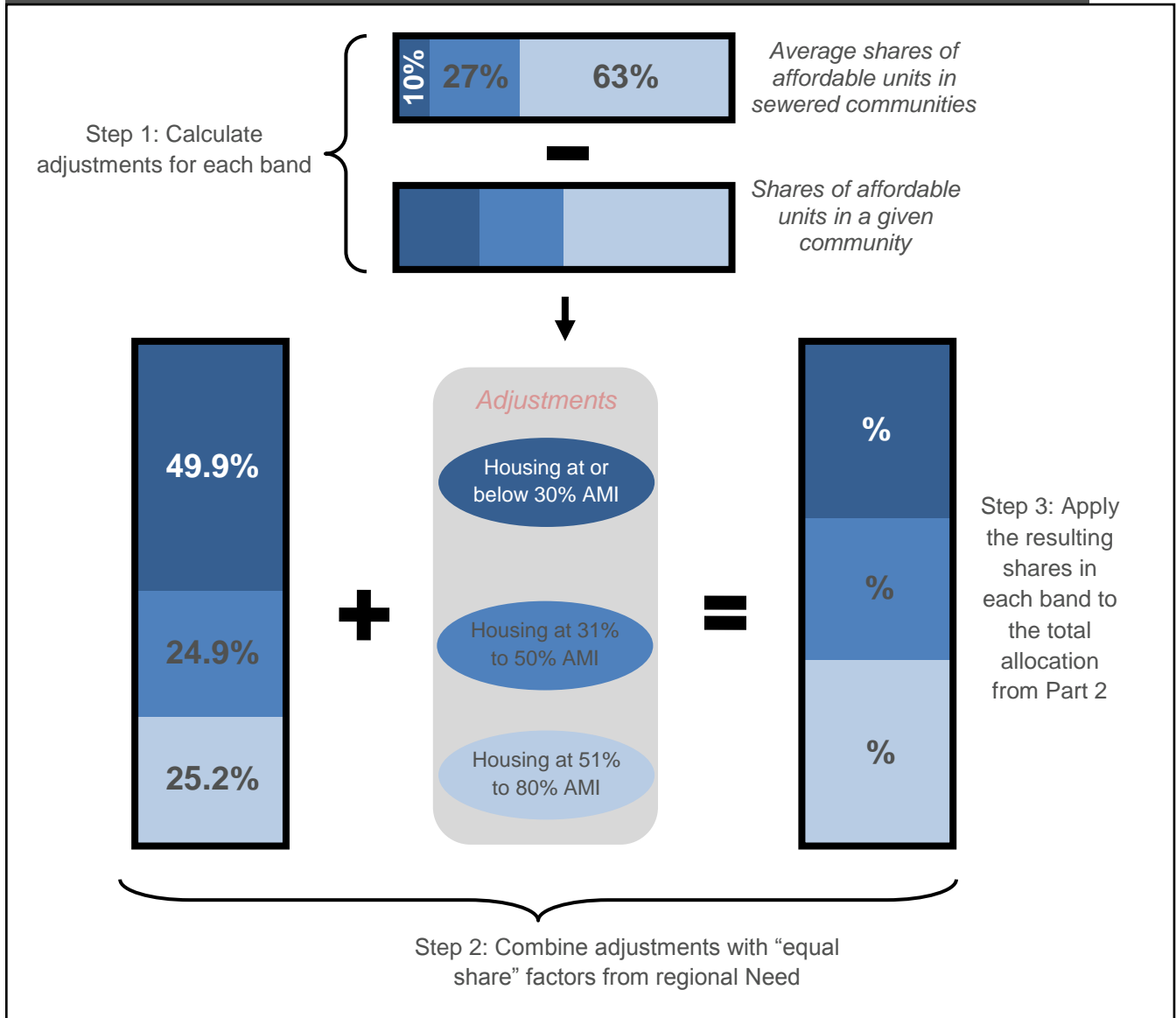
- _Step 1: Calculate differences in affordability for each band from the average for all communities._ In this step, we examine the shares of each community's _affordable_ housing in each band and compare them to the average for all sewered communities. The difference between them provides an adjustment that will help determine the share of each community's total allocation to place in each band.

  Table B-4 provides examples. In Chanhassen, the share of existing affordable units in the 0-30% band is lower than average (so the corresponding adjustment factor is positive), while the shares in the 31-50% and 51-80% bands are higher than average (so those adjustment factors are negative). Maplewood displays a different dynamic: a relatively higher share in the 31-50% band, a relatively lower share in the 51-80% band, and an average share in the 0-30% band.

Note that the shares of existing affordable housing within each band sum to 100%, as do the shares for the average community (before rounding).

Table B-4. Calculation of Adjustments to Band Shares

	Band	**(A)** Share of existing *affordable* housing in band	**(B)** Share of existing *affordable* housing in band for average community	**(C)** Difference of community from average (B – A)[12]
Chanhassen	At or below 30% AMI	2.2%	9.7%	+7.5%
	31% to 50% of AMI	28.4%	27.5%	-1.0%
	51% to 80% of AMI	69.4%	62.9%	-6.5%
Maplewood	At or below 30% AMI	9.6%	9.7%	0.0%
	31% to 50% of AMI	32.7%	27.5%	-5.3%
	51% to 80% of AMI	57.7%	62.9%	+5.2%

- *Step 2: Calculate the share of the total allocation going to each band, adjusting for the differences calculated in Step 1.*

  To determine the share of each community's allocation that should go to each band, we start with the "equal share" factor from the regional Need (Column A in Table B-5), then add the adjustment developed in Step 1. For example, 49.9% of the region's total Need lies in the 0-30% band; this is the starting point for all communities. In Chanhassen, where the share of existing affordable units in this band is lower than average, the adjustment is +7.5%, which yields an adjusted share of 57.4%. In Maplewood, where the share of existing affordable units in this band is about average, the adjustment is very small, which yields an adjusted share of 49.9% (the average share). The final shares, in Column D, reflect benchmarking to attain the regional Need in each band.

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[12] Entries may not equal the difference between Columns A and B due to rounding.

Table B-5. Calcuation of Shares for Band Breakdown

	Band	(A) "Equal share" for each band	(B) Adjustment from Step 1	(C) Adjusted share of allocation to place in band (A + B)	(D) Share of allocation to place in band (benchmarked)[13]
Chan-hassen	At or below 30% AMI	49.9%	+7.5%	57.4%	57.4%
	31% to 50% of AMI	24.9%	-1.0%	24.0%	23.4%
	51% to 80% of AMI	25.2%	-6.5%	18.7%	19.2%
Maple-wood	At or below 30% AMI	49.9%	0.0%	49.9%	49.7%
	31% to 50% of AMI	24.9%	-5.3%	19.7%	19.1%
	51% to 80% of AMI	25.2%	+5.2%	30.4%	31.2%

- *Step 3: Apply the shares from Step 2 to the total allocation from Part 2.*
  In this step, we use these shares (Column D of Table B-5) to break the total allocation developed in Step 2 of Part 2 into the bands of affordability.

  The resulting allocations in each band, shown below in Table B-6, address the differences in affordability *within* the set of affordable units in each community while maintaining the total allocation that address the differences in affordability (as well as job/worker balance) *across* communities.

  For example, Chanhassen's total allocation is higher than Maplewood's, largely because Chanhassen has a lower share of existing affordable housing than Maplewood does. But because a higher share of Chanhassen's existing *affordable* units lie in the 51-80% band than in Maplewood, Chanhassen's allocation in the 51-80% band is reduced, and Maplewood's allocation in the 51-80% band is increased, such that Chanhassen's allocation in this band is actually lower than Maplewood's.

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[13] Entries are calculated by using the shares in Column C to calculate the number of units in each band in each community, then adjusting those numbers so that they add up to the regional Need in each band. We omitted those intermediate calculations from Table B-6 for brevity; the point is that the resulting shares, shown in Column D, are those needed to attain the regional Need in each band.

Table B-6. Calculation of Allocation for Each Band

	Band	(A) Total allocation from Part 2	(B) Share of regional Need in each band	(C) Band breakdown shares from Step 2	(D) Allocation in each band (A × C)
Chanhassen	At or below 30% AMI	805	49.9%	57.4%	463
	31% to 50% of AMI	805	24.9%	23.4%	188
	51% to 80% of AMI	805	25.2%	19.2%	154
Maplewood	At or below 30% AMI	509	49.9%	49.7%	253
	31% to 50% of AMI	509	24.9%	19.1%	97
	51% to 80% of AMI	509	25.2%	31.2%	159

Exhibit 1: Forecasted net household growth
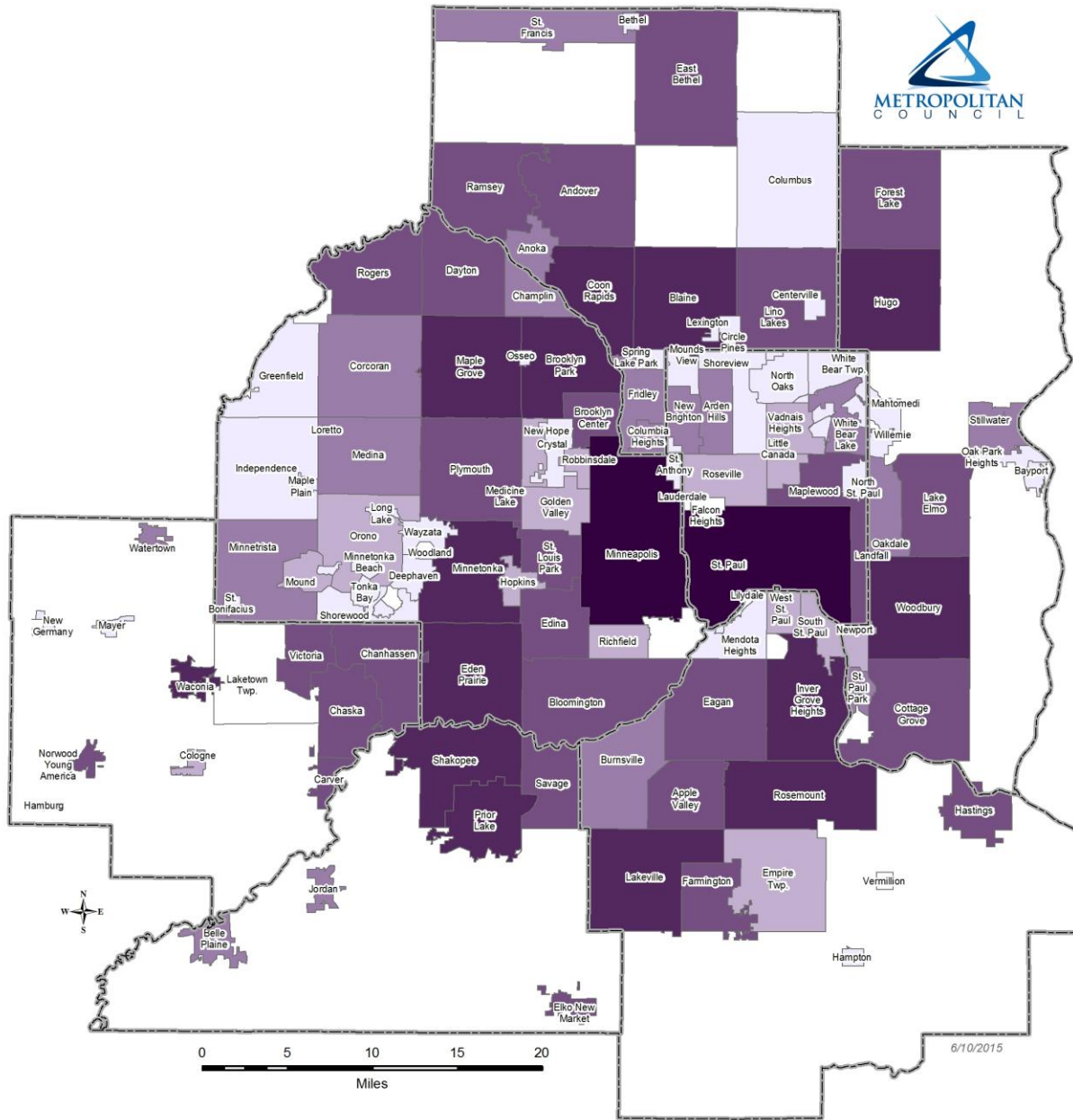
Legend:
- 6,700 households (Saint Paul) and 10,200 households (Minneapolis)
- 2,000 to 4,090 households
- 1,000 to 1,999 households
- 500 to 999 households
- 250 to 499 households
- 10 to 249 households
- No forecasted growth

- County Boundaries
- City & Township Boundaries

Note: Communities without sewer service are not shown.

Source: Forecasts of growth in sewer-serviced households or total household growth (whichever is less) developed by Metropolitan Council staff.

6/10/2015

Exhibit 2: Existing Affordable Housing Shares
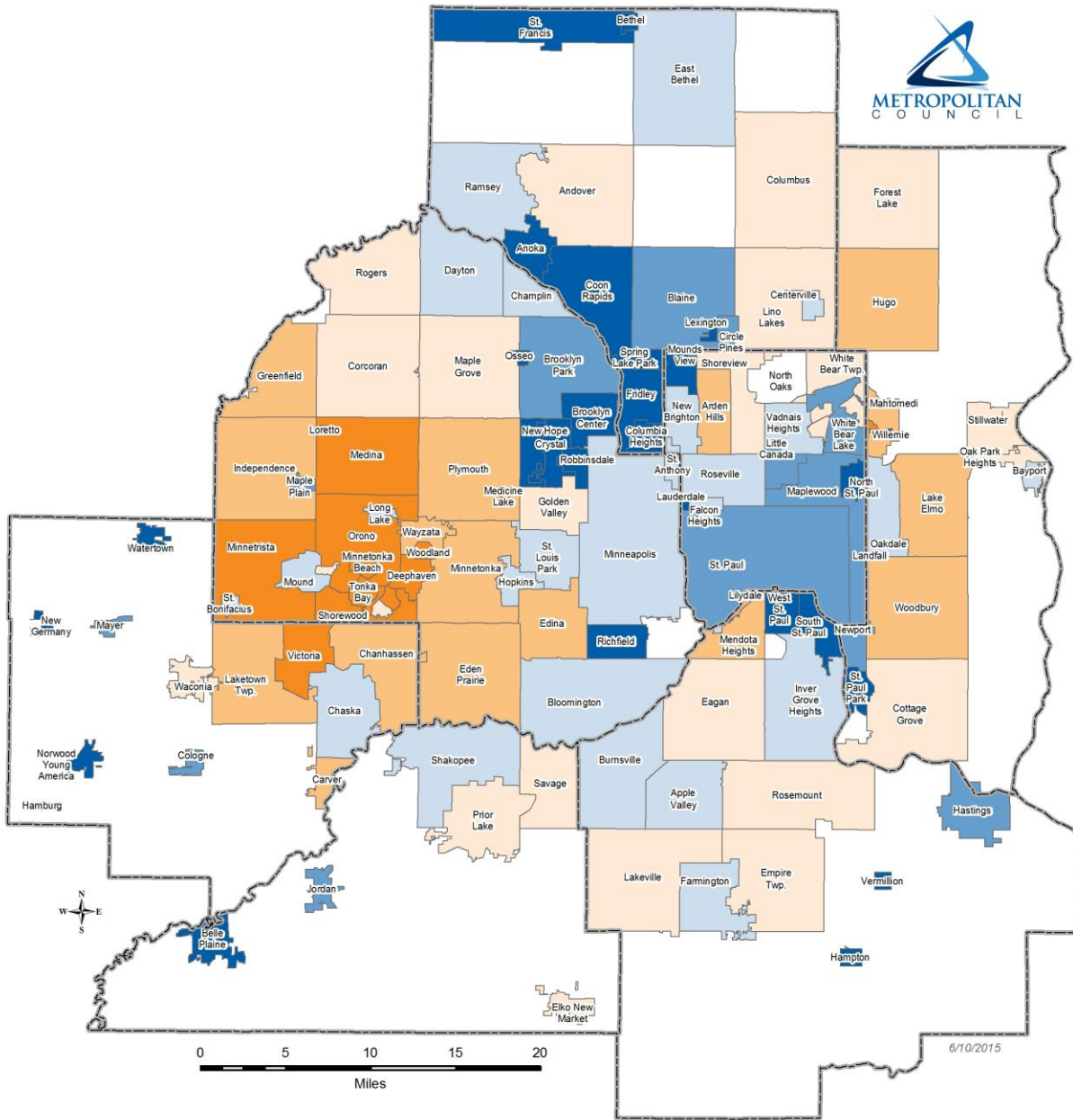
Share of existing housing affordable to households with income at or below 80% of AMI

More affordable housing; adjust allocation downwards

- 90% to 100%
- 80% to 89%
- 66.4% to 79%
- 50% to 66.3%
- 25% to 49%
- 3.5% to 24%

Less affordable housing; adjust allocation upwards
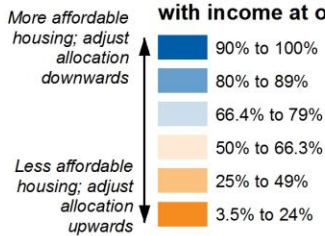
In the average sewered community, about 66.4% of existing housing units are affordable to households whose income is at or below 80% of AMI.

Note: Communities without sewer service are not shown.

County Boundaries

City & Township Boundaries

Source: Metropolitan Council estimates based on 2013 and 2014 MetroGIS Regional Parcel Datasets; 2007-2011 Comprehensive Housing Affordability Strategy (CHAS) data; and the Metropolitan Council's annual survey of manufactured housing parks.

Estimates include all housing units affordable to households at 80% of Area Median Income, whether units are publicly subsidized or unsubsidized.

