

Housing Policy Plan: Comments Received During Public Comment Period

Group/Org	Primary Plan Location	Comment
AIAC Commitments	N/A	The Council will update its housing voucher programs and selection process to begin reconciling the historic racism and relocation that creates unsheltered American Indian people on their homelands. The distinct political status of American Indian people sets the basis for the Council's governmental responsibility to act on the disproportionate number of unsheltered American Indians.
AIAC Commitments	Objective 3, Provide	The Council will partner with American Indian community organizations to work on targeting new vouchers coming through programs like Bring It Home.
AIAC Commitments	Objective 3: Partner	The Council will work through its role on the Fair Housing Implementation Council and the Continuums of Care to identify funding opportunities for which American Indian community organizations could apply in future Requests for Proposals.
AIAC Commitments	Objective 2: Provide	The Council will engage with the American Indian households receiving Metro HRA vouchers on wealth building strategies and future potential homeownership programs.
AIAC Commitments	Objective 3, Provide	The Council will identify ways to increase investment in American Indian organizations and projects by reducing barriers to accessing grants and funding with a priority for American Indian organizations providing supportive services for residents or developing deeply affordable housing.
AIAC	Objective 1, Plan	The Council will explore the inclusion of fair housing guidance specific to Tribal citizens for communities and development partners in the region, as part of housing policy resources for communities seeking to meet fair housing policy requirements for Livable Communities Act grants.
AIAC	Objective 2, Partner	The Council will partner with American Indian organizations to develop relevant technical assistance on homeownership programs for American Indian people to increase understanding of the programs in the region's housing sector
Carver County	Objective 2, Provide	Provide technical assistance and share strategies to counties and local governments to coordinate use of new sources of housing funding and to develop affordable housing opportunities through local program development. This is an important goal outlined in Objective 2. Encourage the Met Council to reach out and learn more about the broader collaboration already taking place in the 7-county metro area on strategies to coordinate the use of new sources of housing funding.

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Carver County	Objective 1	<p>Objective 1: Fair Housing and Geographic Choices.</p> <p>“Goal: Encourage the development of affordable housing in all areas of the region by exploring options to provide funding for the development of local housing programs that will increase affordable housing opportunities, with priority for cities and townships that do not have a demonstrated history of developing affordable housing.”</p> <p>Carver County Comment: Affordable housing development is needed everywhere, especially in the more rural parts of Carver County. Because these small communities, Watertown, Hamburg, or Norwood for example, lack public transportation, thus lose points when applying for affordable housing dollars. If the goal is to give people choice in where they want to live and give priority for cities and townships (and towns) that do not have a demonstrated history of developing affordable housing, then how funding applications are scored needs to change. Consider the population of smaller, rural communities in a revised scoring system.</p>
Carver County	Objective 3, Plan/Partner	<p>“Goal: Require local comprehensive plans to identify tools the local government will seek to use or continue to use to meet the need for stabilizing services and shelter. AND Convene partners throughout the region to set goals and address the need for Shelter as a regional issue.”</p> <p>Carver County Comment: Adequate funding dedicated to the creation of supportive shelter programs designed to meet local community needs, are essential to supporting any shelter plans created. Communities cannot be required to create shelter without the funding to support successful models.</p>
Carver County	Objective 2, Provide	<p>“Goal: Explore the Met Council’s ability to use Met Council-owned land to support affordable housing development, especially in identified Transit-Oriented Development areas.”</p> <p>Carver County Comment: We understand this goal is specific to Metropolitan Council-owned land. However, affordable housing development is needed everywhere, in both transit-oriented areas and in communities that lack public transportation. Some rural communities that lack transit, want to bring more affordable housing development to their communities as well but have a hard time competing for funding when they lack the access to transit. Many low-income households who live in rural communities have vehicles because it is necessary. If the goal is to give people choice in where they want to live, there should be affordable housing options everywhere, not just where there is transit.</p>

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Carver County	Objective 3, Provide	<p>Objective 3: Stability “Goal: Support continued participation in project-based subsidy programs by engaging property owners and emphasizing the community benefits of participation.” Carver County Comment: Current waiting lists for project-based housing options, as well as Rural Development Projects, are long and difficult to access. Along with encouraging more project-based subsidy programs, we encourage continued support of the development of a centralized waiting list process where participants can complete one application and be placed on multiple waiting lists across a region at the same time.</p>
Carver County	Objective 2, Provide	<p>Objective 2: Options to Own and Rent. “Goal: Explore opportunities for Metro HRA to expand capacity for programs that increase the ability for voucher holders to build wealth and access the housing of their choice as their economic situation changes.” Carver County Comment: We encourage adding a housing choice voucher homeownership program as an option for Metro HRA Housing Choice Voucher holders. Many voucher holders that we work with express a desire to use their voucher in this way, but it is not currently possible in the Metro HRA service area. Expand funding opportunities for affordable homeownership models (e.g. community land trusts).</p>
Carver County	Objective 4, Provide	<p>Inform state building code updates to encourage construction of more affordable, maintainable, high-quality, safe, and climate-resilient homes. Balance this with the increased costs it adds to projects and ensure they are then properly funding projects and providing technical assistance prior to submitting an application to ensure this is accounted for in the total development costs.</p>
Carver County	All	<p>Carver County would like to offer an overarching comment that the 2050 draft Housing Policy Plan seems to sit by itself. It lacks authentic collaboration, and superficially mentions, key partners in the space like the Minnesota Housing Finance Agency and Minnesota Department of Human Services. Carver County would encourage the Metropolitan Council to strengthen their partnership with State and local entities deeply immersed in this work.</p>

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Carver County	Objective 4, Provide	<p>Objective 4: Quality “Goal: Promote the use of housing code updates to encourage construction of more affordable, maintainable, high-quality, safe, and climate-resilient homes. AND promote the use of Housing code enforcement or rental licensing as tools to maintain unsubsidized affordable housing. Carver County Comment: Encouraging and incentivizing rental property owners to accept Housing Choice Vouchers as well as Permanent Supportive Housing programs if the applicant passes all other selection criteria for the property creates an entrance to housing stability and future home ownership; and helps persons gain access to housing. When a property owner doesn’t accept vouchers, the application is denied because the applicant can’t prove that their income totals two to three times the monthly rent amount. But if the applicant has a voucher, the rent will automatically be 30% of their income. Better connect low income housing tax credit projects and voucher support to ensure that max rents are supported by vouchers.</p>
City of Andover	Objective 2, Plan	Affordable Ownership Housing allocation based on existing deficit. This may lead to more affordable housing projects. Home ownership promotes wealth building by acting as a savings mechanism and through home appreciation.
City of Andover	Section 4, Land Guided for Affordable Housing	Increase in density for Affordable Housing. City of Andover may run into existing capacity within the existing local sanitary sewer system. Option 2 appears to possibly raise some legal questions on the possibility of guiding property in this manner.
City of Andover	Objective 4, Plan	<p>Require local comprehensive plans to specify the development and preservation tools they will seek to use or continue to use throughout the decade to meet their local affordable housing homeownership need. Housing developers look in multiple places, competitive funds, etc. If the City of Andover decided to use a tool not already identified would a Comprehensive Plan Amendment be required? Comprehensive Plan Amendments tend to slow down the development process, increase time and money needed and thereby reduce the ability of developers to take advantage of existing market conditions.</p>
City of Andover	Objective 4, Provide	Inform state building code updates to encourage construction of more affordable, maintainable, high-quality, safe, and climate resilient homes. Minnesota Housing Finance Agency (MHFA) has requirements outside of building code for housing construction, Met Council should also work with MHFA to reduce affordable housing costs per unit and change their rules. Changing building code will not impact publicly subsidized housing. Market rate units can actually be built cheaper than affordable units.

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City of Bethel	Section 4, Land guided for Affordable Housing (LGAH)	Increase of Affordable Housing Minimum Density (Objective 1, Policy 2, Action 4). The 2040 land use plan allowed areas at 8 unit per acre minimum to meet the affordable housing goal. Imagine 2050 increases this minimum to a minimum of 10 units per acre. The City of Bethel is a largely developed community and has limited space to allow for this type of development. Increasing the density will make this more difficult to accommodate.
City of Blaine	N/A	Clarity on the climate reporting requirement is needed and the City requests this requirement be reviewed to determine the cost to the local government (in terms of staff time, consultant time, as well as direct expenditures). The City would not oppose reporting requirements similar in scale to the Regional Housing Policy and Production Survey. Any reporting more onerous than that would be beyond the limits of available staff. Efforts should be taken by the Met Council to reduce the burden of reporting through prepopulating data and calculations.
City of Blaine	Section 4, Future Need	The City supports the proposed methodology for calculating the Future Affordable Housing Need and the change from calculation at 80% AMI and below to 60% AMI and below. Additionally, the City supports the provision allowing for credit through alternative means.
City of Blaine	Objective 2, Provide	The City supports efforts to modify the SAC calculation for affordable housing to more appropriately reflect modern affordable housing construction norms.
City of Blaine	Objective 2, Provide	The final action under “Provide” within Objective 2 of the housing policy plan, which refers to collaboration with environmental services to support connection of manufactured home communities to public sanitary sewer, should also include exploration of financial assistance to resident owners of cooperatively owned manufactured home parks to make necessary sewer and water line repairs. All parks in Blaine are currently connected to City sewer and water, however, the private lines within the parks likely require substantial maintenance or replacement, which would be highly burdensome on a new cooperative.
City of Bloomington	Section 4, Future Need	Deeply Affordable Housing. The draft Housing Policy Plan identifies the regional need for affordable housing and allocates that need across cities. The Plan shows the greatest need in the 2031-2040 period will be for units affordable to households earning 30% of area median income (AMI). For example, Bloomington’s allocation of future affordable housing need for the period 2031-2040 is 1,275 units. Of those units, 706 should serve the 30% AMI band. Even with the new Local Affordable Housing Aid, cities do not have access to enough tools and resources to deliver this level of 30% AMI units.

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		Bloomington requests additional discussion of this issue within the Housing Policy Plan along with guidance on how cities can achieve their goals for deeply affordable housing.
City of Bloomington	Objective 4, Provide	Tracking Newly Created Unsubsidized Affordable Housing. Through the Metropolitan Council, the region tracks the production of affordable housing where rents or prices are contractually restricted. Bloomington recently had two multi-family developments where units were created that qualify as affordable but where there is no contract restricting future rent levels. Bloomington thinks of this housing as “New NOAH”, new naturally occurring affordable housing. While valuable for residents seeking affordable housing, New NOAH is not formally tracked at the regional level. Bloomington requests that the Metropolitan Council track and report on levels of New NOAH production regionally.
City of Bloomington		Incentivizing City-Level Progress on Affordable Housing Production. Historically, the Metropolitan Council’s affordable housing allocations to cities have been important for goal setting, but compliance or lack thereof has had little practical impact on cities. To make the affordable housing goals more impactful, Bloomington suggests that the Metropolitan Council work with the State of Minnesota and other stakeholders to create tangible incentives that encourage cities to facilitate additional affordable housing. Incentives such as infrastructure funding assistance could be tied to having inclusionary zoning standards in place or tied directly to affordable unit production.
City of Brooklyn Park	All	The City of Brooklyn Park supports the draft Imagine 2050 Housing Policy Plan. The housing objectives are aligned with the City’s goals to ensure there is equal access to housing, residents are protected from discrimination, historical and existing housing inequities are addressed, and a wide variety of quality, affordable living options are available, including homeownership opportunities.
City of Brooklyn Park	Section 4, Future Need	The City of Brooklyn Park has reviewed the allocation of future affordable housing need by affordability band and will align long-range planning efforts with these numbers. The City appreciates the expanded support and resources provided to local governments, including data, technical assistance, and best practices.

