

2050 HOUSING POLICY PLAN

Public comment summary

January 2025



IMAGINE²⁰₅₀
the region's plan for an equitable and resilient future

Regional vision

A prosperous, equitable, and resilient region
with abundant opportunities for all to
live, work, play, and thrive.

Regional core values

Equity | Leadership | Accountability | Stewardship

Regional goals

Our region is equitable and inclusive

Racial inequities and injustices experienced by historically marginalized communities have been eliminated; and all people feel welcome, included, and empowered.

Our communities are healthy and safe

All our region's residents live healthy and rewarding lives with a sense of dignity and wellbeing.

Our region is dynamic and resilient

Our region meets the opportunities and challenges faced by our communities and economy including issues of choice, access, and affordability.

We lead on addressing climate change

We have mitigated greenhouse gas emissions and have adapted to ensure our communities and systems are resilient to climate impacts.

We protect and restore natural systems

We protect, integrate, and restore natural systems to protect habitat and ensure a high quality of life for the people of our region.



Table of Contents

- Public comment period 4
 - Demographic..... 4
 - Summary of feedback 4
- Public comment data 5
 - Online portal participants..... 5
 - Data from online comment portal..... 5
 - In-person and anonymous feedback 10
 - Feedback from government, nonprofit, parks, and other partner organizations 12

Public comment period

The Metropolitan Council accepted public comments from August 15 through October 7 through various channels, including email, phone, mail, recorded message, an online comment portal, and a public hearing on September 25. During that time, approximately 2,000 total comments were received from approximately 500 organizations and individuals. Specifically, the draft Housing Policy Plan received approximately 180 comments from 28 cities, four counties, three non-governmental organizations, one Met Council advisory committee, one state agency, one federal agency, and 25 residents of the region.

For individuals who commented on the draft Housing Policy Plan and provided voluntary demographic data, the following data are available:

Gender

- 53% identified themselves as men
- 12% as women
- 35% preferred not to answer

Age

- 25-34: 42%
- 35-44: 8%
- 45-54: 25%
- 55-64: 17%
- 65-74: 8%

Summary of feedback

Selected quotes

“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 protected from discrimination, historical and existing housing inequities are addressed, and a variety of quality, affordable living options are available, including homeownership opportunities.”

“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. 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.”

“The Metropolitan Council is uniquely positioned to de-silo housing-related topics across agencies and local governments. The Metropolitan Council’s housing policy plan could play a role in determining estimated housing need for specific sub-populations and housing types; it could include the need for accessible units, the need for senior housing, units for youth aged 18-24, 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.”

Major themes

- Regional issues and goals identified
- Alignment with local goals
- Appreciation for engagement, resources and technical assistance
- Increased flexibility for different city and township types

- More collaboration between Met Council divisions
- Land Guided for Affordable Housing (LGAH) density requirements
- Reporting requirements
- Understanding existing housing needs, not just future need
- How will policy be implemented via Met Council incentives
- More funding is needed to meet affordable housing need
- How to reduce barriers to funding
- Can the Met Council have more of a “stick” to promote affordable housing development
- More focus on climate mitigation in housing
- Met Council needs to partner more in regional housing issues

Note: Many commenters provided feedback related to land use topics that also relate to housing policy; while these comments are largely described in the land use plan comment report, responses were created collaboratively among Met Council staff.

Proposed revisions

Proposed revisions to the 2050 Housing Policy Plan fall into three main categories:

1. Clarifying requirements and housing data: Clarifying language related to reporting requirements and the choices that cities will have for implementation; clarifying how existing housing needs data will be available for cities.
2. Context: Using more nuanced language to describe disparities and describing challenges to affordable housing development and funding limitations.
3. Content additions and changes: Adding considerations as noted by commenters, responding to recommended commitments from the Met Council’s American Indian Advisory Council, removing selected proposed requirements in favor of increased technical assistance, and adjusting roles and clarifying how Met Council will provide technical support for implementation.

Public comment data

The following section provides a full output of all the public comments received during the formal public comment period for the Housing Policy Plan.

Online portal participants

There were approximately 20 people who participated in the Housing Policy Plan topics on the online portal. Fourteen provided their names:

Austin Bell	Carrie Mitchell	Soren Stevenson
Brian Hunke	Malachi Moser	Schurkey Swanke
Sarah Larson	Kenny Niemeyer	Bill Tiedemann
Amy Lokensgard	H Olson	Benjamin Werner
William Markert	Rob Rosen	

Data from online comment portal

Full Housing Policy Plan

Question: Which housing policies align with your community's and/or organization's priorities?

Affordable housing needs.	Comment noted.
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.	The Met Council is committed to fostering sustainable land use practices and expanding housing choices, including more infill, redevelopment and diverse housing types, to meet the needs of our growing region.
All of these policies align with my community's priorities.	Comment noted.

Question: What questions do we need to ask about the long-range future of the region?

Are affordable housing aimed for single family home affordability or renting?	The 2050 HPP draft discusses affordable housing options in terms of both rental and ownership opportunities.
How are we going to de-commodify housing? How are we going to build enough deeply affordable housing? Why do we keep over-paying for-profit developers to build low quality housing? How can we increase density without concentrating poverty? How can we build beautiful buildings that we are proud of? How can we make sure the city is really fun?	Comment noted.

Question: What perspectives do we need to prioritize?

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 2050 HPP draft discusses affordable housing options in terms of both rental and ownership opportunities.
The perspective of young people.	Comment noted.

Question: What in your experience or perspective drives your view on this?

The significant rise in housing costs and not being able to afford a house in the area in which I work in.	Comment noted.
I am an urban planner and housing developer. I work for a large nonprofit housing development agency. I'm tired of giving for profits huge amounts of money, and investors tax breaks, just so we can meet our basic needs.	Comment noted.

Housing objectives

Question: How well do you feel these objectives support the future you'd like to see?

	Very well	Somewhat well	Neutral	Somewhat unwell	Not well at all

Fair housing and geographic choice	43%	7%	7%	7%	36%
Options to own and rent	43%	14%	7%	7%	29%
Stability	50%	7%	7%	7%	29%
Quality	50%	7%	7%	0%	36%
Cultural connection and well being	50%	0%	0%	14%	36%
Equity	43%	7%	14%	0%	36%
Environmental justice	50%	7%	7%	0%	36%

Question: What could we do to strengthen or add to these objectives?

Aging in place within a community of choice is critical for all of us as we age in place in this great state. Ensuring that an aging lens is considered in all policies is critical.	Comment noted. Prioritizing community choice for opportunities to age in place will continue to be a focus of the Met Council as we see a growing aging population in the region. The 2050 HPP draft requires the local need for affordable age-restricted housing options to be considered in community-level plans.
Comprehensive and equitable.	Comment noted.
Ensure that sense housing can be built anywhere. Build less parking so that more housing units can be built. Support this with public transit.	Comment noted.
Equitable!	Comment noted
Government intervention in the housing market has historically been an unmitigated disaster for families, communities, and the economy. Stop messing with the free market.	Comment noted. The Met Council will provide technical assistance to local governments to promote housing quality, as described in the draft plan text.
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.	Comment noted. While Met Council does not determine LIHTC allocation plans, the Draft 2050 Housing Policy Plan equips communities to plan for affordable housing development to meet needs in all communities.

Objective 1: Fair housing and geographic choice: People of any ability, age, financial status, race, and family size can live in the community they choose.

Policy: Develop programming, provide resources and funding, and support local, regional, and state initiatives that increase the ability of households to choose where to live in the region regardless of ability, age, financial status, race, or family size.

Question: How well do you feel this policy and these actions support the future you'd like to see?

There were only a handful of respondents to this question. Respondents were split between saying the elements supported their future vision for the region very well or somewhat well, or they were neutral. One respondent to each item identified them as supporting their future vision not at all well.

Question: What could we do to strengthen or add to the objective, policy, and/or actions?

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.

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.

Objective 2: Options to own and rent: all housing options, including rental and ownership, are accessible to households.

Policy: Support and incentivize development, preservation, and maintenance of affordable housing units of all types and tenure (rental, shared equity, and ownership) that reflect what residents can afford.

Question: How well do you feel this policy and these actions support the future you'd like to see?

There were only a handful of respondents to this question. Respondents were split between saying the elements supported their future vision for the region very well or somewhat well, or they were neutral. One respondent to each item identified them as supporting their future vision not at all well.

Objective 3: Stability: Stable, affordable, and dignified places to live are available to everyone, especially those experiencing housing insecurity and homelessness.

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.

Question: How well do you feel this policy and these actions support the future you'd like to see?

There were only a handful of respondents to this question. Respondents were split between saying the elements supported their future vision for the region very well or somewhat well, or they were neutral. One respondent to each item identified them as supporting their future vision not at all well.

Objective 4: Quality: Affordable housing is built and maintained to a high standard, ensuring safety and accessibility for all residents.

Policy: Support and incentivize development, preservation, and maintenance of affordable units of all types that provide residents a safe, dignified, and healthy place to live.

Question: How well do you feel this policy and these actions support the future you'd like to see?

There were only a handful of respondents to this question. Respondents were split between saying the elements supported their future vision for the region very well or somewhat well, or they were neutral. One respondent to each item identified them as supporting their future vision not at all well.

Question: What could we do to strengthen or add to the objective, policy, and/or actions?

<p>“Inform state building code updates to encourage construction of more affordable, maintainable, high-quality, safe, and climate-resilient homes. Promote the use of housing code enforcement or rental licensing as tools to maintain unsubsidized affordable housing.” Preserve existing residential infrastructure, value, usability, and investment via: * Adoption of a uniform Building Code inspection process and procedure using virtual inspection concepts to ensure all aspects of Building Code including Manufacturer Instructions are actually properly completed. The public believes when Building inspections are signed off, that code is met. Unfortunately, that is not currently the case in all communities, including my own. This leads to compromised building structures, health&safety issues, tremendous unnecessary monetary expense, and loss of public trust. * Create a Building Code Inspection oversight and audit office to ensure that Building Inspections are modernized, thorough, uniform, and processes and procedures are consistently followed. *Maintain Building Inspection records and visual documentation indefinitely. By creating government mechanisms for current systems, (Building Officials) the private sector (contractors) have an additional layer of accountability to improve their services that will protect the homeowner, preserve long-term housing assets, validate the need for Building Inspectors, and increase public confidence.</p>	<p>Comment noted. The Met Council will provide technical assistance to local governments to promote housing quality, as described in the draft plan text.</p>
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Objective 5: Cultural connection and well-being: Everyone has access to homes, not just housing

Policy: Enhance residents’ ability to keep their housing, amenities, health, social networks, and sense of belonging within their neighborhoods.

