

**DATE:** Friday, May 23, 2014

**TO:** Council Members

**FROM:** Libby Starling, Manager of Regional Policy and Research  
Dan Marckel, Planning Analyst

**SUBJECT:** Public comments on *Thrive MSP 2040*

Attached are the public comments received on *Thrive MSP 2040*.

Comments are grouped into categories (with number of submissions):

- Cities, township and local public entities (52)
- Counties and county-level public entities (11)
- Elected officials (2)
- State agencies (4)
- Organizations (19)
- Residents (54)

These comments are the basis for changes that have been made in [Thrive MSP 2040](#), attached separately.

A detailed analysis of comments and changes made to *Thrive* will be available as soon as possible.



May 5, 2014

Comments on Thrive MSP 2040 were received from the following cities/townships/local entities:

|                  |                                       |
|------------------|---------------------------------------|
| Apple Valley     | Minneapolis Park and Recreation Board |
| Baytown Township | Mound                                 |
| Belle Plaine     | North St. Paul                        |
| Bloomington      | Oak Grove                             |
| Brooklyn Park    | Plymouth                              |
| Burnsville       | Prior Lake                            |
| Carver           | Ramsey                                |
| Chanhassen       | Richfield                             |
| Corcoran         | Robbinsdale                           |
| Crystal          | Savage                                |
| Eagan            | Shakopee                              |
| Elko New Market  | Spring Park                           |
| Forest Lake      | St. Anthony Village                   |
| Greenfield       | St. Louis Park                        |
| Hugo             | St. Paul                              |
| Independence     | St. Paul Port Authority               |
| Lake Elmo        | Stillwater                            |
| Lakeville        | Vadnais Heights                       |
| Lauderdale       | Victoria                              |
| Linwood Township | Waconia                               |
| Little Canada    | Watertown                             |
| Mahtomedi        | White Bear Lake                       |
| Medina           | Woodbury                              |
| Minneapolis      |                                       |



City of **Apple Valley**  
 7100 147th Street W  
 Apple Valley, MN 55124-9016

Metropolitan Council

APR 28 2014

Received Chair's Office

Telephone (952) 953-2500  
 Fax (952) 953-2515  
 www.cityofapplevalley.org

April 25, 2014

Ms. Susan Haigh, Chair  
 Metropolitan Council  
 390 Robert Street North  
 St. Paul, MN 55101

Subject: February 2014 Draft "Thrive MSP 2040"  
 Regional Development Guide

Dear Ms. Haigh:

The Mayor and City Council for the City of Apple Valley provide the following feedback to the referenced draft and shares the same objective; a thriving Twin City Metropolitan Area in 2040.

- 1) It is recommended that the 2040 draft forecast for Apple Valley be updated to align with consulting work that Maxfield Research Inc. did for the Dakota County Community Development Agency. Maxfield Research, in April, reported to the City that Apple Valley is a growth submarket for population, households and employment.

As a result, the following is recommended for Apple Valley:

|   | Population | Households | Employment |
|---|------------|------------|------------|
| 2040 projected by Met. Council                    | 64,400     | 26,000     | 17,700     |
| 2030 projected by Apple Valley Comprehensive Plan | 71,200     | 27,500     | 22,000     |
| 2014 Maxfield Study revises 2030                  | 68,000     | 28,400     | 22,000     |
| 2040 Proposed by Apple Valley                     | 71,200     | 29,500     | 23,000     |

- 2) Maxfield Research also observed that the Millennial demographic, presently attracted to Urban Center and Urban designated areas, will also be attracted to suburban markets in our shared 2040 future. A more moderate stance is recommended to capture the likely suburban choices to call home and raise and educate children in well serviced areas of the Region such as Apple Valley. At page 26 of the Guide “seems to have different lifestyle preferences” does not reflect future actions of the demographic as described here.
- 3) “Equity” is a new visioning term defined as “all residents must be able to access opportunity”. News media is reporting that transit services reach few workers and areas of low income and racial concentration. Mobility solutions that reach existing affordable housing will manage our existing assets better, and must have a greater priority. Apple Valley advocates and encourages the Guide to address:
  - Existing and future main line transit services that have a robust system of connecting routes. Local studies have determined that 85 percent of Apple Valley can connect to Red Line Cedar Avenue with expanded service on good connecting routes already available.
  - Safe elevated pedestrian crossings at transit stations on higher speed multi-lane routes.
  - Facilities that attract suburban riders; well designed and lighted with weather protection.
  - All solutions thoughtfully: bus rapid transit, light rail, park and ride and local service.
- 4) Thank you for the mention on page 55 of Apple Valley’s Downtown as a gathering place. However, Bus Rapid Transit is not given the same prominent position as light rail and park and ride services at page 55 and page 75. BRT is the most cost effective, efficient, mainline transit solution for rapid deployment from suburban locations.
- 5) MVTA is Apple Valley’s preferred transit service provider. The Guide should embrace the role suburban transit authorities have in providing suburban mobility solutions. Metro Transit should support expanding suburban authorities local connecting services to main lines.
- 6) Apple Valley’s Minnesota Zoo is not mentioned as a regional asset in the Guide. The 1.6 million visitors annually warrant more attention for demonstrating effective multi-cultural and intergenerational access to this unique park and recreation asset. This reference should be added at page 25 and 55 of the Guide when mentioning “regional parks and trails”.
- 7) Water resource management is a shared regional interest at page 69 to 72 of the Guide. Water service, its distribution infrastructure and management, is a local utility. The Metropolitan Council can play a collaborative role in coordinating regional resources without regulating the local utility.
- 8) “Orderly and efficient land use”, at page 64, would convey a clearer representation of a suburban designation if it recognized that a suburb has to address two users: the driver and the walker/biker that picks up the bag of groceries.
- 9) The Metropolitan Council regulates sewer availability rates to the detriment of community development. “Equity” for small business and new restaurants must be found. Thousands of dollars are required up front for the initial user. A solution to the significant front loaded costs must be determined.

- 10) Better housing inventories are needed for communities that have an existing affordable housing stock and develop market rate and lifecycle housing with some affordability. Rather than further regulate affordability or only recognize “new affordable production”, allow communities to thrive with their local housing development markets while the Region addresses impediments to mobility at areas of concentration.
- 11) The Guide does not sufficiently address those impacts, challenges and opportunities in the greater 13 county metropolitan area. More attention is needed here, starting at page 1 of the Guide Plan that references a thriving Region, as it affects all business, development, transportation, and resource management decisions to 2040.
- 12) Much attention is devoted to emerging “climate change” concerns at page 30. Addressing this problem 5, 10 to 25 years into the future is probably too late. If attention is needed, it is needed now and should be managed outside of the Thrive MSP 2040 process if the Region wants to play a collaborative role and impact the future.
- 13) Greater MSP has assembled an industrial property inventory in 2013. The Guide focuses on the need for a Regional assessment of industrial property. Was something missed by Greater MSP?
- 14) Emphasis is made on forestry management and grants at page 95. Apple Valley is already a “Tree City” having recently achieved 30 years of recognition. And, this is significant given a long history of active sand and gravel mining where no trees existed. Perhaps only some suburban areas require this attention rather than the entire Region.
- 15) Financial resources are inadequate to address the challenges identified in the Guide. More deliberate fiscal notes and financial forecasts are needed as a way to prioritize expenditures for different aspects of the Development Guide.

For its part:

- Apple Valley will continue to collaborate and participate in Regional policy development as a partner in Regional success.
- Apple Valley accepts its “suburban” designation if the Guide can also recognize the uniqueness of suburban locations that are differentiated from urban center and urban qualities.
- Apple Valley will continue to manage storm water thoughtfully; with attention to on-site infiltration, regional ponding solutions and good community design and planning.
- Apple Valley has cost effectively implemented a long range street infrastructure maintenance and replacement program without special assessment to adjacent property owners and users.
- Apple Valley will pursue compact, mixed-use, suburban intensive development along Regional transitways and advocate for transit facilities that encourage use and offer safe crossing.
- Apple Valley will be a thriving City that is the place to plant : grow : prosper as it relates to living, working, learning, shopping and recreating.

- Apple Valley will continue to sustain our significant park and trail assets in close proximity to residents and our walkable/bikable downtown for business.
- Apple Valley will negotiate lifecycle and affordable housing goals that take the existing housing inventory and density into account. We will respond to the housing market demand for multi-unit market rate housing with some affordability.

Please consider these items as work on the Thrive MSP 2040 Development Guide continues.

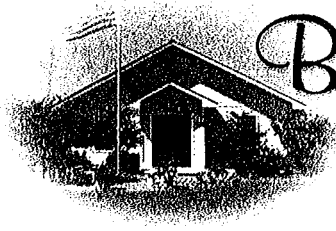
Sincerely,

CITY OF APPLE VALLEY

A handwritten signature in black ink, appearing to read "Bruce Nordquist". The signature is fluid and cursive, with a large initial "B" and "N".

Bruce Nordquist, AICP  
Community Development Director

cc: Mayor and City Council  
City Administrator



# Baytown Township

4220 Osgood Avenue North | Stillwater, MN 55082  
P: (651) 430-4992 | F: (651) 430-4986 | E: baytowncf@comcast.net

April 8, 2014

Metropolitan Council  
390 North Robert Street  
Saint Paul, MN 55010

Re: Thrive 2040  
Comments from Baytown Township

Dear Metropolitan Council:

The Baytown Town Board has reviewed the Community Designations chapter of the draft of the *Thrive 2040* document. The Board believes that the entire township should be designated as Rural Residential, based on recent changes to the Township's zoning map and 2030 Comprehensive Plan. The draft *Thrive 2040* document shows portions of the Township in the Rural Residential designation, and other areas in the Diversified Rural designation.

During the planning process that led to adoption of the Township's 2030 Comprehensive Plan, the Township proposed that the central portion of the Township be rezoned to a Single-Family Estates district that permits a maximum density of 16 units per 40 acres (2.5-acre minimum lot size). The Metro Council required that Baytown refrain from changing the zoning of those areas until completion of a proposed Metropolitan Council St. Croix Valley Wastewater Treatment Plant Study, or until December 31, 2012 if the study was not completed. The Metro Council did not complete the study, and therefore the Township moved forward with the zoning change that was proposed in the Comprehensive Plan.

The Baytown Town Board adopted a revised zoning map for the Township on May 6, 2013. The revised map was based on the land use map included in the Township's Comprehensive Plan. It changed the area at the center of the Township to the Single-Family Estates (SFE) classification, with a maximum density of 16 units per 40 acres. The Washington County Board subsequently adopted the revised zoning map for the Township on November 19, 2013. A copy of the zoning map adopted by the Township and Washington County is attached. The area that was rezoned to SFE is approximately the same area shown in the Diversified Rural designation in *Thrive 2040*.

Based on the review of the descriptions of the Diversified Rural and Rural Residential designations and Land Use Policies in *Thrive 2040*, the Town Board believes that the Rural Residential classification should be applied to the entire Township, based on the following:

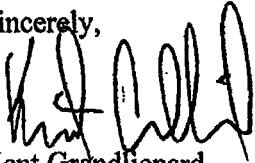
- The Rural Residential designation is a better fit with the Township's land use goals to remain rural and not provide urban infrastructure such as centralized wastewater

treatment. The Township should not be included in the Long-Term Service Area for the regional wastewater system.

- The density regulations for the Township are more consistent with those shown for Rural Residential designations in the table on page 67 in the *Thrive 2040* document than the density expectations for the Diversified Rural area.
- The Rural Residential designation matches the goals of the Township's 2030 Comprehensive Plan.
- The Rural Residential designation is a better fit with the existing residential development in the Township.
- The Township's current zoning and development pattern are similar to the zoning and development in West Lakeland Township, which is in the Rural Residential designation in *Thrive 2040*.

Thank you for your consideration of the Town Board's comments. Please contact me at (651) 430-1142 if you have questions about the comments.

Sincerely,



Kent Grandhienard  
Town Board Chair

Cc: Baytown Town Board  
Connie Fredkove, Clerk  
David Magnuson, Township Attorney  
Dennis O'Donnell, Washington County





April 28, 2014

Angela Torres, Sector Representative  
Metropolitan Council  
390 Robert Street North  
St. Paul, MN 55101

RE: *Thrive MSP 2040 Review*

Dear Ms. Torres:

Thank you for the opportunity to review and comment on the *Thrive MSP 2040* plan, both regionally and as it pertains to the City of Belle Plaine.

As you are aware, Belle Plaine is a third-ring suburb of the metro area; located in southwest Scott County on the TH169 corridor almost directly between the I-494 ring and the Greater Mankato Region. Because of the City's convenient location and proximity to two major growth areas, we feel Belle Plaine is well positioned for growth in the next several decades. The City was afforded the opportunity to respond to the preliminary 2040 population forecasts provided by the Council in 2013, for which revised numbers were provided in the *Thrive MSP 2040* plan. The City has reviewed the revised 2040 forecasts provided by the Council and thanks you for taking time to review concerns and make initial adjustments in the numbers across the region.

Review of the *Thrive MSP 2040* draft, and previously of the 2040 draft forecasts, indicates a strong emphasis on redevelopment efforts in the more Urban Areas. While the City is not arguing the benefit of such efforts, there is concern for how this may affect overall support by the Council in growth initiatives for communities like Belle Plaine for the future; particularly in the areas of population, transportation, economic development. As the Council emphasizes the national and global significance of the Twin Cities metro region, availability of financial and technical resources and support to all communities is important.