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City of Chaska	Section 4	<p>The Housing Policy Plan primarily aims to develop or maintain deeply affordable housing for those earning 30% of the Area Median Income (AMI) in multifamily projects. However, it largely overlooks missing middle housing and affordable ownership options, as well as the necessary resources to support deeply affordable housing. The Plan proposes that cities identify enough eligible land at high densities to meet their “Future Affordable Housing Needs”. For Chaska, the policy plan allocates a need of 550 total affordable units, 279 units below 30% AMI, 169 units at 30-50% AMI and 102 units at 50-60% AMI. The policy, as currently written, does not clearly articulate how the city’s current affordable housing inventory, including naturally occurring affordable housing (NOAH), preservation of existing affordable units, and new construction, are included in the local affordable housing allocation requirement. Without clarity on how Chaska’s numbers were developed and how existing housing stock informs the allocation, city staff are unable to form an opinion on the accuracy and reasonableness of the allocation. Accordingly, city staff request the Metropolitan Council to explain how the affordable housing allocations were determined and provide additional time for review to ensure accuracy. The challenges surrounding housing affordability are complex and will require a comprehensive approach, especially given the limited resources many communities have. While the Housing Plan outlines various policies and actions to tackle these issues, it should more clearly differentiate between suburban and urban areas, considering the differing resources (such as funding and transit) available to each. Additionally, the Plan should better acknowledge the diverse initiatives many communities are pursuing to address housing challenges and enhance collaboration with cities and counties, particularly in exurban regions, to ensure that policies and funding initiatives are practical and effective for all communities.</p>
City of Corcoran	Objective 3, Plan	<p>OBJECTIVE 3: Stability Policy: Develop programming and support local, regional, and state policy that makes it less likely for residents in the region to experience housing instability and homelessness, with focused support for people who are experiencing homelessness and housing insecurity.</p> <ul style="list-style-type: none"> • Require local comprehensive plans to identify tools the local government will seek to use or continue to use to meet the need for stabilizing services and shelter. • Continue to apply the creation of newly constructed High Priority Homeless units towards a local government’s allocation of Future Affordable Housing Need. <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> 1. New affordable housing and support for existing affordable housing does not occur without government funding. Cities without housing funds can offer support for the concepts but can do very little to actually influence the outcome. 2. The City does not have dedicated housing staff. Is funding available to cities to implement these new programs? 3. During the 2040 Comprehensive Plan, the Housing Chapter was very prescriptive. While information was not available during development of the local comprehensive plans, once the plans were submitted, we were unable to get the Comprehensive Plan through the Metropolitan Council process

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		without adopting specific policy language. If there is similar specific policy language expectations for the 2050 plans, we would like to see those and have an open transparent discussion with all cities and the Metropolitan Council.
City of Corcoran		OBJECTIVE 4: Quality and OBJECTIVE 5: Cultural Connection And Well-Being City staff questions/comments include: 1. Please provide more clarity about expectations. Staff note %233 under Objective 3 above is applicable here as well.
City of Corcoran		OBJECTIVE 6: Equity Policy: Limit the effects of historical injustices through reparative and community-centered action, and limit future disparities by shifting current policies to protect communities whose disparities are largest.
City of Corcoran	Section 4, Land Guided for Affordable Housing	Action 4 would change how opportunities for affordable housing are provided. Cities have two options: 1. Guide sufficient land at a minimum density of 10 units/acre to meet the city or township's total Future Need. 2. Guide sufficient land at a minimum density of 12 units/acre to meet the city or township's Future Need for 30% AMI or less and a minimum density of 8 units per acre to meet the Future Need at 31-60% AMI. City staff questions/comments include: 1. The 2040 land use plan allowed areas at 8 units per acre minimum to meet the affordable housing goal. Density alone does not lead to affordable housing and the document provides no empirical evidence to show that this increased density will result in more affordable housing. It could be argued that this will not create more affordable housing and that higher density housing opportunities are limited due to our geographic location and that high density housing demand is now and is expected to remain limited.

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City of Cottage Grove	N/A	<p>Livable Communities Funding Priorities</p> <p>The proposed plan identifies additional criteria for the program funding which are prioritized as part of reviewing and awarding funding. With the inclusion of additional minimums to be met to qualify for the program it continues to become less appealing for cities including Cottage Grove. The criteria results in funding being localized as opposed to spread out across the region as it is intended to. The proposed Imagine 2050 goal of creating communities across the region for everyone is conflicted with the additional criteria. The City objects to the continued addition of criteria for prioritization of funding and encourages the Council to focus on requirements that encourage cities to apply and receive funding that supports affordable funding.</p>
City of Cottage Grove	Section 4, Housing Implementation Plan	<p>Housing Action Plan: Housing Implementation Plan</p> <p>The plan indicates the city may not be eligible for Livable Communities funding if the city does not provide an annual progress report towards the top three housing needs and tools used to work towards them. This requirement does not seem to take into consideration factors out of the City's control including the economy and market trends which could limit the city's ability to meet their expected growth. Challenges such as these could put cities in a position to be out of compliance with their Comprehensive Plans due to factors out of their control. The City does not object to continued annual housing production reporting however, this implementation plan needs additional thought to better set city's up for growth success without the risk of external factors forcing a city to be out of compliance with their comprehensive plans.</p>

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City of Cottage Grove	Objective 4, Plan	<p>Quality Affordable Housing: Objective 4</p> <p>Page 34 indicates local comprehensive plans identify the use of tax abatement, fee waivers, or other locally available financing tools to encourage unsubsidized affordable housing. The City objects to a requirement requiring the use of tax abatement, fee waivers, or other financial incentives as the Metropolitan Council cannot require cities to use specific local financing tools and should be based on eligibility of the project and demonstrated need. Should the City not support financially affordable projects, it would thus be in conflict with its Comprehensive Plan even if it would mean being in violation of the city's local financial policies.</p>
City of Credit River	Section 4, Land Guided for Affordable Housing	<p>The housing policy plan lists several “requirements” for local governments to include in their local plans. The City of Credit River is not supportive of these requirements as it does not apply to our community. Items such as “require local comprehensive plans to identify tools the local government will seek to use to continue to meet the need for stabilizing services and shelter”. This is not a community priority, and we allocate our resources to higher priorities facing our residents. Requiring policies like this make cities include unnecessary text within comprehensive plans that make them unhelpful and unusable for cities.</p> <p>The City acknowledges communities in the metro region must help provide an environment where construction of affordable housing can occur. As the Housing Policy Plan notes, since 2021 the construction of deeply affordable and affordable housing significantly increased while market rate units decreased. While the City acknowledges there is a regional need for additional deeply affordable and affordable housing units in the next planning decade, the City requests the Council consider incremental changes to its housing policies.</p> <p>While the City understands the Council's position that the City's Future Affordable Housing Need may need to predominantly focus on households making 60% AMI or less, the City is not in support of policies that will require to:</p> <p>Option 1: Guide sufficient land at a minimum density of 10 units/acre to meet the city or township's total Future Need; or</p> <p>Option 2: Guide sufficient land at a minimum density of 12 units/acre to meet the Future Need for 30% AMI or less and a minimum density of 8 units per acre to meet the need at 31-60% AMI (the two higher bands of affordability).</p> <p>The increased density requirement will have a significant impact on the historically rural community character of Credit River and is something that is unattainable – at a minimum fiscally unattainable.</p>

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City of Eden Prairie		The policy document includes a long list of priorities to be considered when awarding Livable Communities funding. Most cities would likely have difficulty meeting many of the listed priorities, limiting the opportunity to secure funds to implement regional objectives.
City of Eden Prairie	Section 4, Land Guided for Affordable Housing	The draft policy document includes a minimum density requirement for affordable housing need. Further consideration should be given to the reality that increased density on its own does not explicitly equate to affordability. The City has taken multiple measures to pursue and promote increased housing affordability and will continue to leverage those tools through the development review process.
City of Eden Prairie	Objective 1	Recognizing the regional need for affordable housing, particularly at deeply affordable levels, the City continues to pursue the integration of such units in projects. This continues to present challenges and won't be effective region-wide without deep and sustained financial resources.
City of Eden Prairie	Objective 3	Prioritizing projects that serve the homeless population or that incorporate necessary services is difficult to envision at a local level as homelessness in Eden Prairie is lower than in other communities. The City does, however, partner with non-profit organizations that provide support services to homeless households. Projects that include services as part of their model are largely limited to affordable providers. High opportunity communities face unique challenges in attracting affordable providers which may make it difficult for such cities to meet any such requirements. Consideration should be given to other approaches that would lead to increased support services for residents.

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City of Eden Prairie	Objective 2	Affordable rental and homeownership housing are a priority locally and for the region. For high opportunity communities such as Eden Prairie, this can be challenging with influences we cannot control such as high land costs. With very little developable land left in Eden Prairie, the City has successfully added affordable housing units primarily in multifamily projects. This has been accomplished through a mixed-income approach that utilizes TIF financing and an inclusionary ordinance to secure affordable units. In recent developments, this has resulted in 25% of the units being affordable. Consideration should be given to this type of approach as well as providing credit for efforts aimed at existing NOAH units and local programs and policies that support affordable housing such as first-time homebuyer, owner-occupied rehab, community land trust projects, creation of affordable housing trust funds, and an inclusionary ordinance as mentioned.
City of Eden Prairie	Section 4, Future Need	The policy document introduces the future allocation of affordable housing need and affordable homeownership housing need. As the Met Council determines how this will be allocated among cities, consideration should be given to local demographics that lead to realistic expectations reflecting individual community characteristics, including providing credit for local efforts to support affordable housing through programs and services and recognizing existing housing stock that meets affordable levels.
City of Eden Prairie	Objective 4, Plan	The draft policy suggests that local governments be required to include in their comprehensive plans what tools they will seek to use to create low-income cooperative, shared ownership, mixed-tenure, or ownership, including the preservation of manufactured housing, development of townhomes, small multifamily and accessory dwelling units. The building types identified are very specific and broad ranging. Not all communities include each of these unit types. Consideration should be given to allow communities the flexibility to incorporate tools to promote or maintain housing types that best represent the needs of the individual communities and market conditions. Without such consideration there are likely to be broader land use, housing and tax implications.

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City of Forest Lake	Section 4, Land Guided for Affordable Housing	<p>The City acknowledges communities in the metro region must help provide an environment where construction of affordable housing can occur. As the Housing Policy Plan notes, since 2021 the construction of deeply affordable and affordable housing significantly increased while market rate units decreased. The City would challenge the Council to consider the plausibility that the Council's Thrive 2040 housing policies have been shaping a changing housing market. While the City acknowledges there is a regional need for additional deeply affordable and affordable housing units in the next planning decade, the City requests the Council consider incremental changes to its housing policies. While the City understands the Council's position that the City's Future Affordable Housing Need may need to predominantly focus on households making 60% AMI or less, the City is not in support of policies that will require to:</p> <ul style="list-style-type: none"> • Option 1: Guide sufficient land at a minimum density of 10 units/acre to meet the city or township's total Future Need; or • Option 2: Guide sufficient land at a minimum density of 12 units/acre to meet the Future Need for 30% AMI or less and a minimum density of 8 units per acre to meet the need at 31-60% AMI (the two higher bands of affordability). <p>The increased density requirement will have an impact on the historically rural community character of Forest Lake.</p>
City of Greenwood	Section 4, Land Guided for Affordable Housing	<p>2050 City Density Proposal</p> <p>Greenwood is a very small and essentially fully developed city with what are already excessive property taxes. There is only one possible location currently available for new development and it should be used to generate the highest possible tax revenue. Affordable housing does not accomplish that. I generally support the need for more affordable housing but the City of Greenwood is a poor candidate for such development.</p>