Question: How well do you feel this policy and these actions support the future you'd like to see?

There were only a handful of respondents to this question. Respondents were split between saying the elements supported their future vision for the region very well or somewhat well, or they were neutral. One respondent to each item identified them as supporting their future vision not at all well.

Objective 6: Equity: Repair historic and ongoing injustice in housing practices and outcomes

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.

Question: How well do you feel this policy and these actions support the future you'd like to see?

There were only a handful of respondents to this question. Respondents were split between saying the elements supported their future vision for the region very well or somewhat well, or they were neutral. One respondent to each item identified them as supporting their future vision not at all well.

Objective 7: Environmental Justice: Housing in our region is resilient to climate change impacts and furthers environmental justice

Policy: Support the development, retrofitting, and maintenance of homes to create a climate-resilient future and improve health for residents in the region.

Question: How well do you feel this policy and these actions support the future you'd like to see?

There were only a handful of respondents to this question. Respondents were split between saying the elements supported their future vision for the region very well or somewhat well, or they were neutral. One respondent to each item identified them as supporting their future vision not at all well.

In-person and anonymous feedback

Attendees at several in-person community and youth events were asked what their vision for the region of the future is. Below are their responses.

Comment	Response
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.	Thank you for your comment. The plan includes support for bikeable, walkable, accessible neighborhoods. In the transportation plan, these are supported by policies and actions related to our healthy and safe communities goal, as well as our dynamic and resilient region goal.
Accessible housing + better public transportation for all	
Less car dependency, more bikes, more natural native plants, increased housing density for greater open space - less expansion to farmland.	Thank you for your comment.
More public transportation Less trash More recycling and compost All our lakes and rivers and oceans are protected (legally - rights of nature) Less oil and gas Enough affordable homes for everybody Music in the streets No guns Everyone being treated equally No fast cars	Thank you for your comment.
More feeling of community and safety, less crime and theft. More walkable and transit friendly community Better public transit. More frequent. safer. More affordable housing. Safer housing. Help for those with drug and alcohol issues	Thank you for your comment. Several policies in Imagine 2050 - namely around transit, transportation, housing, and land use - address the items you raise.

Comment	Response
<p>Future Affordable Housing Need by Local Jurisdiction 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>	<p>The Met Council recognizes that deeply affordable (30% AMI or less) units are the region's greatest need, and they are also the units that need the most subsidy and resource support. Other proposed actions in Imagine 2050 identify opportunities for the Met Council to provide greater financial support focused on deeply affordable housing, both through development grants as well as other financial tools such as Sewer Access Charge fees. The Met Council will continue providing data on the region's future need for housing, whether or not it is feasible to achieve it, as well as coordinating with other housing funders to maximize the resources available.</p>
<p>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 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.</p>	<p>Comment noted. The 2050 HPP is developed based on the guidance of Minnesota State Statute 473.859 Subdivision 2(c) which requires the regional development guide to include a housing element which contains standards, plans, and programs for providing housing options to meet the existing and future housing needs of the region, and its communities. This includes the development of low- and moderate-income housing.</p>
<p>Better parks, better transit, better schools, better trails, better lakes, better houses better stores, better jobs better food for a better region</p>	<p>Thank you for your comment.</p>
<p>Transit systems accessible to all different types of housing available throughout the community, parks trails places to work that are in close proximity to where you live proximity to lakes, open spaces and transit</p>	<p>Thank you for your comment. We agree - Imagine 2050 outlines plans to do all these things.</p>
<p>increasing water access and planting more trees, having different types of housing and connected roadways and connected transit</p>	<p>Thank you for your comment. We agree - Imagine 2050 addresses resources and guidance to address climate concerns, including our tree canopy in the region, as well as ensuring housing choice and access to transit.</p>
<p>Rent control apartments, more affordable housing, more co-op, grocery stores, more parks, more transportation, options and more affordable, transportation options, less pollution, equal rights for everyone more art in the community,</p>	<p>Thank you for your comment.</p>

Comment	Response
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<p>Less trash in the streets, more education on future money and savings for kids, better education and less littering better technology less homeless people less trash everywhere more parks</p>	<p>Thank you for your comment.</p>
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Feedback from government, nonprofit, parks, and other partner organizations

The following pages include full output of public comment from various organizations who provided their feedback during the public comment period. Comments are organized, alphabetically, by organization name.

Comment	Response
Carver County	
<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>	<p>Met Council will look for opportunities to clarify/strengthen its partnership commitments and provide tangible examples where relevant. The role of the Housing Policy Plan is to equip cities in the region to plan for, commit to, and support affordable housing development that is consistent with regional goals.</p>
<p>Objective 1: Fair Housing and Geographic Choices. “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.” 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 Young America 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>	<p>We know that affordable housing is needed in all areas of the region and not just in areas with improved access to a variety of transit options. LCA grant programs include scoring criteria that are designed to serve all community designations. Additionally, technical assistance will be available to all communities to encourage the development of housing to meet local allocation of future affordable housing need.</p>
<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>	<p>The Metro HRA is currently studying different options to support homeownership and/or build wealth. It is helpful to know that voucher holders you work with in Carver County are looking for these opportunities and expanding funding for affordable homeownership models is important to Carver County.</p>

Comment	Response
<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>	<p>Comment noted. The goal mentioned applies to Met Council-owned land specifically. The policy plan encourages the development and preservation of affordable housing in all community designations throughout the region.</p>
<p>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.</p>	<p>Thank you for this comment. This is our hope as we know that other partners are also working on greater coordination of housing funding. We hope to learn from these efforts. We look forward to learning more about work that is already being done in this area.</p>
<p>Objective 3: Stability</p> <p>“Goal: Support continued participation in project-based subsidy programs by engaging property owners and emphasizing the community benefits of participation.”</p> <p>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>	<p>The Met Council will continue to build partnerships across the region with HRA/PHAs, funders, developers, property owners, and others to increase access to project-based subsidy programs, including regional collaborative efforts such as those mentioned.</p>

Comment **Response**

“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.”
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.

The action to "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" has been changed to "Plans should include any available data about homelessness and need for shelter in the community and define how the city will address housing instability." This change was made to allow for greater flexibility for communities to explore available data and determine local needs for addressing housing instability. There is no specific requirement to create shelter. We are noting and will continue to support opportunities to address funding needs for housing issues across the region. Convening partners is an action Met Council will take as a regional convener to better address these issues at a regional level.

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.

Thank you for your comment, the Met Council is supportive of increasing property owner participation in voucher programs, please see relevant actions in Objective 1 under the Provide section and Objective 2 under the Provide section. The Metro HRA continues robust engagement with property owners across the region on voucher acceptance.

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.

Comment noted.

City of Andover

Comment	Response
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Supporting missing middle housing. Andover has limited sewer capacity and cannot accommodate additional density beyond what has already been constructed/planned at 3 units per acre, as each unit added takes away from future development.

Minn. Stat 473.145 requires the Met Council to plan for the orderly and economical development of the region. Land use policies that manage the region's planned land supply like supporting compact development, redevelopment, and infill, establishing criteria for expanding the Metropolitan Urban Service Area (MUSA), as well as adjusting density minimums all work in concert to help manage growth and development in urban, suburban, and rural areas of the region. The Met Council has a statutory responsibility to continue implementing the Metropolitan Land Planning Act. Further, density policies address the form/design of growth, not the quantity of growth. A modest increase in minimum densities does not require local governments to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land. Where there are concerns about the amount of forecasted growth, the Met Council works in collaboration with the local government to come to agreement on the appropriate forecast.

Regarding the concern related to the potential impact on regional wastewater system capacity that increasing the minimum residential density from 3 to 4 units per acre, regional wastewater system design assumptions use flow generation rates that reflect development density's greater than the flow typically generated by 3 unit per acre development. Therefore, regionally speaking, an increase in 1 unit per acre in residential densities will generally not adversely impact system capacity in the regional wastewater system. Part of the decennial planning process is intended to identify areas where both local and regional system improvements may be needed as well as changes to development staging, adjustments to growth forecasts, analysis of available land supply, and more. As local governments initiate their planning efforts, the Met Council technical staff and Sector Representatives are available to offer assistance.

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.

Comment noted.

Comment	Response
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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.

Any tool a community may use that is not a part of the Comprehensive Plan will not require a Comprehensive Plan Amendment, but should be reported in the City's annual Housing Action Plan via the Housing Policy and Production Survey.

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.

Comment noted.

City of Blaine

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.

Thank you for the supportive comment.

The City supports efforts to modify the SAC calculation for affordable housing to more appropriately reflect modern affordable housing construction norms.

Thank you for your comment. The SAC program is continually seeking feedback to improve the program and meet the needs of our region. This comment and show of support will be shared with the SAC department and Community Development, as they work together on this important issue.

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.

Through the Imagine 2050, and specifically the Housing Policy plan we hope to continue to find ways to prioritize the needs of our most vulnerable populations through access to and preservation of affordable housing. Met Council appreciates the comment that could further the ways in which we support resident owners of manufactured home parks through additional funding for maintenance needs of private water utility lines.

City of Bloomington

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.

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.

The Met Council recognizes that deeply affordable (30% AMI or less) units are the region's greatest need, and they are also the units that need the most subsidy and resource support. Other proposed actions in Imagine 2050 identify opportunities for the Met Council to provide greater financial support focused on deeply affordable housing, both through development grants as well as other financial tools such as Sewer Access Charge fees. The Met Council will continue providing data on the region's future need for housing, whether or not it is feasible to achieve it, as well as coordinating with other housing funders to maximize the resources available.