The primary concern may lie within the Community Designation of "Rural Center" provided to Belle Plaine. It is unclear why this designation category was changed from "Rural Growth Center," as was the case in the 2030 Framework, but the implication seems to be that the Council no longer sees these communities as growth centers of the region. As was indicated to Todd Graham, in the forecast review letter dated January 2<sup>nd</sup>, the City continues to support the expectation that Belle Plaine will be a place of growth; attracting young couples who purchase or build homes with the idea of starting families. Additionally, significant investment in life-cycle housing has taken place in the community over the last decade, providing opportunity for the largest emerging demographic to age-in-place.

Having lower land costs than inner and second-ring cities, and a convenient location with direct access to one of the major transportation corridors in the State enhances the desirability and accessibility of Belle Plaine. Because of these characteristics City feels it is more closely characterized to the Emerging Suburban Edge designation and not that of Rural Centers; defined as "provid[ing] a range of services appropriate to serve a limited population within a compact geographical area" (*Thrive*, p. 60). The regional significance of being located along TH 169 should not be underestimated. Understanding, however, that there is and will continue to be geographic disconnect between Belle Plaine and the edge of the suburban core where many of these "Emerging Suburban Edge" communities are located, the distinction in categories makes sense. Therefore, the City requests the Council reexamine the community designation names, strategies and roles for the fourteen communities listed as "Rural Center" to determine whether an additional category may be considered. For example, growth patterns for communities such as Hamburg, Watertown and New Germany are likely to be significantly different than those for communities such as Belle Plaine, Jordan and Cologne.

Community Designation is important because of the emphasis the Council is placing on roles within each designation. Where the Council's proposed roles for Emerging Suburban Edge communities are to "promote," "provide," and "invest" in the areas of land use and transportation; the roles change to that of "encourage," "partner," and "explore" with Rural Center communities. Perhaps most troubling is the distinction between designation categories in the area of Economic Competitiveness. *Thrive* emphasizes the importance of competing globally through strength of the region, indicating a desire to "Foster the conditions for shared economic vitality by balancing major investments across the region" and; "Plan for and invest in infrastructure, amenities and quality of life needed for economic competitiveness" (*Thrive*, p. 13). However, where the role of the Council to Rural Centers is to "encourage communities to support a range of housing opportunities for those interested in a more rural lifestyle" (*Thrive*, p. 109) the promotion and support of these economic initiatives in other community designations is well documented. The City is uncertain how this provides support in giving Rural Centers a competitive economic advantage across the region. The implication, then, is that resources for support in these areas may be scarce for Rural Center communities.

As has been addressed several times up to this point, the investment in regional growth identified in *Thrive MSP 2040* appears to represent an abrupt change in the Metropolitan Area's growth philosophy. Whereas the 2030 projections recognize outer ring communities as growth centers, the 2040 projections appear to redistribute growth to the urban core; and communities such as Belle Plaine will be significantly impacted by this change. In anticipation of the growth projections adopted with the 2030 Comprehensive Plan, the City has expended over \$5.5 million working toward implementation of its adopted growth strategies, including a significant expansion to the sanitary sewer system, and planning efforts towards a second bridge crossing over TH169 at County Road 3. There is concern that the outcome of the Metropolitan Council's change in growth philosophy for the 2040 planning process will further restrict growth and that the allocation of regional resources will be more greatly focused on the cities within the urban core; with fewer resources allocated to outer ring cities. In this regard, the City of Belle Plaine is concerned that regional support for growth in the community, along with related funding sources, including grant programs, will be limited or no longer be available.

All factors considered, we respectfully request the Met Council reevaluate the community designation for Belle Plaine and/or whether an additional category may be added for consideration, along with corresponding strategies, and Council and community roles. Thank

you for your consideration. The City looks forward to future discussions with the Met Council regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Chelsea L. Alger", with a long horizontal flourish extending to the right.

Chelsea L. Alger  
Community Development Director

cc Dawn Meyer, Interim City Administrator  
Belle Plaine Mayor and City Council



April 21, 2014

Susan Haigh, Chair  
Metropolitan Council  
390 Robert Street North  
St. Paul, MN 55101

**Re: Draft Thrive MSP 2040 Plan**

Dear Ms. Haigh:

The City of Bloomington appreciates the opportunity to comment on the Draft Thrive MSP 2040 Plan ("Thrive"). The regional plan has the potential to play an important role in guiding our region as it competes with other regions nationally and internationally for jobs and talent. On April 21, 2014, the Bloomington City Council approved the following comments.

### **1. Focus**

As easily happens in a large plan, Thrive lacks focus. The draft lists hundreds of laudable goals and objectives. But what are the three or five key efforts that demand special regional focus before the next plan update? For the region to rally around the plan and its recommendations, the plan needs to identify a few key efforts, provide a definition of success on each effort and a program of regular measurement and reporting of the region's progress.

### **2. Transportation Leadership**

Bloomington believes that the serious disconnect between regional transportation needs and available transportation resources is the single largest threat to our region competing successfully with other regions in the future. While the draft Thrive recognizes that future transportation revenue will cover only one quarter of anticipated need (see Page 11), this critically important issue receives relatively little discussion within the plan.

Bloomington strongly encourages the Metropolitan Council to take an active leadership role in solving this central problem. The Metropolitan Council should aggressively communicate the region's transportation needs, the extent to which funding is lacking in this region, the level at which competing regions throughout the world are funding transportation improvements and the inevitable consequences of falling seriously behind. To make progress on this issue, the Metropolitan Council needs to be a vocal champion for fixing this funding problem. Thrive, the region's plan, can play a role by focusing on this key issue and emphasizing the incredible return on investment that transportation projects provide.

### **3. Regional Benchmarks**

Bloomington encourages the addition of regional benchmarks to Thrive. How does our region compare with competing regions on benchmarks such as access to living wage employment, housing affordability, and average commute times? Bloomington strongly supports the idea of issuing an annual regional report card to focus attention on benchmark status. As the metropolitan planning agency, the Metropolitan Council should take a lead role in promoting dialogue and awareness of the region's strengths and weaknesses, even for issues that are not directly influenced by the Council (crime, educational attainment, unemployment, commercial and residential vacancy rates, etc.).

### **4. Housing Affordability**

In several locations, Thrive indicates that communities must "address the community's share of the region's affordable housing need through redevelopment." Bloomington agrees that redevelopment plays an important role in providing affordable housing. However, affordable housing can also be provided through the conversion and preservation of existing housing stock. Thrive should recognize the importance of such programs and the Metropolitan Council should count affordable units generated through conversion or preservation toward each community's affordable housing goals.

### **5. Wastewater**

Thrive recognizes that one implication of accelerated growth in the region's core is that wastewater interceptor capacity improvements will increasingly be required in developed areas. On Page 11, Thrive states, "the Council's attention will increasingly turn from managing the edge of the system to ensuring adequate maintenance and capacity in the redeveloping areas of the region in order to efficiently use existing wastewater investments." Bloomington and Edina serve as an excellent example of this need. Portions of both cities rely on a lift station that is currently at capacity and needs to be expanded. Longer term, redevelopment will require expansion of the Metropolitan Council interceptor through Bloomington upon which both cities rely.

To better understand this issue, it would be helpful if Thrive included a table comparing the developed portion of the region with the developing portion of the region for the past, present and future regarding percentages of the region's growth, percentage of the region's SAC fee receipts and percentages of the region's wastewater improvement expenditures.

### **6. Metropolitan Area Outside the Seven County Core**

Thrive would benefit from additional discussion on the portions of the metropolitan area that lie outside of the Metropolitan Council's seven county jurisdiction. The draft uses terms such as "region" and "metropolitan area" to refer to just seven of the counties in what the U.S. Census Bureau recognizes as a thirteen county metropolitan area. The Metropolitan Council's practice of reporting seven county data as "metropolitan area" data is often mistakenly carried forward, especially by the media. This underestimates the true size of the Twin Cities (3.5 million not 2.9 million) in comparisons with other metropolitan areas.

Regarding the thirteen country metropolitan area, Thrive should include:

- an overview of growth in the border counties;
- an overview of the extent to which border county residents are tied to the seven county area through transportation, employment and services;
- a discussion of the reasons why growth has leapfrogged to these areas;
- a seven county vs. border county household, population, and employment comparison historically, today, and as forecast for the future;
- the impact of border county growth on regional systems, particularly the transportation system;
- the opportunities and challenges for seven county/border county cooperation; and,
- the potential long term impacts of the Legislature's intent to continue its current definition of a seven county regional planning area.

### **7. Forecasts**

The Metropolitan Council's employment forecast for Bloomington for the year 2040 (111,000) is too low. To put that number in context, Bloomington's listed employment for the year 2000 is 104,548. Past Metropolitan Council employment forecasts for Bloomington show approximately 113,200 jobs in 2030. Thrive calls for more growth in Bloomington, especially within the five designated "job and activity centers" and six designated transit station areas in Bloomington. Given that Bloomington's plans are consistent with the Metropolitan Council's plans for continued growth in these areas, Bloomington does not agree with the Metropolitan Council's estimate that Bloomington will lose employment from 2030 to 2040. Employment should increase significantly.

### **8. Undercounting Regional Employment**

The employment data shown in Thrive for 2000 and 2010 appears to reflect data provided by the Minnesota Department of Employment and Economic Development (MNDEED). Bloomington agrees that MNDEED is the best source for regional and city level employment data. However, MNDEED acknowledges that their data is not total employment but rather the employment that is covered by the unemployment insurance program. MNDEED estimates that three percent of employees statewide are not covered by that program. Therefore, actual employment is higher than MNDEED data. Bloomington encourages the Metropolitan Council to add three percent to the MNDEED numbers to avoid an undercount and to recognize those employees not covered by the unemployment insurance program. Forecasts for future years should also take this issue into consideration.

### **9. Core Competencies and Statutory Mandates**

Thrive indicates that the Metropolitan Council is planning an increased role in areas beyond its statutory mandate, for example water supply and economic development. Given funding constraints and the need for regional focus on key efforts, Bloomington encourages the Metropolitan Council to focus Thrive on the Council's core competencies and statutory mandates.

Ms. Susan Haigh  
April 21, 2014  
Page 4 of 4

Thank you for seeking comments on the draft Thrive MSP 2040 Plan. Should you have any questions regarding this letter, please contact Larry Lee, Community Development Director, at (952) 563-8947.

Sincerely,

A handwritten signature in black ink, appearing to read "Gene Winstead". The signature is fluid and cursive, with the first name "Gene" being more prominent than the last name "Winstead".

Gene Winstead  
Mayor

Copy: Steve Elkins, Metropolitan Council Member - District 5  
Michael Larson, District 5 Staff Representative  
Patricia Nauman, Executive Director, Metro Cities



## Office of the City Manager

5200 85th Ave. N., Brooklyn Park, MN 55443-4301 • Phone 763-424-8000 • Fax 763-493-8391  
TDD 763-493-8392

**JAMES VERBRUGGE**  
City Manager  
763-493-8002

May 2, 2014

Freya Thamman  
Metropolitan Council  
Sector Representative  
390 North Robert Street  
St. Paul, MN 55101

Dear Ms. Thamman:

I am writing in response to comments requested on the Thrive MSP 2040 Draft document. The City of Brooklyn Park appreciates the work of the Metropolitan Council and the outreach that has been done as the 2040 plan has been developed.

We do not have issues with the vision document generally but there are a few areas of concern related to the document that we feel should be addressed now in hopes that it will avoid future issues as we move to update our comprehensive plan in 2018. Concerns are focused on what we anticipate will be included in the system statements and include community definition, density expectations, transportation comments, water systems, and housing expectations.

I have outlined our concerns below following the format of the document.

- The City of Brooklyn Park has been plugged into the Suburban category. Based on our historic staged growth we believe we actually fall into three categories, Urban, Suburban, and Suburban Edge. We believe this more correctly identifies our historic and future development patterns.
- The overall density provisions outlined for the various community categories are a significant concern whether we are designated one or more community type. With a suburban designation, all new housing growth and redevelopment would be expected at an average of 5 units per net acre. As a comparison, our current community wide gross residential density is less than 1 unit per acre. We don't have the capability to calculate the net density for the whole city but we know it is not realistic to go from 1 unit/gross acre to 5 unit/net acre.



Ms. Freya Thamman

Page 2


May 2, 2014

- The direction of planning for water may impact our customers as more restrictions and regulations are placed on water resources. The Mississippi River rulemaking process will impact the need to update our critical area plan.
- The City of Brooklyn Park has been identified as a place with racially concentrated poverty which is addressed in the document as an issue in urban areas. We believe that past housing policies and affordable housing goals have contributed to this concentration. We have an abundance of affordable housing and will need to include robust policies and programs to support the on-going maintenance of our housing stock.
- The need for a variety of housing types has been and will continue to be critical to us as a community. Our focus is on higher value move-up housing and high end multi-family housing to help create what we are missing in our housing stock.
- Housing density and forecasts are not realistic. We believe that we currently provide our share of housing in the region's affordable housing need. We will continue to oppose mandates for additional affordable housing in our community.

There are many suggestions in the document that if they become mandates through the comprehensive planning process will be problematic. Our working relationship with Metropolitan Council has been good and we see the ability to work through the issues that are unique to our community as we move forward. However, the items outlined above are provided as comment on the draft document to help shape the final version and related expectations.

Thank you for the opportunity to comment on the Thrive MSP 2040 document. Please let me know if you have any questions.