Exhibit 3: Balance of Low-Wage Jobs and Workers
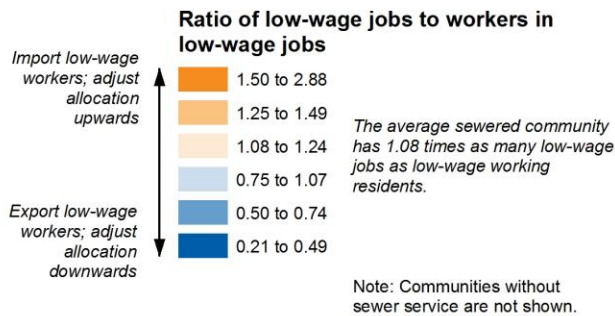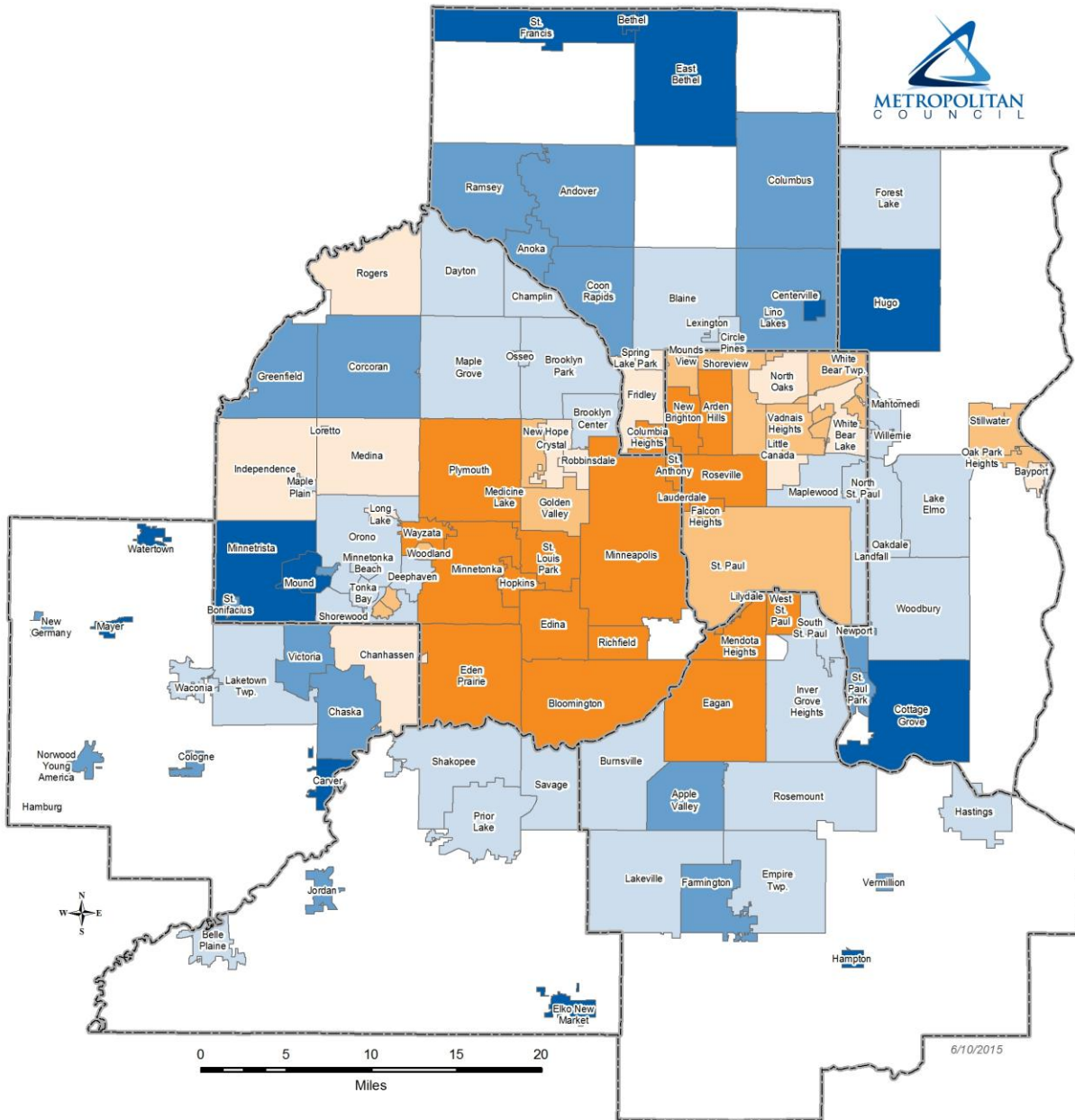
Ratio of low-wage jobs to workers in low-wage jobs

Import low-wage workers; adjust allocation upwards

- 1.50 to 2.88
- 1.25 to 1.49
- 1.08 to 1.24
- 0.75 to 1.07
- 0.50 to 0.74
- 0.21 to 0.49

Export low-wage workers; adjust allocation downwards

The average sewered community has 1.08 times as many low-wage jobs as low-wage working residents.

Note: Communities without sewer service are not shown.

County Boundaries

City & Township Boundaries

Source: Metropolitan Council staff calculations from U.S. Census Bureau, 2011 Longitudinal Employer-Household Dynamics Origin-Destination Employment Statistics.

Each community's ratio reflects jobs and working residents located within five miles of the community's geographic center. "Low-wage jobs" are those paying a monthly wage of $3,333 or less; "workers in low-wage jobs" are those whose primary job is low-wage.

Exhibit 4: Total Allocation (Number of Units Affordable At or Below 80% of Area Median Income)

Legend:

- 1,998 units (Saint Paul) and 3,484 units (Minneapolis)
- 1,000 to 1,391 units
- 500 to 999 units
- 250 to 499 units
- 100 to 249 units
- 2 to 99 units
- No forecasted growth

- County Boundaries
- City & Township Boundaries
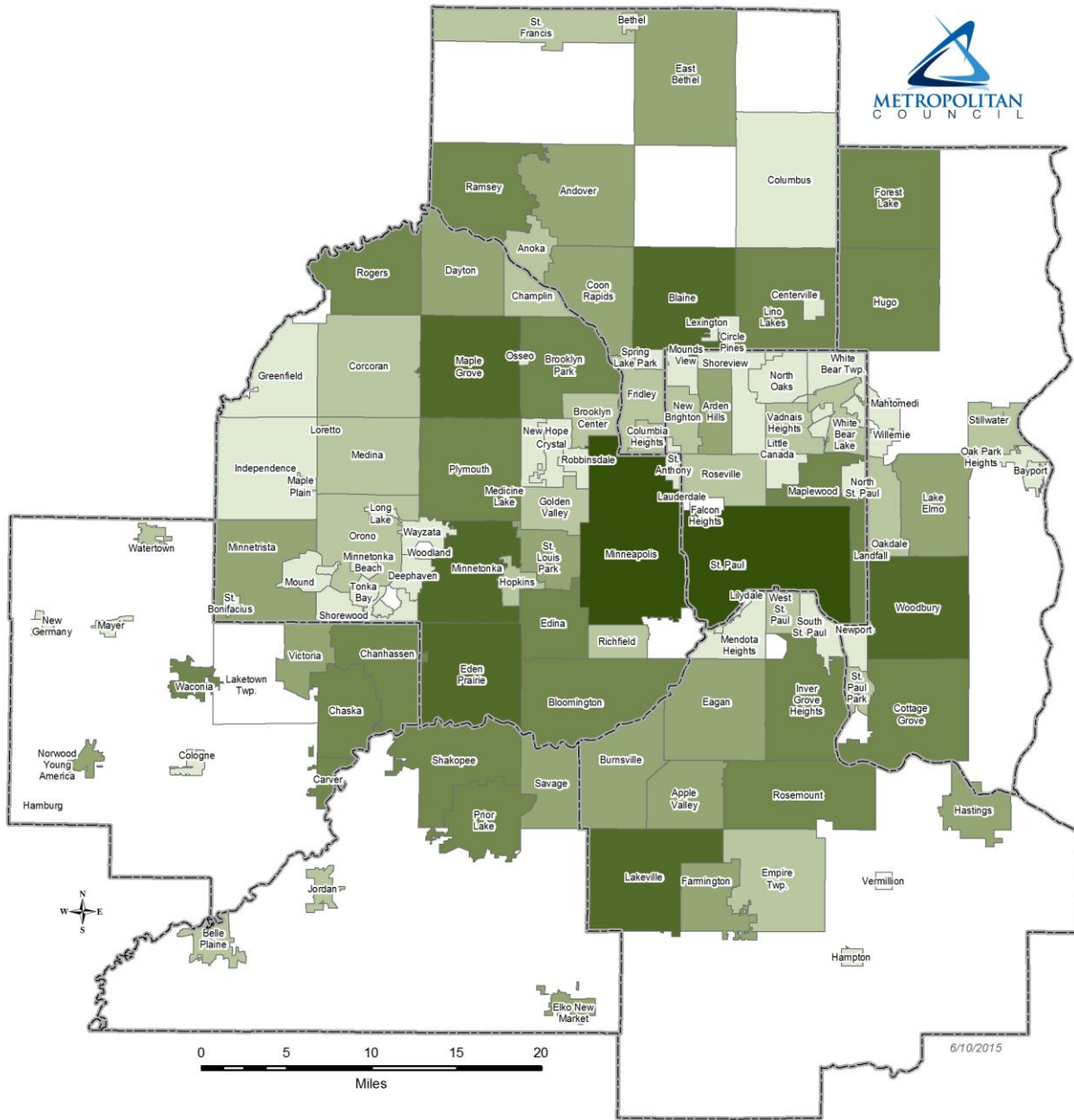
Note: Communities without sewer service are not shown.

Source: Metropolitan Council calculations.

6/10/2015

Exhibit 5: Calculations of Total Allocations for 2021–2030 for All Communities

Sewered Communities	Growth Summary: Sewered Households[1]			(D) Pre-adjusted allocation (C×33.0%)	Measures for Adjustments		Adjustment Factors[2]		Numerical Adjustments		(K) Final Allocation (D + I + J)*
	(A) 2020	(B) 2030	(C) Net growth (B – A)		(E) Housing stock[3] (Avg = 66.4%)	(F) Job/worker balance[4] (Avg = 1.08)	(G) Housing stock	(H) Job/worker balance	(I) Housing stock (D × G)	(J) Job/worker balance (D × H)	
Anoka County											
Andover	7,750	9,350	1,600	528	62.8%	0.50	+3%	-11%	+15	-56	484
Anoka	7,650	8,150	500	165	96.1%	0.72	-23%	-7%	-38	-11	115
Bethel	190	220	30	10	99.5%	0.21	-26%	-16%	-3	-2	5
Blaine**	23,730	27,820	4,090	1,350	80.5%	0.90	-11%	-3%	-147	-44	1,151
Centerville	1,250	1,300	50	17	73.4%	0.49	-5%	-11%	-1	-2	14
Circle Pines	2,100	2,160	60	20	89.5%	0.86	-18%	-4%	-4	-1	15
Columbia Heights	8,400	8,900	500	165	98.5%	1.53	-25%	+8%	-41	+14	137
Columbus	190	270	80	26	54.5%	0.70	+9%	-7%	+2	-2	26
Coon Rapids	24,420	26,420	2,000	660	94.0%	0.65	-21%	-8%	-141	-52	464
East Bethel	4,700	6,000	1,300	429	79.2%	0.24	-10%	-15%	-43	-66	318
Fridley	11,700	12,300	600	198	95.9%	1.10	-23%	+0%	-45	+1	153
Hilltop	450	500	50	17	98.6%	1.31	-25%	+4%	-4	+1	14
Lexington	820	880	60	20	98.5%	0.98	-25%	-2%	-5	+0	15
Lino Lakes	5,340	7,040	1,700	561	57.0%	0.54	+7%	-10%	+41	-55	543
Ramsey	9,400	11,300	1,900	627	79.6%	0.65	-10%	-8%	-64	-49	510
St. Francis	1,440	2,010	570	188	93.6%	0.41	-21%	-12%	-40	-23	124
Spring Lake Park**	2,780	3,000	220	73	96.8%	1.21	-24%	+2%	-17	+2	58

* Column K includes an adjustment to make all communities' allocations sum to 37,900 units (the regional Need), so it is not the exact sum of Columns D, I, and J.
** Cities that are split between two counties are shown in the county with the largest share of households.

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[1] Source: Forecasts developed by Metropolitan Council Environmental Services with input from Council Research staff, and supplemented by Council Research estimates of growth in municipal-serviced areas. For more information, see footnote 8 of Appendix B.

[2] These numbers are rescaled Z-scores based on the measures in Column E and Column F. Communities will have their allocations adjusted upward (positive values in Columns G or H) if they have lower-than-average values in Column E (indicating less affordable housing) or higher-than-average values in Column F (indicating that they import workers in low-wage jobs). Communities will have their allocations adjusted downward (negative values in Columns G or H) if they have higher-than-average values in Column E (indicating more affordable housing) or lower-than-average values in Column F (indicating that they export workers in low-wage jobs).

[3] Housing stock affordability: The percentage of a community's total housing units that is affordable to low-income households (those with income at or below 80% of Area Median Income), including unsubsidized and publicly subsidized units. In the average sewered community, 66.4% of housing units are affordable to low-income households.

[4] Job/Worker Balance: The ratio of low-wage jobs located within five miles of the community's geographic center divided by the number of residents within this distance whose primary job is a low-wage job. In the average sewered community, the ratio is 1.08.

Exhibit 5: Calculations of Total Allocations for 2021-2030 for All Communities (continued)

Sewered Communities	Growth Summary: Sewered Households[1]			(D) Pre-adjusted allocation (C×33.0%)	Measures for Adjustments		Adjustment Factors[2]		Numerical Adjustments		(K) Final Allocation (D + I + J)**
	(A) 2020	(B) 2030	(C) Net growth (B − A)		(E) Housing stock[3] (Avg = 66.4%)	(F) Job/ worker balance[4] (Avg = 1.08)	(G) Housing stock	(H) Job/ worker balance	(I) Housing stock (D × G)	(J) Job/ worker balance (D × H)	
Carver County											
Carver	2,120	3,630	1,510	499	48.8%	0.41	+14%	-12%	+68	-61	502
Chanhassen**	9,170	11,070	1,900	627	32.0%	1.22	+27%	+3%	+168	+16	805
Chaska	9,470	11,370	1,900	627	69.5%	0.70	-2%	-7%	-15	-44	564
Cologne	800	1,170	370	122	82.6%	0.74	-13%	-6%	-15	-8	98
Hamburg	210	230	20	7	99.5%	0.55	-26%	-10%	-2	-1	4
Laketown Township	140	70	0	0	33.5%	0.82	+26%	-5%	+0	+0	0
Mayer	740	970	230	76	89.9%	0.21	-18%	-16%	-14	-12	50
New Germany	190	270	80	26	93.5%	0.50	-21%	-11%	-5	-3	18
Norwood Young America	1,890	3,020	1,130	373	93.6%	0.65	-21%	-8%	-79	-29	263
Victoria	3,210	4,280	1,070	353	22.3%	0.58	+34%	-9%	+121	-32	439
Waconia	5,400	8,000	2,600	858	63.7%	1.04	+2%	-1%	+18	-6	864
Watertown	1,900	2,500	600	198	92.2%	0.45	-20%	-12%	-40	-23	134

* Column K includes an adjustment to make all communities' allocations sum to 37,900 units (the regional Need), so it is not the exact sum of Columns D, I, and J.

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[2] These numbers are rescaled Z-scores based on the measures in Column E and Column F. Communities will have their allocations adjusted upward (positive values in Columns G or H) if they have lower-than-average values in Column E (indicating less affordable housing) or higher-than-average values in Column F (indicating that they import workers in low-wage jobs). Communities will have their allocations adjusted downward (negative values in Columns G or H) if they have higher-than-average values in Column E (indicating more affordable housing) or lower-than-average values in Column F (indicating that they export workers in low-wage jobs).

[3] Housing stock affordability: The percentage of a community's total housing units that is affordable to low-income households (those with income at or below 80% of Area Median Income), including unsubsidized and publicly subsidized units. In the average sewered community, 66.4% of housing units are affordable to low-income households.

[4] Job/Worker Balance: The ratio of low-wage jobs located within five miles of the community's geographic center divided by the number of residents within this distance whose primary job is a low-wage job. In the average sewered community, the ratio is 1.08.

Exhibit 5: Calculations of Total Allocations for 2021-2030 for All Communities (continued)

Sewered Communities	Growth Summary: Sewered Households[1]			(D) Pre-adjusted allocation (C×33.0%)	Measures for Adjustments		Adjustment Factors[2]		Numerical Adjustments		(K) Final Allocation (D + I + J)*
	(A) 2020	(B) 2030	(C) Net growth (B – A)		(E) Housing stock[3] (Avg = 66.4%)	(F) Job/ worker balance[4] (Avg = 1.08)	(G) Housing stock	(H) Job/ worker balance	(I) Housing stock (D × G)	(J) Job/ worker balance (D × H)	
Dakota County											
Apple Valley	21,700	23,300	1,600	528	69.1%	0.61	-2%	-9%	-11	-45	469
Burnsville	25,360	26,260	900	297	78.3%	1.05	-9%	-1%	-27	-2	266
Eagan	27,070	28,370	1,300	429	64.1%	1.53	+2%	+8%	+8	+35	469
Empire Township	730	1,070	340	112	53.5%	0.99	+10%	-2%	+11	-2	120
Farmington	7,850	9,450	1,600	528	74.7%	0.53	-6%	-10%	-34	-53	438
Hampton	260	280	20	7	95.5%	0.35	-23%	-13%	-2	-1	4
Hastings**	9,700	11,100	1,400	462	85.9%	1.03	-15%	-1%	-70	-4	385
Inver Grove Heights	13,990	16,000	2,010	664	72.7%	0.80	-5%	-5%	-32	-34	594
Lakeville	22,300	26,300	4,000	1,321	52.1%	0.80	+11%	-5%	+148	-68	1,391
Lilydale	590	590	0	0	47.9%	1.98	+14%	+17%	+0	+0	0
Mendota	90	110	20	7	79.8%	1.71	-10%	+12%	-1	+1	7
Mendota Heights	4,600	4,710	110	36	30.6%	1.60	+28%	+10%	+10	+3	49
Rosemount	8,450	10,740	2,290	756	60.4%	1.05	+5%	-1%	+36	-4	783
South St. Paul	8,900	9,200	300	99	95.9%	0.81	-23%	-5%	-23	-5	71
Vermillion	160	160	0	0	90.7%	0.57	-19%	-9%	+0	+0	0
West St. Paul	9,090	9,490	400	132	92.7%	1.76	-20%	+12%	-27	+16	120

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[3] Housing stock affordability: The percentage of a community's total housing units that is affordable to low-income households (those with income at or below 80% of Area Median Income), including unsubsidized and publicly subsidized units. In the average sewered community, 66.4% of housing units are affordable to low-income households.