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City of Hugo	Section 4, Housing Implementation Plan	<p>This round of comprehensive plan updates will require that local governments identify three specific housing needs that represent the greatest needs for their community and identify the tools they will commit to using to address these three needs throughout the planning decade. It also states that the Metropolitan Council will not require a community to adopt a particular tool, but rather describe tools it will implement. Thank you for allowing communities to determine the policies they will use. We encourage the Metropolitan Council to provide technical assistance when determining the greatest housing need in the community.</p>
City of Inver Grove Heights	Section 4, Land Guided for Affordable Housing	<p>Future Affordable Housing Need (Objective 1, Policy 2, Action 4)</p> <p>Imagine 2050 shows an affordable housing allotment for Inver Grove Heights of 528 units - 256 units at 30% or less AMI, 210 units between 31% to 50% AMI, and 62 units at 51% to 60% AMI. The associated Policy statement regarding Future Affordable Housing Need identifies two (2) options requiring cities to guide land:</p> <ol style="list-style-type: none"> 1. at a minimum density of 10 units per acre to meet the Future Need, or 2. at a minimum density of 12 units per acre to meet the future need for 30% AMI or less and a minimum density of 8 units per acre at 31% to 60% AMI. <p>City Response: The Metropolitan Council is asked to clarify if the City must select Option 1 or 2, and also clarify if Option 1 requires a land use category that starts at a 10 unit per acre minimum, or if the City is required to have a land use category that is inclusive of 10 units per acre.</p>
City of Inver Grove Heights	Section 4, Housing Implementation Plan	<p>Housing Action Plan (Section 4)</p> <p>Imagine 2050 notes that cities will be required to report annually as to their progress toward meeting their housing goals; that report would be filed along with a city's annual housing production survey (Pg. 49). Additionally, the focus of Imagine 2050 is housing growth and monitoring by decade (i.e. 2030-2040 and 2040-2050) versus the planning continuum (i.e. 2020-2040 and 2030-2050). The purpose of this monitoring period is to ensure communities are meeting their density requirements by decade. It is noted that a city's "failure to report on progress toward their housing goals" could result in the city not being able to receive Livable Communities funding. By this statement, it is also inferred that a city, not meeting its housing targets during the monitoring decade, could also be penalized as a result.</p> <p>Cities do not control or influence the economy. Therefore, national economic conditions (i.e. Great Recession from 2008 to 2012) that result in housing development slowdowns could put cities at risk of</p>

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		<p>being non-compliant with their Comprehensive Plans for failure to achieve their expected growth and/or at the densities expected. This point requires clarification.</p> <p>City Response: The City notes this policy goal requires more thought before being considered or included, so that cities understand the policy, process, implementation and implication. The City requests the Metropolitan Council remove such policy language and goals until such time the agency can thoroughly vet this policy concept. The City does not object to continued reporting its annual housing production.</p>
City of Inver Grove Heights		<p>Livable Communities Funding Priorities</p> <p>Imagine 2050 identifies several changes in criteria for the Livable Communities Program and related programs to prioritize funding for projects. Examples include:</p> <ol style="list-style-type: none"> 1. Prioritize funding housing projects that serve residents who are or have experienced homelessness and/or incorporate supportive services. (Pg. 32) 2. Increase prioritization for affordable housing preservation and improvement criteria. (Pg. 33) 3. Provide clear preference in scoring for housing development projects that exceed the Minnesota Housing state-required minimum that units are designed and constructed to meet accessibility requirements. 4. Prioritize projects that preserve and/or add to the cultural landscape of the neighborhood. (Pg. 40) 5. Prioritize culturally responsive approaches, such as interest-free and individual taxpayer identification mortgage projects, etc. housing projects (Pg. 40) 6. Give funding consideration to projects that use cost-effective energy-saving and decarbonization elements. (Pg. 43) 7. Prioritize energy efficiency, climate resilience and decarbonization in preservation projects. (Pg. 43) <p>The Metropolitan Council has continued to evolve application minimums, requirements, and expectations for funding consideration via its different programs. This has resulted in application processes that are not only more strenuous, but also less appealing due to the added criteria and onerous requirements. Current criteria and new, proposed priorities could result in fewer cities and projects eligible for funding, and thus less likely to apply. The enhanced prioritization criteria - whether required or optional - would make it more difficult for projects to meet the minimum scoring thresholds necessary for program eligibility and funding consideration. The result is more regional funding spent in fewer areas vs. spread out across the region as it should be. This also continues the concentration of affordable, supportive and/or other types of housing in certain areas. The concentration of that housing conflicts with an Imagine 2050 goal of creating communities for everyone. Continually moving the goal posts also results in cities attempting to partner with developers to construct affordable housing and/or local affordable projects not getting funded.</p>

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		<p>City Response: The City objects to continued added criteria and greater prioritization of funding. The City encourages the Metropolitan Council to focus on opportunities to ease requirements and criteria that encourage cities to apply for and receive funding that supports affordable housing.</p>

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City of Inver Grove Heights	Objective 5, Plan	<p>Cultural Connection and Well-Being (Objective 5) Imagine 2050 states the requirement for Comprehensive Plans to establish and actively use tools that support mental health services, job training programs and education support. None of these service areas fall within the scope of municipal governments in Minnesota.</p> <p>City Response: The City objects to these or any similar requirements, and cannot be required to provide such services as noted. The types of support services identified are provided by county and state agencies. As such, the City does not have the capacity, resources and/or staff expertise in these areas to provide or ensure the provision of such services.</p>
City of Inver Grove Heights	Objective 4, Plan	<p>Quality Affordable Housing (Objective 4) Imagine 2050 states the requirement that comprehensive plans identify the use of tax abatement, fee waivers, or other locally available financing tools to be used to encourage the maintenance and preservation of unsubsidized affordable housing (Pg. 34). It should be noted that tax abatement, fee waivers, etc. are public subsidies, and so unsubsidized affordable housing receiving such financial assistance would then be subsidized.</p> <p>City Response: The City objects to any requirement that effectively requires the use of tax abatement, fee waivers or other financial incentives. The City does not object to identifying housing implementation tools as it has with previous Comprehensive Plans. However, the Metropolitan Council cannot require cities to use specific local financing tools in any capacity. Those decisions must be based on project eligibility, demonstrated need and local priorities. Additionally, such requirements potentially put the City in non-compliance with its Comprehensive Plan if such funding is denied, even if such requests do not meet local financial policies.</p>

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City of Lakeville	Objective 4, Plan	<p>The significant elements of the 2050 Regional Housing Policy Plan for the City to address through the 2050 Lakeville Comprehensive Plan are outlined above with respect to designation of land necessary to meet affordable housing allocations. Requirements for local comprehensive plans for implementation of the 2050 Regional Housing Policy Plan do not otherwise vary from the provisions developed for the 2040 Lakeville Comprehensive Plan.</p> <p>Imagine 2050 states the requirement that comprehensive plans identify the use of tax abatement, fee waivers, or other locally available financing tools to be used to encourage the maintenance and preservation of unsubsidized affordable housing. The city objects to any requirement that effectively requires the use of these tools. The city does not object to identifying tools but does not agree to any obligation to use one or more of these tools.</p>
City of Lilydale	Objective 3	<p>Which gets to my view of our collective goal of better addressing housing needs: First, the Metro Council should provide a forum for discussion and decision-making on the definition of the problem. This should be heavy with data on who is homeless (or on the margin), what they need to be in a different position, and how those that improve their situations accomplish that. Maybe it's zoning, but maybe it is the state building code, or local building codes, or market forces, or poor health. We really need to know why people have these issues, and why are they here.</p> <p>Second, the Metro Council should engage with each city, and work with those cities that see ways that they can contribute to solutions to the problem as defined.</p>
City of Loretto	Section 4, Land Guided for Affordable Housing	<p>Increase of Affordable Housing Minimum Density (Objective 1, Policy 2, Action 4). The 2040 land use plan allowed areas at 8 unit per acre minimum to meet the affordable housing goal. Imagine 2050 increases this minimum to a minimum of 10 units per acre. The City of Loretto guided property that met this density requirement in the previous plan. The increase of density for affordable housing minimums will result in a development pattern more difficult for Loretto to provide.</p>

Group/Org	Primary Plan Location	Comment
City of Minneapolis	Objective 4, Provide	Page 37 - Objective 4: "Provide a clear preference in scoring Livable Communities Act housing development projects that exceed the Minnesota Housing state-required minimums that units be designed and constructed to meet accessibility requirements." How will the Met Council implement/enforce this? There is currently no significant design review.
City of Minneapolis	Objective 7, Provide	Page 48 - Objective 7: "Give funding consideration in Livable Communities Act grants to projects that use cost-effective energy-saving and decarbonization elements, promoted by Green Communities criteria, the Minnesota Sustainable Building Guidelines, or other green and sustainable building practices." This aligns well with existing Minneapolis programs and policies.
City of Minneapolis	All	<p>Overall Observations</p> <ul style="list-style-type: none"> • The draft housing policies align with City of Minneapolis' housing priorities/goals/programs: new production, preservation, deep affordability, locational choice, large BR units. Support for both ownership and rental housing • Good to see acknowledgement that we need more affordable housing everywhere • The Met Council should seek cities' input on changes to their LCA programs • It is critical that LCA programs align well with other public funding programs to ensure cities can deliver as much deeply affordable housing as quickly as possible
City of Minneapolis	Appendix B	Page 25, Plan: Minneapolis will want to review the calculated Future Affordable Housing Need when available.
City of Minneapolis	Section 4, Future Need	Page 49 - Section 4: Affordable Housing Future Need calculation – CPED supports the proposed shift to tracking units at <30% AMI, 31-50% AMI, and 51-60% AMI (and dropping 61%-80% AMI, which was capturing too many market-rate units).
City of Minneapolis	Objective 1	Page 25 - Objective 1: Consider encouraging cities to promote the equitable distribution of affordable and supportive housing across communities, ensuring that it's not clustered in specific regions.

Group/Org	Primary Plan Location	Comment
City of Minneapolis	Objective 1, Provide	Page 25, Actions: The Met Council proposes to align LCA programs with Section 8 voucher standards to prioritize funding for projects that meet Section 8 standards, require LCA projects to accept Section 8 and offer rents that meet Section 8. This aligns well with what Minneapolis is already doing and will promote fair housing/increase locational choice in the region.
City of Minneapolis	Objective 2, Plan	Page 26 - Objective 2: Consider encouraging cities to adopt or expand inclusionary housing policies regionwide for both new developments and rehabilitated housing.
City of Minneapolis	Objective 2, Provide	Page 26 - Objective 2: In addition to exploring reduced SAC for deeply affordable housing projects, also consider waiving SAC for missing middle homes (including ADUs) and reducing SAC for projects using green technologies. To incentivize more missing middle homes, many cities across the country have waived or reduced SAC fees. This is an important step towards building missing middle homes more financially viable.
City of Minneapolis	Objective 2, Plan	Page 26 - Objective 2: The Met Council appears to be expanding their role in ownership housing, in terms of what they're looking for in City Comprehensive Plans and how they intend to incentivize affordable ownership. This appears to align well with what Minneapolis is already doing on ownership.
City of Minneapolis	Objective 3, Partner	Page 36 - Objective 3: "Convene partners throughout the region to set goals and address the need for shelter as a regional issue." CPED staff supports this regional effort, but we wonder how it will coordinate with/benefit existing cross-jurisdiction efforts.
City of Minneapolis	Objective 3	Page 36 - Objective 3: Consider encouraging cities to develop more types of transitional housing such as rooming houses and SROs, to provide more flexible solutions to homelessness across the region.
City of Minneapolis	Objective 3, Provide	Page 36 - Objective 3: The Met Council proposed to prioritize LCA funds for homeless housing – this aligns well with Minneapolis programs and priorities.