Sincerely,



James Verbrugge  
City Manager

c. Mayor and City Council  
Kim Berggren, Director of Community Development  
Cindy Sherman, Planning and Development Director



City of  
**BURNSVILLE**

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April 28, 2014

Metropolitan Council  
Attn: Patrick Boylan  
390 North Robert Street  
St. Paul, MN 55101

**RE: Burnsville Review Comments for Draft Thrive MSP 2040 Plan**

Dear Mr. Boylan,

The purpose of this letter is to submit comments, questions and responses to Metropolitan Council from the City of Burnsville on the draft Thrive MSP 2040 plan. We have reviewed the Draft Thrive MSP 2040 plan document and appreciate the opportunity to provide feedback comments and questions. Overall the draft plan outlines many issues facing the region, state and nation including race, poverty, equality, water pollution, climate change, and sustainability to name a few.

Our primary concerns are that these issues are broad, complex, and influenced by multiple factors that are beyond the ability of local and regional government to resolve. The issues are not confined to corporate limits, the metropolitan regional boundary and some such as water quality go beyond state boundaries. A major oversight of Thrive MSP 2040 is that it does not consider or address the impacts tax codes, financial policies, personal choice, credit practices, real estate markets, or other major contributing factors that go well beyond local land use controls and public infrastructure investments.

We are concerned that many of the policies are beyond the ability and jurisdiction of our city to influence. Although our city has an adopted sustainability plan, we question the ability of our city to impact significantly global warming and climate change in this context. This is already a statewide initiative and there is no reason for regional government to duplicate state initiatives. We are concerned that there are few objective standards or measurements set forth in Thrive MSP 2040 and as such it will be extremely difficult for us to develop strategies, budget for technical consulting assistance, or have the ability as a local government to resolve these matters in our local plan. We are also concerned that Thrive MSP 2040 does not include tools or other resources to address these major issues but instead Metropolitan Council appears to be expanding its authority into areas already heavily regulated and managed by other existing agencies. For example, we agree that there is a need to plan and protect our water supply but

this is already a DNR responsibility. It may be the Metropolitan Council's position that they do not believe the DNR has adequately managed the water supply however, the DNR's budgets and staff have been cut. Instead of adding the Metropolitan Council as yet another agency to provide guidance to water quality/ quantity initiatives, the Metropolitan Council should provide support the DNR's efforts. In order to minimize confusion and conflicting guidance, municipalities need one agency leading cooperative efforts to provide sustainable water. Evaluating the roles of the Metropolitan Council, MDH, DNR, MPCA and BWSR to reduce overlap of mission will help toward the goal of a more sustainable and efficient model for water resources.

Federal, state and regional governments continue to impose unfunded mandates, increase regulation and take away the few local tools that communities have to influence private sector development and redevelopment (eminent domain, putting limits on the amount of taxes we can levy, reducing grants etc.,). Burnsville's tools consist of land use regulations clearly defined by state statutes and rules. We have the ability to impact some public infrastructure decisions. Through platting and limited grant funds; at the local level we can preserve some areas for parks and recreation. Through our joint partnership with Dakota County Community Development Agency, we can and have provided assistance for affordable housing opportunities and services in our city. However, local tools have been severely restricted by federal, state and regional government. In the wake of the recession, Burnsville, like most local governments, has reduced staff, eliminated programs and extended infrastructure and maintenance schedules to their limits in order to manage within available resources. These reductions are all tied to fewer dollars coming in to the city due to reduced federal and state funding, state imposed restrictions on the use of eminent domain, tax increment financing and diminished property valuations. We have lost virtually all of the tools and incentives that used to be available to influence the private sector to develop in accordance with regional objectives traditionally desired by the Metropolitan Council. We do not have the financial capability, technology, staff and expertise to take on the lofty objectives of Thrive MSP 2040. If Met Council wants additional programs and services, then they need to provide the funding and technical resources to do so. That is the only way the stated goals are going to be achieved. Placing goals or mandates upon communities which are unrealistic will not lead to success.

#### **GENERAL COMMENTS:**

The draft Thrive MSP 2040 outlines good intentions, but it seems to be pushing the boundaries and places higher expectations on cities in areas that appear to be outside of the system statements and statutory requirements of the Metropolitan Council (climate change/sustainability, potable water, inequities, etc.). In many cases, other agencies are already responsible for carrying out state wide initiatives. While it is good for the metro area to address these initiatives, it is important to recognize that areas beyond the metro counties also contribute to the problems. Met Council needs to limit its scope to that which can be impacted by the metropolitan area so that its policies do not unduly burden metro cities and create inequities between metro and non-metro-cities and the rest of the state. Cities will need more resources for drafting their Comprehensive Plans, implementation, and providing all of the



measurables and opportunities that are being asked for. How will the Met Council partner with cities on assisting with this?

The draft plan is very vague in some areas. There is language throughout the document such as "Council will work with", what does this mean? Also, the plan does not specify if the "Community Role" items are requirements or voluntary. And what are the specific expectations for each item listed under the "Community Role items? While the overall vision of the Metropolitan Council is clear, the implementation directives are not. Will the Metropolitan Council be looking for these items to be in cities Comprehensive Plans? To what extent? What exactly is meant when Met Council says they will "provide technical assistance" in many of the program areas? How much assistance, what type, and will the assistance include local data to be useful rather than regional data? Will funding be provided to cities to assist with hiring experts to gather/interpret local data?

The plan is very focused on protecting the investment the Metropolitan Council has made into transit corridors. Because of this, it seems that cities without transit corridors are going to be less of a priority for funding and other resources. Yet, these are the communities that will see the most growth and may have more opportunities or could achieve success more efficiently. This seems faulty. How has Thrive MSP 2040 integrated the influence of the market in its initiatives? How does Thrive 2040 take advantage of market opportunities?

As part of the Regional Economic Competitiveness, Metropolitan Council will seek to discourage redevelopment of industrial land in strategically important locations along rivers and railroads in the region. Burnsville has an approved Comprehensive Plan that calls for changing heavy industrial located along the Minnesota River to natural open space and recreational trail use. The Minnesota River Quadrant (MRQ) is guided to phase out heavy industrial uses to return the riverfront to a more natural state. The City does not want to compromise our long-range plans for the MRQ and we have reservations about the industrial land use policy being proposed in Thrive MSP 2040.

When Thrive MSP 2040 states that Metropolitan Council will use an "equity or climate impact lens to evaluate operations, planning and investments..." what exactly does this mean? We are unsure what data would be used from Burnsville to show how a local land use or project would provide "equity" or "climate impacts." Also, how does a local government or private development document how a project "advance equality" throughout the region? Met Council needs to define clear attainable indicators that local governments can actually achieve.

We feel our number of households forecast remains too high. The City has been working through this with Metropolitan Council staff and hope to reach an amicable compromise. We appreciate the time staff has spent working with us on the issue as explained in the following paragraphs.

**ISSUES WITH DRAFT 2040 POPULATION, HOUSEHOLD & EMPLOYMENT ESTIMATES**

The City of Burnsville received the revised draft 2040 Population, Household and Employment estimates prepared by the Metropolitan Council. The City has reviewed the revised estimates and continues to believe that further adjustments are needed to reduce the population and household estimates for Burnsville.

The following table illustrates population, household and employment data from previous U.S. Census, the City’s adopted (2030 Comp Plan) and Metropolitan Council forecasts for 2040.

2030 Approved Comp Plan (includes 2012 Update)

**Figure 18  
Metropolitan Council Forecasts for Burnsville**

|                   | 2000<br>Census | 2010<br>Census | Forecasts |        |        |
|-------------------|----------------|----------------|-----------|--------|--------|
|                   |                |                | 2010      | 2020   | 2030   |
| <b>Population</b> | 60,220         | 60,306         | 61,400    | 63,000 | 65,000 |
| <b>Households</b> | 23,687         | 24,283         | 25,200    | 27,000 | 28,700 |
| <b>Employment</b> | 31,765         | 31,514         | 37,700    | 41,200 | 43,300 |

Source: Metropolitan Council, U.S. Census 2010

Table 18 illustrates that the Metropolitan Council forecasts for 2010 households was 24,283. The actual 2010 Census shows that the Met Council forecasts were overestimated by (917 households). Figure 21 below, indicates the total number of households projected by the City, based on actual net acreage available for future development added to the 24,283 households existing as of the 2010 census.

**Figure 21 Revised 4/28/2014  
Residential Unit Projections**

|   | # Residential Units  |
|---|----------------------|
| Approved residential projects with units not yet constructed                  | 474                  |
| Vacant (net) land guided for residential development (Figure 19)              | 545-882              |
| Neighborhood Center Redevelopment - yield plans (Figure 14)                   | 891                  |
| Business District – assisted living/residential health care units (Figure 20) | 642                  |
| MRQ revised new units   | 478                  |
| 2010 Census Households  | 24,283               |
| <b>Total Projected Residential Units</b>                                      | <b>27,313-27,650</b> |

Burnsville estimates that at full development the maximum number of households will be between 27,313 and 27,650. There will be at least 1,350 fewer units than Thrive MSP 2040

forecasts, or approximately five percent. The reduction of forecasted households is based on removal of 990 units from the MRQ and the actual 2010 Census household count. The Met Council estimates have generally been higher than the US Census and the City's estimates. Based on the City's data, and utilizing the Metropolitan Council estimate of 2.41 persons per household, the total build out population of Burnsville is anticipated to be between 65,824 and 66,637.

When Burnsville prepared its 2030 Comprehensive Plan update, the plan anticipated full build out by 2030 with a maximum population of 65,000 and 28,700 households. These revised projections contemplate full development of all existing residentially zoned vacant land and future planned residential redevelopment areas including redevelopment. The City's existing approved plan includes detailed analysis of future redevelopment areas and yield plans for multiple sites within the community. Please refer specifically to Chapter II - Future Land Use Guide Plan, Chapter IV - Housing Plan and Appendix T - Neighborhood Center Yield Plans and Appendix S - Additional Met Council Tables.

Considering the extensive planning the City conducted for its current 2030 Comprehensive Plan and the factors identified herein, Burnsville does not believe that its population will increase to accommodate the 2040 draft projections. The City formally requests the Metropolitan Council to re-evaluate the draft 2040 projections and to bring them into closer alignment with the City's full build out condition as identified in the Burnsville 2030 Comprehensive Plan.

We thank you for the opportunity to comment on the Metropolitan Council's Thrive 2040 plan. The City of Burnsville takes long-term planning seriously but believes that many of the initiatives set forth in the plan will be difficult to achieve given resource constraints at the local level. We look forward to the opportunity to work with you in the future to clarify the objectives outlined in the plan.

Sincerely,



Jenni Faulkner  
Community Development Director

Attachment

Cc: Burnsville City Council



## Attachment I: Specific Comments on Thrive 2040 Plan

### SPECIFIC COMMENTS

Pg. 10- read Met Council will ask cities to adopt strategies to minimize development impacts. To what extent? This is not clear.

Pg. 13 last paragraph. What exactly does this mean? How will the Met Council use its authority and capacity in economic development? Is the plan just calling out Met Council activities (infrastructure, park planning, etc.) as being part of economic development or are there actually new initiatives and funds to be used for regional economic development activities that are forthcoming?

Pg. 16- Preservation of industrial land allowing freight corridors. Especially along rivers, the land may be put to a higher and better land use and environmentally sustainable use. Market demands may be for different uses, especially where water or rail freight is not desired for land users.

Pg. 24 schools and higher education, lifetime learning and arts and culture are left out of the livability factor described. People also choose where to live based on weather, handicapped accessibility, pet friendliness, cost of living, etc.

Pg. 42- Having measurable are good. What about the methods for deciding on the measurable and the resources to collect and present the data?

Pg.45- Transit Corridors development areas (TOD) should extend beyond the ½ mile especially in areas with parking lots at the station. Riders will come from much farther than ½ mile.

Pg. 55- the characteristics of suburban have left out indoor shopping malls/centers.

Pg. 64- "Orderly and Efficient Land Use" Table 1: What is the density basis? Does it exclude all ROW, Parks/Open space, wetlands, utility corridors/easements etc., please clarify.

Pg. 65- Council Role (bullet 7): How can you support economic growth and development by promoting wise use of water? This seems to be a contradiction, please explain further.

Pg. 68- The plan should include Murphy Hanrehan and Cleary Lake as Regional parks. Murphy Hanrehan may have much more ecological and natural resource significance in Dakota/Scott Counties than Lebanon Hills.

Pg. 66-69- Natural Resource Protection- there is no mention of Emerald Ash Borer to protect (or restore) the metro regions significant asset in ash trees. Seems like there should be.

Pg. 69- Community Role: says communities should adopt and enforce ordinances requiring restoration of natural resources. Who is going to pay and fund these restorations? Work with regional partners to acquire and protect natural resources. Again who is paying for this?

Pg. 71- Council Role: 1<sup>st</sup>, 2<sup>nd</sup> and 5<sup>th</sup> bullets address water supply. Isn't this the DNR's responsibility? We do not need 2 agencies doing this. We already have the MDH for water quality (safety), DNR for appropriations and water supply. Historically Met Council was a commenting agency, recently they have made themselves a lead agency on water supply. This is an important role and the State needs to decide who is doing this and have them do it. Multiple agency involvement is confusing and a waste of taxpayer dollars.

Pg. 76: Community Role: This will require the City to invest in bicycle and pedestrian facilities (second bullet). Again, is there any funding proposed to address this requirement?

Pg. 80- Community Role: The comp plan should address climate change? Who is going to pay for that? And regarding solar energy, is this the City's responsibility?

Pg.92- required minimum average density of 5 units per acre. Is this each year? Or is this in a 10 year period? Or, from 2018 through 2040? Is this net or gross density? For a suburban community like Burnsville, this will not be achievable most years, but if taken over a 10 year period or longer, it is reasonable. That is because we don't have a lot of new residential development and we don't build multifamily units every year to get there. But when we do have a multi-family project, the densities are well over the 5 units per acre, so considering this over a longer period of time is do-able.