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.

A part of the "Provide" Actions for Objective 1 includes, "Track all new housing constructed in the region to assess its affordability and report trends in affordable housing construction in the region." This would incorporate the New NOAH suggested in the comment.

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.

The Met Council operates Livable Communities Act programs as an incentive for communities to negotiate and track progress toward specific affordable housing goals. We intend to continue exploring partnerships with other agencies, funders, and stakeholders in the region to align resources and equip communities to meet their goals. We will continue exploring opportunities to better align Met Council resources to incentivize consistency with all regional policies.

City of Brooklyn Park

Comment	Response
<p>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.</p>	<p>Thank you for your supportive comments.</p>
<p>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.</p>	<p>Thank you for your supportive comment.</p>
<p>City of Chaska</p>	

Comment

Response

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.

The allocation methodology of Future Affordable Housing Need is described in "Appendix C: Methodology of Calculating Affordable Housing Need" of the Draft 2050 Housing Policy Plan. As described in this section each city gets an allocation of the total regional Future Need based on the city or townships forecasted local growth, existing stock of affordable housing (including unsubsidized housing and preserved affordable units), and balance of low-wage jobs to low-wage workers. Forecasted growth is based on a city or townships capacity to support future households including the current planned land use in the area, transit access and economic activity and migration, to see how forecasted growth is generated please refer to the "Forecast Methodology Report" from April 2023. Please note that the allocation of Future Affordable Housing Need values in Appendix B of the Draft 2050 Housing Policy Plan are based on the 2040 growth forecasts that were generated in January 2024. The updated growth forecasts that will be finalized will likely be lower, which would make the allocation of Future Affordable Housing Need lower for the City of Chaska. The Met Council appreciates your feedback in regards to better differentiating the capacity, tools and resources that vary across different community designations.

City of Corcoran

Comment	Response
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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.

The draft 2050 Housing Policy Plan does recognize that density is not the only tool for the creation of affordable housing and has made modifications to increase the flexibility of the Land Guided for Affordable Housing (LGAH) requirement in Section 4 of the 2050 Housing Policy Plan in order to reflect this reality. However, Section 4 of the Housing Policy Plan does provide evidence that affordable housing is much more likely to be built at higher densities. According to Minn. Stat. 473.859, comprehensive plans must use land use planning to promote the availability of land to meet low and moderate income housing. This land must be available at densities high enough to accommodate low and moderate income housing, not necessarily required to be developed as affordable housing.

Comment	Response
<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 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. 	<p>Thank you for your comments and questions. Some draft language has changed to reflect the need for additional clarification. The action to "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" has been changed to "Plans should include any available data about homelessness and need for shelter in the community and define how the city will address housing instability." This change was made to allow for greater flexibility for communities to explore available data and determine local needs for addressing housing instability.</p> <p>Met Council will continue to support opportunities to address funding needs for housing issues across the region. The HPP strives to provide assistance through programming as well as financial resources (such as SAC fee reductions alongside available Livable Communities Act grants) to help provide subsidy and reduce barriers to constructing affordable housing across the region, recognizing the specific need to prioritize assistance for deeply affordable housing.</p> <p>The Met Council supports making its LCA funding easier to access for communities with limited capacity to apply, as demonstrated by the action in the Provide section of Objective 1 of the draft Housing Policy Plan to "explore ways to prioritize funding to increase affordable housing opportunities for cities and townships that do not have a demonstrated history of developing affordable housing". Staff encourages Corcoran to become a participating community in LCA programming to become eligible to receive funds for qualifying development. After the Regional Development Guide (which includes the HPP) is adopted Met Council will create resources for local staff drafting comprehensive plans in the form of the Local Planning Handbook. The purpose of the Handbook is to provide clear and specific direction on what the minimum requirements are and how to meet them, as well as provide tools, maps, and data resources to make it easier for local staff to complete minimum requirements through individualized community information and resources.</p>

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 #3 under Objective 3 above is applicable here as well.

Comments noted.

OBJECTIVE 6: Equity

Comment

Response

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 Cottage Grove

Objective 5, Policy 1- Housing Opportunities 'Missing Middle'
Addressing housing affordability and availability is a statewide issue however, a one size fits all approach does not fix the problem as cities across Minnesota are unique with distinct, local housing needs, public infrastructure capacity, public services and safety availabilities and funding resources. Objective 5, Policy 1 would allow a multitude of housing types on a single family residential lot while most cities do not have the infrastructure including water, stormwater, and sewer systems to support the additional density in these residential guided areas. The proposed action does not consider who is responsible for the cost of upsizing infrastructure and long-term maintenance passing the burden to the local taxpayers. The proposed actions replace existing zoning and land use authorities with an overly broad and rigid framework that eliminates the ability for cities to account for local characteristics and to be responsive to local conditions. Cities across the region have implemented innovative changes at the local level with community engagement to address their individual zoning and land use ordinances, provide local resources to ensure affordability, and create opportunities for new development across the housing spectrum. For these reasons the City urges adjustment of the actions under this policy.

The Met Council acknowledges that a one-size fits-all approach to regional policy would not account for the various planning needs throughout the region. For example, in Imagine 2050, the Met Council established eight different community designations to account for different policy approaches.

Density policies address the form/design of growth, not the quantity of growth. A modest increase in minimum densities does not require the City to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land. Further, density is not the driver of increasing cost for local urban services. Growth is the primary factor that increases the cost for services in a community, through the extension of roads, public infrastructure, and public services. Generally, the cost of additional services per household is lower when the land area per household is smaller. More compact development patterns is one way to manage costs and keep expenditures down.

Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.

As part of 2040 Plans, in the checklist of minimum requirements all land use categories were required to "include types of allowed uses and the minimum and maximum densities ('the allowable density range') for all categories that allow residential uses. Allowed uses should include a

Comment	Response
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description of allowable housing types such as single family, detached, duplexes, townhomes, etc." This is not proposed to change and if missing in the 2040 Plan, can be reconciled as part of the City's 2050 planning process.

Livable Communities Funding Priorities
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.

Thank you for this comment. The legislative intent of Livable Communities Act (LCA) grant programs is to incentivize cities and townships to meet regional goals and needs. The intent of the Housing Policy Plan is to provide clarity around regional housing needs and priorities. The Met Council supports making funding easier to access for communities with limited capacity to apply.

Quality Affordable Housing: Objective 4
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, if would thus be in conflict with its Comprehensive Plan even if it would mean being in violation of the city's local financial policies.

The 2050 Housing Policy Plan does not require that communities use or implement any particular tools listed. Rather, it requires Comprehensive Plans to identify and explore potential tools that would support affordable housing preservation and development. Communities have flexibility to consider how their efforts, partnerships, and local tools available to them can better residents and impact housing outcomes.

Comment	Response
<p>Housing Action Plan: Housing Implementation Plan 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>	<p>Thank you for noting these areas that need additional clarification. The report required is only a report on progress towards housing goals and on the tools that a city identifies in its comprehensive plan and is a statutory requirement. This reporting requirement is met through the completion of the Housing Action Plan questions administered in the annual Housing Policy and Production Survey. This does not require communities to have made specific progress in meeting their housing goals, but asks about the efforts made at the local level towards meeting their community's housing goals.</p>

City of Credit River	
<p>The City of Credit River thanks you for the opportunity to review and comment on the IMAGINE 2050 plan. We want the City of Credit River to remain a well-planned, rural residential community. In this letter our Council would like to share some common themes that have been expressed by our residents and local officials in reviewing the draft IMAGINE 2050 plan.</p> <p>The City also notes that several of the proposed housing policies appear to stem from failed legislative efforts during the 2024 Legislative session. Specifically, much of the density increase requirements echo the 'Missing Middle Housing' bills, which were not passed last session. These proposals, which focus on increasing density and affordability mandates, are being reintroduced through the Metropolitan Council's housing policy plan, despite their failure to gain legislative support.</p>	<p>Regarding legislative initiatives, the Met Council is charged with planning for the 7-county region and addressing a wide range of issues as noted in statute and also as it relates to the need for low to moderate income housing. This work must be completed on a timeline that is prescribed in statute. We understand that there is interest at the legislature in solving for some of the very same issues the regional plan discusses. The objectives, policies, and actions in the draft plan are grounded in what is available or possible today rather than what might happen or change at the legislature. Should there be significant changes in statutes that affect how the Met Council or the local governments are able to carry out plans and actions, the Met Council will consider whether revisions to the plan may be necessary at that time.</p>

Comment	Response
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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.

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.

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:

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).

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 unworkable.

The action to "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" has been changed to "Plans should include any available data about homelessness and need for shelter in the community and define how the city will address housing instability." This change was made to allow for greater flexibility for communities to explore available data and determine local needs for addressing housing instability. There is no specific requirement to create shelter.

The focus on housing at 60% AMI or less will create a smaller allocation of Future Need number for cities, making their Land Guided for Affordable Housing (LGAH) requirement easier to meet.

To clarify how land guidance requirements would impact the City: Under the current draft of the 2050 Housing Policy Plan, the City of Credit River has an allocation of Future Affordable Housing Need of 109 units for the 2031-2040 decade. Under the draft 2050 Housing Policy Plan, cities would be required to guide land at densities of 10 units per acre or higher in order to potentially develop or redevelop the number of units in their Future Need allocation. Currently Credit River has a planned land use of High Density Residential that is expected to develop 18.6 acres in the 2031-2040 decade with minimum density of 12 units per acre which could potentially support 223 units, far exceeding the necessary requirement of 109 units as proposed in the Draft 2050 Housing Policy Plan. The Met Council will reach out to the city to discuss how their comprehensive plan can meet the LGAH requirement.

City of Eden Prairie

Comment	Response
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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.

We appreciate this feedback and examples of efforts listed to create and preserve affordable housing.

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.

Thank you for noting this. With the largest regional gap in housing units being at the deeply affordable (30% AMI) level, it is helpful to know that the City is making efforts to integrate deeply affordable units in mixed-income projects and sees a need for increased funding for housing at the deepest affordability.