Group/Org	Primary Plan Location	Comment
City of Minneapolis	Objective 4, Plan	Page 37 - Objective 4: "Consider applying the preservation and substantial rehab of affordable housing units either set to expire or in a state of disrepair towards a local government's allocation of Future Affordable Housing Need." CPED staff supports this recommendation, City-funded preservation work is currently going unrecognized. We want to make sure we maintain a balance between preservation and new production. We recommend utilizing MN Housing's preservation definitions and not creating new, separate definitions that don't align well with other public funders' definitions.
City of Minneapolis	Objective 4, Provide	Page 37 - Objective 4: "Inform state building code updates to encourage construction of more affordable, maintainable, high-quality, safe, and climate-resilient homes." Studying obstacles in the state building code that prevent missing middle housing or other affordable/innovative housing types can facilitate the construction of more of these homes. One example is to advocate for a single staircase in the smaller Missing Middle homes.
City of Minneapolis	Objective 5, Partner	Page 44 - Objective 5: "Continue collaboration with the Blue Line Anti-Displacement Work Group, as well as with anti-displacement efforts of external community partners to ensure alignment in best practices across all of the Met Council's planning and operations." This aligns with and supports ongoing work at the City of Minneapolis.
City of Minneapolis	Objective 5, Provide	Page 44 - Objective 5: "Lead the development of a tool to evaluate displacement risk factors and explore the implementation of this tool in Met Council grant programs." As the Met Council develops a displacement risk tool and implement it in their grant programs, CPED staff looks forward to monitoring and participating in this process.
City of Minneapolis	Objective 5	Page 44 - Objective 5: Consider incorporating a policy that encourages family-sized units in multifamily housing. This would help address the housing needs of low-income families or larger households.
City of Minneapolis	Objective 5	Page 44 - Objective 5: Encourage cities to revise existing policies to remove barriers to building innovative housing types. This includes multi-generational housing, single room occupancy, co-housing, cooperative housing, and other shared housing models.

Group/Org	Primary Plan Location	Comment
City of Minneapolis	Objective 6	Page 46 - Objective 6: "Conduct a study on the risk of inaction of providing affordable housing opportunities on economic and social disparities of residents in the region." CPED staff looks forward to monitoring and participating in this process.
City of Minneapolis	Objective 6, Partner	Page 46 - Objective 6: "Convene local governments, housing organizations, and historically overburdened communities to align communication and best practices to continue addressing racial and ethnic disparities in housing access." We request more details on what this entails.
City of Minneapolis	Objective 6	Page 46 - Objective 6: "Modify the Future Affordable Housing Need calculation to amplify the need of housing for historically excluded communities by more accurately considering economic ability of all households in allocation adjustments." CPED staff looks forward to monitoring and participating in this process.
City of Minneapolis	Objective 6	Page 46 - Objective 6: "Participate in regional efforts to reduce barriers in state, regional, county, and city funding programs that limit the entry of new affordable housing developers, especially those with Black, American Indian, and people of color leadership." This aligns well with City policies and programs. We recommend adding resources too, not just reducing barriers.
City of Minneapolis	Objective 6, Provide	Page 46 - Objective 6: Consider encouraging cities to implement long-term affordability policies (30+ years) for affordable housing units. This could be incorporated into to ensure that affordable housing is not just a short-term solution but a long-lasting one that benefits communities disproportionately affected by housing inequities. Observation: supports and aligns with many existing City policies, programs, and goals.
City of Minneapolis	Objective 7	Page 48 - Objective 7: "Ensure the inclusion of utility costs in rent and ownership affordability limits." Will be useful to have more detail on how this would be implemented and monitored. Any projects with MN Housing or Federal funding will already include these costs.

Group/Org	Primary Plan Location	Comment
City of Minneapolis	Objective 7	Page 48 - Objective 7: "Livable Communities programs will prioritize reductions for households that are both energy cost-burdened and housing cost burdened." We're interested in knowing more about how this would be implemented.
City of Minneapolis	Objective 7	Page 48 - Objective 7: Consider encouraging cities to identify plans to reduce their carbon footprint and to encourage green technologies across the whole city.
City of Minneapolis	Objective 7	Page 48 - Objective 7: Encourage cities to prioritize housing along transit routes and around transit hubs, to ensure access to transportation and reduce car dependency. This could support climate resilience goals by encouraging housing in areas well-served by public transit.
City of Minneapolis	Objective 7	Page 48 - Objective 7: Encourage cities to provide incentives for energy performance tracking and disclosure for residential and commercial buildings, allowing local governments to better understand and manage energy use across the housing sector.
City of Minneapolis	Objective 7	Page 48 - Objective 7: Encourage cities to provide incentives for projects using emerging technologies, such as net-zero housing, green building materials, or advanced decarbonization methods, to push innovation in the region.
City of Minnetonka	Section 4 and Appendix B, Future Need	<p>The unit numbers predicted for 30% AMI units seems high, as these are the most challenging units to construct, given the current ways in which deeply affordable housing is financed. Minnetonka has been a leader in producing housing – 2,803 multifamily units over the last 5 years, 28% (775) of those units being contractually affordable. With that commitment, the city has used its local resources, tax increment financing and affordable housing trust fund, to ensure projects include affordable units. However, despite the city's commitment to more production, unless more funding or the structure for deeply affordable housing financing changes, these units will not be able to be built.</p> <p>Housing: The table below indicates the initial numbers for Minnetonka: *Total local allocation of Future Affordable Housing Need units Allocation of Future Affordable Housing Need units affordable up to 30% AMI Allocation of Future Affordable Housing Need units affordable at 31% to 50% AMI Allocation of Future Affordable Housing Need units affordable at 51% to 60% AMI 1393 752 519 122</p> <p>*Figure 16: Future Affordable Housing need by local jurisdiction - Each sewer-serviced city or township in the region for 2031 to 2040 and their total local allocation of Future Affordable Housing Need for 2031-2040 as well as their allocation of Future Affordable Housing Need by affordability band for 2031 to 2040. Note: This is based on preliminary 2040 forecasts and will change with the forecast update in August of 2024</p>

Group/Org	Primary Plan Location	Comment
City of Mound	Section 4, Land Guided for Affordable Housing	<p>The City of Mound appreciates the opportunity to review and provide feedback on the Draft Imagine 2050 Policy Plan.</p> <p>As a fully developed community with extensive property within the shoreland of Lake Minnetonka, the City is concerned about the potential impact of the proposed policies in the Land Use and Housing Plans. In particular, there is a concern that the increase in the required development density to 7 unit per acre and the required minimum density of 10 units per acre to support affordable housing need will not be achievable for the City due to the existing development patterns and lake and wetland development restrictions.</p> <p>In addition to concerns about increased density requirements, the City notes that the proposed policy plans include new elements to be addressed within upcoming comprehensive plan updates. The City has concerns about its ability to address these with continued staffing and budget constraints. It is hoped that the Metropolitan Council provides cities with as much information and example strategies to help with minimize the impact of additional components to the comprehensive planning process.</p>
City of Oak Grove		<p>The housing policy plan lists several “requirements” for local governments to include in their local plans. The City of Oak Grove is not supportive of these requirements as it does not apply to our community.</p> <p>Objective 2 Plan Bullet 3 - Require that local governments, in their comprehensive plan update, identify tools they will seek to use or continue to use to create low-income cooperative, shared ownership, mixed-tenure, or ownership opportunities, including preservation of manufactured housing and development of townhomes, small multifamily, and accessory dwelling units.</p> <p>Objective 3 Plan Bullet 1 - Require local comprehensive plans to identify tools the local government will seek to use to continue to meet the need for stabilizing services and shelter.</p> <p>Objective 5 Plan Bullet 2 - Require local plans to consider tools currently used, or that the community will seek to use, to enhance the social and economic capital of residents in newly constructed affordable and mixed income housing, such as mental health services, job training programs, and educational support.</p>

Group/Org	Primary Plan Location	Comment
		Typically, the City of Oak Grove has not been allocated affordable housing. Requiring policies like this make cities include unnecessary text within comprehensive plans that make them unhelpful and unusable for cities.
City of Richfield	Objective 5, Plan	Section 3: Connection and Well-Being Objective 5: Cultural Connection and Well-Being Page 40. The “Plan” section requires local comp plans to consider tools the community will seek to use to enhance social and economic capital of residents of new affordable and mixed income housing, such a mental health services, job training, educational support. Cities typically do not provide social services—this is handled by the state, counties, school districts, and nonprofits.
City of Richfield	Appendix D	P. 67 – from the “group” - “Met Council needs to put enough pressure on cities to get serious about developing housing at 30% AMI and allow adequate flexibility on how to meet that Need. There is too much focus on 60-80% AMI.” Deeply affordable housing requires significant funding – funding that is not available. Distinct rental and ownership numbers – the need for this shows up in the HPP but it’s not in the forecast of allocated need – is that coming? Need to identify Need calculation for the preservation of housing units – is this in HPP?
City of Richfield	Objective 6, Plan	Pg 42 - What does this mean in plain English and what does it look like as it plays out in the real world? "Modify the Future Affordable Housing Need calculation to amplify the need of housing for historically excluded communities by more accurately considering economic ability of all households in allocation adjustments."
City of Richfield	Appendix B	Appendix B - Headers should be shown on all pages with table.
City of Richfield	Appendix D	Appendix D “Met Council should use its land use policy lever more intentionally to allow for more affordable housing development in the region.” What does this mean? Where is it reflected in the HPP? I only see LCA being used.
City of Richfield	Objective 1, Provide	Objective 1: Fair Housing & Geographic Choice P. 22 – “Provide” section, 2nd bullet contradicts the first bullet (i.e., encourage deeply affordable and encourage affordable housing in all areas of the region). QAP steers money to projects providing family units and serving people from shelters. How will you fund any project in communities that haven’t typically developed affordable housing?

Group/Org	Primary Plan Location	Comment
City of Richfield	Objective 1, Provide	Objective 1: Fair Housing & Geographic Choice P. 22 – “Provide” section, 4th bullet - Adopting higher payment standards depends on HUD funding. Higher payment standards can reduce the number of vouchers used and therefore the number of people who get served. Payment standards are based on FMRs, per HUD. There is a limit to what they can be.
City of Richfield	Objective 1, Partner	Objective 1: Fair Housing & Geographic Choice P. 23 – “Partner” – 3rd bullet – Simplify the language to make this point more understandable.
City of Richfield	Objective 1, Plan	Objective 1: Fair Housing & Geographic Choice Page 22. Objective 1, 3rd bullet in the “Plan” section indicates that the local allocation of the Future Affordable Housing Need could be adjusted during review of the community’s 2050 Comprehensive Plan. This results in uncertainty and “moves the goal post” after a community has gone through a 3-year comprehensive planning process.
City of Richfield	Objective 1, Plan	Objective 1: Fair Housing & Geographic Choice Page 23. The first bullet states: “Develop a system for attributing credit for cities and townships who have successfully adopted affordable housing development policy, as defined by Met Council, towards meeting their requirement for land guided for affordable housing.” It is unclear what “attributing credit” means. Does it mean accolades on the Council’s website, or does it translate into credits as part of LCA grant programs? What does the Met Council define as an affordable housing development policy? Will there be guidance on this as we launch our comp planning process?
City of Richfield	Objective 2, provide	Objective 2: Options to Own and Rent P. 23 – “Provide” second to last bullet - encourage publicly owned land for housing - WHERE appropriate.
City of Richfield	Objective 2, Plan	Objective 2: Options to Own and Rent P. 24 - “Plan” – 3rd bullet – Offer suggestions as to housing types that cities might consider and resources and technical assistance where appropriate rather than prescribing the types of housing we all have to create.
City of Richfield	Objective 4, Plan	Objective 4: Quality P. 33 – “Plan” 2nd and 3rd bullets - Require local need for accessible housing units, require local need for affordable age-restricted housing options – so this will be a subset of the total units or new units?