April 8, 2014

Angela Torres, AICP  
Metropolitan Council  
390 North Robert Street  
St. Paul, MN 55101

Dear Angela:

Thank you for the opportunity to review and provide comments on the 2040 Thrive MSP draft plan. The City Council submits the following comments for your consideration:

1. The forecasted employment numbers for the City of Carver remain too low. The City recently had a market study prepared by The McComb Group that demonstrates the viability of Carver's Freeway Commercial area for significant retail development. Industrial development is also planned for this area that will result in additional employees. We would recommend that a more realistic employment forecast for the year 2040 would be 3000 employees.
2. The improvement of TH 212 to a four-lane facility from Carver to Norwood Young America is a priority for the City. The existing TH 212 transitions several times between a two- and four- lane facility. As the Transportation Policy Plan is developed, we strongly recommend the inclusion of improvements to this corridor within the plan.

As noted in our letter to you in November 2013, the City has been using the following projections in its internal planning:

| <b>City of Carver</b> | <b>2012</b> | <b>2020</b> | <b>2030</b> | <b>2040</b> |
|-----------------------|-------------|-------------|-------------|-------------|
| <b>Population</b>     | 4012        | 5268        | 10325       | 19560       |
| <b>Households</b>     | 1264        | 2026        | 3971        | 7824        |
| <b>Employment</b>     | 282         | 700         | 2200        | 3030        |

Thank you once again for the opportunity to comment on the Thrive MSP 2040 draft plan. If you have any questions about these comments or wish to discuss them further, please contact either Brent Mareck, City Administrator, at 952-448-5353 or Cindy Nash, City Planner, at 763-473-0569.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Osterdyk". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Greg Osterdyk  
Mayor

cc: Gary Van Eyll, District 4 Metropolitan Council Member  
Jim Ische, Carver County Board  
Dave Hemze, Carver County Administrator



# CITY OF CHANHASSEN

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## Senior Center

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Metropolitan Council  
APR 28 2014  
Received Chair's Office

April 23, 2014

Susan Haigh, Chair  
Metropolitan Council  
300 Robert Street North  
St. Paul, MN 55101

Re: **Draft Thrive MSP 2040**

Dear Chair Haigh:

Thank you for the opportunity to comment on the Thrive 2014 MSP. This plan will help guide the region and the City of Chanhassen in planning future growth. As the southwest part of the metro area grows, several challenges will need to be met.

### *Investment in Roadway Infrastructure*

Chanhassen recognizes lack of transportation improvements could impact our ability to plan for anticipated growth as the Metropolitan Council develops its policy plans and systems statements.

Developing areas are forecasted to accommodate approximately 30% of the regions' growth. Accordingly, Chanhassen is poised for population growth into 2040. This will result in increased congestion as demand increases on the existing roadway infrastructure. Additionally, key corridors such as Hwy 101, Hwy 5, Hwy 212 and Hwy 7 continue to experience increased traffic. Transportation system planning should reflect this current and future need and invest appropriately. The City of Chanhassen supports not only the maintenance and improvement of existing roadway infrastructure, but also roadway network expansion investments to eliminate bottlenecks, and meet the commuter, freight, transit, and all traffic demands of current and planned growth.

Several corridors in Chanhassen will need to be improved in the next 30 years to meet regional growth projects. The Hwy. 101 corridor in Chanhassen is programmed for turn back Carver County. Improvements to this corridor have taken place in the past and in 2014 a new Hwy. 101 Minnesota River bridge between the City of Chanhassen and the City of Shakopee will be constructed. Several segments of Hwy. 101 still need to be turned back to the County. Chanhassen supports more funding of turn back projects in the metro area. These projects make improvements to roadways which have been typically neglected for maintenance and capacity improvements, take maintenance responsibilities away from the Minnesota Department of

Transportation and give it to local agencies and improve safety. Highway 5 will need to be constructed west of Hwy. 41 to a four-lane highway to adequately service the growing traffic demand in western Carver County. Hwy. 212 will need to be completed as a four-lane highway to serve as a vital link between the metro area and western Minnesota. Highway 7 should be studied again for expansion to a 4-lane roadway with needed safety improvements. Traffic in this corridor has reached almost 20,000 trips per day on a 2-lane rural section roadway. This number of trips is exceeding the capacity of the 2-lane facility.

The City of Chanhassen supports the comments submitted to the Metropolitan Council by the SouthWest Corridor Transportation Coalition which are attached to this letter.

### **Station Areas on Existing and Planned Transit ways**

**Localized Transit Service:** There is little discussion in the draft report on private bus services in metropolitan area. SouthWest Transit is recognized as Chanhassen's transit provider. It should be highlighted that rider surveys show private bus has a long history of meeting or exceeding customers needs and expectations. The 2013 SouthWest Transit customer survey for example showed 99% of riders were satisfied or very satisfied with SouthWest Transit's service. SouthWest Transit has also won national awards for outstanding bus service operation. History and community input have shown that the closer the local municipalities are connected to the transit provider, the better the system can meet local demands. The Metropolitan Council should recognize the service and the important role private bus companies, such as Southwest Transit, play in the metropolitan area. The Metropolitan Council should also support private bus company's role in metropolitan transit planning.

### ***Water Supply Considerations***

The City of Chanhassen strives to protect water resources both for today's population need and for the future generations. Water supply issues and sources of drinking water vary widely across the region and planning efforts should recognize this. In the Water Supply section, Page 46, the second paragraph states that "In 2005 the Minnesota State Legislature authorized the Metropolitan Council to take on planning and **management** of the regional water supply issues." State Statute 473.1565 does not authorize the Metropolitan Council to manage the water supply, but to simply carry out planning activities addressing the water supply needs of the metropolitan area. There needs to be a revision to the statement to clarify the role of the Metropolitan Council in regards to water supply.

Chanhasen recognizes that policy plans and systems statements will continue to define the broader policies described in Thrive 2040. The City of Chanhasen looks forward to continuing discussions, and an open process in the development of regional policy plans and system statements.

Sincerely,

CITY OF CHANHASSEN

A handwritten signature in black ink, appearing to read "Todd Gerhardt". The signature is fluid and cursive, with a large initial "T" and "G".

Todd Gerhardt  
City Manager



# CITY OF CORCORAN

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April 24, 2014

Ms. Freya Thamman  
Sector Representative  
Metropolitan Council  
390 Robert Street North  
St. Paul, MN 55101

RE: Metropolitan Council's REVISED Preliminary 2040 Forecasts

Dear Ms. Thamman;

The City of Corcoran has reviewed the Metropolitan Council's preliminary 2040 population, household and employment forecasts and we appreciate the fact that the forecasts were revised slightly upward for our community.

We understand that the draft forecasts are for the year 2040 only and forecasts for 2020 and 2030 will also be revised and incorporated into the final *Thrive MSP 2040*.

The City is disappointed that the Metropolitan Council's preliminary 2040 forecast revisions continue to reflect a significant reduction in Corcoran's estimated number of households, population and employment. These reductions are compared below:

| <b>CORCORAN</b> |   |   |                  |
|-----------------|---|---|------------------|
|                 | 2030 Development Framework and Adopted Comprehensive Plan | Thrive MSP 2040 (preliminary revised February 2014) | Change from 2030 |
| Households      | 6,100   | 4,500   | -26%             |
| Population      | 17,600  | 11,400  | -35%             |
| Employment      | 5,500   | 2,100   | -62%             |

Our 2030 comprehensive plan was developed to accommodate the 2030 forecasts and ensure that the City had guided enough land and had adequate infrastructure in place to accommodate projected growth. Since adoption of our Comprehensive Plan in 2011, the City has invested significantly in sewer and water infrastructure to facilitate the development anticipated in our adopted 2030 Comprehensive Plan. We have several development proposals that are being discussed and we recently approved our first urban development for 426 new single family lots.

We expect that our infrastructure investment, regional transportation investment like the completion of Highway 610, and the energy created by the new Corcoran developments will spur growth at levels anticipated by the 2030 forecasts. While the economic downturn delayed the timing of this development, the City is slowly regaining growth and is expecting to achieve sustainable growth levels as previously anticipated, albeit with a later start date.

As the economy continues to recover, development within Corcoran is expected to increase. Based on our conversation, the City expects that the Metropolitan Council will continue to ensure infrastructure investment that best supports the total capacity of households, population and employment from the City's 2030 Comprehensive Plan.

To accomplish this, the adopted 2030 Comprehensive Plan intentionally provides the city with many options for the phasing of development and the mix of land uses. As noted in our November 25, 2013 letter, we will continue to review development within the context of our approved Comprehensive Plan and will continue to pursue our right to develop at the pace anticipated and with the flexibility anticipated by this plan.

In summary, we continue to request that the 2030 forecast numbers be used as the 2040 forecast numbers to allow our community the flexibility to maximize our infrastructure investments. We look forward to continuing the dialogue with the Metropolitan Council as the forecasts continue to be refined as part of the Thrive MSP 2040 regional plans.

Sincerely,



Kenneth Guenther  
Mayor



Brad Martens  
City Administrator

Copy: Kendra Lindahl, City Planner  
City File



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April 18, 2014

Michael Larson, Sector Representative  
Metropolitan Council  
390 Robert Street North  
St Paul MN 55101-1805

Subject: City of Crystal comments regarding revised 2040 Forecasts and Thrive MSP 2040

Dear Mr. Larson:

The City of Crystal has reviewed the revised 2040 forecasts and applicable sections of Thrive MSP 2040. The city appreciates Metropolitan Council's February 2014 revisions to its 2040 forecasts, which are likely to be much closer to what will actually occur in comparison to the October 2013 preliminary forecasts. The city accepts the revised forecasts subject to the conditions on page 3-4 of this letter. The city is concerned about some of the language in Thrive MSP 2040, especially in the implicit mandates it creates for the local comprehensive plan update process. The city's comments regarding Thrive MSP 2040 are on pages 4-6 of this letter.

***METROPOLITAN COUNCIL'S REVISED 2040 FORECASTS FOR CRYSTAL***

A. Employment:

| <u>2000 Estimate</u> | <u>2010 Estimate</u> | <u>Prelim. (Oct 2013)<br/>2040 Forecast</u> | <u>Revised (Feb 2014)<br/>2040 Forecast</u> |
|----------------------|----------------------|---|---|
| 5,638                | 3,929                | 6,100                                       | 5,500                                       |

Employment ~~+2,171~~ +1,571 or ~~+55.3%~~ +40.0% from 2010-2040

Regarding the employment forecast, the city cannot foresee where in Crystal almost 1,600 jobs would be added unless the Crystal Airport is closed and redeveloped. However, by itself the employment forecast should have no significant impact on the next Comprehensive Plan Update due in 2018.



|    |   |                    |  |                      |                      |
|----|---|--------------------|--|----------------------|----------------------|
| B. | Population:   |                    |  | Prelim. (Oct 2013)   | Revised (Feb 2014)   |
|    | <u>2000 Census</u>  | <u>2010 Census</u> |  | <u>2040 Forecast</u> | <u>2040 Forecast</u> |
|    | 22,698  | 22,151             |  | 28,300               | 23,300               |
|    | (Population +6,149 +1,149 or +27.8% +5.2% from 2010-2040) |                    |  |                      |                      |

Regarding the population forecast, the city accepts 23,300 as a realistic number, but it should be noted that even a slight change in average household size could easily drive the population higher or lower.

|    |                    |                    |  |                      |                      |
|----|--------------------|--------------------|--|----------------------|----------------------|
| C. | Households:        |                    |  | Prelim. (Oct 2013)   | Revised (Feb 2014)   |
|    | <u>2000 Census</u> | <u>2010 Census</u> |  | <u>2040 Forecast</u> | <u>2040 Forecast</u> |
|    | 9,389              | 9,183              |  | 12,400               | 10,000               |

Households +3,217 +817 or +35.0% +8.9% from 2010-2040

Based on our experience with Metropolitan Council’s review process for Crystal’s most recent Comprehensive Plan Update, the households forecast warrants more discussion because it may have a significant impact on the Comprehensive Plan Update due in 2018.

***HOUSEHOLDS VS. HOUSING UNITS***

The Metropolitan Council forecast is for households (occupied housing units) thus excluding vacant units. However, for land use planning, all housing units should be counted, whether occupied or vacant, because it is housing units, not households, which are built upon the land and regulated by the city’s Comprehensive Plan and land use controls.

Based on actual and anticipated development activity, Crystal anticipates little or no net gain in housing units from 2010-2014. An affordable senior rental building (The Cavanagh) will come online in 2015 with new apartment units to accommodate 130 of the 817 additional households forecast by 2040. That leaves 687 households to be added in 2016-2040, meaning an average of 27.5 per year. This is not really plausible in Crystal unless the city gets a “credit” for households that would be accommodated in housing units that existed but were vacant in 2010. (See below.)

***CITY PROPOSAL - ADJUSTED HOUSEHOLD FORECAST***  
***637 additional housing units from 2010-2040***

Due to the 2000s real estate boom and subsequent crash, there was a surge of foreclosures that in turn resulted in a surge of vacancies. The 2010 household count occurred when vacancy was

unusually high. Specifically, the 2010 Census showed a 4.6% vacancy rate in Crystal. As of April 2012, Metropolitan Council estimated that Crystal's vacancy rate had dropped to 4.2%. The most recent low was 2.8% in April 2008.

The 1.8% difference between the 2008 and 2010 vacancy rates should be multiplied by the 2040 households forecast to estimate how many of those households can be accommodated in units that existed but were vacant in 2010.  $1.8\% \times 10,000$  households in 2040 = 180 of the 817 additional households accommodated in existing housing units. This "credit" of 180 households would mean that an increase of 637 housing units would be sufficient to accommodate an increase of 817 households from 2010-2040.