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.

Thank you for highlighting some of the challenges you see locally related to addressing homelessness. That's helpful to hear that the City is using non-profit partnerships to address the needs of those experiencing homelessness. We know that homelessness looks different in different areas of the region, and different communities will address these needs in different ways.

Comment	Response
<p>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.</p>	<p>The 2050 Housing Policy Plan does not require the development or preservation of all types of units, rather lists as examples of housing types and encourages a variety within types of housing stock in communities. Communities have flexibility to consider how their efforts, partnerships, and local tools available to them can better residents and impact housing outcomes.</p>
<p>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.</p>	<p>The allocation methodology of Future Affordable Housing Need is described in "Appendix C: Methodology of Calculating Affordable Housing Need" of the Draft 2050 Housing Policy Plan. As described in this section each city gets an allocation of the total regional Future Need based on the city or townships projected local growth, existing stock of affordable housing (including unsubsidized housing and preserved affordable units), and balance of low-wage jobs to low-wage workers. Forecasted growth is based on a city or townships capacity to support future households including the current planned land use in the area, travel demand and transit access, economic activity and current migration and real estate dynamics, to see how forecasted growth is generated please refer to the "Forecast Methodology Report" from April 2023. As proposed in the 2050 Housing Policy Plan the Land Guided for Affordable Housing requirement will allow credit towards the number of affordable units needed in a city or township for local programs and policies that generate affordable housing opportunities.</p>
<p>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.</p>	<p>Thank you for this comment. The legislative intent of Livable Communities Act (LCA) grant programs is to incentivize cities and townships to meet regional goals and needs. The intent of Imagine 2050 is to provide clarity around regional needs and priorities. The Met Council supports making funding easier to access for communities with limited capacity to apply.</p>

City of Empire

Comment	Response
<p>The City of Empire believes that affordable housing allocations formulas should include a strong factor for proximity to transit. It is noted in the formula in the Appendix that transit access is considered, but it does not state to what degree. The proximity to transit supports affordable housing and affordable housing can support transit. There is a strong correlation and the consideration in the formula should be strong. The City of Empire is concerned about providing affordable housing in the future without adequate services like transit to support those future residents.</p>	<p>When calculating each city's Future Need for Affordable Housing, access to transit is one of the factors included in the calculation. As a result, most of the Future Need for Affordable Housing is in cities served by the regional transit system.</p> <p>Nevertheless, in order to provide households with choices of where to live and to reflect economic realities, the calculation also considers existing housing stock and the presence of jobs that pay low wages and allocates future affordable housing need in communities considering this economic context. US Census Bureau estimates for 2023 indicate that, in our region, over 78% of people earning extremely low incomes commute to work by car (alone or carpool).</p>
<p>Overall there are several new policies that will add more review, analysis, and policies at the local level such as accessible housing goals, use of city tools for more home ownership, and modification to allocation of affordable housing need for advancement of equity. With all of the proposed new policies, it's likely smaller communities will not have the resources to provide the data or meet the requirements. What resources will the Met Council be providing to local jurisdictions to assist with producing a compliant Housing Plan or Housing Chapter of the 2050 local Comp Plan? It feels like only larger entities with a housing authority, economic development agency, or robust planning and housing staff will be able to easily comply.</p>	<p>Thank you for your comment and question. Throughout the HPP, Met Council has committed to providing technical assistance, data, and resources for local governments to use when drafting Comprehensive Plans, or exploring new policies and programs. Information about new considerations such as accessible housing needs or homeownership needs will be provided by Met Council. After Imagine 2050 is adopted, the Met Council will create resources for local staff drafting comprehensive plans in the form of the Local Planning Handbook. The purpose of the Handbook is to provide clear and specific direction on what the minimum requirements are and how to meet them, as well as provide tools, maps, and data resources to make it easier for local staff to complete minimum requirements through individualized community information and resources.</p>
<p>The draft plan notes that there will be credits up to 15% towards housing goal if cities do certain things. Those certain things have not been provided. Is the 15% credit proportional to what those special activities are? Who and when will the particulars be decided and what will be the public input process? With respect to the Draft 2050 Population Projections, Empire is suggested to have increase by 514 households by 2050. This assumes current MUSA. Responding to current market demand, at this time, the City of Empire is studying the possibility of opening up approximately 2,500 acres for development by extending public utilities. This will require an amendment to the current Comp Plan and extension of the MUSA. It is possible this change may be in place prior to adoption of the 2050 Plan. It will result in a significantly larger increase in households. The City has been in conversation with our Sector Representative about this, but we want to go on record to inform the Metropolitan Council of the potential change and request likely coming forward in the next 24 months.</p>	<p>As in the 2021-2030 decade the 2031-2040 allocation of Future Affordable Housing Need is adjusted based on changes in forecasted growth for the relevant decade. Met Council staff can communicate with the city directly on how an increase in forecasted growth could affect the acres needed for the Land Guided for Affordable Housing (LGAH) requirement. The proposed optional credit in the Imagine 2050 Housing Policy Plan would require cities to submit proof that they have an adopted, and proven, policy or process that has and will result in the construction of affordable housing units through the decade. More details will be provided by Met Council staff in the Local Planning Handbook.</p>

City of Forest Lake

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:

- 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).

The increased density requirement will have an impact on the historically rural community character of Forest Lake.

The Met Council recognizes the need to make incremental changes as to not create large barriers for cities in implementing their local comprehensive plans. The focus on housing at 60% AMI or less will create a smaller allocation of Future Need number for cities, making their Land Guided for Affordable Housing requirement easier to meet.

To clarify the impact of land guidance requirements for the City: Under the current draft of the 2050 Housing Policy Plan the City of Forest Lake's allocation of Future Affordable Housing Need would be 357 units for the 2031-2040 decade, which is significantly smaller than the current 648 units needed for the 2021-2030 decade. Under the draft 2050 Housing Policy Plan, cities would be required to guide land at densities of 10 units per acre or higher in order to potentially develop or redevelop the number of units in their Future Need allocation. Currently Forest Lake is guiding 59 acres of land with minimum densities of 10 units per acre or higher which could potentially support 635 units, far exceeding the necessary requirement of 357 units as proposed in the Draft 2050 Housing Policy Plan.

City of Greenwood

2050 City Density Proposal

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.

We understand that increases to density for the Land Guided for Affordable Housing (LGAH) requirement can be difficult to accommodate, especially for smaller cities who are not anticipating much growth. The Met Council has worked to increase flexibility for cities to meet this requirement, especially for smaller cities. Met Council will provide an alternative compliance option for cities with a limited anticipated growth, such as the City of Greenwood, defined as a Future Need allocation of less than 20 units. More specifics on this requirement will be communicated with the city directly.

City of Hugo

Comment	Response
<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>	<p>Thank you for this comment. The Met Council believes that flexibility is important for communities to consider how their efforts, partnerships, and local tools available to them can better residents and impact housing outcomes. We will continue to provide technical assistance to support communities in determining and addressing housing needs. We will add additional clarification to this section of the draft plan on the requirements, process, and related resources available to communities, including in our Local Planning Handbook resource that cities will receive.</p>

City of Inver Grove Heights

Comment	Response
<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> <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>	<p>The Met Council supports making funding easier to access by having clear priorities for the program. The legislative intent of Livable Communities Act (LCA) grant programs is to incentivize cities and townships to meet regional goals and needs. The intent of the Housing Policy Plan is to provide clarity around regional housing needs and priorities. The Met Council supports making funding easier to access for communities with limited capacity to apply, as demonstrated by the action in the Provide section of Objective 1 of the draft Housing Policy Plan to "explore ways to prioritize funding to increase affordable housing opportunities for cities and townships that do not have a demonstrated history of developing affordable housing".</p>

Comment	Response
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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.
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.

The 2050 Housing Policy Plan is not requiring that communities use or implement specific tools, rather requires Comprehensive Plans to identify and explore these potential tools, indicating the support of affordable housing preservation and development in the community. The language of having local comp plans "consider tools" is a very open requirement, because the Met Council thinks that flexibility is important for communities to consider how their efforts, partnerships, and local tools available to them can better residents and impact housing outcomes.

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.
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.

We are removing this action and, instead, will be providing technical assistance to support communities in making efforts to address these needs. Met Council believes that flexibility is important for communities to consider how their efforts, partnerships, and resources can impact housing outcomes for residents.

Comment

Housing Action Plan (Section 4)

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.

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 being non-compliant with their Comprehensive Plans for failure to achieve their expected growth and/or at the densities expected. This point requires clarification.

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.

Response

Met Council will clarify this reporting requirement in the Housing Policy Plan. "Reporting on the progress towards housing goals" refers to an existing statutory requirement for LCA programs. This requirement is met through the completion of the Housing Action Plan questions administered in the annual Housing Policy and Production Survey. These questions on communities' progress do not require communities to have made specific progress in meeting their housing goals, but rather, ask about the efforts made at the local level towards meeting their community's housing goals.

City of Lakeville

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.

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.

The 2050 Housing Policy Plan is not requiring that communities use or implement listed tools, rather requires Comprehensive Plans to identify and explore potential tools these tools, indicating the support of affordable housing preservation and development in the community. The language of having local comp plans "consider tools" is a very open requirement, because the Met Council thinks that flexibility is important for communities to consider how their efforts, partnerships, and local tools available to them can better residents and impact housing outcomes.

Comment	Response
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City of Lilydale

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.

The Met Council understands that homelessness looks different in different areas of the region and there are a variety of supports need to help people obtain and maintain stable housing. Engaging with Cities, residents, and those experiencing housing insecurity is important in learning about local needs. Met Council plans to provide opportunities for discussion on this issue. As staff engage with communities to address issues of the high cost of housing, lack of access to services that support housing stability, and other challenges that make it difficult to afford the cost of housing, Met Council will continue to work with cities.

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.