Group/Org	Primary Plan Location	Comment
City of Richfield	Objective 4, Provide	Objective 4: Quality P. 33 – “Provide” – last bullet - “Seek opportunities to find new sources of funding to be used to prevent buildings from going into disrepair or becoming unsafe.” Seems out of Met Council’s scope. Recommend that Met Council focus its efforts for greater impact.
City of Richfield	Objective 4, Provide	Objective 4: Quality P. 33 – “Provide” 7th bullet - “Inform state building code updates to encourage construction of more affordable, maintainable, high-quality, safe, and climate-resilient homes” Seems out of Met Council’s scope.
City of Richfield	Objective 4, Plan	Objective 4: Quality P. 34 – “Plan” first bullet – “Require local comprehensive plans to identify the use of tax abatement, fee waivers, or other locally available financing tools they will seek to use or continue to use to encourage the maintenance and preservation of unsubsidized affordable housing.” If there’s a need. Statute says we need to identify tools to implement the plan.
City of Richfield	Objective 2, Provide	Pg 23 - Publicly Assisted Housing/Conservation SAC reduction policy - What is this policy? Haven't heard of it and can't find it on Met Council website.
City of Richfield	Section 2	Pg 38 - "Today, 45% of households of color live in Environmental Justice areas of concern..." Where is this map? Reference to ACA does not help to determine where these areas are.
City of Richfield	Objective 5, Plan	Pg 40 - "Require local plans to consider tools currently used, or that the community will seek to use, to enhance the social and economic capital of residents in newly constructed affordable and mixed income housing, such as mental health services, job training programs, and educational support." What would an example of this be? The more requirements we add to affordable housing, the less affordable it becomes and we are maximizing our subsidies to get housing units built and outside resources are very competitive.
City of Richfield	Objective 6	Pg 42 - Exploring tenant protection requirements as part of LCA grants. We support carrots rather than sticks, but isn't there already a participation problem with LCA? Are more requirements going to encourage additional communities to participate?

Group/Org	Primary Plan Location	Comment
City of Richfield	Housing Implementation Plan Section	Pg 49 - States that Met Council staff will not require communities to use any particular tool to achieve these goals; however, every tool was required by Met Council staff in order to have plans approved in 2008.
City of Richfield	Section 1	Section 1: Proximity and Choice Data/Introductory Section The supporting data seems lacking/confusing (e.g., p. 11 household types – what is the need for larger units?) Can you provide actual numbers. Section on Homeownership: We are actively working to expand homeownership to communities that have not had access but believe it's important to remember that homeownership isn't appropriate for everyone.
City of Richfield	Section 4, Land Guided for Affordable Housing	Land Use Objective 1 Policy 2: Action 4: regarding option two, it is unclear how land is guided for certain levels of affordability; land isn't guided 30% AMI.
City of Richfield	Section 1	Section 1: Proximity and Choice P. 16 – The loss of NOAH housing also adds to the need for affordable housing. Construction labor shortages aren't just because of COVID but are a long-term challenge affecting the cost of housing construction. This section is about proximity and choice needing to be available throughout the metro area. Maps could help to make the case.
City of Richfield	Section 2	Section 2: Dignity and Decency Data/Introductory Section p. 26 – Is the line in the graph accurate?
City of Richfield	Section 2	Section 2: Dignity and Decency Data/Introductory Section P. 27 – The other issue is that long-time owners of NOAH don't have mortgages. Buyers do. They inherit below market rents (which can't be sustained when mortgage payments are added).

Group/Org	Primary Plan Location	Comment
City of Richfield	Section 2	Section 2: Dignity and Decency Data/Introductory Section P. 28 - Accessibility in NOAH housing is needed too. We don't believe we can build our way to a sufficient amount of accessible units – can we? Providing actual numbers of the need would be helpful.
City of Richfield	Objective 3, Plan	Section 2: Dignity and Decency Objective 3: Stability P. 32 "Plan" 1st bullet – "to meet the need for stabilizing services and shelter." What does this mean? This appears to be a new requirement and needs much more detail and explanation.
City of Richfield	Objective 6, Plan	Section 3: Connection and Well-Being Objective 6: Equity Page 42 First bullet in the "Plan" section states: "Modify the Future Affordable Housing Need calculation to amplify the need of housing for historically excluded communities by more accurately considering economic ability of all households in allocation adjustments." This statement is obfuscated. What does it mean? When will the Future Affordable Housing Need be modified and how does the modification affect our comp planning process?
City of Richfield	Objective 6, Plan/Provide	Section 3: Connection and Well-Being Objective 6: Equity Page 42. The third bullet in the "Plan" section talks about exploring whether to require the adoption of a local tenant protections policy to be eligible for LCA grants. P. 45. The "Provide" sections talks about tenant protection policy workshops with a housing advocacy organization. Housing advocacy organizations have a specific agenda and may push policies that are not practical or feasible for a city to effectuate. Cities need to be part of the conversation, rather than just being required to adopt what the Council and housing advocates determine is best.

Group/Org	Primary Plan Location	Comment
City of Richfield	Objective 7, Plan	Section 3: Connection and Well-Being Objective 7: Environmental Justice P. 43 – “Plan” 1st bullet – “Ensure the inclusion of utility costs in rent and ownership affordability limits.” Is this the role of the Metropolitan Council? Are you referring to tax credit units (which fall under Minnesota Housing for compliance) or city’s inclusionary housing policy units (which falls under city review).
City of Richfield	Objective 7, Plan	Section 3: Connection and Well-Being Objective 7: Environmental Justice P. 43 – “Plan” 2nd bullet – Comprehensive Plans need to identify opportunities to direct energy efficiency, weatherization, etc. to low income households –this level of detail seems inappropriate for a comprehensive plan. Do cities have the capacity for this? Consider allowing cities with Climate Action Plans to incorporate the documents into their comprehensive plans.
City of Richfield	Objective 7, Provide	Section 3: Connection and Well-Being Objective 7: Environmental Justice Page 43. In the “Provide” section, the last sub-bullet under the first bullet states: “Livable Communities programs will prioritize reductions for households that are both energy cost burdened and housing cost burdened.” Reductions to what?
City of Richfield	Section 4, Local Needs	Section 4: Roles, Responsibilities, and Implementation P. 47 – 1st bullet at the top of the page states, “Number of needed affordable ownership opportunities based on “homeownership ready” households at 80% AMI or below – please clarify what you mean as “homeownership ready.” Homeownership is not appropriate for all households.
City of Richfield	Section 4, Future Need	Section 4: Roles, Responsibilities, and Implementation P. 48-49 – Is LCA the only carrot/tool the Metropolitan Council has/plans to use? Forecast - How do these numbers take into account any progress we make this decade?
City of Richfield	Section 4, Land Guided for Affordable Housing	Section 4: Roles, Responsibilities, and Implementation Page 47. The first bullet in the “Land Guided for Affordable Housing” section states: “Increased density correlates with reduced costs of developing new housing by reducing per unit cost of land and fixed infrastructure.” This is not necessarily true. Depending on the number of stories, steel frame construction may be required for high density housing, rather than stick construction. The cost of this construction may offset any reductions in per unit cost of land and not result in reduced costs of developing new housing. Consider saying “increased density may correlate.....”.

Group/Org	Primary Plan Location	Comment
City of Richfield	Section 4, Land Guided for Affordable Housing	<p>Section 4: Roles, Responsibilities, and Implementation Page 48. The last paragraph states that local comp plans will need to identify tools that a community will commit to using to address housing needs and that the Council will provide a list of the eligible tools. The eligible tools are not identified in the Housing Policy Plan, however. If the HPP is adopted with this language, a community will be tied to committing to use tools that will be disclosed at a future date.</p> <p>A comprehensive plan is a high-level, long-range planning document. Implementation of certain housing tools is done on a case-by-case basis, considering the context of the situation. “Commit” is a strong and binding word. By forcing a community to commit to using a particular tool across the board may set the community up for future lawsuits when using the tool is not practical or feasible. We suggest that “commit” be revised to “evaluate” or “consider.”</p>
City of Shakopee		<p>It's essential to acknowledge that inflation is not caused by the actions of cities, yet it significantly impacts housing costs driven by land prices, lumber, labor, and the maintenance of both existing and new homes. Additionally, rising interest rates affect mortgage costs and the overall viability of development projects. Recognizing these fundamental issues is crucial for creating effective and sustainable housing solutions.</p>
City of Shorewood	Section 4, Land Guided for Affordable Housing	<p>Objective 1, Policy 2, Action 4 – Increase Affordable Housing Minimum Density</p> <p>The 2040 land use plan allowed areas at 8 unit per acre minimum to meet the affordable housing goal, while Imagine 2050 increases this minimum to 10-12 units per acre. Density alone does not lead to affordable housing and the document provides no empirical evidence to show that this increased density will result in more affordable housing in Shorewood. It could be argued that this will not create more affordable housing, as remaining developable land in Shorewood is not and is expected to remain limited.</p> <p>Additionally, the 2040 plans were only recently adopted, mostly likely within the last three years. The Metropolitan Council hasn't given the cities time to absorb the previously required 8 units per acre minimum before ratcheting up the numbers. This allows very little time for the residents and property owners to absorb the change before the new plan has to be adopted. It seems like the Metropolitan Council has created a moving target that cities will never be able to achieve before the next plan is required to be completed.</p>

Group/Org	Primary Plan Location	Comment
City of Shorewood	Section 4, Future Need	<p>Local Affordable Housing Need</p> <p>The City of Shorewood's affordable housing need allocation between 2021-2030 was a total of 48 new affordable units. However, Imagine 2050 proposes an affordable housing need allocation between 2031-2040 of 169 new affordable units. This is a substantial increase of over 350% that would likely be challenging for the City of Shorewood to absorb given the limited remaining land in the community available for development. There are only an estimated 25 net acres of developable land remaining in the community, which would likely not be able to support this amount of affordable housing.</p>
City of Shorewood		<p>Prescriptive Policy Language</p> <p>During the 2040 Comprehensive Plan process, the Housing Chapter was very prescriptive. While information was not available during development of the local comprehensive plans, once the plans were submitted, cities were unable to get their Comprehensive Plan through the Metropolitan Council process without adopting specific policy language. If there are similar specific policy language expectations for the 2050 plans, those should be made available for review and public comment prior to the release of system statements.</p>
City of Spring Lake Park		<p>Affordable Housing and Income Distribution: Spring Lake Park benefits from a substantial amount of naturally occurring affordable housing, which helps meet the needs of residents without the need for additional concentrated low-income developments. The City currently has nearly 500 units of concentrated affordable housing within the community. While we support the provision of affordable housing, we are concerned about the potential negative effects of concentrating too much low-income housing in one area, which can impact community diversity and access to resources. According to the 2020 Census, the City's median household income is significantly lower than both the broader Twin Cities metropolitan area and the state of Minnesota. We believe it is important to maintain a balanced mix of housing options to avoid over-concentration and ensure that all residents benefit from a diverse and inclusive community.</p>

Group/Org	Primary Plan Location	Comment
City of Victoria		<p>Objective 1, Policy 2, Action 4</p> <p>Victoria is committed to increasing affordable housing options, and we fully support initiatives aimed at achieving this goal. However, we face significant challenges due to a lack of adequate tools to make meaningful progress in this area. While the city strives to meet affordable housing targets, the current policy framework does not provide sufficient mechanisms for smaller suburban fringe cities like Victoria to succeed in the long term. Victoria also faces unique challenges as a community with a relatively high economic status, which can drive up property values and limit affordable housing development. Additionally, the absence of nearby transit options further complicates efforts to create affordable housing, as it reduces access to job opportunities and essential services for potential residents. To address these challenges, we believe the Metropolitan Council should play a crucial role in providing direct financial support through dedicated affordable housing grants or loans that specifically target smaller cities. Increasing the pool of available funding through the Livable Communities Act Pre-Development grant, Local Housing Incentives Account grant, or creating new grant programs is one strategy to accomplish this. Funding for land acquisition, infrastructure improvements, or subsidizing development costs would make it more feasible to build affordable housing in higher-cost areas like Victoria. We are eager to collaborate with the Metropolitan Council to explore additional tools or incentives that can better support our efforts.</p>
City of Woodbury	Objective 4, Plan	<p>When allocating the region's fair share of affordable housing units, the Council should further define affordable housing as those housing units at So% of AMI, rather than the 3-tiered approach identified in the Imagine 2050 Plan. The Imagine 2050 Plan should not require or obligate the use of tax abatement or tax increment financing as required tools to achieve affordable housing goals. The City would understand the value of the Council identifying available tools, but the requirement to utilize those tools is inappropriate.</p>
City of Woodbury	Section 4, Future Need	<p>The 2040 allocation for Future Affordable Housing Need by Local Jurisdiction is included within the Imagine 2050 plan. The plan identified a 2031-2040 need of 1,184 units of affordable housing, including 702 units at 30% of Area Median Income (AMI) or lower. While the City of Woodbury will continue to be a strong advocate for providing affordable housing, we must identify the significant unlikelihood of providing anywhere close to 702 units of 30% AMI units from 2031-2040 or during any decade. While we understand these numbers are goals, we believe the Council should evaluate reasonable goals that communities across the region can aspire to reach, versus providing unattainable goals.</p>