[4] Job/Worker Balance: The ratio of low-wage jobs located within five miles of the community's geographic center divided by the number of residents within this distance whose primary job is a low-wage job. In the average sewered community, the ratio is 1.08.

Exhibit 5: Calculations of Total Allocations for 2021-2030 for All Communities (continued)

Sewered Communities	Growth Summary: Sewered Households[1]			(D) Pre-adjusted allocation (C×33.0%)	Measures for Adjustments		Adjustment Factors[2]		Numerical Adjustments		(K) Final Allocation (D + I + J)*
	(A) 2020	(B) 2030	(C) Net growth (B − A)		(E) Housing stock[3] (Avg = 66.4%)	(F) Job/ worker balance[4] (Avg = 1.08)	(G) Housing stock	(H) Job/ worker balance	(I) Housing stock (D × G)	(J) Job/ worker balance (D × H)	
Hennepin County											
Bloomington	38,100	39,700	1,600	528	75.7%	2.12	-7%	+19%	-38	+101	587
Brooklyn Center	11,300	12,300	1,000	330	93.1%	0.80	-21%	-5%	-68	-17	243
Brooklyn Park	29,330	31,530	2,200	726	84.4%	0.87	-14%	-4%	-102	-28	592
Champlin	8,060	8,760	700	231	77.2%	0.86	-8%	-4%	-19	-9	202
Corcoran	490	1,040	550	182	52.7%	0.63	+11%	-8%	+19	-15	185
Crystal	9,500	9,600	100	33	95.8%	1.13	-23%	+1%	-8	+0	25
Dayton	2,200	3,200	1,000	330	66.8%	1.04	-0%	-1%	-1	-2	325
Deephaven	1,360	1,380	20	7	10.8%	0.98	+43%	-2%	+3	+0	10
Eden Prairie	27,400	30,400	3,000	991	43.3%	2.32	+18%	+23%	+178	+225	1,384
Edina	22,000	23,800	1,800	594	34.8%	2.49	+25%	+26%	+146	+154	888
Excelsior	1,200	1,300	100	33	62.0%	1.49	+3%	+8%	+1	+2	36
Golden Valley	9,300	9,600	300	99	57.7%	1.46	+7%	+7%	+7	+7	112
Greenfield	220	300	80	26	43.3%	0.71	+18%	-7%	+5	-2	29
Greenwood	300	300	0	0	14.0%	1.41	+41%	+6%	+0	+0	0
Hopkins	9,300	9,700	400	132	79.7%	2.88	-10%	+33%	-14	+44	161
Independence	1,400	1,560	160	53	25.1%	1.21	+32%	+2%	+17	+1	71
Long Lake	790	870	80	26	69.9%	1.23	-3%	+3%	-1	+1	26
Loretto	280	290	10	3	74.1%	1.22	-6%	+3%	+0	+0	3
Maple Grove	26,600	29,900	3,300	1,090	56.8%	1.06	+7%	-0%	+81	-4	1,159

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[4] Job/Worker Balance: The ratio of low-wage jobs located within five miles of the community's geographic center divided by the number of residents within this distance whose primary job is a low-wage job. In the average sewered community, the ratio is 1.08.

Sewered Communities	Growth Summary: Sewered Households[1]			(D) Pre-adjusted allocation (C×33.0%)	Measures for Adjustments		Adjustment Factors[2]		Numerical Adjustments		(K) Final Allocation (D + I + J)*
	(A) 2020	(B) 2030	(C) Net growth (B – A)		(E) Housing stock[3] (Avg = 66.4%)	(F) Job/ worker balance[4] (Avg = 1.08)	(G) Housing stock	(H) Job/ worker balance	(I) Housing stock (D × G)	(J) Job/ worker balance (D × H)	
Maple Plain	790	890	100	33	81.9%	0.87	-12%	-4%	-4	-1	28
Medicine Lake	170	170	0	0	36.8%	1.91	+23%	+15%	+0	+0	0
Medina	2,300	2,840	540	178	23.9%	1.23	+33%	+3%	+59	+5	240
Minneapolis	183,800	194,000	10,200	3,368	78.1%	1.80	-9%	+13%	-305	+445	3,484
Minnetonka	24,200	26,600	2,400	792	47.0%	2.12	+15%	+19%	+120	+151	1,056
Minnetonka Beach	210	220	10	3	9.8%	0.77	+44%	-6%	+1	+0	4
Minnetrista	1,280	1,970	690	228	19.9%	0.44	+36%	-12%	+82	-27	281
Mound	4,200	4,460	260	86	75.9%	0.41	-7%	-12%	-6	-11	69
New Hope	8,900	9,200	300	99	91.1%	1.30	-19%	+4%	-19	+4	83
Orono	3,200	3,560	360	119	22.8%	1.05	+34%	-1%	+40	-1	157
Osseo	1,300	1,400	100	33	94.7%	1.02	-22%	-1%	-7	+0	26
Plymouth	31,200	33,000	1,800	594	48.0%	1.70	+14%	+11%	+85	+68	742
Richfield	15,600	16,000	400	132	91.8%	1.68	-20%	+11%	-26	+15	120
Robbinsdale	6,300	6,600	300	99	95.1%	1.12	-22%	+1%	-22	+1	77
Rogers	5,000	6,700	1,700	561	53.6%	1.21	+10%	+2%	+56	+13	626
St. Anthony**	4,200	4,300	100	33	69.6%	2.50	-2%	+26%	-1	+9	41
St. Bonifacius	870	880	10	3	78.9%	0.64	-10%	-8%	+0	+0	3
St. Louis Park	23,600	24,600	1,000	330	71.0%	1.91	-4%	+15%	-12	+50	365
Shorewood	2,800	2,910	110	36	21.5%	0.94	+35%	-3%	+13	-1	48
Spring Park	960	1,040	80	26	65.6%	0.55	+1%	-10%	+0	-3	23
Tonka Bay	630	660	30	10	22.6%	0.86	+34%	-4%	+3	+0	13
Wayzata	2,100	2,310	210	69	47.2%	1.72	+15%	+12%	+10	+8	86
Woodland	54	54	0	0	4.7%	1.36	+48%	+5%	+0	+0	0

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Exhibit 5: Calculations of Total Allocations for 2021-2030 for All Communities (continued)

Sewered Communities	Growth Summary: Sewered Households[1]			(D) Pre-adjusted allocation (C×33.0%)	Measures for Adjustments		Adjustment Factors[2]		Numerical Adjustments		(K) Final Allocation (D + I + J)*
	(A) 2020	(B) 2030	(C) Net growth (B – A)		(E) Housing stock[3] (Avg = 66.4%)	(F) Job/ worker balance[4] (Avg = 1.08)	(G) Housing stock	(H) Job/ worker balance	(I) Housing stock (D × G)	(J) Job/ worker balance (D × H)	
Ramsey County											
Arden Hills	3,200	4,100	900	297	45.6%	1.52	+16%	+8%	+48	+24	366
Falcon Heights	2,200	2,200	0	0	67.2%	1.83	-1%	+14%	+0	+0	0
Gem Lake	90	120	30	10	51.8%	1.26	+11%	+3%	+1	+0	11
Lauderdale	1,200	1,200	0	0	92.8%	2.44	-20%	+25%	+0	+0	0
Little Canada	4,520	4,790	270	89	81.6%	1.19	-12%	+2%	-10	+2	80
Maplewood	16,540	18,440	1,900	627	84.9%	0.87	-14%	-4%	-90	-24	509
Mounds View	5,100	5,200	100	33	94.1%	1.42	-22%	+6%	-7	+2	28
New Brighton	9,500	10,000	500	165	77.7%	1.59	-9%	+9%	-14	+15	165
North Oaks	710	800	90	30	3.5%	1.19	+49%	+2%	+15	+1	46
North St. Paul	5,000	5,200	200	66	95.1%	0.82	-22%	-5%	-15	-3	48
Roseville	15,300	15,700	400	132	73.6%	1.88	-6%	+15%	-7	+19	143
Saint Paul	124,700	131,400	6,700	2,212	85.1%	1.38	-15%	+6%	-322	+122	1,998
Shoreview	11,000	11,200	200	66	63.1%	1.29	+3%	+4%	+2	+3	71
Vadnais Heights	5,700	6,100	400	132	70.9%	1.40	-4%	+6%	-5	+8	134
White Bear Township	4,000	4,180	180	59	58.6%	1.31	+6%	+4%	+4	+2	65
White Bear Lake**	10,500	11,200	700	231	83.3%	1.23	-13%	+3%	-30	+6	206

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	(A) 2020	(B) 2030	(C) Net growth (B – A)		(E) Housing stock[3] (Avg = 66.4%)	(F) Job/ worker balance[4] (Avg = 1.08)	(G) Housing stock	(H) Job/ worker balance	(I) Housing stock (D × G)	(J) Job/ worker balance (D × H)	
Scott County											
Belle Plaine	2,900	3,860	960	317	94.9%	1.05	-22%	-1%	-70	-2	243
Elko New Market	1,560	2,590	1,030	340	54.7%	0.43	+9%	-12%	+31	-40	329
Jordan	2,500	3,160	660	218	80.3%	0.58	-11%	-9%	-23	-20	174
Prior Lake	10,500	13,100	2,600	858	51.2%	1.01	+12%	-1%	+102	-11	942
Savage	10,790	12,190	1,400	462	54.3%	0.75	+9%	-6%	+44	-28	475
Shakopee	15,400	18,400	3,000	991	70.3%	1.04	-3%	-1%	-29	-7	948

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[1] Source: Forecasts developed by Metropolitan Council Environmental Services with input from Council Research staff, and supplemented by Council Research estimates of growth in municipal-serviced areas. For more information, see footnote 8 of Appendix B.

[2] These numbers are rescaled Z-scores based on the measures in Column E and Column F. Communities will have their allocations adjusted upward (positive values in Columns G or H) if they have lower-than-average values in Column E (indicating less affordable housing) or higher-than-average values in Column F (indicating that they import workers in low-wage jobs). Communities will have their allocations adjusted downward (negative values in Columns G or H) if they have higher-than-average values in Column E (indicating more affordable housing) or lower-than-average values in Column F (indicating that they export workers in low-wage jobs).

[3] Housing stock affordability: The percentage of a community's total housing units that is affordable to low-income households (those with income at or below 80% of Area Median Income), including unsubsidized and publicly subsidized units. In the average sewered community, 66.4% of housing units are affordable to low-income households.

[4] Job/Worker Balance: The ratio of low-wage jobs located within five miles of the community's geographic center divided by the number of residents within this distance whose primary job is a low-wage job. In the average sewered community, the ratio is 1.08.

Exhibit 5: Calculations of Total Allocations for 2021-2030 for All Communities (continued)

Sewered Communities	Growth Summary: Sewered Households[1]			(D) Pre-adjusted allocation (C×33.0%)	Measures for Adjustments		Adjustment Factors[2]		Numerical Adjustments		(K) Final Allocation (D + I + J)*
	(A) 2020	(B) 2030	(C) Net growth (B – A)		(E) Housing stock[3] (Avg = 66.4%)	(F) Job/ worker balance[4] (Avg = 1.08)	(G) Housing stock	(H) Job/ worker balance	(I) Housing stock (D × G)	(J) Job/ worker balance (D × H)	
Washington County											
Bayport	920	1,040	120	40	67.5%	1.22	-1%	+3%	+0	+1	41
Birchwood Village	360	360	0	0	20.2%	1.07	+36%	-0%	+0	+0	0
Cottage Grove	13,300	15,200	1,900	627	63.9%	0.40	+2%	-12%	+13	-78	558
Forest Lake	7,040	8,930	1,890	624	61.2%	1.06	+4%	-0%	+25	-2	642
Hugo	4,460	6,950	2,490	822	48.3%	0.39	+14%	-13%	+116	-104	828
Lake Elmo	1,170	2,340	1,170	386	28.9%	0.85	+29%	-4%	+113	-16	480
Landfall	260	260	0	0	100.0%	0.65	-26%	-8%	+0	+0	0
Mahtomedi	2,860	2,910	50	17	33.4%	0.98	+26%	-2%	+4	+0	21
Newport	1,220	1,530	310	102	87.6%	0.68	-16%	-7%	-17	-7	77
Oakdale	11,390	11,890	500	165	71.9%	0.89	-4%	-3%	-7	-6	151
Oak Park Heights	2,200	2,420	220	73	60.6%	1.27	+5%	+3%	+3	+3	78
St. Paul Park	2,300	2,810	510	168	95.3%	0.72	-22%	-7%	-38	-11	118
Stillwater	8,370	8,970	600	198	55.5%	1.43	+9%	+6%	+17	+13	226
Willernie	230	230	0	0	90.4%	0.89	-19%	-3%	+0	+0	0
Woodbury	26,800	29,500	2,700	891	37.4%	0.81	+23%	-5%	+201	-44	1,041

* Column K includes an adjustment to make all communities' allocations sum to 37,900 units (the regional Need), so it is not the exact sum of Columns D, I, and J.

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[1] Source: Forecasts developed by Metropolitan Council Environmental Services with input from Council Research staff, and supplemented by Council Research estimates of growth in municipal-serviced areas. For more information, see footnote 8 of Appendix B.

[2] These numbers are rescaled Z-scores based on the measures in Column E and Column F. Communities will have their allocations adjusted upward (positive values in Columns G or H) if they have lower-than-average values in Column E (indicating less affordable housing) or higher-than-average values in Column F (indicating that they import workers in low-wage jobs). Communities will have their allocations adjusted downward (negative values in Columns G or H) if they have higher-than-average values in Column E (indicating more affordable housing) or lower-than-average values in Column F (indicating that they export workers in low-wage jobs).

[3] Housing stock affordability: The percentage of a community's total housing units that is affordable to low-income households (those with income at or below 80% of Area Median Income), including unsubsidized and publicly subsidized units. In the average sewered community, 66.4% of housing units are affordable to low-income households.

[4] Job/Worker Balance: The ratio of low-wage jobs located within five miles of the community's geographic center divided by the number of residents within this distance whose primary job is a low-wage job. In the average sewered community, the ratio is 1.08.

Exhibit 6: Allocations by Affordability Band for 2021-2030 for All Communities

Sewered Community	(A) Overall Allocation	Shares of existing affordable housing in each band[1]			Shares of allocation in each band[2]			Allocation by bands		
		(B) At or below 30% of AMI (Avg = 9.7%)	(C) 31% to 50% of AMI (Avg = 27.5%)	(D) 51% to 80% of AMI (Avg = 62.9%)	(E) At or below 30% of AMI (Region = 49.9%)	(F) 31% to 50% of AMI (Region = 24.9%)	(G) 51% to 80% of AMI (Region = 25.2%)	(H) At or below 30% of AMI (A × E)	(I) 31% to 50% of AMI (A × F)	(J) 51% to 80% of AMI (A × G)
Anoka County										
Andover	484	2.8%	12.2%	85.0%	57.2%	39.7%	3.1%	277	192	15
Anoka	115	5.4%	57.6%	37.0%	50.8%	0.0%	49.2%	58	0	57
Bethel	5	9.9%	63.4%	26.7%	40.0%	0.0%	60.0%	2	0	3
Blaine**	1,151	12.8%	25.6%	61.6%	46.6%	26.1%	27.2%	536	301	314
Centerville	14	1.0%	21.2%	77.8%	61.5%	30.8%	7.7%	9	4	1
Circle Pines	15	0.6%	43.8%	55.6%	60.0%	6.7%	33.3%	9	1	5
Columbia Heights	137	7.6%	59.2%	33.2%	48.0%	0.0%	52.0%	66	0	71
Columbus	26	0.0%	4.4%	95.6%	55.6%	44.4%	0.0%	14	12	0
Coon Rapids	464	6.5%	40.3%	53.1%	52.7%	11.6%	35.7%	244	54	166
East Bethel	318	9.6%	18.9%	71.5%	50.3%	32.6%	17.1%	160	104	54
Fridley	153	7.6%	48.4%	43.9%	51.0%	3.9%	45.2%	78	6	69
Hilltop	14	78.2%	21.8%	0.0%	0.0%	25.0%	75.0%	0	4	10
Lexington	15	15.7%	45.1%	39.2%	46.7%	6.7%	46.7%	7	1	7
Lino Lakes	543	4.1%	17.0%	79.0%	55.9%	34.8%	9.3%	303	189	51
Ramsey	510	2.9%	16.2%	81.0%	57.0%	35.6%	7.3%	291	182	37
St. Francis	124	16.8%	35.0%	48.1%	42.4%	16.8%	40.8%	52	21	51
Spring Lake Park**	58	9.0%	31.2%	59.9%	50.9%	21.1%	28.1%	30	12	16

** Cities that are split between two counties are shown in the county with the largest share of households.

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[1] Shows the share of all housing units *affordable to households with income at or below 80% of AMI* in each band of affordability. Percentages may not sum to 100% due to rounding. In the average sewered community, 10% of all affordable units are affordable at or below 30% of AMI; 27% are affordable at 31% to 50% of AMI; and 63% are affordable at 51% to 80% of AMI.