In summary:

- 817 Metropolitan Council Forecast: Increase in households from 2010 to 2040
- 180 "Credit" for unusually high vacancy rate that existed in 2010
- = 637 Adjusted Forecast: Increase in housing units from 2010 to 2040
- 0 No net change in housing units 2010-2014 (estimated)
- 130 The Cavanagh opens in 2015 with 130 new housing units
- = 507 Increase in housing units from 2016 to 2040 (avg. 20.3 units per year after 2015)

After The Cavanagh opens in 2015 with 130 new units, the Adjusted Forecast would mean an average of 20.3 new housing units per year from 2016-2040. This is just a bit below the pace of the 2000-2007 development boom. Given the difficulty and unpredictability of redeveloping sites with existing uses, this pace would be ambitious, yet plausible. But as always, the pace of development ultimately depends on market forces overcoming the many barriers to redevelopment of existing uses.

### ***CITY COMMENTS – REVISED 2040 FORECASTS***

The City of Crystal accepts the revised 2040 forecasts subject to three conditions:

1. That Metropolitan Council acknowledge the difference between households and housing units, specifically that the number of households was depressed in the 2010 baseline due to a high vacancy rate. Therefore, for land use planning purposes, the city shall receive a credit of 180 households presumed to be accommodated in units that were existing but vacant in 2010. This means that, for the purposes of updating the city's Comprehensive Plan, the forecast increase in new housing units from 2010 to 2040 will be 637, not 817.
2. Crystal will accommodate the increase in housing units through a combination of the following:

- a. In part by preemptive land use guidance, where appropriate as determined by the city and identified in a 2040 Planned Land Use Map to be included in the city's next Comprehensive Plan Update due in 2018; and
  - b. In part by redevelopment of existing uses, the location and extent of such sites being unknowable at the time of the Comprehensive Plan Update, and instead to be determined as redevelopment opportunities arise over time.
3. Crystal will not use its 2040 Planned Land Use Map to guide a particular quantity of land a certain way to "hit" the household / housing unit forecast or other forecasts. This approach is only appropriate for cities on the developing edge of the metro area where vacant land is abundantly available. In the case of Crystal and other developed suburbs ("Urban Communities" in Thrive MSP 2040), there is no way to know which existing uses will actually be redeveloped by 2040. Instead, the city will identify potential redevelopment areas (see item 2b above) to help guide developers and other interested parties to those parts of the city where market forces and physical conditions provide more fertile ground for redevelopment. This approach was explained at length in the city's previous Comprehensive Plan Update and the city will use a similar approach in the next update.

### *CITY COMMENTS – THRIVE MSP 2040*

The City of Crystal offers the following comments regarding Thrive MSP 2040:

1. Under "Orderly and Efficient Land Use", "Community Role":

Page 87      *"Plan for forecasted population and household growth at average densities of at least 10 units per acre, and target opportunities for more intensive development near regional transit investments, at densities and in a manner articulated in the 2040 Transportation Policy Plan."*

The city objects to a density mandate, whether specifically indicated (10 units per acre) or yet to be determined (Transportation Policy Plan). The city also objects to Metropolitan Council turning its forecasts into a mandate for the comprehensive plan to guide a specific quantity of land for redevelopment for a particular use or density. Density mandates may have a place in areas with abundant vacant land, but not in communities that are already developed with existing homes and businesses.

Page 87      *"Identify areas for redevelopment..."*

The city has identified numerous potential redevelopment areas, and will continue to do so, but will not go further. Changes to the state's eminent domain laws in 2006 mean that, even if a city wants to make

redevelopment happen in a particular area, it cannot make a property owner sell to make way for redevelopment. Furthermore, most potential sites in Crystal are comprised of parcels with multiple owners, meaning that a single holdout may stop a project even if all of the other owners want to sell. The city will use its map of potential redevelopment areas to help guide developers and other interested parties to those parts of the city where market forces and physical conditions provide more fertile ground for redevelopment. As specific redevelopment proposals emerge, amendments to the Comprehensive Plan and land use controls will be considered in the normal manner by the Planning Commission and City Council.

2. Under “Housing Affordability and Choice”, “Community Role”:

Page 88 *“Designate land in the comprehensive plan to support household growth forecasts...”*

Again, the city objects to Metropolitan Council turning its forecasts into a mandate for the comprehensive plan to guide a specific quantity of land for redevelopment for a particular use or density.

Page 89 *“Plan for an adequate supply of affordable housing along regional transitways at station areas.”*

Because housing, affordable or otherwise, is not a regional system under M.S. Chapter 473, the city objects to any mandate for specific number, density, type or cost of housing. Crystal is already one of the most affordable suburbs in the metropolitan area, and the city is focused on preserving the vast majority of its housing units rather than redeveloping them. The city is also concerned about the open-ended nature of the term “adequate supply”, because it depends on how that term is defined – and by whom. The city will identify potential redevelopment areas in its Comprehensive Plan Update, especially areas near a planned station with high frequency transit service. The city anticipates, but cannot ensure, that developers and the market will respond positively to high-frequency transit service.

3. Under “Access, Mobility, and Transportation Choice”, “Community Role”:

Page 89 *“Develop comprehensive plans that focus growth in and around regional transit stations and near high-frequency transit services, commensurate with planned levels of transit service and the station typologies (land use mix, density levels) identified in the 2040 Transportation Policy Plan.”*

The city objects to the use of the Transportation Policy Plan to mandate specific land uses and densities in already-developed areas, whether or not they are near a transit station. As stated in the preceding item, the city will identify potential redevelopment areas in its Comprehensive Plan Update, and will look closely at any areas near a planned station with high frequency transit service. The city anticipates, but cannot ensure, that developers and the market will respond positively to high-frequency transit service. As specific redevelopment proposals emerge, amendments to the Comprehensive Plan and land use controls will be considered in the normal manner by the Planning Commission and City Council.

Page 89      *“Adopt development requirements that improve the user experience, circulation and access for bicyclists and pedestrians.”*

It should be up to the city to determine whether it needs to adopt any official controls to accomplish this item. The city will review this subject as it prepares the next Comprehensive Plan Update, just as it did when preparing the previous update. The city objects to this item being turned into a mandate, such as a requirement that the city adopt a model ordinance provided by Metropolitan Council or another party.

Page 89      *“Adopt complete streets policies that improve safety and mobility for all road users.”*

It should be up to the city to determine whether it needs to adopt policy changes to accomplish this item, whether or not the city uses the term ‘complete streets’. As with the preceding item, the city will review this subject as it prepares the next Comprehensive Plan Update, just as it did when preparing the previous update. The city objects to this item being turned into a mandate, such as a requirement that the city adopt a model policy provided by Metropolitan Council or other party.

4. Under “Building in Resilience”, “Community Role”:

Page 90      *“Adopt local policies and ordinances that encourage land development that supports travel demand management (TDM) and use of travel options.”*

It should be up to the city to determine whether it needs to adopt any policies or official controls to accomplish this item. In Crystal’s case, there is very little employment relative to other cities, so TDM may not be necessary, appropriate or effective here. The city objects to this item being turned into a mandate, such as a requirement that the city adopt a model policy/ordinance provided by Metropolitan Council or other party.

Thank you for the opportunity to comment on the revised 2040 forecasts and Thrive MSP 2040. The City of Crystal looks forward to receiving Metropolitan Council's policy plans and system statements as they are prepared between now and fall 2015. In the meantime, please direct any questions to City Planner John Sutter at (763) 531-1142 or [john.sutter@crystalmn.gov](mailto:john.sutter@crystalmn.gov).

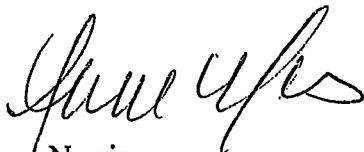
Sincerely,



Jim Adams  
Mayor



Richard VonRueden  
Chair, Planning Commission



Anne Norris  
City Manager

Cc: Todd Graham, Metropolitan Council Research – Demographics & Population  
Dennis Farmer, Metropolitan Council Research – Employment & Economy  
Libby Starling, Manager, Metropolitan Council Research  
James Brimeyer, District 6 Representative, Metropolitan Council  
Susan Haigh, Chair, Metropolitan Council



# City of Eagan

Mike Maguire  
Mayor

Paul Bakken  
Cyndee Fields  
Gary Hansen  
Meg Tilley  
Council Members

Dave Osberg  
City Administrator

Municipal Center  
3830 Pilot Knob Road  
Eagan, MN 55122-1810  
651.675.5000 phone  
651.675.5012 fax  
651.454.8535 TDD

Maintenance Facility  
3501 Coachman Point  
Eagan, MN 55122  
651.675.5300 phone  
651.675.5360 fax  
651.454.8535 TDD

[www.cityofeagan.com](http://www.cityofeagan.com)

The Lone Oak Tree  
The symbol of  
strength and growth  
in our community.

April 29, 2014

Metropolitan Council  
390 N Robert Street  
St. Paul, MN 55101

RE: MSP THRIVE 2040 COMMENTS

To Whom It May Concern:

Thank you for the opportunity to provide comments on the draft Thrive MSP 2040 plan. As stated in my email of April 28, 2014, the Metropolitan Council already classifies Eagan as a “developed” city and the Eagan 2030 Comprehensive Plan acknowledged the limited supply of vacant land remaining. At the time the Plan was completed, the City had about 700 acres or 8% of its residential land as vacant or underutilized remaining to be developed. Of that, only 100 acres were vacant. The Plan anticipates higher density redevelopment to take a larger portion of new growth due to the limiting characteristics of residentially guided vacant and infill properties.

Eagan currently has approximately 27,000 units either existing or under construction. The 2030 Plan assumed an additional 3,100 units and a total of 29,500 households and a population of 70,800 by 2030. Nearly half of these units were anticipated to come from redevelopment within Special Areas, particularly Cedar Grove Commons and Cliff Road Commons. While the City will continue to consider higher density residential development at Cedar Grove, the current development pattern will result in less area being available for that use than was expected when the 2030 Plan was done. The remaining areas assumed to generate additional units are predominately limited to infill development in areas with a Low Density Guide Plan designation (1-4 units/acre).

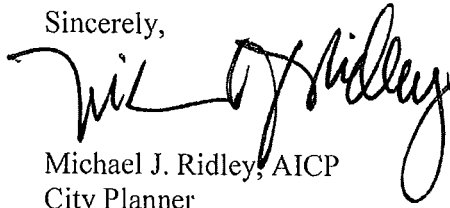
Current Thrive 2040 forecasts project 32,000 households in Eagan by 2040 (potentially up to 33,000 housing units based on the forecast methodology) to support a population of 80,200. An additional 6,000 units would need to be planned for in the next 25 years, or 240 per year to accommodate this forecast. Based on remaining land availability and the limited number of areas that would be appropriate for higher density redevelopment, it is unlikely this number would be achieved over this period.

Since 2010, Eagan has approved residential development with an average density of 5.2 units/acre. Eagan has supported higher density development; however, the Thrive MSP 2040 population/household forecasts are concerning because they represent a significant increase that we anticipate to be unattainable.

The Thrive MSP 2040 forecasts will certainly result in updates to the Met Council's Systems Plans and Eagan needs to understand the consequences for the City if the forecasted numbers are not met.

Please do not hesitate contacting me at (651) 675-5650 or [mridley@cityofeagan.com](mailto:mridley@cityofeagan.com) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Ridley". The signature is fluid and cursive, with the first name "Michael" and last name "Ridley" clearly legible.

Michael J. Ridley, AICP  
City Planner





Rec'd  
4-30-14

April 24, 2014

Mr. Todd Graham  
Principal Forecaster  
Metropolitan Council  
390 Robert Street North  
S. Paul, MN 5501

RE: Elko New Market - Thrive MSP 2040 Comprehensive Development Guide

Dear Mr. Graham:

On behalf of the City of Elko New Market, thank you for the opportunity to review the draft Thrive MSP 2040 Comprehensive Development Guide dated February 26, 2014.

In review of the draft document, the City of Elko New Market offers the following comments:

**Updated Forecasts.** Of primary interest to the City of Elko New Market is the Metropolitan Council's updated 2040 population, household and household size forecasts as provided in the Thrive document. Such updated forecasts, as well as prior Metropolitan Council forecasts for the City, are provided below:

| Year                    | Population | Households | Household Size |
|-------------------------|------------|------------|----------------|
| 2010                    | 4,110      | 1,259      | 3.26           |
| 2030 Projection         | 20,800     | 8,000      | 2.60           |
| 2040 Projections        |            |            |                |
| • Initial (summer 2013) | 8,000      | 3,500      | 2.29           |
| • Updated (winter 2014) | 12,200     | 4,500      | 2.71           |

The City of Elko New Market finds the updated 2040 population and household forecasts to be acceptable with the following understandings.

- 1. The Metropolitan Council will not require a reduction in City's existing MUSA area or sewer capacity allocation as part of the 2040 Comprehensive Plan Update. In this regard, the City requests that the 2030 MUSA essentially be allowed to become the 2040 MUSA.***
- 2. The City will be allowed to amend its present MUSA boundaries with an understanding that such change will not result in an increased sewer demand (beyond the existing 2030 allocation).***

Like most cities, economic growth is a primary objective of the City of Elko New Market. In this regard, the Interstate 35 corridor (between County Roads 2 and 86) is considered a significant community asset and a means to achieve such growth. Recognizing the visibility and accessibility afforded properties along the corridor, the City has experienced a significant amount of developer interest in such properties. To promote economic growth, the City desires flexibility to adjust its current 2030 MUSA boundary to include some Interstate 35 area properties as part of its 2040 Comprehensive Plan Update.