City of Lino Lakes

Land Use Policy Plan, Policy 2, A4 Affordable Housing Density Requirements
 Metropolitan Council is responsible for ensuring the local communities accommodate their share of the regions affordable housing need. The City's proposed Affordable Housing need for 2031-2040 is estimated at 450 units. Communities are required to guide enough land at a minimum density to accommodate the housing number.
 The proposed plan 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.
 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 in Lino Lakes. It could be argued that this will not create more affordable housing and that higher density housing opportunities in Lino Lakes are limited due to our geographic location and that high density housing demand is now and is expected to remain limited.

The draft 2050 Housing Policy Plan does recognize that density is not the only tool for the creation of affordable housing and has made modifications to increase the flexibility of the Land Guided for Affordable Housing (LGAH) requirement in Section 4 of the 2050 Housing Policy Plan in order to reflect this reality. However, Section 4 of the Housing Policy Plan does provide evidence that affordable housing is much more likely to be built at higher densities. According to Minn. Stat. 473.859, comprehensive plans must use land use planning to promote the availability of land to meet low and moderate income housing. This land must be available at densities high enough to accommodate low and moderate income housing, not necessarily required to be developed as affordable housing.

Comment	Response
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City of Loretto

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.

We understand that increases to density for the Land Guided for Affordable Housing (LGAH) requirement can be difficult to accommodate, especially for smaller cities who are not anticipating much growth such as Loretto. The Met Council has worked to increase flexibility for cities to meet this requirement, especially for smaller cities. Met Council will recommend providing an alternative compliance option for cities with a limited anticipated growth, defined as a Future Need allocation of less than 20 units. More specifics on this requirement will be communicated with the city directly.

City of Minneapolis

Overall Observations

- 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

This support is noted. Met Council will continue to engage cities and townships that are Livable Communities Act (LCA) participants, and will continue to engage with other public funders as we consider program design for LCA and the need for layered funding and financing for deeply affordable units.

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.

Comment noted.

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.

Comment noted.

Comment	Response
<p>Page 25, Plan: Minneapolis will want to review the calculated Future Affordable Housing Need when available.</p>	<p>Thank you, please refer to the Appendix B of the Draft 2050 Housing Policy Plan for the drafted allocation of Future Affordable Housing Need values based on the 2040 forecasts generated in January of 2023. The allocation will be recalculated with the final forecasts.</p>
<p>Page 26 - Objective 2: Consider encouraging cities to adopt or expand inclusionary housing policies regionwide for both new developments and rehabilitated housing.</p>	<p>Comment noted.</p>
<p>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.</p>	<p>Comment noted.</p>
<p>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.</p>	<p>Comment noted.</p>
<p>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.</p>	<p>The draft 2050 Housing Policy Plan recognizes the importance of reducing barriers to production of all types of housing, including transitional housing, and housing with supportive services as one potential solution to housing instability and homelessness in the region. Actions specifically addressing solutions to housing stability are within Objective 3: Stability and include LCA funding prioritization for housing projects that serve populations who have experienced homelessness and/or incorporate supportive services as well as an increase collaboration and meaningful partnerships throughout the region to address the need for shelter as a regional issue.</p>
<p>Page 36 - Objective 3: The Met Council proposed to prioritize LCA funds for homeless housing – this aligns well with Minneapolis programs and priorities.</p>	<p>Comment noted.</p>
<p>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.</p>	<p>Comment noted. We acknowledge there are already cross-jurisdictional efforts to address the need for shelter and a variety of other partners across sectors leading efforts in this space. We don't want to duplicate efforts.</p>

Comment	Response
<p>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.</p>	<p>Comment noted. The draft Housing Policy Plan supports this in Objective 4 through a "Provide" Action and will be exploring specific obstacles to development.</p>
<p>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.</p>	<p>This preference currently exists in Met Council's Local Housing Incentives Account (LHIA) program by considering whether a project has the same or exceeds MN Housing's Universal Design standards. The program provides points through a Universal Design worksheet submitted by project applicants.</p>
<p>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.</p>	<p>The Draft 2050 Housing Policy Plan strives to recognize the importance of both preservation and new production through its Objections and Actions. A definition that aligns with MN Housing preservation definition has been added to Appendix A: Glossary.</p>
<p>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.</p>	<p>Thank you for this recommendation. We will add an action under Objective 2 related to finding ways for communities to encourage the development of rental housing types that are not always supported by the housing market (including larger units for multigenerational living/ larger families). The Livable Communities Act programs also consider this for scoring the housing component of programs.</p>
<p>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.</p>	<p>Comment noted. Met Council will provide technical assistance on this topic to assist cities to revise existing policies or create new policies to remove barriers to development for all housing types, including the ones specified in this comment as they are all part of the solution to address our region's housing needs.</p>

Comment	Response
<p>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.</p>	<p>Comment noted.</p>
<p>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.</p>	<p>Comment noted.</p>
<p>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.</p>	<p>Comment noted.</p>
<p>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.</p>	<p>Comment noted.</p>
<p>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.</p>	<p>Comment noted.</p>
<p>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.</p>	<p>Comment noted, Met Council will reach out to the city directly.</p>

Comment	Response
<p>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.</p>	<p>Comment noted.</p>
<p>Page 48 - Objective 7: Consider encouraging cities to identify plans to reduce their carbon footprint and to encourage green technologies across the whole city.</p>	<p>Comment noted. This topic is also addressed in the land use section of the Imagine 2050 draft.</p>
<p>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.</p>	<p>Comment noted. The Imagine 2050 draft continues the Thrive 2040 practice of setting minimum density expectations within defined transitway station areas - see the Land Use section of the plan draft.</p>
<p>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.</p>	<p>Comment noted.</p>
<p>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.</p>	<p>Comment noted.</p>
<p>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.</p>	<p>Thank you for identifying this connection to Minneapolis programs and policies.</p>
<p>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.</p>	<p>Thank you for your comment. We will clarify this action. Criteria for LCA programs will include consideration of energy efficiency strategies in projects which can reduce energy cost burden for populations who are housing cost-burdened.</p>

Comment	Response
<p>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.</p>	<p>Comment noted. Annual updates of affordability limits utilize HUD data, and for rental values already include tenant-paid utilities as the comment suggests. Met Council will continue to release affordability limits annually which will apply to Met Council programs and data.</p>
<p>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).</p>	<p>Thank you for your supportive comment.</p>
<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>	<p>The Met Council commends the City of Minnetonka for all the work it has done to supply affordable and high density housing in the last 5 years. The Met Council recognizes that the greatest current and future need for housing, deeply affordable housing for households below 30% of AMI, is that which needs the most subsidy. The Future Need numbers provided are intended to describe not what is possible to build - which may be challenging due to funding constraints - but what is needed based on projected household growth and income levels. Additionally, the Draft 2050 Housing Policy Plan includes actions intended to prioritize funding for the housing that is most needed, both with Met Council-directed resources and via partnerships in the region.</p>

City of Mound

Comment	Response
<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>	<p>Where the City is concerned about accommodating growth, please note that density policies address the form/design of growth, not the quantity of growth. A modest increase in minimum densities does not require local governments to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land. Where there are concerns about the amount of forecasted growth, the Met Council works in collaboration with the local government to come to agreement on the appropriate forecast.</p> <p>Minn. Stat. § 473.859, subd. 2 Land use plan now requires GHG inventory information along with strategies to reduce emissions in the local planning process. Minn. Stat. § 473.859, subd. 7 Climate Mitigation and Adaptation also requires new minimum requirements for local governments in the areas of climate mitigation and adaptation. We understand the constraints of local governments during the planning process. Please note that any new requirements would be supported by Met Council technical assistance. In most cases, where a minimum requirement is added for local governments, for instance in the area of climate action, that minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. For instance, the Met Council has a GHG inventory and strategy planning tool that communities can use to make meaningful commitments on GHG reductions and we will provide technical assistance on how to use this tool.</p> <p>As in past rounds of regional planning, the Met Council will also provides technical assistance, tools and resources, and financial assistance to eligible communities via Planning Assistance Grants and direct technical assistance through the Sector Representative Program. These resources alleviate some, but not all of the impact to local governments from the decennial planning process, and they are intended to assist meet minimum planning requirements to the extent possible. In addition, the Local Planning Handbook is being updated for local governments to respond to new goals and policies in Imagine 2050 policies.</p>

City of Oak Grove

Comment	Response
<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>Thank you for your comment.</p> <p>The action to "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" has been clarified to describe that local governments are required to identify tools they will seek to use or continue to use to create a variety of housing types and rental and ownership housing options. It is not a requirement that the different types of housing listed are created. They are examples of different types of housing that can be considered. We acknowledge that flexibility is needed for communities to create housing opportunities across income levels.</p> <p>The action to "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" has been changed to "Plans should include any available data about homelessness and need for shelter in the community and define how the city will address housing instability." This change was made to allow for greater flexibility for communities to explore available data and determine local needs for addressing housing instability.</p> <p>The action to "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" has been changed to an action describing how Met Council staff will provide technical assistance and tools to be considered to support communities' efforts to enhance the social and economic capital of residents in newly constructed housing.</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>Please see response.</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>Please see response</p>

Comment	Response
<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>	<p>Please see response</p>
<p>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.</p>	<p>Comment noted. Section 4 of the Housing Policy Plan indicates which requirements are applicable only to cities and townships with forecasted growth in sewer serviced households, such as Future Need and Land Guided for Affordable Housing (LGAH).</p>
<p>City of Richfield</p>	
<p>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.</p>	<p>This is a current policy located in the 2024 Sewer Availability Charge Procedure Manual in section 5.1.2.2</p>
<p>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.</p>	<p>The updated Housing Policy Plan draft will include a link to a map showing these areas: https://www.pca.state.mn.us/about-mpca/environmental-justice</p>
<p>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.</p>	<p>We are removing this action and, instead, will be providing technical assistance to support communities in making efforts to address these needs. Met Council believes that flexibility is important for communities to consider how their efforts, partnerships, and resources can impact housing outcomes for residents.</p>

Comment	Response
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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."