[2] Shows the share of the total allocation assigned to each band, as developed by Part 3 of the allocation process. The 0-30% band is 49.9% of the regional Need, the 31-50% band is 24.9% of the regional Need, and the the 51-80% band is 25.2% of the regional Need.

Exhibit 6: Allocations by Affordability Band for 2021-2030 for All Communities (continued)

Sewered Community	(A) Overall Allocation	Shares of existing affordable housing in each band[1]			Shares of allocation in each band[2]			Allocation by bands		
		(B) At or below 30% of AMI (Avg = 9.7%)	(C) 31% to 50% of AMI (Avg = 27.5%)	(D) 51% to 80% of AMI (Avg = 62.9%)	(E) At or below 30% of AMI (Region = 49.9%)	(F) 31% to 50% of AMI (Region = 24.9%)	(G) 51% to 80% of AMI (Region = 25.2%)	(H) At or below 30% of AMI (A × E)	(I) 31% to 50% of AMI (A × F)	(J) 51% to 80% of AMI (A × G)
Carver County										
Carver	502	0.9%	36.8%	62.3%	58.4%	15.1%	26.5%	293	76	133
Chanhassen**	805	2.2%	28.4%	69.4%	57.4%	23.4%	19.2%	463	188	154
Chaska	564	15.2%	22.7%	62.1%	44.4%	28.9%	26.7%	250	163	151
Cologne	98	7.2%	25.1%	67.7%	52.6%	26.8%	20.6%	52	26	20
Hamburg	4	12.2%	74.2%	13.6%	40.0%	0.0%	60.0%	2	0	2
Laketown Township	0	8.4%	8.0%	83.6%	0.0%	0.0%	0.0%	0	0	0
Mayer	50	2.3%	18.5%	79.2%	58.0%	34.0%	8.0%	29	17	4
New Germany	18	8.2%	64.2%	27.7%	45.0%	0.0%	55.0%	8	0	10
Norwood Young America	263	8.2%	58.1%	33.7%	47.9%	0.0%	52.1%	126	0	137
Victoria	439	8.2%	19.3%	72.5%	51.5%	32.4%	16.1%	226	142	71
Waconia	864	5.5%	28.2%	66.3%	54.0%	23.6%	22.4%	466	204	194
Watertown	134	11.9%	35.9%	52.2%	47.8%	15.7%	36.6%	64	21	49

** Cities that are split between two counties are shown in the county with the largest share of households.

[1] Shows the share of all housing units *affordable to households with income at or below 80% of AMI* in each band of affordability. Percentages may not sum to 100% due to rounding. In the average sewered community, 10% of all affordable units are affordable at or below 30% of AMI; 27% are affordable at 31% to 50% of AMI; and 63% are affordable at 51% to 80% of AMI.

[2] Shows the share of the total allocation assigned to each band, as developed by Part 3 of the allocation process. The 0-30% band is 49.9% of the regional Need, the 31-50% band is 24.9% of the regional Need, and the the 51-80% band is 25.2% of the regional Need.

Exhibit 6: Allocations by Affordability Band for 2021-2030 for All Communities (continued)

Sewered Community	(A) Overall Allocation	Shares of existing affordable housing in each band[1]			Shares of allocation in each band[2]			Allocation by bands		
		(B) At or below 30% of AMI (Avg = 9.7%)	(C) 31% to 50% of AMI (Avg = 27.5%)	(D) 51% to 80% of AMI (Avg = 62.9%)	(E) At or below 30% of AMI (Region = 49.9%)	(F) 31% to 50% of AMI (Region = 24.9%)	(G) 51% to 80% of AMI (Region = 25.2%)	(H) At or below 30% of AMI (A × E)	(I) 31% to 50% of AMI (A × F)	(J) 51% to 80% of AMI (A × G)
Dakota County										
Apple Valley	469	11.9%	26.5%	61.6%	47.6%	25.2%	27.1%	224	118	127
Burnsville	266	13.4%	24.7%	61.9%	46.1%	27.0%	27.0%	122	72	72
Eagan	469	9.5%	30.3%	60.1%	50.0%	21.4%	28.6%	235	100	134
Empire Township	120	1.1%	15.7%	83.2%	58.8%	36.1%	5.0%	71	43	6
Farmington	438	3.5%	31.6%	64.9%	56.0%	20.2%	23.9%	246	88	104
Hampton	4	0.0%	29.6%	70.4%	50.0%	25.0%	25.0%	2	1	1
Hastings**	385	11.7%	37.5%	50.9%	47.5%	14.3%	38.2%	183	55	147
Inver Grove Heights	594	12.3%	29.0%	58.7%	47.2%	22.8%	30.0%	281	135	178
Lakeville	1,391	12.2%	17.9%	70.0%	47.5%	33.8%	18.7%	661	470	260
Lilydale	0	1.0%	43.0%	56.0%	0.0%	0.0%	0.0%	0	0	0
Mendota	7	9.0%	44.8%	46.3%	50.0%	12.5%	37.5%	3	1	3
Mendota Heights	49	9.3%	16.2%	74.5%	50.0%	36.0%	14.0%	24	18	7
Rosemount	783	9.6%	24.0%	66.5%	50.0%	27.8%	22.2%	391	218	174
South St. Paul	71	7.7%	46.5%	45.8%	51.4%	5.6%	43.1%	36	4	31
Vermillion	0	0.0%	17.7%	82.3%	0.0%	0.0%	0.0%	0	0	0
West St. Paul	120	9.7%	34.6%	55.8%	50.0%	16.7%	33.3%	60	20	40

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Exhibit 6: Allocations by Affordability Band for 2021-2030 for All Communities (continued)

Sewered Community	(A) Overall Allocation	Shares of existing affordable housing in each band[1]			Shares of allocation in each band[2]			Allocation by bands		
		(B) At or below 30% of AMI (Avg = 9.7%)	(C) 31% to 50% of AMI (Avg = 27.5%)	(D) 51% to 80% of AMI (Avg = 62.9%)	(E) At or below 30% of AMI (Region = 49.9%)	(F) 31% to 50% of AMI (Region = 24.9%)	(G) 51% to 80% of AMI (Region = 25.2%)	(H) At or below 30% of AMI (A × E)	(I) 31% to 50% of AMI (A × F)	(J) 51% to 80% of AMI (A × G)
Hennepin County										
Bloomington	587	6.7%	21.9%	71.3%	53.0%	29.8%	17.2%	311	175	101
Brooklyn Center	243	5.6%	71.6%	22.8%	44.6%	0.0%	55.4%	108	0	135
Brooklyn Park	592	7.5%	37.3%	55.2%	51.8%	14.7%	33.6%	306	87	199
Champlin	202	2.2%	18.3%	79.5%	58.0%	33.5%	8.5%	117	68	17
Corcoran	185	19.5%	7.9%	72.6%	40.2%	43.5%	16.3%	74	81	30
Crystal	25	3.5%	48.7%	47.8%	56.0%	4.0%	40.0%	14	1	10
Dayton	325	24.8%	20.6%	54.6%	34.8%	30.8%	34.5%	113	100	112
Deephaven	10	0.6%	2.6%	96.8%	54.5%	45.5%	0.0%	5	5	0
Eden Prairie	1,384	2.7%	25.1%	72.3%	57.0%	26.7%	16.3%	789	370	225
Edina	888	19.5%	27.1%	53.4%	39.9%	24.5%	35.5%	354	218	316
Excelsior	36	14.3%	40.6%	45.1%	45.7%	11.4%	42.9%	17	4	15
Golden Valley	112	11.6%	21.4%	67.0%	47.8%	30.1%	22.1%	53	34	25
Greenfield	29	3.8%	37.6%	58.6%	55.2%	13.8%	31.0%	16	4	9
Greenwood	0	8.7%	2.2%	89.1%	0.0%	0.0%	0.0%	0	0	0
Hopkins	161	13.9%	23.0%	63.2%	46.0%	28.6%	25.5%	74	46	41
Independence	71	6.9%	22.8%	70.3%	52.9%	28.6%	18.6%	38	20	13
Long Lake	26	7.5%	22.8%	69.7%	51.9%	29.6%	18.5%	13	8	5
Loretto	3	6.8%	39.3%	53.9%	66.7%	0.0%	33.3%	2	0	1
Maple Grove	1,159	1.6%	24.9%	73.5%	58.2%	26.8%	15.0%	674	311	174
Maple Plain	28	4.7%	34.3%	61.0%	53.6%	17.9%	28.6%	15	5	8
Medicine Lake	0	4.7%	34.4%	60.9%	0.0%	0.0%	0.0%	0	0	0
Medina	240	13.7%	8.3%	77.9%	46.2%	43.3%	10.5%	111	104	25
Minneapolis	3,484	14.7%	37.5%	47.8%	44.5%	14.4%	41.1%	1,552	502	1,430

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[2] Shows the share of the total allocation assigned to each band, as developed by Part 3 of the allocation process. The 0-30% band is 49.9% of the regional Need, the 31-50% band is 24.9% of the regional Need, and the the 51-80% band is 25.2% of the regional Need.

Sewered Community	(A) Overall Allocation	Shares of existing affordable housing in each band[1]			Shares of allocation in each band[2]			Allocation by bands		
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Minnetonka	1,056	12.5%	13.4%	74.1%	47.2%	38.3%	14.5%	499	404	153
Minnetonka Beach	4	26.1%	4.3%	69.6%	25.0%	50.0%	25.0%	1	2	1
Minnetrista	281	4.0%	31.3%	64.7%	55.5%	20.3%	24.2%	156	57	68
Mound	69	7.9%	42.8%	49.3%	50.7%	9.9%	39.4%	35	7	27
New Hope	83	7.2%	24.7%	68.1%	52.4%	26.8%	20.7%	44	22	17
Orono	157	16.0%	18.3%	65.7%	43.3%	33.8%	22.9%	68	53	36
Osseo	26	5.3%	55.7%	39.0%	51.9%	0.0%	48.1%	13	0	13
Plymouth	742	5.6%	19.9%	74.5%	54.3%	31.8%	13.9%	403	236	103
Richfield	120	5.9%	27.9%	66.1%	53.8%	23.5%	22.7%	65	28	27
Robbinsdale	77	6.8%	52.9%	40.3%	51.9%	0.0%	48.1%	40	0	37
Rogers	626	2.3%	20.1%	77.6%	57.5%	31.6%	11.0%	359	198	69
St. Anthony**	41	14.3%	13.3%	72.3%	46.3%	39.0%	14.6%	19	16	6
St. Bonifacius	3	5.1%	35.3%	59.6%	50.0%	25.0%	25.0%	1	1	1
St. Louis Park	365	7.8%	21.4%	70.8%	51.8%	30.3%	17.9%	189	111	65
Shorewood	48	13.4%	15.1%	71.5%	45.8%	37.5%	16.7%	22	18	8
Spring Park	23	1.4%	34.9%	63.7%	56.5%	17.4%	26.1%	13	4	6
Tonka Bay	13	9.3%	10.0%	80.7%	50.0%	42.9%	7.1%	6	6	1
Wayzata	86	12.4%	16.8%	70.8%	47.7%	34.9%	17.4%	41	30	15
Woodland	0	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0	0	0

** Cities that are split between two counties are shown in the county with the largest share of households.

Exhibit 6: Allocations by Affordability Band for 2021-2030 for All Communities (continued)

Sewered Community	(A) Overall Allocation	Shares of existing affordable housing in each band[1]			Shares of allocation in each band[2]			Allocation by bands		
		(B) At or below 30% of AMI (Avg = 9.7%)	(C) 31% to 50% of AMI (Avg = 27.5%)	(D) 51% to 80% of AMI (Avg = 62.9%)	(E) At or below 30% of AMI (Region = 49.9%)	(F) 31% to 50% of AMI (Region = 24.9%)	(G) 51% to 80% of AMI (Region = 25.2%)	(H) At or below 30% of AMI (A × E)	(I) 31% to 50% of AMI (A × F)	(J) 51% to 80% of AMI (A × G)
Ramsey County										
Arden Hills	366	25.4%	24.8%	49.8%	34.2%	26.8%	39.1%	125	98	143
Falcon Heights	0	2.0%	29.1%	68.9%	0.0%	0.0%	0.0%	0	0	0
Gem Lake	11	0.0%	23.5%	76.5%	63.6%	27.3%	9.1%	7	3	1
Lauderdale	0	1.6%	45.3%	53.1%	0.0%	0.0%	0.0%	0	0	0
Little Canada	80	24.6%	16.2%	59.2%	35.0%	35.0%	30.0%	28	28	24
Maplewood	509	9.6%	32.7%	57.7%	49.7%	19.1%	31.2%	253	97	159
Mounds View	28	14.4%	31.9%	53.8%	44.8%	20.7%	34.5%	12	6	10
New Brighton	165	8.4%	33.9%	57.7%	50.9%	18.2%	30.9%	84	30	51
North Oaks	46	13.6%	0.0%	86.4%	46.7%	51.1%	2.2%	21	24	1
North St. Paul	48	6.9%	45.0%	48.1%	52.1%	8.3%	39.6%	25	4	19
Roseville	143	10.3%	16.8%	72.9%	49.0%	35.0%	16.1%	70	50	23
Saint Paul	1,998	16.6%	45.5%	38.0%	42.5%	6.6%	50.9%	848	133	1,017
Shoreview	71	10.0%	22.4%	67.6%	50.0%	28.6%	21.4%	36	20	15
Vadnais Heights	134	15.8%	21.2%	63.0%	43.7%	30.4%	25.9%	58	41	35
White Bear Township	65	4.5%	15.2%	80.3%	56.3%	35.9%	7.8%	37	23	5
White Bear Lake**	206	3.7%	15.9%	80.4%	56.4%	35.8%	7.8%	116	74	16

** Cities that are split between two counties are shown in the county with the largest share of households.

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[1] Shows the share of all housing units *affordable to households with income at or below 80% of AMI* in each band of affordability. Percentages may not sum to 100% due to rounding. In the average sewered community, 10% of all affordable units are affordable at or below 30% of AMI; 27% are affordable at 31% to 50% of AMI; and 63% are affordable at 51% to 80% of AMI.

[2] Shows the share of the total allocation assigned to each band, as developed by Part 3 of the allocation process. The 0-30% band is 49.9% of the regional Need, the 31-50% band is 24.9% of the regional Need, and the the 51-80% band is 25.2% of the regional Need.

Exhibit 6: Allocations by Affordability Band for 2021-2030 for All Communities (continued)

Sewered Community	(A) Overall Allocation	Shares of existing affordable housing in each band[1]			Shares of allocation in each band[2]			Allocation by bands		
		(B) At or below 30% of AMI (Avg = 9.7%)	(C) 31% to 50% of AMI (Avg = 27.5%)	(D) 51% to 80% of AMI (Avg = 62.9%)	(E) At or below 30% of AMI (Region = 49.9%)	(F) 31% to 50% of AMI (Region = 24.9%)	(G) 51% to 80% of AMI (Region = 25.2%)	(H) At or below 30% of AMI (A × E)	(I) 31% to 50% of AMI (A × F)	(J) 51% to 80% of AMI (A × G)
Scott County										
Belle Plaine	243	6.2%	32.5%	61.3%	53.3%	19.3%	27.5%	129	47	67
Elko New Market	329	0.9%	12.1%	87.0%	59.3%	39.8%	0.9%	195	131	3
Jordan	174	21.0%	31.5%	47.5%	38.3%	20.0%	41.7%	67	35	72
Prior Lake	942	6.1%	21.9%	72.0%	53.6%	29.7%	16.6%	505	280	157
Savage	475	1.3%	11.7%	87.1%	58.7%	40.2%	1.1%	279	191	5
Shakopee	948	2.5%	37.0%	60.5%	56.8%	15.0%	28.3%	538	142	268

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[1] Shows the share of all housing units *affordable to households with income at or below 80% of AMI* in each band of affordability. Percentages may not sum to 100% due to rounding. In the average sewered community, 10% of all affordable units are affordable at or below 30% of AMI; 27% are affordable at 31% to 50% of AMI; and 63% are affordable at 51% to 80% of AMI.

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Exhibit 6: Allocations by Affordability Band for 2021-2030 for All Communities (continued)

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Washington County										
Bayport	41	2.0%	22.3%	75.7%	58.5%	29.3%	12.2%	24	12	5
Birchwood Village	0	0.0%	2.7%	97.3%	0.0%	0.0%	0.0%	0	0	0
Cottage Grove	558	1.9%	12.1%	86.0%	58.2%	39.7%	2.2%	325	221	12
Forest Lake	642	9.1%	27.5%	63.4%	50.3%	24.3%	25.4%	323	156	163
Hugo	828	6.9%	11.3%	81.8%	53.1%	40.4%	6.5%	439	335	54
Lake Elmo	480	53.2%	15.5%	31.3%	6.2%	35.8%	58.0%	30	172	278
Landfall	0	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0	0	0
Mahtomedi	21	5.0%	13.1%	81.9%	55.0%	40.0%	5.0%	12	8	1
Newport	77	6.3%	53.0%	40.7%	52.6%	0.0%	47.4%	40	0	37
Oakdale	151	6.6%	27.5%	65.8%	52.6%	24.3%	23.0%	79	37	35
Oak Park Heights	78	9.3%	38.1%	52.6%	49.4%	13.9%	36.7%	38	11	29
St. Paul Park	118	6.1%	19.7%	74.1%	53.8%	32.5%	13.7%	64	38	16
Stillwater	226	8.0%	14.6%	77.4%	51.8%	37.1%	11.2%	117	84	25
Willernie	0	5.5%	26.3%	68.2%	0.0%	0.0%	0.0%	0	0	0
Woodbury	1,041	2.0%	16.1%	81.9%	58.0%	35.6%	6.4%	603	371	67

[1] Shows the share of all housing units *affordable to households with income at or below 80% of AMI* in each band of affordability. Percentages may not sum to 100% due to rounding. In the average sewered community, 10% of all affordable units are affordable at or below 30% of AMI; 27% are affordable at 31% to 50% of AMI; and 63% are affordable at 51% to 80% of AMI.