In a letter dated April 15, 2014 to Elko New Market's Consultant Planner (attached), our Metropolitan Sector representative addresses the preceding "understandings." While Elko New Market Staff believes there is a common understanding between the City and the Metropolitan Council, the City is concerned that the letter does not express definitive support for the maintenance of the City's existing MUSA and sewer allocation. Rather, the referenced letter indicates that the Metropolitan Council "*does not expect*" the City's MUSA to contract as part of the 2040 comprehensive plan update process.

**Community Designation.** In the Thrive document, the City of Elko New Market is designated as a "Rural Center." While the City understands the definition of the designation, a number of related concerns regarding the designation exist as noted below:

- It appears that regional infrastructure investments will depend on community category designations. In this regard, it appears that "Emerging Suburban Edge" communities are more likely than "Rural Centers" such as Elko New Market to receive regional investments.

Only in "Suburban" communities does the Thrive document clearly state that the Metropolitan Council's role is to "invest in regional amenities and services, including transit, regional parks and trails and bikeways to support the Suburban area as an attractive place to locate and do business." This would appear to put "Rural Centers" such as the City of Elko New Market at a competitive disadvantage.

Obviously, the City of Elko New Market does not wish to be "penalized" as a result of its community classification.

- The "Rural" Center" description in the Thrive document notes that growth should be orderly and economical so as to best utilize existing infrastructure and investment prior to the extension of new services. In Elko New Market, an extension of new services will be necessary to foster economic growth, particularly along Interstate 35.
- The City of Elko New Market holds several features which are more characteristic of an "Emerging Suburban Edge" community than a "Rural Center" as described in the Thrive document. These features include, but are not limited to, the following:
  - Elko New Market is in the early stages of transitioning to urbanized level of development.
  - Elko New Market offers both connections to urban amenities and proximity to open spaces that characterizes a rural lifestyle.
  - Elko New Market has a mix of residential, rural and agricultural areas, often including low density single family neighborhoods and small downtown service centers.

- Growth patterns in Elko New Market demonstrate challenges related to the conversion of rural to urban.
- Elko New Market provides commercial activities along its primary transportation corridor and encompasses a historic downtown with small town characteristics.

**Regional Investments.** In regard to regional investments, the Thrive document indicates that the Metropolitan Council wishes to change its traditional course from “expanding” to “maintaining” the region’s wastewater and highway infrastructure. As you are aware, the City of Elko New Market is a growing community which provides desirable housing opportunities for young families. To accommodate future growth, an expansion of infrastructure will undoubtedly be necessary. Simple maintenance of existing infrastructure would not only discourage growth (for which sewer capacity is presently allotted) but could potentially pose public, health and safety concerns.

Recognizing that future City growth will be highly dependent upon Interstate 35 and that the Interstate is a designated Bus Rapid Transit (BRT) corridor, the City of Elko New Market believes the Metropolitan Council should consider long-term investments along the corridor.

The City of Elko New Market requests that the Metropolitan Council respond to its need for continued expansion, not just maintenance, of regional infrastructure investments.

**Employment.** As previously noted, the City of Elko New Market views the Interstate 35 corridor as an opportunity for economic growth. Associated with such growth is the expected creation of new jobs related to future commercial and industrial development. In this regard, the City of Elko New Market expects to contribute to SCALE’s objective of providing over 78,000 jobs in Scott County by 2030. The Thrive document projects a total of 640 jobs in the City of Elko New Market by 2040. As part of forecasted job growth in the City, job creation opportunities along the Interstate 35 corridor should be given due consideration by the Metropolitan Council.

In conclusion, the City of Elko New Market finds the updated 2040 population and household forecasts, as provided in the Thrive document, to be generally acceptable. Such acceptance is however, contingent upon the receipt of a more definitive Metropolitan Council response demonstrating support of the following:

1. The City’s desire to maintain its 2030 MUSA (and related sewer allocation) as part of the forthcoming 2040 Comprehensive Plan Update.
2. City flexibility to adjust its MUSA boundary to respond to economic development interests/opportunities (within the framework of the current 2030 sewer allocation).

Further, it is hoped that the Metropolitan Council will give due consideration to the City’s more generalized comments related to community designation, regional investments and employment.

The City of Elko New Market looks forward to your response regarding its 2040 population and household forecasts and would welcome a meeting with Metropolitan Council representatives to discuss any of the preceding items as they relate to the content of the Thrive MSP 2040 document.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, consisting of several fluid, overlapping strokes that form the name 'Thomas M. Terry'.

Thomas M. Terry  
City Administrator

April 15, 2014

Bob Kermis  
Northwest Associated Consultants  
4800 Olson Memorial Highway #202  
Golden Valley, MN 55422

**RE: Elko New Market – Metropolitan Urban Service Area**

Dear Mr. Kermis,

Thank you for your continued engagement in the development of *Thrive MSP 2040*. We understand that you have some questions regarding the Metropolitan Urban Service Area (MUSA) for the City of Elko New Market. Specifically, that the City has interest in the 2030 MUSA as it relates to the 2040 Comprehensive Plan Update process.

The direction in *Thrive* is to extend the timeline for the MUSA from 2030 to 2040. The Council does not expect the City's MUSA to expand or contract as part of the next comprehensive planning process. On December 28, 2009, the Metropolitan Council reviewed the City of Elko New Market's 2030 Comprehensive Plan Update (Update) and found that the Update conforms with Council Systems, is consistent with Council policy and is compatible with adjacent and affected jurisdictions. The MUSA for the City is illustrated in the Update and is archived in the Council's files.

The Council expects the City to continue to develop within MUSA as defined in the City's current plan, and amend when appropriate as needed.

As a reminder, the City must submit comprehensive plan amendments to the Council for review as it annexes property or when it enters into an Orderly Annexation Agreement with the surrounding township for future development.

If you have further questions, please contact Patrick Boylan at 651-602-1438 or at [patrick.boylan@metc.sate.mn.us](mailto:patrick.boylan@metc.sate.mn.us).

Sincerely,



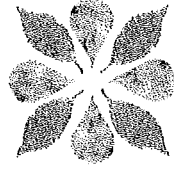
LisaBeth Barajas  
Manager, Local Planning Assistance

*Encl.*

Cc: Tom Terry, Elko New Market  
Wendy Wulff, Councilmember  
Kyle Colvin, Environmental Services  
Patrick Boylan, Sector Representative

*N:\CommDev\LPA\Communities\Elko New Market\Letters\MUSA Response.docx*





# Forest Lake

AS GOOD AS IT SOUNDS

Susan Haigh, Chair  
Metropolitan Council  
390 Robert Street North  
St. Paul, MN 55101

Chair Haigh:

On behalf on the City of Forest Lake, thank you for the opportunity to submit comments on Thrive MSP 2040.

The City of Forest Lake has the following comments:

1. In general, there seems to be many broad policy statements, but no specifics as to how to address the issues or funding.
2. The plan seems to be silent on regional parks and trails. The City of Forest Lake would like to see a regional trail that would better connect Forest Lake to Big Marine Park in Washington County.
3. The plan lacks discussion regarding transportation for disability and senior populations such as local circulator bus service. This is an issue that Forest Lake would like address. Forest Lake would like to learn how it can be better served.
4. The City of Forest Lake seems to fit the Community Designation Strategy as a Suburban Edge Community instead of an Emerging Suburban Edge Community. Here are examples of what sets Forest Lake apart from other communities identified as Emerging Suburban Edge below:
  - Forest Lake's development density is much higher than those identified as emerging suburban edge communities. Recently, the City approved a 4 story, 29 units per acre senior housing redevelopment project in its downtown as an example.
  - The City is served by a Washington County Transit Center and express bus service to and from Minneapolis and St. Paul.

- Forest Lake is the host of Headwaters, which was Washington County's first TOD development.
- The City allows mixed use development through its Comprehensive Land Use Plan and Zoning in almost all its commercial corridors, which includes high density residential up to 15 units per acre, and additional density increases through its Affordable Housing Incentives and Planned Unit Development standards.
- The City itself is a freestanding economic hub for the area and serves its housing trade area made up of more rural communities with higher density housing opportunities. This includes senior, workforce and affordable housing.
- The City has added 230 high density affordable housing units to its housing stock since 2010.
- The City has a strong focus on redevelopment as well as new development. A recent example of this effort and focus on redevelopment is the City of Forest Lake EDA redeveloping a 13 acre site, which included removal of a 1970's indoor mall. This site is now home to a new \$20 million city hall/public safety building and commercial out-lots that are under contract for new commercial development.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Borglund', written in a cursive style.

Doug Borglund  
Community Development Director

# City of Greenfield

7738 Commerce Circle  
Greenfield, Minnesota 55373  
763.477.6464/Fax: 763.477.4172

Email: [cityhall@ci.greenfield.mn.us](mailto:cityhall@ci.greenfield.mn.us)  
Web: [www.ci.greenfield.mn.us](http://www.ci.greenfield.mn.us)

April 28, 2014

Metropolitan Council  
390 N. Robert St  
St. Paul, MN 55101

Re: Thrive MSP 2040 Comment

To Whom It May Concern:

We have reviewed the Thrive MSP 2040 long-range planning document prepared by the Metropolitan Council and are grateful for the opportunity to respond. We appreciate and understand the challenges and difficulties in trying to plan for such a large and diverse area as that which is served by the Metropolitan Council. Perhaps the challenge is too difficult because the resulting report seems to be a one-size-fits-all solution and fails to recognize the very real situation that exists in Greenfield in all the areas addressed by the report, but specifically the financial, transportation and land use challenges of today and into the future.

Greenfield has limited tax capacity and annually strives to minimize tax increases. Due to our location on the western edge of Hennepin County we compete for residents and businesses with Wright County just across the Crow River. Taxes in Wright County are significantly less than in Hennepin and that puts us at a distinct competitive disadvantage. The Thrive document will not help us in this environment when we will be required to comply with the many mandates hidden in the plan while our neighbors will be able to practice freely in an open market unhindered by burdensome central planning which focuses more on the needs of the core cities than the outlying suburban area.

Transportation will continue to hinder the development of Greenfield. The recent re-surfacing of State Highway 55 has pushed the eventual expansion to four lanes into the distant future; anywhere from 30-40 years. This will continue to hinder our ability to attract business to our city. Instead, Thrive 2040 will spend billions of dollars on light rail and a limited number of customers will use it while commercial traffic finds alternative routes around the outer rim of cities.

Land use activities in the Thrive 2040 Plan do not address a city such as Greenfield. Much of the city has developed with a minimum lot size of 2.5 acres. There are no Met Council sewer services contemplated for our city in the current plan. Greenfield will have to develop and increase its tax base without the support of the Met Council's infrastructure assistance. We will need to be creative in the use of our own resources in order to be economically efficient. We



believe that people still have the dream of owning a home and many enjoy the rewarding environment of country style living. While they are willing to pay for this lifestyle they also expect their elected officials to maintain a reasonable tax structure. Over the past 30 years we have seen what happens when this does not exist. Commuters opt to drive longer distances to work and get greater value from the homes in lower taxed municipalities. This has already been the case with the help the nearsighted central planning of the past pushing development to surrounding counties such as Wright and Sherburne.

Thank you for the opportunity to respond.

Regards,

*Bonnie Ritter, City Administrator for:*  
Mayor and City Council Members  
City of Greenfield



April 25, 2014

Metropolitan Council  
Att: Lisa Barajas  
390 Robert Street N  
St. Paul, MN 55101-1805

Re: Thrive MSP 2040 – Draft Comprehensive Development Guide

Dear Ms. Barajas:

Staff has reviewed the Thrive MSP 2040 draft comprehensive development guide. With Thrive MSP 2040, there are five desired outcomes with three guiding principles on how the Metropolitan Council will implement its policies to achieve their vision for the region. These outcomes include stewardship, prosperity, equity, livability, and sustainability, with the guiding principles being, integration, collaboration, and accountability. The City of Hugo believes that these outcomes and principles are a good base for planning for the future of the region. These outcomes and principles also coincide with the goals and policies that the City of Hugo already has in place.

After reviewing draft document, the City of Hugo would like to provide comments on the following:

*Water Supply (pg. 46)*

The second paragraph states that “In 2005, the Minnesota State Legislature authorized the Metropolitan Council to take on planning and management of the regional water supply issues.”

State Statute 473.1565 does not authorize the Metropolitan Council to manage the water supply, but to simply carry out planning activities addressing the water supply needs of the metropolitan area. There needs to be a revision to the statement to clarify the role of the Metropolitan Council in regards to water supply.

*Community Designations and Planning Strategies*

The City of Hugo is split between two community designations (Emerging Suburban Edge and Diversified Rural) based on the overall state of development and the potential for growth in the areas.

### Emerging Suburban Edge

The western portion of Hugo is designated as Emerging Suburban Edge. The City of Hugo believes this designation provides a good overview of the area and supports the planning strategies outlined in the development guide.

### Diversified Rural

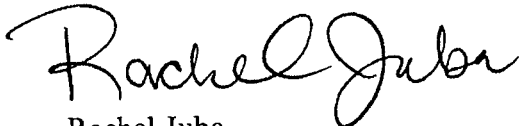
The eastern portion of Hugo is designated as Diversified Rural. The goal for the area is to protect land for rural lifestyles and long term urbanization. The maximum allowed density in this area is 4 units per 40 acres.