Group/Org	Primary Plan Location	Comment
Corporation for Supportive Housing	Objective 3, Provide	<p>My name is Amy Stetzel, and I am the Upper Midwest Director for the Corporation for Supportive Housing. I am reaching out to flag a serious concern and offer solutions. We must increase the stability of the supportive housing sector to ensure Minnesotans who are currently living in supportive housing are not displaced from their current housing and that Minnesotans who are unstably housed or homeless are not faced with even fewer housing resources. By stabilizing existing supportive housing, we will set a path forward to maintain long-term sustainability for all supportive housing developments, including new developments currently in the pipeline.</p> <p>Factors such as lower rent collection rates, higher vacancy rates, higher acuity of needs in tenants, increased costs driven by inflation, insurance cost increases, ripple effects from COVID including decreases in community infrastructure resulting in the need for increased security, and staffing churn have weighed heavily on existing supportive housing providers nationally and across Minnesota. Some of the most well-established and savvy supportive housing providers in the state are making it publicly known that they will be financially unable to keep their current housing portfolios up and running without stabilizing financial help.</p> <p>For the Minnesotans currently living in the more than 7,000 units of supportive housing across the state, losing their current supportive housing would be traumatic and potentially deadly. For communities and leadership, the threat of thousands of vulnerable Minnesotans becoming unhoused has extremely negative consequences that could include at minimum a significant increase in street homelessness and encampments, increases in jail capacity, and pressure on already overburdened emergency room and hospital systems.</p> <p>Local Affordable Housing Aid and Statewide Affordable Housing Aid creates new, significant, and immediate opportunities to stabilize and increase access to housing resources for low-income Minnesotans and those suffering from destabilizing behavioral health issues and systems involvement that disproportionately impact Minnesotans of color in your counties and cities.</p> <p>Please find attached recommendations and strategies to stabilize supportive housing using Local Affordable Housing Aid and Statewide Affordable Housing Aid. These recommendations came out of conversations with supportive housing providers, County and State partners, and national experts, and I urge you to consider them as you are planning how to use your LAHA and SAHA dollars now and into the future.</p>
Housing Justice Center		<p>Land Guiding and Zoning Conformance: The land guiding requirements of MLUPA have little impact unless local governments conform their zoning to how they have guided their land, as required by Minn. Stat. 473.858 Subd.1. Despite being legally obligated to bring zoning into conformance with Comprehensive plans, generally within nine months of adoption of comprehensive plan updates, many cities fail to do so. The consequence is that a developer seeking to build housing may look to the comprehensive plan for the city's intentions but then find that if they acquire and seek to develop that</p>

Group/Org	Primary Plan Location	Comment
		<p>land, they will be compelled to seek a rezoning because the city failed to conform their zoning to the comprehensive plan as required by law.</p> <p>A recent experience in Edina illustrates the problem. After financing fell through on a market rate development, a developer sought to replace it with a much smaller but affordable apartment building. The city had guided the land to meet its affordable housing obligations, and the developer obtained 9% LIHTC for the project based. However, despite the comprehensive plan, Edina never rezoned the property. The developer was forced to seek a rezoning, and the city took the position it had full discretion in considering rezoning despite the fact it had been obligated to rezone itself and had never done so. The developer's rezoning application triggered a public hearing process in which a strong and well-organized NIMBY movement convinced the City Council to discourage the application. Most telling was that the primary argument of the Council and the NIMBY opposition was that the city needed to adopt a small area plan for this location before permitting any redevelopment, even though no one said a word about a small area plan when the earlier market rate development was under consideration. Further, illustrating the need for affordable housing densities to be located where housing can be built, the city had designated this site to meet its affordable housing obligations even though it had purportedly not developed sufficient sewer capacity to serve multifamily housing at that location. The lack of sewer capacity also helped kill the affordable project, raising the question of how serious the city really was in designating this location to meet its affordable housing obligations and demonstrating the need to require cities to designate only land actually available for redevelopment.</p> <p>As the Council is aware, zoning barriers are a major impediment to building more housing of all kinds, but particularly affordable housing. We are pleased to see that the Council was able to obtain a PRO grant from HUD to offer technical expertise to cities and to encourage them to undertake zoning reform. We support the use of incentives to achieve policy goals where they really work and where there are not adverse consequences. But, as the Council is aware, its relationship with local governments requires a combination of incentives and requirements.</p> <p>Incentives only go so far.</p> <p>Cities' failure to conform their zoning to their comprehensive plans is a long-standing problem, due largely to the fact there are no practical consequences for failing to rezone. There are relatively simple steps the Council can take, however, which could go a long way to fixing this problem.</p> <p>The Livable Communities Act program was designed to offer grants to cities in exchange for city commitments to certain public policy goals. For example, the Council requires as a condition of LCA eligibility, negotiation of affordable housing goals and a city adoption of a Fair Housing Plan. We would note that exclusionary zoning practices such as described above, should be just the kind of issue addressed by a local Fair Housing plan. The Council has stated in the draft plan the desire to strengthen local Fair Housing plans. Addressing exclusionary and unnecessary zoning barriers would be the most useful improvement. Minnesota statutes set general requirements for Met Council administration of the LCA program but leaves to the Council the adoption of the details of eligibility conditions for cities.</p> <p>In the Housing Policy Plan, the Council should amend LCA procedures to require that to receive a LCA</p>

Group/Org	Primary Plan Location	Comment
		<p>grant, a city must demonstrate its zoning is in conformance with its comprehensive plan. There will be timing issues to work out since LCA grants could be awarded before, during or after comp plan updates. Adopting this eligibility requirement would provide a powerful incentive for cities to follow the law and would also be fully consistent with the statute creating the LCA program.</p> <p>The draft Plan does link LCA to cities' land guiding obligations, but only by making cities ineligible for LCA if they fail to guide sufficient acres at appropriate densities in their comprehensive plans. But as noted above, guiding land is all too easy to do, and too often not in the spirit of the statute. LCA eligibility should be linked both to realistic land guiding and to subsequent zoning conformance.</p> <p>Finally, consistent with the Plan's emphasis on equity and inclusion, the Plan should expressly make it clear that a city's failure to comply with the statutory requirement to rezone consistent with the comprehensive plan, could result in affordable housing barriers that violate federal or state fair housing laws and be subject to legal remedies.</p>
Housing Justice Center	N/A	<p>We write to offer the following comments on the draft 2050 Housing Policy Plan. The Housing Justice Center (HJC) has a long-standing interest in regional land use decisions, including the Met Council Housing Policy Plans. We appreciate the opportunity to provide comments. While the current draft contains some important and useful changes, it also represents several missed opportunities to make our region more equitable. Additionally, the plan as proposed does not currently meet the Council's statutory obligations in several critical ways.</p>
Housing Justice Center	Section 4, Land Guided for Affordable Housing	<p>Realistic Guiding of Land: The University's Center for Urban and Regional Affairs demonstrated in a 2002 study that over a 20-year study period "only 6% of the acres set aside for high-density residential use produced new high density low- and moderate-income housing." This finding has had no effect on the Council's inadequate land use requirements imposed on comprehensive plan development. The Council's Plan concedes this failure, noting that the average affordable housing is built at more than 56 units per acre, but the Council requires only density minimums of 10-12 units per acre. Limiting "planning to promote availability of land" to a requirement that cities simply compile a list of higher density residential uses ignores, among other things: the need for an analyses of land, especially including public land, which is actually likely to be potentially available for affordable housing; the need for programs that use land-use controls to promote affordability in new developments; and the need to alert affordable housing developers to a city's readiness to be flexible in its land use policies in order to promote affordable development. The Council's draft Land Policy Plan acknowledges this problem, regarding land planning generally, not just for affordable housing, Objective 1, Policy 2, A3. V.: "Evaluate the practical feasibility of demand and development to ensure that both the intensity (density range) and location of planned developments are practical. Local governments need to plan land uses that are realistically marketable within the planning period, focusing on plausibility and long-term viability. This differentiates between what is merely allowed and what is plausible, providing a realistic framework for land use planning."</p>

Group/Org	Primary Plan Location	Comment
		<p>Developing guidelines for land guiding that addresses this issue and ensures the land that is guided is realistically available for affordable development is one of the most useful new steps the Council can undertake. As the Council fleshes out its guidance in this area, it should incorporate California's experience with this same issue. In that state, a detailed definition of when land will be considered "realistically available " is now in use and appears to be having a positive effect.</p> <p>The Plan notes the density requirements for land guiding of 10-12 units/acre, while also noting that the average affordable housing development is built at 56 units/acre. This is a stark contrast, raising the question of how the first set of numbers can hope to achieve the second. The draft Plan does not adequately address this discrepancy which essentially guarantees failure. It is inconsistent with the Council's Guidance obligation under 473.854.</p> <p>For that reason, and because of the likelihood that the land set aside will not necessarily turn out to be the best places to develop affordable housing, the Policy should include a provision guaranteeing quick, or automatic, Council approval of Comprehensive Plan amendments necessary to permit affordable developments.</p> <p>Finally, the Plan's proposal to reward cities for certain affordable housing policies or actions by reducing their land guiding obligations is counter to the stated objectives and obligations of the Council. Strengthening rather than weakening city obligations to guide land for affordable housing would not only bring current practice closer to what the statute requires but it would also go far to address one of the reasons it is so difficult to build new housing</p>
Housing Justice Center	N/A	<p>Conclusion - We appreciate the opportunity to comment on the draft plan. We look forward to working with the Council to address our concerns and ensure that the Housing Policy Plan meets the council's legal obligations and strengthens the tools and resources to ensure that our region has safe, stable, affordable, and dignified places for people to call home in communities free from discriminatory barriers.</p>
Housing Justice Center	All	<p>Housing Policy Plan Objectives: One of the strengths of the Housing Policy Plan is the explanation of objectives and the high-level goals. The stated objectives, including a commitment to fair housing and choice across our region, are critical and the context that the plan provides about the current state of the region is important for local communities to have meaningful discussions about the future of the region.</p> <p>However, we fear that great goals without tools to achieve them will only lead to the same results that we have seen in the past – high level concepts that are largely not implemented at the local level. We believe that the Council can use a combination of enforcement powers, financial resources, and technical assistance to realize the promise of the objectives and goals.</p> <p>Over the past two decades, many metro cities have failed to produce even a small fraction of the need for affordable housing as determined by the Met Council. The failure of local communities to meet the need for affordable housing, or even to meet meaningful progress toward that need, has contributed substantially to the critical shortage of affordable housing across the region. The most recent HUD Comprehensive Housing Affordability Strategy (CHAS) data indicates that over 97,000 metro area</p>