[2] Shows the share of the total allocation assigned to each band, as developed by Part 3 of the allocation process. The 0-30% band is 49.9% of the regional Need, the 31-50% band is 24.9% of the regional Need, and the the 51-80% band is 25.2% of the regional Need.

Changes to the lettering of the Appendices:
Appendix ~~B~~C: Chronology of Regional Housing Policy and Implementation (p. 119)

Appendix ~~C~~D: Senior Housing Types and Arrangements (p. 121)

Appendix ~~D~~E: Glossary of Affordable Housing Terms, Programs, and Funding Sources (p. 123)

Appendix ~~E~~F: About the Housing Policy Plan Indicators (p. 136)

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[i] Arthur C. Nelson, "Metropolitan Council Area Trends, Preferences, and Opportunities: 2010 to 2020, 2030 and 2040" (2014). Retrieved from http://metrocouncil.org/METC/files/57/571ff237-6d73-4e26-86bc-3c12978b1b89.pdf.
[ii] Data are from the ~~2007~~2013 American Housing Survey Public Use File (available from ~~http://www.census.gov/programs-surveys/ahs/data/2007/2007-ahs-metropolitan-puf-microdata.html~~ http://www.census.gov/programs-surveys/ahs/data/2013/2013-ahs-metropolitan-puf-microdata.html) and cover the 13-county Minneapolis-St. Paul-Bloomington metropolitan statistical area. Units were classified as having a "serious maintenance problem" if they showed any of the 35 characteristics included in the "Poor Quality Index" developed in Frederick J. Eggers and Fouad Moumen, "American Housing Survey: A Measure of (Poor) Housing Quality" (2013), retrieved from http://www.huduser.org/portal//publications/pdf/AHS_hsg.pdf.
[iii] U.S. Census Bureau, 2000 Census and ~~2008-2012~~2009-2013 American Community Survey.
[iv] U.S. Census Bureau, ~~2008-2012~~2009-2013 American Community Survey Public Use Microdata Sample.
[v] U.S. Census Bureau, ~~2008-2012~~2009-2013 American Community Survey Public Use Microdata Sample.
[vi] This estimate of unsubsidized affordable owner-occupied units was calculated using 2013 and 2014 MetroGIS Regional Parcel Datasets to identify units whose assessed value would produce monthly mortgage payments (including principal, interest, property taxes, and insurance) at or below 29% of the monthly household income of a household earning 80% of the area median income. This estimate of unsubsidized affordable rental units was calculated using the 2007-2011 Comprehensive Housing Affordability Strategy (CHAS) data. The resulting counts were adjusted for consistency with the Council's annual estimates of housing units, tenure distributions from the 2013 American Community Survey, and the affordability distribution of rental units from the 2013 American Community Survey Public Use Microdata Sample.
[vii] This forecast looks at new households earning less than 80% of AMI and excludes seniors who own their home free and clear and are not cost-burdened. Including those, the number is ~~73,600~~ 56,400.
[viii] For a full definition of entitlement communities, see the Glossary in the Appendices.) Entitlement communities in our region are Anoka, Dakota, Hennepin, Ramsey, and Washington counties and the cities of Bloomington, Coon Rapids, Eden Prairie, Minneapolis, Minnetonka, Plymouth, Saint Paul, and Woodbury.
[ix] This forecast looks at new households earning less than 80% of AMI and excludes seniors who own their home free and clear and are not cost-burdened. Including those, the number is ~~73,600~~ 56,400.
[x] Affordable home prices are Metropolitan Council staff calculations of the purchase prices at which estimated monthly mortgage payments—including principal, interest, property taxes, and insurance—are no more than 29% of the monthly income for a household of four with the given income. The Council assumed a 3.97% interest rate (the Midwestern average for 2013) and other standard mortgage assumptions: a 3.5% downpayment, a property tax rate of 1.25% of property sales price, mortgage insurance at 1.35% of unpaid principal, and $100/month for hazard insurance. Household income values are the income limits for 2013 calculated by the U.S. Department of

Housing and Urban Development based on the median family income for the 13-county Minneapolis-Saint Paul-Bloomington metropolitan statistical area.

[xi] U.S. Census Bureau, ~~2008-2012~~2009-2013 American Community Survey.
[xii] U.S. Census Bureau, ~~2008-2012~~2009-2013 American Community Survey.
[xiii] ~~Ibid.~~U.S. Census Bureau, 2009-2013 American Community Survey Public Use Microdata Sample.
[xiv] U.S. Census Bureau, ~~2008-2012~~2009-2013 American Community Survey Public Use Microdata Sample.
[xv] U.S. Department of Housing and Urban Development. 2013. Picture of Subsidized Housing data.
[xvi] Ibid.

Public Comment Summary
Amendment to the *2040 Housing Policy Plan*

Commenters

ID	Organization	Name
1	City of Anoka	Darin Berger
2	City of Apple Valley	Bruce Nordquist
3	City of Blaine	Mayor Tom Ryan
4	City of Brooklyn Park	Mayor Jeffrey Lunde
5	City of Burnsville	City Manager Heather Johnston
6	City of Carver	Mayor Mike Webb
7	City of Cottage Grove	Mayor Myron Bailey
8	City of East Bethel	City Administrator Jack Davis
9	City of Independence	City Councilmember Brad Spencer
10	City of Lakeville	Mayor Matt Little & City Administrator Justin Miller
11	City of Minneapolis Community Planning & Economic Development	Executive Director D. Craig Taylor
12	City of Orono	Lili Tod McMillan
13	City of Ramsey	Tim Gladhill
14	City of Rogers	City Administrator Steve Stahmer
15	City of Rosemount	Mayor William H. Droste
16	City of St. Francis	Nate Sparks
17	City of St. Paul Park	Nate Sparks
18	City of St. Paul	Jonathan Sage-Martinson
19	City of Victoria	Mayor Tom O'Connor
20	City of Waconia	City Administrator Susan MH Arntz
21	City of White Bear Lake	City Administrator Mark Sather

ID	Organization	Name
22	Anoka County Housing & Redevelopment Authority	Scott Schulte, Chair
23	Carver County Community Development Agency	Executive Director Julie Frick
24	Carver County	Randy Maluchnik, Chair
25	Hennepin County	Margo Geffen
26	Washington County Housing & Redevelopment Authority	Executive Director Barbara Dacy
27	St. Paul Housing & Redevelopment Authority	Amy Brendmoen
28	Catholic Charities	Jessie Sorenson
29	Center of the American Experiment	Katherine Kersten*
30	Housing Justice Center, Mid-Minnesota Legal Assistance, Minnesota Housing Partnership, ISAIAH, and All Parks Alliance for Change	Tim Thompson*
31	Institute on Metropolitan Opportunity (IMO)	Will Stancil
32	Metro Cities	Patricia Nauman*
33	Metropolitan Interfaith Council on Affordable Housing (MICAH)	Sue Watlov Phillips*
34	Resident	Steve Ficker
* Indicates individuals that testified during the public hearings on the Housing Policy Plan Amendment		

Comments and Council Responses

Contributor(s)	Topic(s)	Comment		Response
1	Allocation of Need, Housing Performance Scores	1.	The need allocation and scoring methodology process in the Housing Policy Plan need to be fully transparent.	Appendix B of the draft amendment provides the allocation methodology in great detail. The Housing Performance Score methodology will be provided in greater detail in the Guidelines for Priority Funding for Housing Performance (that is, the Housing Performance Scores) which are being concurrently released with this report.
2	Allocation of Need	2.	The Need allocated by the Met Council is similar to the need determined by a separate report commissioned by the city/county.	We appreciate the acknowledgement of consistency in need.
2	Allocation of Need	3.	The City acknowledges the Need if there are sufficient affordable housing resources, credit is given to mobility and job creating solutions and if the goal remains a recommendation rather than a requirement.	The Need is neither a recommendation or a goal, but a forecast of household growth at 80% AMI or below distributed throughout the region. Cities' only requirement associated with their Need number is to guide enough land at high enough densities to provide the opportunity for affordable housing development. Clarifying language was added in Part III: Council Policies and Roles. Forecasts of household growth already consider job growth when estimating future incomes.
2, 33	Allocation of Need	4.	The complexity of the Need methodology is excessive.	The Need methodology's complexity was balanced against the desire to allocate communities their share of the Need using the most statistically and mathematically sound method possible given the policy direction for Need adjustments.

Contributor(s)	Topic(s)	Comment	Response
2	Allocation of Need	5. Apple Valley has licensed group homes that provide affordable housing with services to 156 households and Adult Foster Care and Residential Habilitation Service locations serving and additional 132 residents - these should be credited [in the allocation formula]	Group housing is neither counted as existing affordable housing in the allocation formula nor as a type of housing that is included in the growth projections that the allocations are based on - creating in effect a neutral impact on the Need methodology.
2	Allocation of Need, Lack of Resources to Meet Need	6. The city objects to only allocating limited resources to affordable housing when resources spent on improved transit service for lower income households or job creation that improved household incomes should be credited as adjustment factors to meeting affordable housing needs.	Directly or indirectly, transit service and job opportunities both adjust a community's share of the regional Need for affordable housing - this is described in great detail in Appendix B of the draft amendment. There are no policies in the HPP that require cities to allocate their limited resources to affordable housing.
2	Allocation of Need	7. Affordable interest rates in the marketplace have not been fully considered in addressing the impact on housing cost.	Affordable home ownership costs were based on an interest rate of 3.97%.
3, 29	Allocation of Need	8. We are concerned about the approach taken with suburban communities as it relates to housing growth and the need to develop a certain percentage as affordable housing.	Communities do not have to develop a certain percentage of their growth as affordable, but simply, per state statute, provide sufficient land at densities that promote the development of affordable housing. Clarifying language was added in Part III: Council Policies and Roles.
3	Allocation of Need	9. Affordable housing goals are placed on the backs of growing communities which are neither in the business of or equipped to provide affordable housing	Affordable housing **Goals** have not been determined for 2021-2030 yet and are not addressed in the draft amendment. Affordable housing **Need** shares are allocated in the draft amendment and do not require that a city provide affordable housing, but per state statute provide sufficient land at densities that promote the development of affordable housing. Clarifying language was added to Part III: Council Policies and Roles.

Contributor(s)	Topic(s)	Comment	Response
5	Allocation of Need	10. The proposed formula makes some adjustments for existing housing, but communities such as ours that are nearly fully developed have few opportunities for new housing development in the future.	The Allocation of Affordable Housing Need is a share of total forecasted household growth in a community and can never exceed overall household forecasts.
5	Allocation of Need	11. The report asserts there is very little affordable housing need or opportunities in rural unsewered areas and, therefore, those areas are not taken into account in the allocation. This is shortsighted as there are affordable housing needs everywhere. There are manufactured home communities or individual homes in the region in rural areas and not on city utilities that provide affordable housing.	The plan recognizes that Council policies do not encourage development beyond sewer-serviced areas and therefore does not allocate need outside of such areas. Furthermore, the densities possible outside sewer-serviced would not allow for enough new affordable housing to have a tangible impact on the Need.

Contributor(s)	Topic(s)	Comment	Response
6	Allocation of Need	12. The 441 affordable units allocated to Carver represent a cost burden of $81.6 million, or approximately $62,000 per each existing household just for the construction of those units. By contrast, the relative cost burden on existing households would be $5,875 for Plymouth and $3,660 for Minneapolis. By contrast, that relative cost burden on cities similarly situated to Carver (small but fast-growing) is much greater on a per household basis than it is for the majority of the communities in the region. The city believes that the number of affordable housing units allocated to Carver is disproportionate to a community of its size. The allocation formula should be adjusted to account for the financial ability to develop and support new affordable housing for each community, potentially measured by tax capacity.	The Need by definition does not consider the cost of, resources available for, or barriers to building new affordable housing. It simply estimates the future need. While Cities are encouraged to consider affordable housing needs when determining their policy and funding priorities, Cities are not responsible for funding new construction of affordable housing to meet their share of the Need. Adjusting the Need based on financial ability is counter to its definition and purpose, which is to provide information for land use planning.
6	Allocation of Need	13. Allocations are based solely on new growth in a community and do not consider the impacts of redevelopment on both the destruction and potential creation of affordable housing. The allocation formula should be adjusted to account for redevelopment potential instead of only focusing on new growth, but also focusing on locations that have high access to jobs (even if their growth is relatively small).	The growth forecasts upon which the Allocation of Need is based on do consider redevelopment potential in addition to the potential for greenfield development. Access to low-wage jobs is an adjustment factor in the Allocation of Need, as described in Appendix B of the draft amendment.

Contributor(s)	Topic(s)	Comment	Response
6	Allocation of Need	14. A preliminary review of draft updated forecasts suggest that Carver's affordable housing allocation would increase from 441 (from the draft HPP amendment) to approximately 680-685 units. There is no reason to assign an even higher allocation to Carver.	The Allocation of Affordable Housing Need moves up and down with changes to household forecasts. The Allocation in the amendment incorporates the forecasts that reflect local input from spring 2015 and that the Council will adopt simultaneously with the amendment.
6	Allocation of Need, Housing Performance Scores	15. We are requesting that the Council re-examine and adjust the formulas for the Need and the Scores in order to reduce the allocations on small communities to an achievable level that is fiscally constrained.	The new Score methodology strives to improve the ability of both small and large communities to score well. The Need is based on forecasted growth and cannot be larger than total projected household growth, and by definition is not based on fiscal considerations.
8	Allocation of Need, Comprehensive Plans	16. We have met our allocation of affordable housing and this issue is addressed in our Comprehensive Plan. Any further allocation is not warranted as our population has declined since 2010 and the Council's projections for 2030 have been revised downward. The projected 30% decrease in our population growth should reflect a reduction in our allocation. We object to any increase over the allocation that we cover in our Comprehensive Plan. If there is an increase assigned to the city, we wish to appeal the decision.	The Allocation of Need in the draft amendment is for the 2021-2030 decade and must be addressed in plan updates due in 2018. However, land guided at residential densities sufficient to meet the Need but not yet built as such do count toward addressing the 2021-2030 Need, even if they were already guided in the prior Comp plan. If a community's forecasted growth has been adjusted downward since the release of the draft amendment, final Need numbers will reflect that reduction.
9	Allocation of Need	17. With most of city un-sewered agriculture preserve & density restricted to large lot sizes our allocation of 45 should be 0.	Any community's Allocation of Need is based solely on projected growth in sewer-serviced locations.

Contributor(s)	Topic(s)	Comment	Response
9	Allocation of Need	18. Large lots and low income housing don't go together.	While we recognize that affordable housing is possible at any density, this point characterizes why communities must guide enough land at high enough densities to address their Allocation of Need.
9	Allocation of Need	19. Development (of the allocated # of units) would be impossible under Comprehensive Plan and Met Council restrictions.	The City of Independence does have land that can be guided at densities that can support affordable housing.
10	Allocation of Need	20. The allocation for affordable housing units includes adjustment factors such that cities like Lakeville are expected to develop affordable housing beyond their proportionate share of the region's affordable housing needs from 2020-2030.	Comment noted. The Allocation of Need does in fact adjust cities' allocations for certain factors, which means not every community has the same share of growth identified as their Allocation of Need.
3, 7, 10, 13, 14, 15, 19, 22, 23, 29, 30, 33	Allocation of Need, Lack of Resources to Meet Need	21. The Council's allocation of new housing units being affordable is not likely to be achieved given market factors and the lack of sufficient financial resources.	The Allocation of Need by definition does not consider the cost of, resources available for, or barriers to building new affordable housing. It simply estimates the future need. While Cities are encouraged to consider affordable housing needs when determining their policy and funding priorities, Cities are not responsible for funding new construction of affordable housing to meet their share of the Need.
11	Allocation of Need	22. We support the allocation of affordable housing need methodology and its application.	Comment appreciated.
12	Allocation of Need	23. Given the high land values and limited areas of the city where land is available with the types of services necessary to accommodate affordable housing, we believe that achieving the low and mid range allocation goals will be extremely difficult at best.	We acknowledge the challenges associated with building affordable housing and will provide technical assistance to local governments to assist in this effort.

Contributor(s)	Topic(s)	Comment	Response
13	Allocation of Need	24. It appears that the methodology is focused heavily on existing regional and local forecasts and doesn't quantify different socioeconomic factors between individual communities.	Adjusting a community's Allocation of Need based on their relative share of existing affordable housing does address some socioeconomic factors of individual communities.
13, 32	Allocation of Need	25. Allocation numbers should be reviewed and updated if necessary.	Because Need numbers are used for long range planning, it is not ideal to update them frequently. However, unforeseen, widely experienced shifts in the landscape of population growth and affordable housing need, may necessitate an update to the Allocation of Need. Language has been added to Part III: Council Policies and Roles.
13	Allocation of Need	26. We desire a conversation regarding our ability to achieve the allocation of affordable housing at the 30% AMI level.	We appreciate that Need numbers are high and will not necessarily be achievable. There is no requirement to achieve the Allocation of Need at any level. Guiding land at high enough densities to support affordable housing development meets the statutory requirement for addressing a community's share of the regional Need for affordable housing.
14, 15, 32	Allocation of Need	27. The proposed allocation does not adjust for transit/transportation access, as this factor is accounted for in growth forecasts. Cities with high growth but little transit investments are receiving allocations that are too high. The amendment should be more explicit as to how this adjustment is accounted for in the forecast model, so that this information is transparent and can be appropriately evaluated.	All else being equal, cities that have transit / transportation access are more likely to see household growth than those that do not; this results from both the higher density (both existing and allowed) of these areas and the increased accessibility. The Allocation of Affordable Housing Need is a share of forecasted household growth.