This action describes a minor modification to the inputs to the Future Affordable Housing Need calculation that is presented in this draft plan document, as part of the forecast of the number of households at each income band in the region in the 2031-2040 decade, which is a component of the Future Need calculation described in Appendix B. Data has shown that certain racial groups such as Black and American Indian households have more limited economic mobility over time than white households. Because of this, the Met Council made efforts to better incorporate these disparities when forecasting income growth and mobility for households from the 2021-2030 decade to the 2030 to 2040 decade. In practice this adjustment in the overall regional Future Need for affordable housing was negligible for this decade, as most of the variability in economic mobility of households when racial disparities were applied are in the income bands that are above 60% AMI. In plain language, deeply low-income households remained deeply low-income across all scenarios, and some households with moderate incomes moved in to slightly lower moderate income bands. The Future Need numbers for each city in Appendix B include all calculation adjustments. The Met Council is happy to discuss this in more detail.

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?

Comment noted. Exploring this idea does not mean it will become a requirement. If this were to be considered, Met Council staff would work with cities and townships to set standards and provide sample texts/protections to ease the burden of implementation on local staff. The Met Council supports making funding easier to access by having clear priorities for the LCA program. The legislative intent of LCA grant programs is to incentivize cities and townships to meet regional goals and needs. We acknowledge that tenant protections play an important role in preventing displacement and supporting access to safe and affordable housing in the region.

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.

Cities will be required to identify their existing local housing needs, the required need values are located in Appendix B. (page 64). Cities can choose which tools they will consider in response to local housing needs, as Met Council will not require cities to use any one particular tool, rather must identify a tool/tools for each need identified to achieve consistency in their Comprehensive Plan.

The HPP provides a very ambitious work plan for cities (and Metropolitan Council staff). Absent additional staff and resources, cities (and the Council) are unlikely to accomplish even a fraction of what is identified. Many of the items "required" for the plan will need a significant level of

Comment noted. The statute cited (473.146) is specific to policy plans for transportation and wastewater treatment; however, the HPP draft acknowledges the limited funding resources available for affordable housing development as a

Comment

analysis and when added together become an overwhelming task. Many of the “required” items also go beyond the statutorily-required elements of the plan.

MN Statute 473.146 —Policy Plans for Metropolitan Agencies, Subd 1 (5) requires a policy plan to include: “a statement of the fiscal implications of the council's plan, including a statement of: (i) the resources available under existing fiscal policy; (ii) the adequacy of resources under existing fiscal policy and any shortfalls and unattended needs; (iii) additional resources, if any, that are or may be required to effectuate the council's goals, objectives, and priorities; and (iv) any changes in existing fiscal policy, on regional revenues and intergovernmental aids respectively, that are expected or that the council has recommended or may recommend.” This information appears to be missing from the Housing Policy Plan.

“The Livable Communities Demonstration Account (LCDA) provides funding for projects that increase access to housing, jobs, services and transit in an effort to support more equitable, livable communities in the region.” The HPP suggests several priorities for LCDA funds that go beyond this purpose and that may geographically limit LCDA’s investment. For example, deeply affordable housing is one priority. Low Income Housing Tax Credits (LIHTC) are a critical source of funding for creating deeply affordable housing units, but very few projects receive LIHTC funding outside of Minneapolis and St. Paul. Coupling LCDA with LIHTC will further restrict where “livable communities” are developed.

The primary carrot/stick in the HPP appears to be LCDA funding. Not all communities try to access these funds. What other tools will the Council use to ensure all metro communities are making efforts to meet local and regional housing needs? The HPP should incorporate references to those tools as well.

There are several disconnects between the data that’s provided and the needs identified (or a lack of data to support the identified needs). For example, p. 11 – the chart of household types suggests that adults with no children are a significant percentage of the population, but one of the needs identified is for larger rental units. We believe there is a need for larger rental units, but what is that need in terms of number of units? We encourage you to continue to talk with cities about the kind of data that would be helpful.

We encourage you to review the document with a “plain language” lens. Many statements are unclear and/or are written in “policy wonk” language. For example, “Provide thought leadership including exploring opportunities to partner at the federal, state and local level to advance the evolution of affordability standards that improve on current affordability limit models to

Response

constraint in meeting future need.

The LCA program priorities listed as actions in the Housing Policy Plan aim to ensure that everyone in the region has housing choice and access to affordable, safe, healthy, and dignified homes across the region. The legislative intent of Livable Communities Act (LCA) grant programs is to incentivize cities and townships to meet regional goals and needs. Considering the gap in production for affordable housing with the deepest affordability, projects of deeper affordability levels are prioritized. LCA funds are offered through several specific competitive funding opportunities each year; in addition to multifamily affordable housing development, LCA programs currently support policy development, projects that create and preserve living wage jobs, and affordable homeownership projects.

The intent of the Housing Policy Plan is to provide clarity around regional housing needs and priorities. Met Council will continue to engage cities and townships that are and are not Livable Communities Act (LCA) participants, and will continue to engage with other public funders as we consider program design for LCA and the need for layered funding and financing for deeply affordable units.

We will continue to work with cities to learn more about what kinds of data would be helpful, including estimates (and data gaps) for understanding the need for both large-household and small-household housing unit type.

Comment

Response

be more reflective of resident experience.” (p. 23, Objective 1: Fair Housing & Geographic Choice)

Provide specific examples to help clarify statements. For example, additional information is needed to understand what’s expected with these requirements, that appear to be well beyond the capacity and scope of most cities: “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.” (p. 32, Objective 3: Stability) “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. 40 Objective 5: Cultural Connection and Well-Being)

Several areas of the HPP seem outside the scope of the Metropolitan Council and its role as a regional planning agency, and we encourage the Council to focus its efforts. Some examples include, “Ensure the inclusion of utility costs in rent and ownership affordability limits.” (p. 43 Objective 7: Environmental Justice, Plan bullet 1) “Inform state building code updates to encourage construction of more affordable, maintainable, high-quality, safe, and climate-resilient homes.” “Seek opportunities to find new sources of funding to be used to prevent buildings from going into disrepair or becoming unsafe.”

The HPP states that local communities are the experts on local needs, yet many of the requirements place the Metropolitan Council as the expert. For example, requiring cities to identify three of their greatest local housing needs, identify tools and commit to using them, but also requiring us to use tools from a list the Metropolitan Council provides, contradicts this statement. Offer a list of resources and tools but don’t mandate the commitment of specific tools.

Requiring specific tools and specific outcomes is a “one-size-fits-all” approach. In the following examples specific ownership models and financing tools are required that may not be appropriate/applicable/feasible in all communities: “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. 24, Objective 2: Options to Own or Rent) “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

Comment	Response
<p>maintenance and preservation of unsubsidized affordable housing.” (p. 34, Objective 4: Quality)</p> <p>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.</p>	<p>Comment noted. Met Council will clarify data.</p>
<p>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.</p>	<p>Comment noted.</p>
<p>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?</p>	<p>Thanks for your question. We recognize the need for deeply affordable housing across the region including cities and townships that don’t have a demonstrated history of developing affordable housing as a priority, and we will provide technical assistance to support communities in identifying strategies to meet their local needs.</p>
<p>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.</p>	<p>Thank you for this comment. The Met Council will balance potential payment standard changes with effects on households served.</p>
<p>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.</p>	<p>Comment noted. This "Plan" action is only a consideration, not a finalized adjustment to the allocation of Future Affordable Housing Need. Staff intend to explore the impact of this potential adjustment that would be more inclusive of economic factors in Need allocation.</p>

Comment	Response
<p>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? P. 23 – “Partner” – 3rd bullet – Simplify the language to make this point more understandable.</p>	<p>The 2050 Housing Policy Plan recognizes that guiding land use to support the development of affordable housing is only part of the solution for creating affordable housing opportunities. The 'credit' referenced will apply to local governments' overall Future Need number and will reduce their Land Guided for Affordable Housing obligation in exchange for a policy that will support development, reducing the number of eligible acres a city would need to guide to meet the statutory requirements of their housing element of the Comprehensive Plan. A maximum of 15% of the local government's Future Need would be eligible for this credit. There will be guidance provided to cities as Met Council will provide technical resources and a list of qualifying policies that would be considered for receiving credit. Examples could include an inclusionary housing policy/inclusionary zoning or collaboration with a community land trust.</p>
<p>Objective 1: Fair Housing & Geographic Choice P. 23 – “Partner” – 3rd bullet – Simplify the language to make this point more understandable.</p>	<p>Comment noted.</p>
<p>Objective 2: Options to Own and Rent P. 23 – “Provide” second to last bullet - encourage publicly owned land for housing - WHERE appropriate.</p>	<p>Comment noted.</p>
<p>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.</p>	<p>The 2050 Housing Policy Plan does not require the development or preservation of all types of units, rather lists as examples of housing types and encourages a variety within types of housing stock in communities. Although the language of having local comp plans "consider or identify tools" is a very open requirement, we think that flexibility is important for communities to consider how their efforts, partnerships, and local tools available to them can better residents and impact housing outcomes.</p>
<p>Section 2: Dignity and Decency Data/Introductory Section p. 26 – Is the line in the graph accurate?</p>	<p>Thank you for your comment. Figure 12 of the Housing Policy Plan has been replaced with a visualization that better represents the data.</p>
<p>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).</p>	<p>Comment noted.</p>

Comment	Response
<p>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.</p>	<p>The 2050 Housing Policy Plan expresses the need for accessible housing for all ages, ability levels, and incomes and aims to promote housing choice for all households with accessibility needs through creation and preservation of accessible housing through development of new units and modifications to existing housing stock, which would include NOAH and for those who already own their homes. (p. 30)</p>
<p>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.</p>	<p>Thanks for this question and comment. We had changed the language of this action and added additional clarification. The proposed action is "Plans should include any available data about homelessness and need for shelter in the community and define how the city will address housing instability." We will continue to support opportunities to address funding needs for housing issues across the region.</p>
<p>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.</p>	<p>Comment noted. This is part of an overall commitment in the draft plan to exploring and addressing specific obstacles to development, including in partnership with others in the region and the state.</p>
<p>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.</p>	<p>Comment noted. Language will be clarified in the draft plan to specify that Met Council will explore partnerships within the region to address this need.</p>
<p>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?</p>	<p>The "Plan" actions requiring the consideration of accessible and affordable age-restricted housing options are a subset of the total units. These values are more informative and do not require policy or land use implementation in the same way that the allocation of Future Need does.</p>
<p>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.</p>	<p>Thank you for your comment, yes all cities will be required to identify tools only for the identified existing and future local and regional housing needs. The existing and future housing needs that will be required to report are located in Section 4.</p>