Group/Org	Primary Plan Location	Comment
		<p>renter households experience what HUD characterizes as “severe housing problems”. The most prevalent of these “severe housing problems” is severe cost burden - paying more than half of household income toward housing costs. Two-thirds of these households have incomes at or below 30% of Area Median Income (AMI).</p> <p>A vast number of suburban communities have ignored the Council-adopted need for housing affordable at or below 30% of AMI. The Council's 2040 Housing Plan, as well as the proposed 2050 Housing Plan, are silent as to the special financial requirements to produce deeply affordable housing, including large capital subsidies and annual operating subsidies. This unmet need and the widespread failure to attempt to address it have serious fair housing implications.</p> <p>First, the HUD CHAS data show that households of color in the metro area are about 3.8 times more likely than white, non-Hispanic households to be renters in this income group with severe housing problems. Second, while the Central Cities and some inner-ring suburbs have taken significant steps to meet their affordable needs for new housing, many suburbs have largely failed to do so. Many of these failures are due to active resistance in violation of federal and state fair housing laws. And overall, this widespread suburban failure flies in the face of the 2050 Plan's regional goal of equity and inclusion. There are tools at the disposal of local communities if they choose to use them. City's uniquely have two alternative tools to address annual operating costs and thus provide annual rent subsidies: tax increment and tax abatement. If other annual subsidies are not available the increment should be used but not pay as you go, rather providing annual tax reductions. Cities also need to understand that 30% requires deeper capital subsidies and they will need to provide what they can – for example TIF, CDBG, land donation, or City revenues. Cities also need to explicitly invite and encourage affordable housing proposals that meet the needs of households at 30% AMI to address the historic opposition and hostility that such developments have faced in the past.</p> <p>Finally, the Council needs to make clear that using local tools for encouraging deeply affordable housing is an expectation and implementation plans will not be acceptable without them. By strengthening the use of existing Council powers under Minnesota law, the Council can go further and do more in meeting its obligation and commitment to fair housing and to meeting its overall goals of a more just and equitable region.</p>
Housing Justice Center	Section 4, Housing Implementation Plan	<p>Implementation Program requirement and comprehensive plan review: Perhaps the most critical requirement of the Metropolitan Council statute with respect to comprehensive plans is set out in 473.859 Subd. 4 for an "Implementation Program" which "shall describe public programs, fiscal devices and other specific actions to be undertaken in stated sequence to implement the comprehensive plan and ensure conformity with metropolitan system plans;" and which includes "a housing implementation program, including official controls to implement the housing element of the land use plan, which will provide sufficient existing and new housing to meet the local unit's share of the metropolitan area need for low and moderate income housing."</p> <p>The council is required to provide guidance and procedures which will assist governments in complying with this provision under 473.854. In December 2014, the Council adopted guidance for development of comprehensive plans which addressed that standard: Complete implementation programs must</p>

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		<p>identify a community's "public programs, fiscal devices and other specific actions to be undertaken in stated sequence" (Minn. Stat. 473.859, Subd. 4) to meet housing needs as stated in statute, and clearly and directly link which tools will be used, and in what circumstances, to explicitly address the needs previously identified. 2040 Plan at 113.</p> <p>Further, a community must describe which tools it will implement and describe the sequence of their implementation. Id. However, two years later, the Council added a statement that undercut these principles and effectively gave cities the green light to ignore the Council's Housing Policy Plan: In the Council's review of the community's plan, the Council may provide comments regarding the community's plan but will not judge the tools proposed by the community. Id. 4</p> <p>This "will not judge" statement directly violates several statutory provisions: Minn. Stat. 473.175 subd. 1, requiring council review and comment on consistency of comprehensive plans with Council policy (the statement effectively prohibits the Council, in its review, from doing so); §473.854 which requires the Council to adopt guidelines and procedures "which will provide assistance to local governmental units in accomplishing the provisions" of the Land Planning Act; and 473.129 which requires the Council to "exercise all powers which may be necessary or convenient to enable it to perform and carry out" its duties and responsibilities.</p> <p>Minnesota Statutes 462.361 provides the ability of citizens and housing advocates to enforce compliance by cities with requirements of the LPA, providing for judicial review of government planning actions, including failure, pursuant to 462.355 Subd. 1a, to update its comprehensive plan in conformance with the LPA requirements. Council approval of plans which fail to meet the statutory requirement of consistency with Council policy substantially undermines the Legislative intent of Chapter 462 that citizens can challenge local government's failure to comply with the statutory comprehensive planning requirements.</p> <p>The 2050 Housing Policy must clearly and without reservation provide that consistency with the plan pursuant to 473.175 Subd. 2 requires that every implementation program meet every requirement of 473.859 Subd. 4.</p>

Group/Org	Primary Plan Location	Comment
Housing Justice Center		<p>Matters of metropolitan significance and conformance with system plans: Minn. Stat. 473.173 Subd.1 requires the Council to "review all proposed matters of metropolitan significance." The council is required to adopt regulations to implement this provision. However, the council has not fulfilled its statutory duty to include in the regulation consideration of all relevant council plans in determination of whether a proposed action has metropolitan significance. The intersection of systems plans with the housing policy plan is one of the most powerful pieces of leverage that the council has in ensuring that residential development meets the needs of the region. The rationale for having a regional planning body is to ensure that systems work together. The 2050 Housing Policy Plan should include language committing the Met Council to undertake a review of how housing contributes to matters of metro significance with a goal of amending the administrative rule to account for such outcomes.</p> <p>In response to § 473.173, the Council adopted Administrative Rule 5800.0400. The regulations do not include the statutorily required consideration of the requirements of § 473.173 Subd. 3 or Subd. (4)(j). Both Minn. Stat. 473.173 and 473.129, requiring the Council to "exercise all powers necessary...to enable it to perform and carry out its duties." Section 5800.0040 sets out the criteria for finding metropolitan significance in subs 2 to 4, but it only addresses a small number of very specific connections between housing and issues of metropolitan significance, including intersections with systems plans, subsidized projects, and projects affecting another government. Even these requirements are limited in scope.</p> <p>The current rule does not address the failure to provide sufficient affordable housing throughout the Metro area suburbs, which is a matter of metropolitan significance. Were it to comply with statutory requirements, the rule could apply to large housing developments in the metro area that do not include meaningful (or any) affordable opportunities in communities that have excluded affordable housing development. Additionally, the Council has the power and the obligation, to require comprehensive plan amendment if the plan may "have a substantial impact on or contain a substantial departure from metropolitan system plans," Minn. Stat. § 473.175 Subd. 1, and there are multiple ways in which the council's housing policies are intertwined with its system plans. For example, in <i>City of Lake Elmo v. Metro Council</i>, the Council's rejection of the city's comprehensive plan was upheld because of a failure to conform to Council transportation and wastewater system plans. 685 N.W.2d 1 (Minn. 2004). But the reason the comprehensive plan failed to conform was the City's insistence on new development limited to lower densities that Council housing policy required. <i>Id.</i> at 6. It was a housing issue that triggered system plan review. Similarly, Council housing and transportation policies are closely tied together and failure by a city's comprehensive plan to provide for affordable housing at transit stops could contradict both housing policy and transportation policy</p>

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Housing Justice Center		<p>Metro HRA redevelopment powers: The draft Plan recognizes the important role of Metro HRA's administration of housing choice vouchers with respect to Objectives for Fair Housing and Geographic Choice, and Housing Stability and Quality. However, the Council has never recognized or mobilized its powers as a redevelopment agency pursuant to 473.195 to address the widespread failure of suburban jurisdictions to produce affordable housing.</p> <p>Under Minn. Stat. § 473.195 the council has the same functions, powers and duties as are provided to municipal housing and redevelopment authorities (HRAs) under Minn. Stat. 469.001-469.047 to plan and propose projects anywhere in the metro area. The purposes of 469.001-469.047 include "to remedy the shortage of housing for low- and moderate-income residents." Minn. Stat. 469.001.</p> <p>The Metro HRA has the authority to play several critical roles in the development of affordable housing, especially in suburban areas where local governments have not been effective in doing so. Utilizing its redevelopment powers, the Council could play a major role in overcoming the failure of many metro-area suburban jurisdictions to take any meaningful steps to address their need for new affordable housing and in addressing the outright resistance of many such communities to new affordable housing.</p> <p>The Council could play a typical HRA role of finding developable sites, encouraging developers to explore potential sites, working with developers to propose potential plans, advocating for those plans with local governments, and, with local approval, acquiring sites and lining up financing. By exercising these powers, the Council HRA could play a major role in compensating for the lack of experienced development staff that hinders many suburbs affordable housing efforts and overcoming the excuses of suburban cities that have little interest in such development.</p> <p>Implementing HRA powers to help remedy the shortage of housing for low-income residents falls firmly within the Council's "all powers" mandate under Minn. Stat § 473.129 Subd. 1. It has obvious fair housing consequences given the failure of many metro cities to meet anything close to their share of the regional need. Finally, it is a necessary step to meet the Council's commitment to equity and inclusion.</p>
Housing Justice Center		<p>We write to offer the following comments on the draft 2050 Housing Policy Plan. The Housing Justice Center (HJC) has a long-standing interest in regional land use decisions, including the Met Council Housing Policy Plans. We appreciate the opportunity to provide comments. While the current draft contains some important and useful changes, it also represents several missed opportunities to make our region more equitable. Additionally, the plan as proposed does not currently meet the Council's statutory obligations in several critical ways.</p>

Group/Org	Primary Plan Location	Comment
Metro Cities		The HPP outlines potential criteria for the Livable Communities Act Programs (LCA). A comprehensive review of the LCA programs currently underway and this inclusion thus seems premature. Metro Cities strongly supports the LCA programs and criteria that are sufficiently flexible to promote a variety of local projects and broad participation.
Metro Cities	Section 4, Housing Implementation Plan	The HPP, in section 4, articulates a new requirement that city comprehensive plans identify three specific housing needs representing the greatest needs of the community. Currently, local plans must identify public programs, fiscal devices and other actions to be undertaken in a stated sequence. Requiring this level of specificity appears overly prescriptive and its purpose is not clear. Metro Cities requests that the Council clarify the purpose of this requirement and eliminate overly prescriptive components.
Metro Cities		Metro Cities recognizes that effective approaches to addressing housing require participation from all levels of government, the private sector, and non-profit groups. Local needs as well as capacities vary and require approaches that recognize these varying local circumstances and constraints.
Metro Cities	Section 4, Housing Implementation Plan	The Housing Implementation Plan includes a requirement for cities to identify the current portion of local discretionary funding going to housing programs. Metro Cities asks for clarity on this requirement. Metro Cities is opposed to duplicative or additional reporting requirements of this type.
Metro Cities	Objective 5, Plan	The HPP, under objective 5, requires local comprehensive plans to include consideration of tools to enhance the social and economic capital of residents in newly constructed affordable and mixed income housing, namely mental health services, job training, educational support. These are important services, but generally are not provided by city governments. Metro Cities requests that this objective be modified to name applicable government entities responsible for providing these types of services, or that the statement be eliminated from the document.
Metro Cities	Section 4, Future Need	The Metropolitan Council's role in housing policy serves important regional needs and objectives. The Council's authority in this policy area is also limited in scope, with a focus on assisting local governments in planning for housing to serve the needs of the region. The Metropolitan Council performs this function by identifying the region's allocation of need for affordable housing, projecting regional growth and identifying available resources, technical assistance and methods cities can utilize to create local affordable housing opportunities. Metro Cities consistently advocates for resources to assist cities in meeting housing needs.

Group/Org	Primary Plan Location	Comment
Metro Cities	All	Finally, in several sections of the HPP, the need for increased technical assistance to cities is noted and is supported by Metro Cities.
Minnesota Department of Health		Consider including connection to municipal drinking water systems in the statement, “Seek opportunities to defray the costs for manufactured home communities to connect to the wastewater system”.
Minnesota Department of Health	Objective 7, Provide	In Objective 7, many of the actions include energy efficiency. Suggest the inclusion of clean water and water efficiency as well.
Ramsey County		As a state agency and regional government, the Metropolitan Council is uniquely positioned to de-silo housing-related topics across state agencies and local governments. The Metropolitan Council’s housing policy plan could play a larger role in determining estimated housing need for specific subpopulations and housing types. Examples could include the need for accessible units, the need for senior housing, units for youth aging out of foster care, units that support the reunification of families in the child protection systems, units for those leaving state and local prisons, and units connected to other waived services. This information would help local governments plan what types of units to resource and which services are needed to support housing choice.
Ramsey County	Objective 7	Ramsey County commends the Metropolitan Council’s climate-focus within the draft housing plan and recommends alignment with the Ramsey County Equity Action Plan. Rather, than focusing on climate data on the siting of affordable housing, staff recommends incorporating mitigation and adaptation tools into affordable housing developments. The focus on siting, such as flood plain awareness, is already required by federal environmental reviews.
Ramsey County	Objective 2 and Objective 4	Ramsey County commends the Metropolitan Council’s proposed actions to study, support and implement ways to lower the cost of affordable housing construction. Proposed actions include lowering sewer-related fees, incentivizing development on government-owned land, and removing unnecessary barriers to affordable housing in state code while balancing safety.
Ramsey County	Section 4, Regional Needs	The Metropolitan Council’s plan focuses on “Future Affordable Housing Need”. This is a prediction of new low-to-moderate income households that will be added to the region. We believe that a greater emphasis is needed on our existing affordable housing need by incorporating cost-burdened households, number of residents on coordinated entry lists, and number of residents on voucher waiting lists into each city and county’s allocated need. A focus on existing cost-burden households would better align with the new Local Affordable Housing Aid (LAHA) that cities and counties across the metropolitan area can use to meet their existing and future housing need.