Contributor(s)	Topic(s)	Comment	Response
16	Allocation of Need	28. We are concerned with the allocation and respectfully request the number be reduced. With limited transportation and employment options, we are concerned that it will be difficult to provide high-quality affordable housing to the level required by the draft policy plan.	Directly or indirectly, limited transportation and limited employment are considered in the Allocation of Need methodology (see Appendix B). Communities are not required to provide the affordable housing units necessary to meet their share of the Need.
17, 22	Allocation of Need	29. We are concerned with the allocation because we have limited land available for development.	The Allocation of Need is based on forecasted growth and cannot be larger than total projected household growth, therefore it is reasonable to expect every community can guide enough land to address their share of the Need. Guiding land for redevelopment (and not just greenfield development) is an acceptable way to address the Need.
18	Allocation of Need, Lack of Resources to Meet Need	30. We are concerned that the Council is over estimating the number of affordable owner-occupied housing units through its exclusion of utilities and property maintenance fees and as a result does not recognize the true regional and local need for affordable housing.	Comment noted. The Council is comfortable with the assumptions used to estimate the amount of existing affordable owner-occupied housing units.
18	Allocation of Need	31. Affordable housing allocation, especially within the three bands of affordability, should consider existing level of need in each community. Adjusting the need downward for communities that exceed the current metropolitan average for each affordability band without looking at the remaining need is too simplistic a formula for an extremely complex issue.	The Allocation of Need does consider the existing level of Need in each community (see Appendix B). Adjustments not only reduced the allocation for communities that exceed the current average for each affordability band but also increased the allocation for communities with less than the current average for each affordability band. The formula ensures that the sum of each community's share of the Need will equal the originally forecasted regional Need.

Contributor(s)	Topic(s)	Comment	Response
19	Allocation of Need	32. The Housing Plan indicates that three key inputs were used to identify the assigned share allocation of low income housing for our community: 1) number of existing affordable units; 2) presence of transit options; 3) proximity of low wage jobs.	The presence of transit options, while factored into overall regional growth upon which the Allocation of Need is based, is not considered a key input as are the number of existing affordable units or the proximity of low-wage jobs to low-wage workers.
19	Allocation of Need	33. The fact that our community does not have access to transit and is not yet strong in our job base are reasons why we've been challenged at seeing affordable units organically woven into our community to date. Yet this lack of affordable units and its higher weight in the allocation creates an allocation that will be problematic to achieve.	Directly or indirectly, limited transportation and limited employment are considered in the Allocation of Need methodology (see Appendix B). Communities are not required to achieve the affordable housing units necessary to meet their share of the Need.
19	Allocation of Need, Council Activities in Housing	34. Does the Council expect us to supply and meet the high target of allocated affordable housing unit numbers and place residents and families in a location that is absent affordable transportation options and is also a distance from large job centers?	Directly or indirectly, limited transportation and limited employment are considered in the Allocation of Need methodology (see Appendix B). However, the Housing Policy Plan asserts that affordable housing opportunities are needed throughout the region, even where transit or job centers are lacking. Communities are not required to "supply" or "meet" their Need numbers.
19	Allocation of Need	35. If developer interest was currently strong in providing affordable housing options in our community we would already have a larger proportional "equal share" of the region's total affordable housing stock.	Affordable housing is very difficult to develop and therefore is only built by a few, mission-driven developers, who tend to propose projects in communities that are known to be receptive to affordable housing. It is misleading to state that a lack of developer interest is the cause of a less than regional average amount of affordable housing.

Contributor(s)	Topic(s)	Comment		Response
19, 24	Allocation of Need	36.	We request that the Council identify how compliance with the housing allocation targets will be determined and any consequences for non-compliance.	"Compliance" with a community's share of the regional Need is addressed in the guiding of land at minimum densities to support affordable housing development. The consequences of not guiding enough land at minimum densities are that the community's comprehensive plan will be considered inconsistent with Council policy and the community would be ineligible for Livable Communities program participation. Clarifying language about compliance and consequences with respect to the Allocation of Need has been added to Part III: Council Policies and Roles.
19	Allocation of Need	37.	The allocation formula should reflect a community's present market conditions, planned regional investment in transit, and proximity to low wage jobs or employment centers.	The Allocation of Need by definition does not consider market conditions. The presence of transit options is factored into overall regional growth upon which the Allocation of Need is based, and the proximity of low-wage jobs to low-wage workers is used to adjust each community's allocation (See Appendix B).
20	Allocation of Need	38.	We don't really have the ability to determine how we are going to manage to create housing in various financial thresholds. It's not clear how the Council will manage those accomplishments other than using density.	Density is the key way that communities can address their share of the region's Need. However, the Council encourages communities to use the information about their projected affordable housing Needs in any additional planning, policy, or funding endeavors.
21	Allocation of Need	39.	Distribution of proposed affordable housing goals are unsupported and inequitable for cities already meeting their reasonable share of the needs. Institute on Metropolitan Opportunity's proposal for need distribution should be reconsidered, as it factors existing affordable units into the calculation.	Communities with more than the average share of the region's existing affordable housing do have their Allocation of Need adjusted downward. Affordable and Lifecycle housing **Goals** are not distributed but negotiated. Goals for 2021-2030 have not yet been negotiated.

Contributor(s)	Topic(s)	Comment	Response
22	Allocation of Need	40. The formula does not adequately address the differences in [existing] housing supply.	Comment noted.
22	Allocation of Need	41. Communities that have a majority of homes without water and sewer are being asked to increase affordable housing options without having reasonable access to funding sources.	Any community's Allocation of Need is based solely on projected growth in sewer-serviced locations.
23	Allocation of Need	42. The demand for affordable housing in our 2014 Housing Needs Study does not coincide with the Need identified in the HPP.	Comment noted.
23	Allocation of Need	43. New retail, office and commercial businesses in the county have all identified the need for housing, and typically affordable housing is identified as a necessity.	We agree.
25	Allocation of Need	44. We commend staff for attempting to demystify the methodology for allocation.	Comment appreciated.
29	Allocation of Need	45. Andover is a challenging and inconvenient place for people of very limited means to live. Yet this plan requires Andover to plan and budget for nearly 1/3 of new dwelling units built in our community between 2021 and 2030 to be "affordable," whether or not low-income people will actually want to live there, or whether it makes economic sense for developers to build housing for them there.	Over 23% of Andover's current households have incomes at 80% AMI or less, and are therefore in need of what the Housing Policy Plan defines as "affordable" housing. Over half of Andover's current housing stock is "affordable" per the Housing Policy Plan. These data suggest that Andover is not a challenging and inconvenient place for low-income people to live. Andover does not have to budget for their Allocation of Need.

Contributor(s)	Topic(s)	Comment	Response
29	Allocation of Need	46. The plan requires cities to plan and budget for the Council's need numbers regardless of how much buildable land they have. Over time this will create an artificial oversupply of high-density zoned land, which will drive up the price of single-family homes across the metro.	State statute asks cities to provide sufficient land at densities that promote the development of affordable housing. Since the Allocation is based on total forecasted household growth (which is feasible within existing local land supply), no city has to plan for more housing than they have buildable land for. Additionally, Council data suggest that, given demographic trends over the next decades, there may be an artificial oversupply of land guided for single-family detached housing.
30	Allocation of Need	47. The proposed method of allocating need among communities is reasonable and balanced.	Comment appreciated..
31	Allocation of Need	48. A simpler approach to the Allocation of Need would be to require that a certain share of new housing in each community be affordable, and adjust those shares annually based on existing affordability, past performance, and current conditions. Relative surpluses (or shortages) of affordable units should simply be subtracted from (or added to) fair share targets. This method would create a strong negative correlation with current affordable housing concentrations, and is more likely to allocate new affordable housing to cities served by higher-performing schools.	The current methodology does adjust shares based on existing affordable housing stock.
31	Allocation of Need	49. The Council should implement a true "fair share" system in which cities' allocations and goals are lowered and increased in relation to a cities' existing affordable housing stock.	The current methodology does adjust shares based on existing affordable housing stock.

Contributor(s)	Topic(s)	Comment	Response
31	Allocation of Need, Fair Housing	50. The Council should ensure that they do not exacerbate existing economic and racial disparities with its allocation of need and goals.	Allocations are made on a city-wide basis. In what location within the city Need numbers are addressed in terms of guiding land is entirely up to local governments. The Housing Policy Plan does not yet contain specifics on goals.
31	Allocation of Need	51. The Council should ensure that its housing allocations result in greater housing availability in areas with racial and economic integration, low crime, and high K-12 educational opportunity.	The Council supports a balanced approach that provides both more affordable housing in high opportunity areas AND improves opportunity in low-income areas.
31	Allocation of Need	52. If the allocation places housing in areas with little opportunity, or stifles the access of lower-income families to areas of high opportunity, than the plan is critically flawed. The allocation as proposed has a negative correlation between cities that receive high numerical housing allocations and cities that score highly on the crime, education, and environmental dimensions that indicate high opportunity areas.	The allocation formula increases the Need numbers for communities with relatively less affordable housing and decreases the Need for communities with relatively more affordable housing. Where within a city land is guided to meet the need is entirely up to the local government.
31	Allocation of Need	53. There are two problems with the use of the Council's growth projections as the basis for the need calculations: 1) It creates a serious risk of artificially inflated targets in the central cities and inner suburbs while reducing them in middle and outer suburbs; 2) relying on growth to set the base share can potentially insulate communities with stable populations from any need to contribute additional affordable housing, regardless of current housing choices.	Comment noted.

Contributor(s)	Topic(s)	Comment	Response
31	Allocation of Need	54. The methodology should more fully reward places with current surpluses in affordable housing and penalize places with shortages in available affordable housing.	The Housing Performance Scores reward places with more affordable housing.
32	Allocation of Need	55. Although the allocation adjusts for existing stock that is subsidized and not subsidized, we are concerned that the method may not adequately adjust for a community's existing housing, including preservation efforts. The amendment should include additional detail as to the measures used to account for existing affordable housing.	Appendix B of the draft amendment provides the allocation methodology in great detail, including the sources and measures used to account for existing affordable housing.
32	Allocation of Need, Lack of Resources to Meet Need	56. The amendment needs to be clearer about the purpose and function of the need numbers, and provide sufficient context about the lack of resources to meet the need. Without this information the function of the allocation can be easily misunderstood and hinder productive discussion about addressing the need for affordable housing.	Clarifying language about the purpose and function of the Need numbers has been added to Part III: Council Policies and Roles. Clarifying language to address the lack of resources to meet the need has been added to Part I.
33	Allocation of Need	57. We recommend vacancies be built into each income level to address turnover and repair issues.	Comment noted.

Contributor(s)	Topic(s)	Comment	Response
33	Allocation of Need	58. The amendment does a good job describing the need for housing choice throughout the metro area for all income levels. As you indicated, 64% of all trips of people with incomes under $30,000 are by automobile. People with limited incomes can move and live beyond our transit lines and affordable housing opportunities need to be available throughout the region.	Comment noted.
33	Allocation of Need	59. 30% AMI targets are "a joke." We need the Council to use both carrot and stick to push more jurisdictions to reach these goals.	The Council is using the carrots it has within its statutory authority on housing.
1	Comprehensive Plans	60. Is the Council's desire to hold cities more accountable to what is stated in their comprehensive plans? If so, we would fully support that, but feel that this should be transparent and gradual, rather than immediate.	Comment noted.
2	Comprehensive Plans	61. To the extent land is available for development, Apple Valley is willing to consider guiding land that may be used for affordable housing as well as commercial redevelopment and job creation.	Comment noted.
2	Comprehensive Plans	62. The amended HPP develops new density options sufficient to promote affordable housing. Other Council policies/plans recommend different density options (TPP, Thrive) for other criteria - this is inconsistent policy.	There are a variety of density requirements related to various Council policies. Not all communities have the characteristics that would trigger a particular density requirement, so in some cases there may be multiple density requirements that seem inconsistent. The Local Planning Handbook will clarify which density requirements are expected for which land.

Contributor(s)	Topic(s)	Comment	Response
3	Comprehensive Plans	63. Producing a comprehensive plan with a stated unrealistic goal creates an expectation from the public or housing consumers that cannot be met.	Affordable housing **Goals** have not been determined for 2021-2030 yet and are not addressed in the draft amendment nor will they be required components of comprehensive plan updates. It is statutorily required to plan for the projected Need for affordable housing, even if there are not sufficient resources for it all to be built. Comprehensive Plans are capable of explaining the difference between guiding land sufficient to promote affordable housing and creating an expectation that the Need will be met.
3	Comprehensive Plans	64. Efforts required to prepare and document steps and actions we propose to take to meet affordable housing goals is unnecessary and will take time and attention away from community issues that require real solutions.	Stating the official controls and in what sequence they will be used is statutorily required.
5	Comprehensive Plans	65. Requiring specific densities to meet the need is overreaching by morphing into a land use mandate. Land use decisions should be made at the local level.	Affordable housing is very difficult to develop at low densities - and guiding land is one of the few official controls cities can utilize to encourage its development. Promoting the development of affordable housing sufficient to meet the Need is statutorily required. Where within the city and in what range of densities is a decision to be made at the local level.
5	Comprehensive Plans	66. Density is not always a predictor of affordability.	Comment noted. Guiding land at higher densities encourages the availability of land for the development of affordable housing, even if it isn't a guaranteed predictor of it.

Contributor(s)	Topic(s)	Comment	Response
5	Comprehensive Plans	67. Met Council has used the lowest density of a given land use range when calculating opportunities for affordable housing - cities should be given credit for actual densities, or the average density of that range.	Since guiding land is used to identify future use, it isn't clear how to give credit for "actual" densities. Since the average density of a publicly subsidized affordable housing development since 2003 was 49 units/acre, the minimum density - 8 units/acre - required to meet the Need is the lowest end of the reasonable spectrum for encouraging affordable housing. Clarifying language has been added to Part III: Council Policies and Roles.
5	Comprehensive Plans	68. The HPP should allow for flexibility when determining how a community's need can be met by using average density or actual density of a given land use category.	Clarifying language about the options for guiding land to address the Need has been added to Part III: Council Policies and Roles.
5	Comprehensive Plans	69. Does "projected need" and "guiding land for affordable housing need" include only vacant land? Is all land guided in the city taken into account or a combination of vacant and other land?	Any land that is not currently residential in use at densities greater than a density sufficient to meet the Need can be guided to address the projected Need. This includes vacant land or land planned for redevelopment. Clarifying language about how to guide land to meet the Need has been added to Part III: Council Policies and Roles.
5	Comprehensive Plans	70. It was noted by Council staff that cities will have to list what resources are reasonably available and then why or why not they will be used. Who determines what is reasonable?	The Council will provide an illustrative but not exclusive list of reasonable tools to address affordable housing in the Local Planning Handbook.
5	Comprehensive Plans	71. Council staff has noted that cities will not be judged on why or why not a particular tool is available, yet there is no reference in the amended HPP that addresses this.	Language has been added to Part III: Council Policies and Roles.

Contributor(s)	Topic(s)	Comment	Response
10	Comprehensive Plans	72. We will need to designate at least 176 acres of land for development by 2030 at densities of 8 dwelling units per acre or more. The area of land for development at these densities likely can be guided along Cedar Avenue with the Special Plan Area designated by the 2008 Lakeville Comprehensive Plan	Comment noted.
11	Comprehensive Plans	73. The city supports the proposed housing requirements for comprehensive plans.	Comment appreciated.
13	Comprehensive Plans	74. Will we receive credit for areas currently shown as High Density Residential (7-15 units per acre) toward guiding land to promote the development of affordable housing?	For cities that choose Option 2, land guided at 7-15 units per acre would count toward projected Need at the 51-80% AMI band of affordability.
13	Comprehensive Plans	75. Define what "updated housing requirements" mean regarding implementation plans. Previously, this was referred to simply as review criteria.	Minimum requirements for Housing Elements of Comprehensive Plans refer to what is required to be consistent with Council policy and subsequently eligible for Livable Communities funds. They are based on statutory requirements for Comprehensive Plans.
13	Comprehensive Plans	76. We assume that our current future land use map accommodates the allocation provided in the amendment. If the Council feels adjustments to this map are necessary please inform us. Otherwise, we will move forward on the assumption that no changes to our land use plan are necessary in order to achieve this allocation.	Comment noted. To be clear, the Allocation of Need must be addressed in future land use maps submitted with 2040 Comprehensive Plan updates in 2018. Current land use maps and current Comprehensive Plans are not required to address the Allocation of Need for 2021-2030 released with the Housing Policy Plan.

Contributor(s)	Topic(s)	Comment	Response
14, 32	Comprehensive Plans	77. No additional content or format for the completion of comprehensive plans that goes beyond the Land Use Planning Act is needed for the Council to perform its statutory functions.	Comment noted. Comprehensive Plan requirements are based on the Metropolitan Land Planning Act.
14	Comprehensive Plans	78. Density requirements must be reasonable and take into account the impacts of market trends on city re/development activity. Prescribed densities cannot be consistently achievable in all cities due to market forces well beyond the control of cities.	Since the average density of a publicly subsidized affordable housing development since 2003 was 49 units/acre, the minimum density of 8 units/acre required to meet the need is the lowest end of the reasonable spectrum for encouraging affordable housing. Clarifying language has been added to Part III: Council Policies and Roles.
14	Comprehensive Plans	79. Increased densities are not the sole answer to affordable housing, nor should affordable housing be the sole or primary criteria on which a community's densities are based.	Density minimums are only meant to encourage, or set the table, for affordable housing development. Since the Allocation of Need is only a portion of a community's total growth, communities will have ample opportunities for flexibility in overall density guidance.
14	Comprehensive Plans	80. The [density minimum] policy must be sufficiently flexible to allow for differences in city needs, capacities and market trends.	There are multiple options for meeting density minimums to address the Need. Clarifying language has been added to Part III: Council Policies and Roles.
14	Comprehensive Plans	81. The types of local tools and resources cities employ to meet housing or any other local needs are local decisions, to be made by local elected officials, and whether particular tools are reasonable for a given community are decisions that other communities, and not the Metropolitan Council, are in a position to make.	This comment reflects the intention of the Comprehensive Plan requirements outlined in the HPP. Clarifying language has been added to Part III: Council Policies and Roles.