Comment	Response
<p>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.</p>	<p>We are removing this action and, instead, will be providing technical assistance to support communities in making efforts to address these needs. Met Council believes that flexibility is important for communities to consider how their efforts, partnerships, and resources can impact housing outcomes for residents.</p>
<p>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?</p>	<p>This action describes a minor modification to the inputs to the Future Affordable Housing Need calculation that is presented in this draft plan document, as part of the forecast of the number of households at each income band in the region in the 2031-2040 decade, which is a component of the Future Need calculation described in Appendix B. Data has shown that certain racial groups such as Black and American Indian households have more limited economic mobility over time than white households. Because of this, the Met Council made efforts to better incorporate these disparities when forecasting income growth and mobility for households from the 2021-2030 decade to the 2030 to 2040 decade. In practice this adjustment in the overall regional Future Need for affordable housing was negligible for this decade, as most of the variability in economic mobility of households when racial disparities were applied are in the income bands that are above 60% AMI. In plain language, deeply low-income households remained deeply low-income across all scenarios, and some households with moderate incomes moved in to slightly lower moderate income bands. The Future Need numbers for each city in Appendix B include all calculation adjustments. The Met Council is happy to discuss this in more detail.</p>
<p>Section 3: Connection and Well-Being Objective 6: Equity 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.</p>	<p>Comment noted. This action is intended to be a resource for local staff and start conversations with communities. This action does not require adoption of any policy. We acknowledge that tenant protections play an important role in preventing displacement and supporting access to safe and affordable housing in the region.</p>

Comment	Response
<p>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?</p>	<p>Thank you for this question. We have added some text edits to this action for clarification. Clarified action is "Livable Communities programs will prioritize projects that reduce energy costs for households that are both energy cost-burdened and housing cost burdened."</p>
<p>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).</p>	<p>Annual updates of affordability limits (for affordable housing in regard to the Livable Communities Act, which the Met Council regularly publishes online) utilize HUD data, and for rental values already include tenant-paid utilities. For Met Council's own ownership affordability limits there are currently consistent assumptions included in the calculation such as interest rate, property taxes, and home insurance. The 2050 Housing Policy Plan intends to include a utility cost assumption in the ownership affordability limit model to ensure consideration of all housing costs to determine affordability for ownership opportunities and better align with rental considerations.</p>
<p>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.</p>	<p>A 'homeownership ready' household is a household that has income at a high enough level to be able to afford purchasing a home, should ownership be desired. Met Council will provide a calculation for informational purposes to inform communities' plans; however, this homeownership-ready number will not be tied to a specific requirement such as land guidance.</p>
<p>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.</p>	<p>Comment noted. In their housing element cities may reference any other local plans or local programs that relate to prioritizing low-income households for energy-efficiency and weatherization resources.</p>

Comment	Response
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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.....”.

Comment noted. Text in Section 4, Land Guided for Affordable Housing was changed to reflect comment and reads "increased density often correlates..."

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.
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.”

Complete Housing Implementation Plans do not have to commit to using every available tool, program, or fiscal approach to meet the City's housing needs although they must identify specific actions and consider reasonable resources. Any tool a community may use that was not originally included in the City's Comprehensive Plan will not be considered an inconsistency, but should be reported in the City's annual Housing Action Plan via the Housing Policy and Production Survey. Specific tools, along with resources, and fact sheets for housing related items are included in Met Council's Local Planning Handbook and will be updated and made available following the adoption of Imagine 2050. Cities are required to identify potential tools that they will continue or seek to use throughout the decade to meet these needs.

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?

Cities that do not guide an adequate supply of land at appropriate densities to meet their allocation of Future Affordable Housing Need will be considered inconsistent with the Housing Policy Plan and will not be eligible to participate in or receive funding from Met Council grant programs, such as Livable Communities Act grant programs. Forecast numbers are based on anticipated change in household growth during the 2031-2040 decade.

Appendix B - Headers should be shown on all pages with table.

Comment noted.

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.

Comment	Response
<p>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.</p> <p>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?</p> <p>Need to identify Need calculation for the preservation of housing units – is this in HPP?</p>	<p>The Met Council recognizes that the greatest current and future need for housing, deeply affordable housing, is that which needs the most subsidy. The Met Council has committed to the following actions to increase Met Council funding as well as reduce their barriers to funding in the Draft 2050 Housing Policy Plan.</p> <p>Please refer to the first action under "Plan" under Objective 2 in Housing Policy Plan referring to the Affordable Ownership Need. The intention behind this action is to provide local governments data around their local deficit in moderate income housing options without tying it to the Land Guided for Affordable Housing (LGAH) requirement, as these moderate income options tend to be at lower densities. The Met Council is proposing to make this more clear by changing the language of this action to "Provide data reflecting the need of local governments to plan for the development of low-income affordable ownership opportunities based on cities' and townships' existing deficit of affordable ownership options." For actions around preservation of housing units and local level plans please refer to the actions under "Plan" in Objective 4 of the Draft 2050 Housing Policy Plan.</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>	<p>Comment noted.</p>
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City of Shorewood

Comment	Response
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Local Affordable Housing Need
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.

The allocation of Future Affordable Housing Need is based on the forecasted growth for the city for the 2031-2040 decade. The values in Appendix B of the Draft 2050 Housing Policy Plan are based on the 2031-2040 forecasts generated in January of 2023 in which Shorewood had a forecasted net growth in sewer serviced households of 340 and a total allocation of Future Affordable Housing Need of 169 units. The latest forecasts generated in August of 2024, after this draft was submitted for public comment, have Shorewood's total forecasted net growth at around 169, so the total allocation of Future Affordable Housing Need should be closer to 84 units should those forecasts and all other contributing factors remain final.

Prescriptive Policy Language
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.

Comment noted.

City of Spring Lake Park

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.

The allocation of Future Affordable Housing Need (Future Need) considers the existing affordable housing in a city or township, including subsidized and unsubsidized units.

City of Wayzata

Comment	Response
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In the housing policy plan, there seems to be some inconsistency on what the “upper limit” on affordable housing AMIs are. There are a couple places where it notes 80% as the upper limit and a few, including one of the appendices, where it notes 60%. Can you clarify this?
If the upper limit is 60%, I would comment that in an environment of rising housing prices the 60%-80% affordability band is still extremely important to provide and the Council should encourage it.

Affordable units are those which are affordable at incomes that are 60% AMI or less for rental units and 80% AMI or less for ownership units.

City of Woodbury

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.

The allocation of Future Affordable Housing Need is based on the deficit of available affordable housing to meet the needs of new and additional households in the region throughout the decade. This allocation of Future Need is the total need based on growth and not tied to a city's goals adopted at the beginning of the decade to be eligible to participate in Livable Communities Act programs. Historically, those goals have been 65% of the allocation of Future Need.

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.

The 2050 housing policy plan assesses both rental and ownership affordable housing needs which range from 30-80% AMI. While affordable housing is needed at all income bands, there are large variances of need between income bands, therefore disaggregation provides cities the most accurate data for their affordable housing need.
The Imagine 2050 Plan does not require the use of tax abatement or TIF.

Corporation for Supportive Housing

Comment	Response
<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. 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>	<p>We appreciate your in depth recommendations to increase the stability of the supportive housing sector and highlighting some ways Met Council can have a role here. We will be incorporating additional information on these needs in the Housing Policy Plan.</p>

Housing Justice Center

Comment

Response

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.

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.

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.

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 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).

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.

First, the HUD CHAS data show that households of color in the metro area

Met Council recognizes the greatest housing affordability need presently, and as identified in 2050 Housing Policy Plan, is housing affordable to those at or below 30% AMI across the region.

The HPP elevates and prioritizes the need for the most deeply affordable housing throughout the plan, notably in the Future Affordable Housing Need allocation, and prioritization for meeting this greatest housing need within Livable Communities Act grant programs.

Although there is still significant need for deeply affordable units throughout the region, and they require complicated capital stacks and substantial capital subsidies to be successfully developed, Met Council has played a role in assisting the development of these financially complex developments that require the most subsidy, and LCA funding has been involved in nearly every 30% AMI unit constructed this decade. Met Council data shows that the large majority of 30% AMI units have been constructed in urban communities. Met Council will provide additional clarity regarding the gap in funding available to support 30% AMI housing development in the text of the 2050 Housing Policy Plan, and in our subsequent technical assistance resources. Met Council will continue to provide information on existing housing conditions to communities in addition to the 2050 Housing Policy Plan via the Existing Housing Assessment, which includes community-specific severe cost burden data, and existing gaps in housing stock. Tools available to implement housing solutions are described throughout the plan draft. As described in the 2050 Housing Policy Plan draft, Met Council will require cities and townships to identify tools currently being used, or that will be used in the future to meet their highest priority housing needs, as well as to guide enough land to support future affordable housing development. Following the adoption of the plan, Met Council will provide information on tools, including those suggested here, in our technical assistance to cities and townships as they develop their housing implementation plans as a part of the comprehensive planning process. Additionally, Met Council intends to provide technical assistance and

Comment

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. Cities 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. 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.

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. In response to § 473.173, the Council adopted Administrative Rule

Response

support development of best practices for the new LAHA funding source for cities and counties that will impact affordable housing throughout the region.