The strategies section suggests that there may be a way to allow residential developments at a higher density, if the City adopts an ordinance to allow this to occur, such as a cluster development ordinance. It also suggests using the Flexible Residential Development Ordinance Guidelines, adopted by the Metropolitan Council in 2008. The guidelines state that this can be applied to the areas in a community designated as Diversified Rural and in the Long-Term Sewer Service Area. In Hugo, the Diversified Rural area is split between the Long-Term Sewer Service Area and the Rural Service Area. Although the description of the designation seems reasonable, this section does not seem to address a situation in which communities are split between service areas. Furthermore, the guidelines seem to allow types of cluster developments to protect property for future development, not to protect natural resources. This is contradictory to the strategies section that encourages natural resource protection through the use of cluster development ordinances and conservation easements.

It is unclear of how the Diversified Rural designation in relation to the Wastewater System Long Term Service Area Map will effect future planning of this area. Staff is uncertain if this is the right community designation for the eastern portion of the City. Prior to the adoption of the draft Thrive MSP 2040 document, further discussion with Metropolitan Council staff is necessary to discuss the Diversified Rural designation in this area.

Thank you for considering the City of Hugo's comments on the draft Thrive MSP 2040 Comprehensive Development Guide. Please contact me with any question at [rjuba@ci.hugo.mn.us](mailto:rjuba@ci.hugo.mn.us) or (651) 762-6304, thank you.

Sincerely,



Rachel Juba  
Planner

Cc: Mayor and City Council  
Bryan Bear, City Administrator



April 25, 2014

Metropolitan Council  
Att: Lisa Barajas  
390 Robert Street N  
St. Paul, MN 55101-1805

Re: February 19, 2014, Population, Household, and Employment Forecasts

Dear Ms. Barajas:

Thank you for discussing the preliminary forecasts with me for the City of Hugo. Staff and City Council members have also attended the Thrive MSP 2040 workshops to discuss the preliminary forecasts.

The City of Hugo is asking the Metropolitan Council to revise its forecasts for Hugo based on the following:

1. Previous forecasts for 2030 led to a system statement that included a population of 40,000 people, 15,600 households, and 4,500 for employment for the City of Hugo. In its 2030 Comprehensive Plan the City planned for these projections. The preliminary forecasts for 2040 are significantly lower than what was forecasted for 2030, which if adopted could result in the City removing properties from the MUSA. This would be a big undertaking for the City because we have already committed to property owners that they are within the MUSA.

Per our discussions it has been explained that the Metropolitan Council has planned for infrastructure in Hugo for the forecasted numbers in the City's 2030 Comprehensive Plan. It was stated that the Metropolitan Council is committed to providing infrastructure and sanitary sewer flows to accommodate for those population and household projections in the plan. It remains unclear how the Metropolitan Council plans on making this commitment to the City.

2. There are pending development applications for a 100 unit senior housing complex, a 57 unit single family residential development, and 16 residential lots to be final plat. There are also 60 single family units with preliminary plat approval and staff expects final plat applications to be filed soon. Staff has been having discussions with multiple other residential developers and expects more applications to be submitted over the summer.
3. This past summer the Washington County HRA had Maxfield Research Inc. completed a comprehensive housing needs assessment for Washington County. This compared Maxfield's population, households, and employment projections to the two recent Metropolitan Council's projections. They evaluated each city in Washington County. I encourage you to review this document.

The City of Hugo is requesting the forecasts be revised to a population of 40,000 people and 15,600 households by 2040. Please contact me with any question at [rjuba@ci.hugo.mn.us](mailto:rjuba@ci.hugo.mn.us) or (651) 762-6304, thank you.

Sincerely,

A handwritten signature in black ink that reads "Rachel Juba". The signature is written in a cursive, flowing style.

Rachel Juba  
Planner

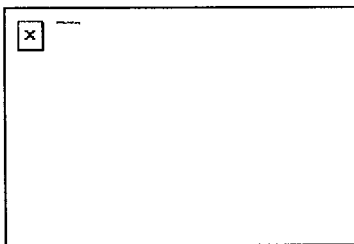
Cc: Mayor and City Council  
Bryan Bear, City Administrator

**From:** Thamman, Freya  
**Sent:** Thursday, April 24, 2014 4:11 PM  
**To:** Starling, Libby; Marckel, Daniel; Conley, Debbie  
**Cc:** Barajas, Lisa; Hanson, Paul; Colvin, Kyle  
**Subject:** Independence Thrive Comment

Independence City Administrator, Toni Hirsch, called and provided a Thrive MSP 2040 comment. There is a small part of Independence (north of Maple Plain), which is planned for sewerred Medium Density Residential. It is classified as Diversified Rural vs Emerging Suburban Edge- Toni asked that the geographic planning area/mapping be updated for this area.

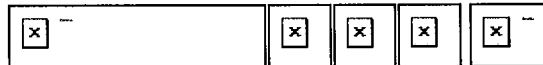
She and I talked on the phone about the change – I don't believe she will submit a written comment.

~Freya



**Freya Thamman**

Sector Representative | Local Planning Assistance  
[freya.thamman@metc.state.mn.us](mailto:freya.thamman@metc.state.mn.us)  
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390 North Robert Street | St. Paul, MN | 55101 | [metro council.org](http://metro council.org)



Ms. Lisa Barajas  
Manager  
Local Planning Assistance  
Metropolitan Council  
390 Robert Street North  
St. Paul, MN 55101



THE CITY OF  
**LAKE ELMO**

**RE: Lake Elmo, MN Request to Reduce Preliminary Thrive 2040 Growth Projections**  
**DA: April 11, 2014**

Dear Ms. Barajas:

As requested the City of Lake Elmo is responding to the preliminary projections for our community's growth as put forth in the proposed Thrive 2040 draft report. While we are pleased that our numbers have dropped roughly 3,000 from previous 2030 projections, we still believe these numbers to be elevated based on an exhaustive review of land use, ability / inability to provide municipal services, granted easements, and recreational areas. If you add in natural topography, storm water management and projected need for transportation right-of-way it appears that there is simply not enough available land to support an increase of 13,000 in population to approximately the 21,000 level as suggested in the Thrive 2040 draft report.

The rationale for this reduction can be found in the attached staff memo written to our City Council dated 10-15-2013. This memo was put together by our planning staff of Kyle Klatt, Community Development Director and Nick Johnson, City Planner, after months of study that included a spatial analysis, ability to serve areas with municipal services, transportation (including a municipal airport and mainline railroad), and a comprehensive market analysis. It is our belief that our ability to grow over the next 26 years is approximately 10,000-11,000 to a total of 18,000-19,000. We believe these numbers to be consistent with our designation as an Emerging Suburban Edge community outline in the Thrive 2040 modeling.

These numbers were the same used to construct a pro forma analysis to provide the confidence needed for the City Council to install two major sewer lines in the community in 2014. The sewer lines installation also acted as the foundation of the "Terms for Termination of the MOU" proposed by the Met Council in January of this year. This same pro forma analysis serves as our rationale for the construction of backbone water supply lines to be constructed in 2014-15. We have high confidence in our analysis and the market-based ability to grow to this level.

Therefore, the City of Lake Elmo respectfully requests that the Metropolitan Council reduce its growth projection for Lake Elmo, MN **to 18,000 for the year 2040** due to spatial constraints, the inability to serve a vast part of the community with municipal sewer and market-based realities. We believe that this growth is consistent with fundamental tenants of the MOU in that it recognizes the realities of the land, yet cash flows trunk sanitary sewer lines provided by the Metropolitan Council.

The City of Lake Elmo would like to acknowledge all of the partnering work that has been accomplished by yourself, Guy Peterson and the many others who have helped us to a point of collaborative communication as our community looks to move forward. We hope that our actions over the last few years have demonstrated a competency that will allow you to consider our request with great confidence.

Thank you for your consideration. If you should require any additional information or have any question about this request please do not hesitate to call either myself at 651-747-3905 or Kyle Klatt, Community Development Director at 651-747-3911.

Respectfully,

*Dean A. Zuleger*

Dean A. Zuleger  
City Administrator

**Attached: 10-15-2013 Staff memo**



MAYOR AND COUNCIL COMMUNICATION

DATE: 10/15/2013  
**REGULAR**  
ITEM #: 15

**AGENDA ITEM:** Met Council 2040 Growth Forecast Discussion

**SUBMITTED BY:** Kyle Klatt, Planning Director

**THROUGH:** Dean A. Zuleger, City Administrator

**REVIEWED BY:** Nick Johnson, City Planner

---

**SUGGESTED ORDER OF BUSINESS:**

- Introduction of Item.....Staff
- Report/Presentation .....Staff
- Questions from Council to Staff..... Mayor Facilitates
- Public Input, if Appropriate..... Mayor Facilitates
- Call for Motion..... Mayor & City Council
- Discussion ..... Mayor & City Council
- Action on Motion ..... Mayor Facilitates

**PUBLIC POLICY STATEMENT**

In preparation for next spring's adoption of Thrive MSP 2040 and the beginning of decennial Comprehensive Plan updates, the Metropolitan Council has developed preliminary local forecasts of population and employment to 2040. This is the beginning of the process to determine the population and household projections that will be used for the City's next Comprehensive Plan Update. With the release of these forecast numbers, the City intends to continue working with the Met Council towards an overall reduction of the population, household, and employment projections specified in the Memorandum of Understanding (MOU) between the City and the Met Council, with the ultimate goal of eventually eliminating the MOU as regulatory document.

**FISCAL IMPACT:** None at present – the Wastewater Inefficiency Fees that are included as part of the MOU would require the City to make payments to the Met Council if the development targets specified in the agreement are not met.

**SUMMARY AND ACTION REQUESTED:**

The City Council is being asked to review proposed population, household, and employment projections for Lake Elmo that have been prepared in response to recent conversations with the Met Council concerning the Thrive MSP 2040 process. With the release of preliminary 2040 forecast numbers for Lake Elmo, the timing is appropriate for the City to propose a new set of growth targets for the community that are much more consistent with the expected level of development in the community and the help the City Council achieve its stated goal of easing the Met Council REC unit mandates and to extend the deadlines for development out until 2040. Planning Staff has recently met with Mayor Pearson and Council Member Smith to begin the process of creating a credible 2040 forecast for the City of Lake Elmo, with the intent of:

- Understanding the real growth potential of the community in the next 27 years using primarily a single family residential philosophy.
- Determining how this growth relates to sewer REC units.
- Allowing enough growth to provide enough cash flow to support ancillary efforts like downtown development.
- Ensuring that the population forecast will be viewed as credible by the Met Council and provide a sufficient level of development to permit the eventual elimination of the MOU.

The projections that have been proposed as a result of this meeting are included below as part of this memorandum.

At this time, Staff is seeking conformation from the City Council that the proposed forecast numbers may be presented to the Met Council for consideration as a first step towards revising or eliminating the MOU. With the City Council's support, Staff will be submitting a letter to the Met Council with the proposed updated numbers for Lake Elmo. The suggested motion for this action is as follows:

*“Motion to authorize Staff to present the proposed 2040 forecast numbers to the Met Council”*

**PROPOSED FORECAST:**

Using the goals noted above, the following numbers are being proposed to replace the projections included in the Comprehensive Plan and Memorandum of Understanding (both of which were updated earlier this year). These numbers would be presented as a minimum commitment on the part of the City.

|                             | <b>PROPOSED</b> | <b>EXISTING MOU</b> |
|-----------------------------|-----------------|---------------------|
| <b>MOU Projections</b>      |                 |                     |
| 2040 Total Population       | <b>18,000</b>   | 24,000              |
| 2040 REC Units              | <b>5,000</b>    | 6,600               |
| <b>New Housing Units</b>    |                 |                     |
| Rural Development Areas     | <b>720</b>      | 1,407               |
| Village Planning Area       | <b>1,250</b>    | 900                 |
| I-94 Corridor               | <b>2,600</b>    | 3,300               |
| <b>Commercial REC Units</b> |                 |                     |
| I-94 Corridor               | <b>500</b>      | 1,400               |

Please note that it is very difficult (if not impossible) to predict the number future housing units and commercial REC units within the Village due to the mixed-use zoning that will be used for the central portions of the Village Planning Area. Rather than attempting to guess at the commercial/housing nature of future development and the amount of existing units will be lost due to redeveloped in the future, Staff is proposing to establish a baseline REC count of 2.5 units per acre for all land outside of the greenbelt in the Village. This allows the City to use a general number for planning purposes while allowing flexibility to plan for various forms of development. The number used in the existing MOU does not take into account any future housing development within the mixed use development area within the Village, nor

does it take into account any future commercial development in the Village (this is why the existing MOU number is smaller than the proposed unit count).

In moving ahead with a proposal to revise or eliminate the MOU, the City's ultimate goal is the elimination of any numbers that are otherwise not required to be included in the Comprehensive Plan. This would allow the City to focus on attracting appropriate development that is consistent with the overall objectives of the Comprehensive Plan rather than having to worry about whether or not an arbitrary housing or commercial REC number is being met. The projected REC counts are important for planning purposes, but typically are only reported as part the wastewater plan and generally do not serve as targets for growth and development.

The assumptions and rationale that led to these numbers include in the above table are as follows:

- That the City should be planning for residential densities of 2.5 units per acre throughout all of the areas that guided for public sanitary sewer service. This is seen as the minimum level of housing development that is needed to help support the needed public infrastructure on City-wide basis. This also correlates with the housing demand that is anticipated in Lake Elmo.
- That the household and population growth in the rural development areas should be set at a level that anticipates a low to moderate level of growth consistent with the City's 2010 rural development review and analysis.
- That the overall projections should reflect a reduced amount of housing in all three of the City's future development areas (Village Area, I-94 Corridor, and rural development areas) rather than reducing the household numbers in only one or two of these areas. Although it does not appear to the case, the proposed Village unit count does represent a decrease from the current plan following the methodology described above.
- That previous projections for commercial development areas were overly aggressive and could only be achieved through the creation of large employment centers. The City prefers to focus on developing appropriate land uses within the commercial areas rather than concentrating on employment numbers and REC unit counts.