Contributor(s)	Topic(s)	Comment	Response
15	Comprehensive Plans	82. We were informed that Council staff will be flexible in some areas of implementation if previous local activities have resulted in affordable housing. The document does not appear to provide for this stated "negotiated flexibility."	Language addressing this comment has been enhanced in Part III: Council Policies and Roles.
18, 26	Comprehensive Plans	83. Home prices designated as affordable in Table 8 should be reconsidered. They should consider accounting for key housing costs such as utilities, maintenance and association costs, and the increasing costs of land, development, and construction of housing.	Comment noted.
18	Comprehensive Plans	84. The inclusion of a 80% of AMI map will provide little value in a city-wide plan for housing goals and policies over a 30-year time horizon. This element should not be required.	Comment noted.
29	Comprehensive Plans	85. Under this plan local communities must plan and budget for the Council's arbitrarily forecasted growth in households making 80% of AMI or below.	The Allocation of Need methodology was determined thoughtfully and thoroughly by a working group of stakeholders that represent a variety of geographies and interests throughout the region.

Contributor(s)	Topic(s)	Comment	Response
29	Comprehensive Plans	86. The plan essentially gives the Council veto power over cities' comprehensive planning on housing-related matters, though the Council lacks statutory authority to do this. The Council will decide whether cities' updated comprehensive plans are "complete" - which means cities must keep resubmitting their plans until they conform to the Council's demands. In this way the housing plan will actually give the Council more authority over housing than over statutory systems specifically placed under its control by the Metropolitan Land Planning Act.	Clarifying language that identifies the consequences for Comprehensive Plans that are not consistent with Council policy has been added to Part III: Council Policies and Roles.
30	Comprehensive Plans	87. Providing greater guidance and more rigorous review of housing elements in comprehensive plans should lead to better plans, particularly if there is follow up review on the commitments cities make in those plans.	Comment noted.
30	Comprehensive Plans	88. The HPP should explicitly state and define how the Council will review implementation plans per the statutory requirement that they describe in what sequence their actions will be taken.	Additional language clarifying how implementation plans will be reviewed has been added to Part III: Council Policies and Roles.
30	Comprehensive Plans	89. One of the most important ways the Council can make housing elements more meaningful is if the Council devotes staff resources to follow up with cities over the course of the decade to see if they follow through on the housing element commitments they make.	Comment noted.

Contributor(s)	Topic(s)	Comment	Response
30	Comprehensive Plans	90. We urge a special emphasis on city assistance in identifying and facilitating acquisition of sites for affordable housing.	Comment noted.
30	Comprehensive Plans	91. Reference to income levels as affordable above 80% AMI (Table 8 of the amendment) is inconsistent with Plan policy and should be eliminated or otherwise differentiated from the definition of "affordable."	The title of this Table has been edited to address this comment in Part III: Council Policies and Roles.
32	Comprehensive Plans	92. The Council must not prescribe or judge a city's use or non-use of particular tools and resources in their housing element.	Comment noted.
32	Comprehensive Plans	93. The following language: "The Council will accept reasonable explanations (e.g. lack of capacity of competing priorities) for why available tools will not be used to address housing needs as a part of a complete housing element." was in the original draft amendment and should be reinstated.	Comment noted.
32	Comprehensive Plans	94. We request that the Council staff work to provide additional clarity and assistance to local communities around the density requirements. The new density requirements are confusing and should be sufficiently flexible.	Language has been edited for clarity in response to this comment in Part III: Council Policies and Roles.
33	Comprehensive Plans	95. We believe cities are currently using amendments as a way to get around the approved land use plans and are decreasing the zoned density after the approved plan without replacing it with other zoned land at higher densities. We believe this violates the comprehensive housing plan process and we support amendments that increase density.	The Council monitors the amount of land that each community has guided to meet its Allocation of Affordable Housing Need and notes that no comprehensive plan amendments have left communities without adequate land to address their Need.

Contributor(s)	Topic(s)	Comment	Response
1, 22	Council Activities in Housing	96. Add definitions that describe the roles and responsibilities of the public, private and non-profit communities when housing is being developed. The HPP does not provide any information about partnerships needed to put projects together.	Regional and local roles around the Housing Policy Plan are provided throughout the document.
1	Council Activities in Housing	97. We would like to confirm that the proposed policies found within this document are voluntary policies and not mandates passed down to local governments.	Some of the policies in the Housing Policy Plan are required by statute. Others are voluntary but may be encouraged or incentivized.
1	Council Activities in Housing	98. If based solely on areas of concentrated poverty and racially concentrated areas of poverty, we have some concern that funding for transportation and housing projects will only go to the urban core first leaving diminished funding for outer ring suburbs.	There are no funding sources for transportation or housing that are based solely on areas of concentrated poverty.
2, 22	Council Activities in Housing	99. Housing is not a "system" yet is being highly regulated into the 2040 Plan	The Housing Policy Plan operates within the Council's roles under state statute.
3	Council Activities in Housing	100. Creating opportunities for families to obtain affordable housing is very necessary and important and the work that the Council has done to document and foster discussion is commendable.	Comment noted.
3	Council Activities in Housing	101. We understand many of these requirements are placed upon the region and the Met Council by the legislature and only their discussion and action on these actions might provide a more reasonable approach, but we felt it important to voice these concerns	Comment noted.

Contributor(s)	Topic(s)	Comment	Response
5	Council Activities in Housing, Lack of Resources to Meet Need	102. There seems to be a disconnect between where the affordable housing needs are (greatest numbers in the suburbs according to Council staff) and where the funding goes, especially LCDA dollars or transportation dollars under Council purview. More of these resources should be dedicated to the suburbs if that is where the need is.	The final version of the amendment now contains an action item that the Council will undertake a review of how the funding priorities under the Livable Communities Act programs advance the Housing Policy Plan. The Transportation Advisory Board is also undertaking a review of transportation projects funded under the 2014 Regional Solicitation.
5	Council Activities in Housing	103. If the suburbs do not receive a proportionate share of transportation dollars, how are the affordable housing units going to be accessible to the people who need them?	The Transportation Advisory Board is undertaking a review of transportation projects funded under the 2014 Regional Solicitation.
6	Council Activities in Housing	104. We would encourage the Council to develop the HPP in a fiscally constrained manner, similar to the Transportation Policy Plan.	Comment noted.
6	Council Activities in Housing, Allocation of Need, Housing Performance Scores, Fair Housing, Lack of Resources to Meet Need	105. The methodologies for both the Allocation of Need and Housing Performance Scores steers limited state and regional financial resources to support affordable housing and related system improvements to larger communities that have a tax capacity that can better support the construction of new affordable housing than smaller communities, and further much of that funding is being steered towards Areas of Concentrated Poverty.	Comment noted.

Contributor(s)	Topic(s)	Comment	Response
10	Council Activities in Housing, Allocation of Need, Comprehensive Plans	106. The proposed amendment changes the focus of the document from guiding development of regional and local housing policy to effectively mandating cities to implement programs, fiscal devices and other specific actions to achieve affordable housing targets defined for cities by the Council. We strongly believe that our elected officials are acutely aware of the City's housing needs and consistently review our plans and goals to address the changing demographics in our city.	Comment noted. Comprehensive Plan requirements are based on the Metropolitan Land Planning Act. The Housing Policy Plan provides additional guidance to local governments that offers a regional perspective on housing needs.
13, 26	Council Activities in Housing	107. The report lacks a focus on an increase in aging population, a key housing priority for our city.	The full Housing Policy Plan contains language on the increase in the aging population, including a section on "Plan housing choices for the growing senior population". The amendment did not revise the original Plan language.
14	Council Activities in Housing	108. Providing job creation can address housing affordability in addition to the creation of new affordable housing. Both approaches are extremely important and should deserve credit when it comes to distribution of regional infrastructure dollars.	Comment noted.
15	Council Activities in Housing	109. HPP policies should not discourage cities from participating in the Livable Communities program.	Housing Policy Plan policies will not discourage cities from participating in the Livable Communities program.
15	Council Activities in Housing	110. The HPP should build in an ability to be more nimble in the face of market changes such as the recent economic downturn. Communities were unable to react adequately to such changes and this impeded city development goals.	Unforeseen, widely experienced shifts in the landscape of population growth and affordable housing need, may necessitate an update to some housing policies. Text has been added in Part III: Council Policies and Roles to address this.

Contributor(s)	Topic(s)	Comment	Response
19	Council Activities in Housing	111. We are concerned with our inability to seek funding through the Super RFP due to our Housing Performance Score which, in turn, prevents our ability to achieve the specific allocation totals at 50% or less AMI.	Cities with lower Housing Performance Scores receive funding priority from the Council – through the Local Housing Incentives Account - for projects that build new affordable housing. The Consolidated Request for Proposals managed by Minnesota Housing does not include the Housing Performance Score in its evaluation criteria.
22	Council Activities in Housing	112. The HPP is a one size fits all solution to affordable housing.	Comment noted.
23, 24	Council Activities in Housing	113. Council policies stress that it will focus its affordable housing development assistance in transit oriented development along fixed transitways.	The Housing Policy Plan policy is to create viable options for safe, stable, and affordable housing across the region. The Council will review how its funding priorities align with the policies in the Housing Policy Plan.
23	Council Activities in Housing	114. Housing is driven by job creation, not necessarily access to public transit. When the Council is reviewing allocation of funding for housing with its policies, it should strongly consider where jobs and investment are occurring.	The Housing Policy Plan policy is to create viable options for safe, stable, and affordable housing across the region. The Council will review how its funding priorities align with the policies in the Housing Policy Plan.
24	Council Activities in Housing	115. All communities should have a legitimate opportunity to compete for the Council's housing development assistance programs, like the various LCA accounts. Project proposals should be evaluated against the community's current stage of development and previous affordable housing development experience.	The Housing Policy Plan policy is to create viable options for safe, stable, and affordable housing across the region. The Council will review how its funding priorities align with the policies in the Housing Policy Plan.
25	Council Activities in Housing	116. We encourage the Council to continue to work with cities to ensure that affordable housing "Needs" and "Goals" are accurately reflected in those communities.	Comment noted.

Contributor(s)	Topic(s)	Comment	Response
26	Council Activities in Housing	117. The allocation of Low Income Housing Tax Credits to the County HRA is limited and is one of the many elements that will need to be factored into the goal negotiations with those cities that choose to participate in the Livable Communities Act program.	Comment noted.
26	Council Activities in Housing	118. Add more direct language regarding the need to foster a rigorous analysis to determine the supportive service costs and program needs, and then determine how to couple these services with the housing development programs, especially at or below 30% AMI.	Comment noted.
26	Council Activities in Housing	119. Communities outside the urban service area are attempting to diversify their housing stock in order to retain and to attract young families. It is suggested that the Council consider revising its Local Housing Incentives Account to assist cities who demonstrate a feasible program which creates new affordable housing.	Comment noted. Local Housing Incentives Account funding is restricted by statutory language in the Livable Communities Act.
27	Council Activities in Housing	120. Funding from the Council has the ability to be transformative by supporting the renovation of existing units, promoting home-ownership, investing in economic development near affordable housing, and encouraging income diversity in all communities.	Comment noted.

Contributor(s)	Topic(s)	Comment	Response
28, 33	Council Activities in Housing	121. The three brackets to describe levels of affordable housing will give our region a more accurate view of the availability of affordable housing across income spectrums. Tracking housing need and production at these new thresholds will support greater transparency and accountability as local communities make investments to meet the demand for a wide variety of affordable housing.	Comment appreciated.
28	Council Activities in Housing	122. We are grateful for the Council's encouragement of local communities to take equal responsibility for providing affordable housing options, while also leveraging federal, state and regional resources.	Comment appreciated.
28	Council Activities in Housing	123. We are particularly excited and supportive of the Met Council's landlord outreach plan to encourage more rental owners to participate in the Housing Choice Voucher program.	Comment appreciated.
28	Council Activities in Housing	124. We are encouraged by the Council's participation in the Metropolitan Housing Implementation plan to align priorities with MN Housing and other government and nonprofit stakeholders.	Comment appreciated.
29	Council Activities in Housing, Lack of Resources to Meet Need	125. The plan is unconstrained by real world market considerations of supply and demand, by the needs and preferences of local communities, or by the availability of the funds required.	Comment noted.

Contributor(s)	Topic(s)	Comment	Response
29	Council Activities in Housing	126. The Council will attempt to strong-arm cities into financing new affordable housing themselves by tying receipt of vital transportation and other Council-controlled benefits to compliance with its allocation of Need numbers.	Comment noted.
29	Council Activities in Housing	127. Does the Council understand its housing plan's implications for the local communities that will be expected to carry it out?	The Housing Policy Plan was shaped by dozens of working group members representing a wide variety of local communities. We are grateful for their assistance in understanding the plan's implications for local communities.
29	Council Activities in Housing	128. Does the Council know what cities will have to do to supply the services - like public transportation - that new low-income residents will need?	Low-income households already live across the region.
29	Council Activities in Housing	129. Does the Council know what cities will have to do as they struggle to supply the jobs these residents will need?	Job forecasts shape households growth upon which the Need is based. Moreover, much job growth is occurring in the region at wage levels that cannot support local housing costs.
29	Council Activities in Housing	130. Does the Council know how much cities will have to raise taxes or how much housing costs are likely to rise for market-value-paying residents, who now must subsidize many others?	Comment noted.
31	Council Activities in Housing, Allocation of Need, Lack of Resources to Meet Need	131. The Council's attempt to describe housing need and goals in exact numerical totals is problematic because when projections miss the mark, or insufficient resources are available to build the housing the Council has assigned, the Council's system risks breaking down, producing outcomes that are actively detrimental to the region.	To implement the statutory requirements of the Land Planning Act, forecasts are required. While population forecasts may be imperfect, they serve an important role in planning for the region's growth.

Contributor(s)	Topic(s)	Comment	Response
31	Council Activities in Housing, Fair Housing	132. The Council's housing policy should seek to reverse existing disparities at the municipal, neighborhood and individual level.	Comment noted.
32	Council Activities in Housing, Lack of Resources to Meet Need	133. We noted persistent advocacy by housing stakeholders for more stringent Council requirements on local governments for affordable housing. While cities and the Council play important roles, providing housing is a shared responsibility that involves many partners and is severely constrained by the lack of available resources.	Comment noted.
32	Council Activities in Housing	134. Generally, the Council's role in housing is a limited one, and the Council must take care not to overstep its authority in this area.	Comment noted.
33	Council Activities in Housing	135. Accessibility is not clearly defined and the Council should expand its input into its housing policy by including people with various accessibility needs.	The full Housing Policy Plan contains language on housing for people with disabilities, including a section on "Expand the supply of housing choices accessible to people with disabilities". The amendment did not revise the original Plan language.
33	Council Activities in Housing, Housing Performance Scores	136. Training/information on local housing issues for local decisionmakers could add points to the scoring and should include fair housing regulations, homelessness in school districts, existing and future local and regional housing needs and opportunities, land use and efforts to advance compatibility with other communities consistent with metropolitan systems plans.	Comment noted.

Contributor(s)	Topic(s)	Comment	Response
33	Council Activities in Housing	137. The Legislature has been considering a bill where each City's proposed number of affordable units may have to be approved by the Legislature. How would such a change impact this plan? How would different affordable housing funding scenarios from the Legislature affect the HPP?	Changes in proposed legislation that would impact the Housing Policy Plan were not adopted.
2	Fair Housing	138. The city supports building and sustaining neighborhoods that do not create areas of concentrated poverty	Comment noted.
2	Fair Housing	139. Requiring significantly more affordable housing only near transit risks developing new areas of concentrated poverty.	The Housing Policy Plan encourages the full range of housing choices across the region, in both locations close to transit and not. The Council's policy along transit is to create a preserve a mix of housing affordability.
4	Fair Housing	140. The plan does not affirmatively further fair housing laws and will not help the region solve for inequities.	Comment noted.
31	Fair Housing	141. Combating racial disparities and promoting integration are legally required for the Council because it receives a variety of funding from the federal government. The Council must take steps to ensure subsidized housing is not concentrated in areas of high poverty and segregation.	The Council is actively working to promote the full range of housing options across the region, including funding affordable housing development in suburban communities, planning an adequate supply of land providing incentives for housing performance, providing Housing Choice Vouchers and mobility counseling, technical assistance to local governments on how to build affordable housing
33	Fair Housing	142. Fair Housing law enforcement is not included.	The Council does not have the authority to enforce Fair Housing law.

Contributor(s)	Topic(s)	Comment	Response
33	Fair Housing	143. The Analysis of Impediments in no way goes deeply enough into the problems with Fair Housing. At the very minimum the Council should commit to and fund fair housing screening across the region.	The Council is continuing to work with the Fair Housing Implementation Council on collaborative efforts to advance fair housing.
33	Fair Housing	144. There is virtually no discussion of insuring fair housing opportunities for people of color, Latino/Hispanic, American Indians, ethnicity, people with disabilities, people with criminal backgrounds, credit issues, large families, faith, different languages/cultural considerations in the housing amendment.	The full Housing Policy Plan contains language on fair housing, including a strategy to "Advance fair housing" and a collaborative strategy to "Develop shared regional strategies to affirmatively further fair housing and address housing discrimination in the region". The amendment did not revise the original Plan language.
1, 6, 11, 22, 33	Lack of Resources to Meet Need	145. A stronger, more detailed description of the funding mechanisms (or lack thereof) that will support the goals you have set is needed. If you are setting high goals for communities, there needs to be an understanding of resources available to meet development need.	The full Housing Policy Plan contains additional descriptions of the resources that are available for affordable housing. The amendment did not revise the original Plan language. Additionally, the Council will provide technical assistance to local governments to help them understand the resources available to them.
2	Lack of Resources to Meet Need	146. Resources will be insufficient and affordable housing is only one of many community needs.	Comment noted.
6	Lack of Resources to Meet Need	147. Low-income residents need the same services that all residents do (schools, parks, road maintenance, etc). Presuming that a city would need to utilize local tools such as tax increment financing (TIF) to subsidize the construction of the units, there would then not be a tax funding source for the additional service need.	Tax Increment Financing is one of many tools and resources cities can consider to create affordable housing opportunities. The Council assumes that local governments consider a wide variety of impacts, include tax implications, when evaluating what tools to use.