Group/Org	Primary Plan Location	Comment
Ramsey County	Objective 1	The plan has a section called "Fair Housing and Choice." There is a regional coordinating body called the Fair Housing Implementation Council (FHIC) that Ramsey County and the Metropolitan Council both participate in. Continued participation in the FHIC and encouragement of other housing agencies to participate in the FHIC could be mentioned in this section. In the current draft of the plan the FHIC is only mentioned in the "Equity" section.
Ramsey County	All	While the plan disaggregates data by race and ethnicity, further disaggregation is needed. For example, the plan states that Asian American households have the most wealth and have the most housing choice. In Ramsey County the Asian American community is incredibly diverse and new immigrant communities, such as the Karen community, often have drastically different outcomes than other ethnicities within that racial category.
Scott County		"Support "missing middle" housing (small and medium multifamily and attached single family homes) as a strategy to improve affordability and expand housing choices for cities and townships across the region." The Board took a formal position opposing the "missing middle" legislation (SF3946/HF4009) introduced last session. We expressed concern with provisions of the bill that preempt city zoning and land use authorities, remove public input in the residential development process, ignore long-range comprehensive plans and lack consideration for how cities utilize zoning and land use authorities to ensure investments in utilities and infrastructure are sized and scaled appropriately to support new housing density.
Scott County	Objective 1, Provide	<ul style="list-style-type: none"> • The Board has the following comments on the Action items listed under Objective 1: Fair Housing & Geographic Choice <ul style="list-style-type: none"> o "Encourage the development of affordable housing in all areas of the region by exploring options to provide funding for the development of local housing programs that will increase affordable housing opportunities, with priority for cities and townships that do not have a demonstrated history of developing affordable housing." <p>This is important to acknowledge as Scott County falls outside of the Metro HRA voucher administration region and, therefore, affordable projects proposed for our communities are unable to secure Project-based Vouchers awarded through Metro HRA. This has a direct impact on the timeline of development for certain types of affordable housing development in our county.</p>
Scott County	Objective 2, Provide	<p>The Board has the following comments on the Action items listed under Objective 2: Options to Own and Rent</p> <ul style="list-style-type: none"> o "Explore the potential for a Met Council role in monitoring ownership of rental housing properties in the region." AND "Maintain and improve an accessible data infrastructure to advance knowledge and awareness of the region's housing stock and demographic characteristics." Transparency in the

Group/Org	Primary Plan Location	Comment
		ownership of rental housing properties is important and could inform policies in the future. The Board believes this would be an incredible tool for increased coordination with rental property owners/managers in the county.
Twin Cities Housing Alliance	All	<p>TCHA Supports/Encourages: Proposed increases in minimum densities across all communities and in areas near key regional transportation investments. As noted in the density report, many developments far exceed the minimum densities. We would encourage increasing these minimum densities, particularly in areas near key job centers and areas with access to infrastructure and amenities. Holding cities accountable to higher densities in all areas of the region by proactively aligning zoning with comprehensive plans. Provide enhanced technical assistance to support those cities with limited capacity to ensure the alignment of zoning with comprehensive plans occurs within the timeframe set by State Statute. Providing flexibility in guiding land at higher densities to create more affordability in housing across all areas of the region. In a time when the region has a severe housing shortage of over 80,000 units, ensuring that more housing development of all types and at all incomes levels is supported and encouraged is critically important including:</p> <ul style="list-style-type: none"> o Streamlined and standardized approval processes o Relax parking requirements and partnering with the development community to ensure that parking meets the needs of the project o Reduce local fees, particularly for affordable housing projects o Expand use of local finance tools and resources o Allow multifamily housing in exiting commercially zoned area o Support conversion of economic obsolete buildings to housing
Twin Cities Housing Alliance	All	We are deeply involved in finding practical solutions to address the alarmingly short supply of housing and work to advocate for policies and programs that support more housing supply, ensure that there is quality well maintained existing housing and that there are protections for those most vulnerable to housing instability. This requires partnership across the entire housing ecosystem and with the public sector. We are attaching our policy framework which recognizes the role of the Metropolitan Council in supporting policies and programs to increase housing supply, opportunities and affordability.

Group/Org	Primary Plan Location	Comment
Washington County	Objective 6, Partner	<p>Equity</p> <p>In the Partner actions, we encourage the Council to participate and partner with the Homeownership Opportunity Alliance as they are already convening a regional group of people and organizations actively working to reduce the homeownership disparity gap.</p>
Washington County	Section 4, Future Need	<p>Future Affordable Housing Need by Local Jurisdiction</p> <p>We fully understand the desire and need to establish need of affordable units by income range. We support this. However, we encourage Metropolitan Council to put more funding and policy forward to make this possible. The 2030 allocations of need have also included 30% AMI and 50% AMI unit needs but nothing was done at a regional level to fund the cost of those rent and price reductions. This creates frustration for those communities attempting to meet the needs.</p>
Washington County	Objective 1, Plan/Provide	<p>Geographic Choice:</p> <ul style="list-style-type: none"> • Within the Provide actions, we would encourage Metropolitan Council to consider offering LCA program funding for deeply affordable housing outside of Minnesota Housing's RFP process. For example, developers who utilize private activity, tax exempt bonds with 4% Low Income Tax Credits as their primary financing will generally have relatively small funding gaps. The timing of the bonding applications and 120 day closing deadline do not align well with the super RFP timelines. • Within the Plan actions, we would encourage Metropolitan Council to consider other factors beyond high density residential land guidance to demonstrate plans for meeting a local allocation of Future Affordable Housing Need. Some Washington County communities have infrastructure limitations which cannot support higher densities. We have witnessed how land guided and zoned for high densities did not result in affordable residential units.

Group/Org	Primary Plan Location	Comment
Washington County	Objective 2, Provide/Plan	<p>Options to Own and Rent</p> <ul style="list-style-type: none"> • Within the Provide actions, we strongly support the action of exploring financial support or other resources to reduce SAC charges for deeply affordable housing units. The CDA has been developing its own policies and funding resources to incent developers to include deeply affordable units (30% of the Area Median Income). We have found that it takes a significant amount of subsidy to make the rents pencil out. Anything the Council can do to incentivize or reduce costs for deeply affordable housing would be helpful. • This Housing Policy Plan acts as a jobs strategy for many communities. Many of the jobs available in Washington County will only be filled by employees within a short commuting distance. We encourage Metropolitan Council to look at how their investments in transit, transportation, and water boost and hinder the ability to meet the future affordable housing need as well as the ability to grow, build, and sustain strong communities.
Washington County	Objective 3, Provide	<p>Stability</p> <p>In the Provide actions, we appreciate the inclusion of an action that prioritizes developments that incorporate supportive services for allocating project-based vouchers; however, this may have unintended consequences. We are seeing a number of supportive housing providers struggle to fund the ongoing supportive services. We are seeing non-profit providers reduce services in order to survive. The requirement has to also come with secured and long-term funding to be successful. In addition, Washington County is at a disadvantage as the allocation of Housing Choice Vouchers is less per capita than any other county in Minnesota. We encourage Metro HRA to continue offering project-based vouchers within the jurisdiction of Washington County.</p>
Washington County	All	<p>Thank you for the opportunity to comment on the draft Imagine 2050 Housing Policy Plan. The amount of public engagement the Council and its staff have engaged in to obtain input on the Housing Policy Plan has resulted in a more meaningful and valuable plan. We appreciate being invited to participate in the Plan's Technical Advisory Group.</p> <p>The Washington County CDA is generally supportive of the Housing Policy Plan. The Plan's values of Proximity and Choice, Dignity and Decency, and Connection and Wellbeing align well with the values and work of the CDA. Given the housing needs of the communities in Washington County, we are particularly supportive of the objectives around fair housing and geographic choice, options to own and rent, stability, and equity.</p>
Washington County	All	<p>Washington County affirms the comments shared by the Washington County CDA in their comment letter to the Metropolitan Council.</p>

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Public		None - you should leave cities alone so they can plan the type of housing and density they want to their city to look like. It is not your statutory responsibility.
Public		Community using green space Prioritize pedestrian or public transportation Prioritize native plants + gardens
Public		Housing and Land Use - very forward-looking document, with similarities to other plans in the United States and English-speaking parts of the world. I would like to see Minnesota avoid problems of accountability. Imagine 2050 imagines a future where people have more housing choices. We are pushing options that raise housing costs by requiring more land or higher construction costs. We should promote smaller options like townhouses/multi-family (2 to 4 stories), especially for in-fill development. We should provide more opportunities for more housing choices.
Public		I imagine being able to get everything I need within 15 minutes of where I live. I imagine walkable, bikeable, accessible neighborhoods. I imagine thriving public transit, bustling local businesses, and affordable housing located all around the twin cities.
Public	Objective 7, Provide	Innovative environmental and climate-friendly practices! Roadways that are more permeable or have lower carbon emissions. Electric buses. Building designs that reduce the need for AC.
Public	Objective 1	Moved here for grad school and have since convinced a number of family members to move here because it's so affordable. Really concerned that housing will not be this affordable in the metro area. The only way to keep housing affordability low is to increase density throughout the region, especially in suburban communities. Multi-family housing developments (townhomes, etc.). More rigorous data collection from cities across the region about new greenfield development, as well as experiences with upzoning so the other housing types can be built.

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Public	Section 4, Land Guided for Affordable Housing	Why does affordable housing have to translate into a density conversation? Why can't we maintain density restrictions that enable affordable housing without needing to jam more housing into a smaller space. Seems like we should be trying to incentivize cities, construction companies and landowners to keep density an option with more creative planning. The only thing these massive complexes of cookie cutter homes does is fill the pockets of large corporate firms.
Public	Objective 4	Affordable housing for seniors living on social security. More community gardens.
Public	Objective 2	Are affordable housing aimed for single family home affordability or renting? The state needs more single family homes to help with affordability and to help with people being able to buy their first house and make home ownership a reality again. The significant rise in housing costs and not being able to afford a house in the area in which I work in.
Public	Objective 1	Create incentives and disincentives to get cities to eliminate exclusionary zoning and auto-only infrastructure. Prevent cities from keeping low income housing tax credit buildings out of their borders or their wealthiest neighborhoods.
Public	N/A	Government intervention in the housing market has historically been an unmitigated disaster for families, communities, and the economy. Stop messing with the free market.
Public	Objective 1	The policy is "good" in theory, but in practice it falls short. There is no consideration for how adding affordable housing to communities will affect schools. In our community, our schools are already at capacity, and recent large affordable housing developments have added a large number of students to the schools, to the point where students have to stand on the buses, class sizes have grown, and there is insufficient staffing and infrastructure at the schools to support this influx. If you are going to promote affordable housing, then you also need to fully fund new schools in that same community, without an added tax burden to people in that community. You should also assess if emergency response calls increase when affordable housing developments are built, because that is also an added cost to local governments.
Public	Objective 1	It sounds like you are going to effectively force communities to implement affordable housing, which is wrong. If affordable housing is beneficial to a community, then provide the statistics to support it. When

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		affordable housing is added, what happens to the schools, the crime rates, the value of nearby homes, the impact on local businesses, etc. And use reputable statistics that account for confounding factors.