As defined in Minn. Rules Ch. 5800, proposed matters considered of metropolitan significance apply to projects, not to the review of comprehensive plans, which is already governed by the Metropolitan Land Planning Act. Because addressing affordable housing need is not wholly attributable to a single entity or a single project, it would be inappropriate to apply review under metropolitan significance to any given project at any time under that premise. In the statutes that establish the Metropolitan Council, the Legislature has enumerated the Council's authorities with respect to comprehensive plan review and metropolitan significance review in statute. Section 473.129 does not confer additional powers in those areas. The system plans in Imagine 2050 each describe what it means to conform to a regional system plan. For many iterations of the regional plan, the Council has identified a minimum average residential density as one of the criteria it uses to determine whether a proposed plan is more

Comment	Response
<p>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>	<p>likely than not to represent a substantial departure from or impact on the regional wastewater system, since residential density and overall quantity are directly connected to the efficiency and economy of the regional wastewater system. The connections to residential development in the Lake Elmo case were about the inefficient use of the regional wastewater system (densities that fell far below the minimum density standard identified for conformance) as well as no plans to connect to the wastewater service that had been provided. The negative impacts of low densities on the regional wastewater system were described in the Water Resources Management Policy Plan (1996), and the density standard was set in the 2020 Regional Blueprint.</p> <p>Similarly, Imagine 2050 continues the Thrive 2040 practice of setting minimum density expectations within defined transitway station areas. The Council does not prescribe a level of affordability for housing development given the variety of station types across the region, but does continue to support and encourage communities in considering a mix of housing and affordability types for any planned residential development when conducting their planning processes.</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

The discussion of the language in the 2040 Housing Policy Plan is not relevant to the current plan draft, but the Council disagrees that it violated the law.

Section 4 of the 2050 HPP draft is clear that, under the Metropolitan Land Planning Act, local comprehensive plans must include a housing element that:

- Contains standards, plans, and programs for providing adequate housing opportunities to meet existing local and regional housing needs;
- Acknowledges the community's share of the region's need for low- and

Comment

and new housing to meet the local unit's share of the metropolitan area need for low and moderate income housing."

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 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.

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

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.

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.

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.

Response

moderate-income housing (the Need); and promotes the availability of land for the development of low- and moderate-income housing; and

- Includes an implementation section identifying the public programs, fiscal devices, official controls, and specific actions the community will use to address their existing and projected needs (Minn. Stat. § 473.859, subds. 2 and 4)

The Met Council reviews updated local comprehensive plans based on the requirements of the Metropolitan Land Planning Act and the regional development guide (Imagine 2050 and the associated system and policy plans).

Comment	Response
<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. 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>	<p>Comment noted. The draft plan does not include an expanded development role for Metro HRA. The statute that the commenter references requires local government consent to any HRA redevelopment activity in their jurisdictions. The Met Council's practice is to respond to requests from local governments for partnership, with Metro HRA, as well as with its other housing implementation tools including the LCA grant program.</p> <p>The intention of the creation of Metro HRA was to fill gaps where other housing authorities' programs did not exist.</p>

Comment	Response
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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.

Metro Cities

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.

Comment noted.

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.

Comment noted. The Housing Policy plan intends to provide data and technical assistance to cities and townships so that communities may utilize specific approaches that best meet their local needs and capacities when working to addressing housing needs in the region.

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.

We are removing this action and, instead, will be providing technical assistance to support communities in making efforts to address these needs. Met Council believes that flexibility is important for communities to consider how their efforts, partnerships, and resources can impact housing outcomes for residents.

Comment	Response
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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.

This recommendation is noted. Met Council staff have clarified this requirement in the Housing Policy Plan. The intent is to make sure that all communities identify strategies to work toward meeting the housing needs in their comprehensive plans, and that they identify priorities among these needs.

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.

We have changed this proposal, removing it in recognition of other reporting requirements that may be duplicative.

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.

The Livable Communities Act (LCA) review of programs will ensure that LCA priorities continue to be in line with state statute and align with the regional Imagine 2050 housing policy and other Imagine 2050 policies, while providing recommendations for LCA program changes that can increase participation in programs. The LCA priorities listed as actions in the Housing Policy Plan aim to ensure that everyone in the region has housing choice and access to affordable, safe, healthy, and dignified homes across the region. In line with the Council's cross-cutting regional goals, staff will identify ways that LCA programs can support these cross cutting goals.

Finally, in several sections of the HPP, the need for increased technical assistance to cities is noted and is supported by Metro Cities.

Thank you for your supportive comment.

Metropolitan Council (American Indian Advisory Council)

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.

The Council will update its Administrative Plan in preparation for opening the Housing Choice Voucher waiting list in 2025 to set aside a percentage of waiting list placements for households that identify as American Indian. The Council will engage with the American Indian community to determine to appropriate set-aside percentage. The Council will share the process and outcomes of this policy change with other HRAs in the region.

Comment	Response
<p>The Council will partner with American Indian community organizations to work on targeting new vouchers coming through programs like Bring It Home.</p>	<p>(Objective 3, Provide, Sub action added to "Improve outreach and work to simplify access and reduce barriers to Met Council rental assistance programs.") Sub action added: "As part of developing outreach efforts, partner with American Indian community organizations to target new voucher holders, including through programs like Bring It Home"</p>
<p>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.</p>	<p>(Objective 3, Partner, Sub action added to "Collaborate with counties, Community Action Partnerships, Continuums of Care, and schools, and other partners on funding sources and priorities for ending homelessness in the region.") Sub action added: "The Met Council will identify opportunities for American Indian organizations to apply for funding through its partnerships with organizations such as Continuums of Care and the Fair Housing Implementation Council (FHIC)"</p>
<p>The Council will engage with the American Indian households receiving Metro HRA vouchers on wealth building strategies and future potential homeownership programs.</p>	<p>(Objective 2, Provide, sub action to "explore opportunities for Metro HRA to expand... wealth building and voucher holders") Sub action added: "Proactively engage American Indian and Black voucher holders in wealth building strategies and any potential homeownership programs"</p>
<p>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.</p>	<p>(Objective 3, Provide, added action) Action added: "Prioritize American Indian-led organizations for funding and partnerships when serving American Indian people."</p>
<p>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.</p>	<p>(Objective 1, Plan, sub action to "maintain the Livable Communities Act . . . provide best practices in fair housing policy adoption to support local government efforts") Sub action added: "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."</p>

Comment	Response
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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.

(Objective 2, Partner, new action)
 Action added: "Partner with American Indian organizations to develop technical assistance on homeownership assistance on pathways and programs to homeownership and communicate these to regional partners in order to increase understanding of the pathways to American Indian homeownership programs"

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”.

Comment noted.

In Objective 7, many of the actions include energy efficiency. Suggest the inclusion of clean water and water efficiency as well.

Comment noted.

Neighbors for More Neighbors

We strongly support the policies to:
 1. Require municipalities to allow at least 4 units/acre within the MUSA,
 2. Require municipalities to allow diverse housing types on all residential land, and
 3. Carefully plan expanded areas where higher density housing near transit stops and existing or planned businesses are permitted.

Thank you for your supportive comments.

Ramsey County

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.

Met Council recognizes that planning for enough additional housing units to meet Future Affordable Housing Need only meets a portion of the total affordable housing need in the region. Local comprehensive plans must include a housing element that addresses existing and current housing needs in their communities. The Met Council will provide an Existing Housing Assessment resource that includes households that are cost burdened at different income levels, and helps cities determine their local needs and priorities to be addressed in their Housing Implementation Plan within the comprehensive plan.

Comment	Response
<p>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.</p>	<p>These recommendations are noted. We look forward to working closely with counties and other partners to determine how Met Council can play a role in determining housing needs and providing beneficial data to communities. We commit to exploring new partnerships and strengthening current ones with counties as it pertains to funding sources, coordination of resources, strategies to address homelessness and others. We also plan to improve data infrastructure and tools for communities.</p>
<p>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.</p>	<p>Thank you for noting this. We recognize this issue and have made it a goal to disaggregate data by race and ethnicity as much as possible. We will add additional clarification to charts in order to note this limitation.</p>
<p>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.</p>	<p>Comment noted. Actions relevant to fair housing and our partnership with FHIC are now represented in the "Fair Housing and Choice", "Stability" and "Equity" sections, to clarify this connection.</p>
<p>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.</p>	<p>Comment noted.</p>

Comment	Response
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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.

Comment noted.

Scott County

- The Board has the following comments on the Action items listed under Objective 1: Fair Housing & Geographic Choice
 - 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."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.

Comment noted.

"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 concerned 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.

Comment noted. When the Housing Policy Plan references 'missing middle' housing, staff is specifically referring to a type of housing, small and medium multifamily and attached single family homes (as noted in the comment) that is often more medium density development.

Comment	Response
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The Board has the following comments on the Action items listed under Objective 2: Options to Own and Rent
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 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.

Comment noted.

Twin Cities Housing Alliance	
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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.

Comment noted.

Comment	Response
<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 	<p>Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed. Additionally, local governments are required to meet the requirements of Minn. Stat. §473.865 which requires local official controls to be amended within 9 months following amendments to comprehensive plans. The Livable Communities Act (LCA) Policy Development grant program to advance equitable development patterns, may be able to provide funding assistance to update local ordinances to meet these statutory requirements and assist local governments meet these requirements. We acknowledge and understand that flexibility is an important part of the planning process, and the Met Council is committed to working with local government partners on any proposed changes that may be made to administrative guidelines to reflect and implement the policies in Imagine 2050. The Met Council plans to review its guidelines and administrative practices after the adoption of Imagine 2050. Any changes to net density calculation guidelines, or programs which rely on density calculations, must be approved by the Met Council after adoption and any changes made to provide local flexibility must be consistent with regional goals. The Met Council looks forward to working with local governments through the update/review of those guidelines. Many of the bullets listed in the comment refer to parts of the development process controlled by local governments. The local approval process, parking requirements, local process fees, local finance tools, zoning, and redevelopment/adaptive reuse are not within the Met Council's authority to regulate at a local or regional scale. Imagine 2050 provides supportive policy language, technical assistance, tools, and resources which encourage local adaptation of these efforts and more. Through local and regional partnership, public and private, the goals of Imagine 2050 can be realized.</p>

Washington County

Comment	Response
<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>	<p>Comment noted.</p>
<p>Washington County affirms the comments shared by the Washington County CDA in their comment letter to the Metropolitan Council.</p>	<p>Comment noted.</p>



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