Contributor(s)	Topic(s)	Comment	Response
23, 24	Lack of Resources to Meet Need	148. Market realities dictate that financial assistance is a key component to successfully develop affordable workforce and senior housing options regardless of proximity to fixed transitways.	We acknowledge the complexity of the challenges and hope that recognizing the issues will bring greater attention.
25	Lack of Resources to Meet Need	149. We encourage the Council to provide additional resources toward affordable housing in the region. The Council does not currently have a sufficient funding mechanism to incent communities to develop affordable housing.	We acknowledge the complexity of the challenges and hope that recognizing the issues will bring greater attention.
27	Lack of Resources to Meet Need	150. Little public investment is available to finance housing developments that stabilize neighborhoods struggling with concentrated poverty.	We acknowledge the complexity of the challenges and hope that recognizing the issues will bring greater attention.
29	Lack of Resources to Meet Need	151. Does the Council know what it will cost individual cities to supply the affordable housing the plan imposes on them?	Cities are not required to "supply" the affordable housing Need numbers allocation to them. What resources cities choose to use to address their Need numbers is a local decision.
1	Housing Performance Scores	152. There should be recognition for affordable housing projects that the city has already completed and continues to maintain.	Affordable housing developments will continue to count in the Housing Performance Score process for 10 years after their completion. Additionally, 25% of the Housing Performance Scores is from the existing housing stock.

Contributor(s)	Topic(s)	Comment	Response
1	Housing Performance Scores	153. Considering the LCA objectives of re/development that mixes incomes and creates a full range of housing a scoring mechanism could give the highest number of points to both a project that adds market rate and/or higher cost housing in a low income area and a project that adds affordable units in a higher income area. Conversely, the lowest number of points would be awarded to a project that adds additional affordable housing in an area with an existing concentration of affordable housing and a project that adds market rate housing in an area with an existing concentration of market rate housing.	The final version of the amendment now contains an action item that the Council will undertake a review of how the funding priorities under the Livable Communities Act programs advance the Housing Policy Plan.
1	Housing Performance Scores	154. The current housing performance score emphasizes efforts related to the construction of new affordable housing. We feel that developed areas should get credit for protecting existing affordable housing stock.	Preservation efforts are a significant portion of the point opportunities in the new Housing Performance Score and even more so for areas expected to see less household growth.
2, 5, 13, 22	Housing Performance Scores	155. We would like to see a draft housing performance score - it would help the discussion	Language added to the Guidelines for Priority Funding for Housing Performance specifies a biennial review starting in 2016.
5	Housing Performance Scores	156. The new formula seems like it could provide for a balanced and more equitable approach across the region, and takes into account whether the community is fully developed by giving points for existing affordable and preservation of units or for providing new affordable housing opportunities in growing cities.	Comment appreciated.

Contributor(s)	Topic(s)	Comment	Response
5, 11, 32	Housing Performance Scores	157. The Council should be open to re-reviewing the performance score criteria and making changes since this is a new formula.	Language added to the Guidelines for Priority Funding for Housing Performance specifies a biennial review starting in 2016. By removing the Housing Performance Scores from the Housing Policy Plan, the Council will be more able to review the criteria and adjust as needed.
5	Housing Performance Scores	158. Cities should be given credit for head of household job creation as they reduce the affordable housing need.	High wage jobs often bring low-wage jobs to support the needs of high wage workers. The creation of jobs above 80% AMI is not likely to cause less need for affordable housing.
5, 15	Housing Performance Scores	159. Credit is not given for private preservation of [affordable] units. Does it matter if the affordable housing preserved is publicly or privately funded? It should not.	The Guidelines for Priority Funding for Housing Performance (that is, the Housing Performance Scores) now recognize the importance of rehabilitation efforts, regardless of funding source.
5	Housing Performance Scores	160. It would be helpful if the Council could coordinate the collection of information and data for cities with County HRAs. Some consideration should be given for how the cities are actually going to have to gather and report on data or use funding that is not theirs.	The Council will coordinate the collection of information from counties and Minnesota Housing to inform city and township Housing Performance Scores.
6	Housing Performance Scores	161. The combination of a high affordable housing allocation, lower tax capacity, and limited local capacity and economies of scale to provide "Housing Programs and Policies" do not lend themselves to success with achieving high Scores.	Allocation of Need and local tax capacity do not impact Housing Performance Scores. There are many efforts communities can undertake that are of minimal or no cost and would result in points added to their Housing Performance Score.

Contributor(s)	Topic(s)	Comment	Response
6	Housing Performance Scores	162. We have no affordable rental units to preserve, rendering 30% of the possible points impossible to receive.	Our data show that the city of Carver has 626 existing housing units that are affordable at 80% AMI or below. Additionally, local efforts to create new affordable housing that surpass the maximum points for New Units can spill over into the points for Preservation and Substantial Rehabilitation.
6	Housing Performance Scores	163. Smaller communities will not have the number of housing programs and tools of larger communities, thus are not on a level playing field in the calculation of the Score.	The Guidelines for Priority Funding for Housing Performance (that is, the Housing Performance Scores) were designed to limit maximum points such that all communities, both small and large, have a reasonable opportunity to earn enough points to score well.
6	Housing Performance Scores	164. The use of Housing Performance Scores as a factor in funding decisions for everything from Livable Communities grants to transportation funding reduces the competitiveness of projects proposed by smaller, high-growth communities.	The Guidelines for Priority Funding for Housing Performance (that is, the Housing Performance Scores) were designed to limit maximum points such that all communities, both small and large, have a reasonable opportunity to earn enough points to score well.
10	Housing Performance Scores	165. The inability of the City to meet the Council's targets for affordable housing has potentially severe implications for other elements of development in our community due to the resulting effect to the city's Housing Performance Score. The affordable housing goals set forth by the Council are unrealistic for the city to achieve and will ultimately negatively affect the city's ability to support the region's growth and development projected by Thrive MSP 2040.	The Council has not yet negotiated Goals for affordable housing for 2021-2030; the Allocation of Need is for planning purpose and is not a target.
11	Housing Performance Scores	166. We support the proposed methodology for calculating the Housing Performance Score.	Comment appreciated.

Contributor(s)	Topic(s)	Comment	Response
13, 32	Housing Performance Scores	167. We appreciate the flexibility granted in the Housing Performance Scores that recognizes variation in new construction levels and acknowledges policies that encourage affordable housing even if actual construction is not experienced in a given year.	Comment appreciated.
13	Housing Performance Scores	168. It appears that our comment regarding "normalizing" our Housing Performance Score has been incorporated to a degree. Acknowledgement of future forecasted growth and history of activities of the past ten years has been added.	Comment noted.
13	Housing Performance Scores	169. Under Housing Programs and Policies, will the programs provided by Anoka County qualify for our Housing Performance Score? We do not desire to duplicate these already existing services and programs.	County resources used to create affordable housing opportunities will result in points for the city in which they were used. Counties will provide data to inform the Housing Performance Scores.
14	Housing Performance Scores	170. Scores are not equitable when relating to transportation needs, which should be based on traffic and safety needs. Although we have historically scored lower on the Housing Performance Score, this in no way reflects upon the transportation needs for the city as a whole or those of the larger region.	The Transportation Advisory Board is undertaking an evaluation of the 2014 Regional Solicitation to inform the development of the next Regional Solicitation.
14, 24	Housing Performance Scores	171. We object to the use of Housing Performance Scores in the Regional Solicitation process.	The Transportation Advisory Board is undertaking an evaluation of the 2014 Regional Solicitation to inform the development of the next Regional Solicitation.

Contributor(s)	Topic(s)	Comment	Response
15	Housing Performance Scores	172. Housing Performance Score surveys are not provided in the amendment. As an important tool for future decision-making, such as regional transportation funding, we request a draft of the survey with the ability for future dialogue.	The Guidelines for Priority Funding for Housing Performance (that is, the Housing Performance Scores) provide the policy basis for the survey, which is simply a tool to implement the policy which will be finalized at a later time.
24	Housing Performance Scores	173. If the Housing Performance Score is to be a part of the Regional Solicitation scoring, the Metropolitan Council needs to define what Housing Performance Score will be used to evaluate county transportation projects. If no county Housing Performance Scores are to be calculated, the Council needs to justify how it can hold counties seeking to complete regionally significant transportation projects accountable for city decisions and performance related to affordable housing production.	County Housing Performance Scores have been discontinued. The Council encourages county transportation departments to partner with county community development agencies or housing and redevelopment authorities.
25	Housing Performance Scores	174. The inclusion in the 2015 methodology to break down affordability by levels is a positive step.	Comment appreciated.
25, 26	Housing Performance Scores	175. We support the discontinuation of calculation of Housing Performance Scores for counties.	Comment appreciated.
26	Housing Performance Scores	176. We support revising the scoring procedure to credit cities with points for the countywide programs and services conducted by county HRA/CDA's.	Comment appreciated.
30	Housing Performance Scores	177. Modifications to the Housing Performance Scores will make it a more useful and meaningful tool to encourage greater affordable housing efforts.	Comment appreciated.

Contributor(s)	Topic(s)	Comment	Response
30	Housing Performance Scores	178. Placing greater weight on local government activities that are most important to accomplishing our larger regional goals should be explicitly expressed as a goal of the Scores.	Comment noted.
30	Housing Performance Scores	179. The proposed methodology effectively reduces incentives to support new production if points can instead by earned for preservation activities. A city should not get points for preservation when the funding comes from other entities. Preservation points should focus on activities undertaken by the local government.	The Guidelines for Priority Funding for Housing Performance (that is, the Housing Performance Scores) now recognize the importance of rehabilitation efforts, regardless of funding source. However, local contributions to rehabilitation efforts also receive points.
30	Housing Performance Scores	180. Actions cities take to preserve manufactured home parks at risk due to redevelopment pressures of declining physical conditions should be explicitly recognized as a preservation activity.	Language addressing points for the preservation of manufactured parks has been added to the Guidelines for Priority Funding for Housing Performance (that is, the Housing Performance Scores).
30	Housing Performance Scores	181. Two per cent of total development cost is a far too modest contribution and setting the bar this low will become a disincentive for those communities now making contributions greater than 2%. This unintended consequence could be eliminated by awarding more points based on the extent of the city's contribution, although 2% is still too low as a starting point. The approach must also make sure it is evaluating the net financial impact of a city's policy actions as well as direct contributions.	Points for local contributions toward affordable housing have been modified in the Guidelines for Priority Funding for Housing Performance (that is, the Housing Performance Scores)

Contributor(s)	Topic(s)	Comment	Response
30	Housing Performance Scores	182. Regulatory flexibility, such as density bonuses and parking requirement reductions, can result in very substantial financial incentives which should be recognized and properly valued.	Tools such as these that help create affordable housing would earn Housing Performance Score points.
30	Housing Performance Scores	183. Inclusionary housing policies should be elevated in the Housing Performance Score and given greater weight.	Points awarded for inclusionary housing policies have been increased from 3 to 8 in the Guidelines for Priority Funding for Housing Performance (that is, the Housing Performance Scores)
30	Housing Performance Scores	184. When cities follow through on new policy or funding commitments they make in the housing elements of their comprehensive plans, they ought to receive some credit in their Scores. This will better integrate Housing Performance Scores with housing elements and reinforce expectations for cities.	We anticipate that those policies and funding commitments will receive points through the Housing Performance Scores.
31	Housing Performance Scores	185. The current scoring system is improved from the previous iterations, particularly by the inclusion of a greater focus on local housing programs and policies, and the extra points awarded for housing affordable at the very lowest incomes.	Comment appreciated.
31	Housing Performance Scores	186. Scores should consider local zoning and land use laws, which often form a key barrier to improved housing choice.	Comment noted.
31	Housing Performance Scores	187. The scores are applied to a very narrow set of funding, limiting their incentive value. Nearly 25% of regional cities are not even eligible for the majority of the funding that is intended to incentivize them to improve their housing performance.	Nearly 25% of cities eligible for LCA funding choose not to participate in the program, which is voluntary. However, these communities would still receive Housing Performance Scores which would be factored into any applications for the Regional Solicitation of transportation dollars.

Contributor(s)	Topic(s)	Comment	Response
31	Housing Performance Scores	188. Even though cities with a low score are more eligible for affordable housing subsidies, it does not create a significant incentive to produce affordable housing. Many higher-income communities resist affordable housing for political reasons, and are unlikely to avail themselves of housing funding, even if they would receive high priority for that funding.	Comment noted.
31	Housing Performance Scores	189. Housing Performance Scores are not worth enough (7%) in the Regional Solicitation process to have much effect on local policies or performance.	The Council has been in dialogue with local governments who are more actively addressing housing performance because of the points in the Regional Solicitation.
31	Housing Performance Scores	190. The Council should utilize the scores in evaluating applications for a broader array of funding, including all applications for state and federal funding and cooperative agreements with state and local agencies.	The Council does not control or influence any additional sources of funding to cities and townships.
32	Housing Performance Scores	191. We support the "hold harmless" provision of a city's 2015 score being no lower than 80% of the average of a city's 2010-2014 score.	Comment appreciated.
33	Housing Performance Scores, Fair Housing	192. There should be more points for Fair Housing and a large bonus for fair housing testing.	Fair housing points have been increased from 3 to 8 in the Guidelines for Priority Funding for Housing Performance (that is, the Housing Performance Scores)
33	Housing Performance Scores	193. Points should be provided to communities based on developers that live in the community, and hire unemployed or underemployed people in the community.	Comment noted.

Contributor(s)	Topic(s)	Comment	Response
33	Housing Performance Scores	194. How will narrative information provided by cities be transparently and fairly incorporated into their Housing Performance Score? What documentation will be required to support such narrative information?	Clarifying language about how narrative information fits into the overall points structure has been added to the Guidelines for Priority Funding for Housing Performance (that is, the Housing Performance Scores).
33	Housing Performance Scores	195. We recommend that cities receive points for their work to create incentives for owners/managers of rental properties to accept Section 8 vouchers and also people with rental barriers.	This type of activity would receive points in the Housing Programs and Policies section of the Guidelines for Priority Funding for Housing Performance (that is, the Housing Performance Scores).
33	Housing Performance Scores	196. Awarding points for tools and mechanisms actually used by jurisdictions rather than those simply available - but unused - is a step forward.	Comment appreciated.
34	Housing Performance Scores	197. New Housing Performance Scores have great potential but aren't specific enough to be escape proof. How will the Council determine if the information provided by communities is complete and accurate?	Comment noted.
4	Other	198. The Housing Plan could have a detrimental impact on our community's tax base.	Comment noted.
6	Other	199. Workgroup membership for both the Allocation of Need and Housing Performance Scores did not contain any representatives from smaller, rapidly growing communities and the amendment reflects formulas that favor larger communities	Comment noted.

Contributor(s)	Topic(s)	Comment	Response
11	Other	200. The City of Minneapolis has consistently advocated for improvement to SAC including less complexity and lower rates. We have also advocated for a fee structure where there is a more direct correlation between the charge and the service or benefit rendered.	This is a comment for the Council's Water Resources Policy Plan, not the Housing Policy Plan.
11	Other	201. Minneapolis supports the goal of finding additional funding sources for affordable housing development and preservation. It is unclear if an affordable housing SAC credit is the most effective tool to achieve the desired outcomes.	The Council will collaboratively explore opportunities to promote affordable housing production through its handling of Sewer Availability Charges. There will be further opportunities to comment if any proposals emerge from this dialogue.
13	Other	202. Clarify that SAC policies should not result in limitations in future expansion of the MUSA.	This is a comment for the Council's Water Resources Policy Plan, not the Housing Policy Plan.
13, 22	Other	203. We would have desired additional representation from Anoka County communities on the workgroups advising the amendment. Are there documented summaries of these working group meetings?	Meeting minutes were not kept for the working group meetings, but the Amendment language reflects those conversations.
14	Other	204. An affordable housing SAC credit could give the more urbanized communities an economic advantage over cities that are not connected to MCES sewer. If an "affordable housing SAC" program were to be adopted, some additional resources (e.g., grants) should be provided to communities operating their own local wastewater treatment operations.	The Council will collaboratively explore opportunities to promote affordable housing production through its handling of Sewer Availability Charges. There will be further opportunities to comment if any proposals emerge from this dialogue.
30	Other	205. We support the Council continuing to explore how to promote affordability through the Council's handling of SAC.	Comment acknowledged.

Contributor(s)	Topic(s)	Comment	Response
32	Other	206. We oppose the use of the SAC fee to subsidize Council goals and objectives.	The Council will collaboratively explore opportunities to promote affordable housing production through its handling of Sewer Availability Charges. There will be further opportunities to comment if any proposals emerge from this dialogue.
33	Other	207. In the Introduction you indicate our community is growing, we would like you to add that it is also aging, becoming more diverse, and many people have extremely low incomes.	The full Housing Policy Plan contains language on the increase in the aging and diversifying population, including a section on "Plan housing choices for the growing senior population". The amendment did not revise the original Plan language.
33	Other	208. We are concerned about the level of community input from people with low-incomes and people of color. We had community members review the plan and many did not understand what they were reading and felt left out and not heard in this process.	The Need methodology's complexity was balanced against the desire to allocate communities their share of the Need using the most statistically and mathematically sound method possible given the policy direction for Need adjustments.