The numbers as proposed have also been drafted in order to account for the following variables, which will be very difficult to project with any degree of certainty in the future:

- How much of the Village Planning Area will develop for commercial or mixed use development compared to housing alone.
- What the average household size will be in 2040 given current population trends and the City's desire to accommodate senior housing options.
- Other factors that may shift more of the City's planned REC units into commercial or mixed-use development.
- How much development is likely to occur in the City's rural development areas. Under the City's current comprehensive plan, many of the City's 10-20 acre parcels would need to be redeveloped as OP or OP-2 development in order to achieve the housing unit projections. The proposed rural development number of 720 would greatly reduce this pressure

**STAFF RECCOMENDATION:**

Based upon the above background information and Staff report, it is recommended that the City Council authorize the drafting and submission of a letter to the Met Council with the proposed updated projections for Lake Elmo by undertaking the following action:

*“Motion to authorize Staff to present the proposed 2040 forecast numbers to the Met Council”*



**City of Lakeville**  
*Positioned to Thrive*

April 28, 2014

Susan Haigh, Chair  
Metropolitan Council  
390 North Robert Street  
St. Paul, Minnesota 55101

**Subject: Thrive MSP 2040 Draft Report – City of Lakeville Review Comments.**

Dear Chair Haigh:

Thank you for the opportunity to review the Thrive MSP 2040 draft report. The City of Lakeville recognizes the need for the development of a comprehensive long range vision for the metropolitan seven county region and appreciates the work completed so far in preparation of the Thrive MSP 2040 report. After reviewing the report the City of Lakeville has the following comments for consideration prior to the Metropolitan Council adoption of the final report:

**Transportation/Transit –**

- Given the growth in Lakeville and other developing suburban communities, the report should recognize the need for continued and increased highway infrastructure funding for improvements and new construction beyond 2023.
- At the bottom of Page 35 the report states that “Requiring land use in transit corridors, especially in station areas, to be commensurate with the level of transit investment.” Lakeville agrees it is important to have land uses and development densities adjacent to transit stations and corridors that are sufficient to support transit service. However, Lakeville suggests this verbiage be revised to “recommended” terminology rather than “required” to avoid any mandated land uses in transit corridors without the consideration of local market conditions and development trends.
- The report indicates the continued prioritization and funding for new transit projects into the future and states “the regions highway network is essentially complete.” This statement may be true for the urban areas, but many developing suburban areas, as growth occurs, are in need of constructing major arterial roadways and highways to provide the transportation corridors needed for the continued growth of the local, regional and state economy.
- The report indicates no additional funding and construction of new roads after 2023 with only maintenance of existing roads being a priority. The City of Lakeville believes this statement needs to be reconsidered and equal emphasis needs to be placed on the continued and future construction and funding of new roadways similar to the continued and future funding of transit services and facilities.

### **Housing –**

- How will the Metropolitan Council ensure the costs associated with regional infrastructure improvements and meeting the region's affordable housing needs are not borne solely by local municipalities? The fiscal burden for providing affordable housing seems to fall mainly on local municipalities and not on regional or state agencies.
- The report should be clarified to address the funding of affordable housing near transit and how this focus will affect the ability for the City to meet affordable housing needs in other areas of the City where transit is not available.
- In the report the Metropolitan Council indicates they will provide guidance and technical assistance to cities to "establish, encourage, expand, and preserve affordable housing options." The report also indicates the Metropolitan Council will "convene regional and local housing stakeholders to refine policies and develop programs." However, the report does not indicate how they will seek to provide additional funding for communities to develop affordable housing.

### **Land Use –**

- Lakeville is currently designated in the report as an Emerging Suburban Edge City and a Suburban Edge City. After reviewing the definition of each category and compared to the other Cities that fall within these categories (Maple Grove, Blaine and Woodbury) it appears the most appropriate classification for the City of Lakeville would be as a Suburban Edge City. Lakeville has experienced significant residential growth since the 1990's, is over 60% developed and does not include any large scale agricultural areas.
- The City of Lakeville is concerned regarding the designation as an Emerging Suburban Edge City or Suburban Edge City and how this designation will affect our ability to obtain funding for regional transportation and infrastructure improvements necessary to accommodate our share of the region's growth in population, households, and employment.

### **Natural Resources/Parks/Trails/Ground Water –**

- The draft plan states that cities need to protect against the impacts of more frequent or severe weather events but provide little direction as to what is expected or how to achieve it - more clarification regarding this point is needed.
- The City of Lakeville supports the Metropolitan Council's natural resource preservation efforts and would like to be included in the continuing discussions regarding the efficient use of the region's natural resources.
- The City of Lakeville generally supports the regional greenway, trail and park corridor planning as discussed in the draft report and supports continued and increased funding to suburban units of government to make trail and greenway connections into the local and regional network and urban core.

### **Economic Competiveness –**

- The Metropolitan Council's role is identified as "Prioritize regional investment in places that are drivers of economic investment and growth for the region and prioritize regional investments that improve access and international markets by regional and state

businesses.” Lakeville supports this to the extent this priority includes the continued funding of road and sewer infrastructure improvements for urban and suburban areas that would provide local and regional economic growth.

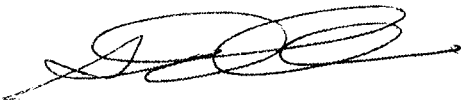
#### **Equity Distribution –**

- According to Page 20 of the report “The Metropolitan Council will use equity as a lens to evaluate its operations, planning, and investments, and explore its authority to use its resources and roles to mitigate the place-based dimension of racial, ethnic and income-based disparities”.

Lakeville supports the Metropolitan Council’s efforts for equity among the region to improve the lives of individuals, neighborhoods and communities. However, the report is unclear as to how these regional equity and funding policies will be applied. The report should be revised to include specific steps and processes as to how the Metropolitan Council is proposing to implement this policy and the potential effect this policy will have on individual cities and counties regarding infrastructure, housing and transportation funding and prioritization of projects.

The City of Lakeville appreciates the opportunity to review the Thrive MSP 2040 draft report and recognizes the many hours of work dedicated to preparing it by the Metropolitan Council staff. We hope the Metropolitan Council seriously considers our comments and concerns outlined above and revise the report as needed prior to final adoption. If you have any questions, need clarification or would like to discuss our comments in more detail please contact me.

Sincerely,



Steven C. Mielke  
City Administrator

cc: Mayor and City Council  
Wendy Wulff, District 16 Metropolitan Council Member  
Patrick Boylan, Metropolitan Council Sector Representative  
Allyn Kuennen, Administrative Services Manager  
David Olson, Community & Economic Development Director  
Daryl Morey, Planning Director

**From:** Heather Butkowski [<mailto:heather.butkowski@ci.lauderdale.mn.us>]

**Sent:** Monday, April 28, 2014 2:04 PM

**To:** Barajas, Lisa

**Subject:** RE: Lauderdale 2040 Forecast Response

Dear Lisa,

I wanted again to pass on my concerns regarding the 2040 population, household, and employment forecasts. Since I wrote the email in November we have learned that the Luther Seminary property sale will not ultimately include additional land for housing. We also learned that the Corval Group plans to rebuild their headquarters with some additional space for new employees but will ultimately remain largely the same over the upcoming decades. In the next twenty-five years the aging multi-family housing could see some teardowns and rebuilds but in light of the additional requirements for things like stormwater, parking, and rental amenities, the density would likely not change significantly (even if the height of the buildings did). Aside from seeing some small changes along Larpenteur Avenue itself, the rest of the City is expected to remain primarily residential.

The initial forecast predicted an additional 521 residents and 292 employees. In total, the new estimates for 221 new residents and 1,092 new employees are significantly higher than the previous estimates in spite of the concerns expressed by the City and my understanding that the Metropolitan Council was revising the numbers for inner ring suburbs downward due to feedback that the land supply would not accommodate the projections. I encourage the Metropolitan Council to revisit Lauderdale's estimates again. I would gladly share our concerns with any of the planners preparing the estimates and would like to learn more about the drivers behind our specific numbers.

Sincerely,

Heather Butkowski  
Lauderdale City Administrator  
651.792.7657



## LINWOOD TOWNSHIP

ANOKA COUNTY

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Stacy, Minnesota 55079

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Website: <http://linwoodtownship.org>

April 22, 2014

Metropolitan Council  
390 N. Robert St.  
St. Paul, MN 55101

From: Linwood Town Board of Supervisors

Re: Thrive 2040 MSP Draft Plan

Dear Members of the Metropolitan Council,

The Linwood Town Board has reviewed the "Thrive 2040 MSP Draft Plan." This letter serves to give you our comments regarding the draft plan and the policies in the plan as they impact the citizens of Linwood Township.

Linwood Township currently has a community designation as "Diversified Rural." A large portion of the township has an existing rural residential development pattern with unsewered residential lots. It is noted that other areas in Anoka County with similar development patterns are proposed to be reclassified as rural residential. We believe the same consideration should be given to Linwood Township.

In the description of the community designation, it states that "Rural Residential communities have residential patterns characterized by large lots and do not have plans to provide urban infrastructure, such as centralized wastewater treatment." This description accurately fits Linwood Township as there are no future plans for sewer development in the Town and a large amount of the Town is developed with residential lots of 2.5 to 5 acre parcels.

The draft plan states that the "Diversified Rural" community designation is intended for "protecting land for rural lifestyles and long-term urbanization." It continues to say such communities "are home to a variety of farm and non-farm land uses including very large-lot residential, clustered housing, hobby farms and agricultural uses" and "large portions of communities in the Diversified Rural area also contain prime agricultural soils." Linwood Township has very limited agriculture due to poor soils, an existing development pattern of rural residential style development, and no plans for long-term urbanization. Therefore, Linwood Township does not appear to fit the intent of the "Diversified Rural" community designation.

The Town Board requests the community designation for Linwood Township be changed from Diversified Rural to Rural Residential. If not, the Metropolitan Council should consider flexible density standards for communities that are Rural Residential in nature but not so designated.

Thank you for the opportunity to comment on the Thrive 2040 MSP Draft Plan.

Sincerely,

Philip Osterhus  
Chair, Linwood Town Board

Ed Kramer  
Supervisor, Planning & Zoning





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MAYOR  
Bill Blesener

COUNCIL  
Rick Montour  
John Keis  
Michael McGraw  
Shelly Boss

ADMINISTRATOR  
Joel R. Hanson

April 24, 2014

Metropolitan Council  
390 N. Robert St.  
St. Paul, MN 55101

RE: Thrive MSP 2040  
Comments on Behalf of the City of Little Canada

To Whom It May Concern:

Thank you for the opportunity to comment on the draft of the Thrive MSP 2040 document. These comments are offered on behalf of the City of Little Canada, particularly in relation to the City's proposed housing and population forecasts, how those forecasts might affect the City's long-term land use pattern, and how such a pattern fits (or doesn't fit) with other aspects of the region and its planned growth and development.

In the City's 2030 Comprehensive Plan Update, as approved by the Met Council and adopted by the City Council just five years ago, it is noted that the City is nearly fully developed. The City's current population is estimated at just about 10,000 persons, and 4,500 housing units. According to the 2030 Plan, there were 92 acres of vacant land in the city. More than half of that land area is in small parcels surrounded by or embedded in low density single family residential neighborhoods. Moreover, much of that land is impacted by water and wetland issues. Of the remaining, most of the rest is within commercial and industrial areas, unsuitable for any type of residential development.

The Plan estimates a build-out capacity of an additional 500 persons, perhaps 200 dwelling units over existing numbers. These build-out estimates would result in a population of around 10,500 and a housing unit count of about 4,700 units. The City has been developing its land use and infrastructure in support of this pattern for several years. At this late date, it is particularly unrealistic to attempt a significant change in pattern.

Also to note – the City of Little Canada is, among suburban Ramsey County communities, near the highest in terms of multiple family units and affordable housing units. This is a result of the City's significant number of multiple family developments that comprise more than 40% of the City's housing stock – again among the highest in the County.

Unfortunately, the Thrive MSP 2040 document proposes numbers that are grossly out of scale with these adopted estimates. Thrive 2040 projects an *additional* 4,000 persons and 1,700 dwelling units over current totals – about 800% more than the currently estimated saturation development. There is, frankly, no reasonable way to resolve this projection with any view of future development or redevelopment in Little Canada, nor is there any interest on the part of the City to work toward new goals. The City continues to work hard toward achieving its long term land use objectives – objectives that Met Council has recently declared are consistent with regional requirements.

Further, the Thrive 2040 forecasts project an increase in Little Canada employment of around 3,300 persons – there is no way that the City could consider the conversion of commercial/industrial land to accommodate residential growth in this context. The available C/I land is already inadequate.

Finally, Thrive MSP 2040 states that suburban communities such as Little Canada should plan for growth around transit corridors and where transportation investments support higher growth opportunities. It is well-known that the I-35E corridor through Little Canada is one of the most heavily congested highways in the region. The Met Council Transportation Policy Plan suggests that the Rush Line transit corridor may be one where new transit service could be planned, and that an alternatives analysis is underway. It is, as yet, undetermined if the Rush Line will prove to be a viable transit corridor, or if so, where it would fall on the list of priorities for the region.

Little Canada believes that the sudden and significant departures in land use policy necessary to accommodate Thrive MSP 2040 are highly premature at best, given the lack of planned regional support infrastructure. It is hoped that Met Council will seriously rethink the policies of the Thrive draft, and in particular, that the City of Little Canada's population and housing forecasts will be revised to reflect the planning done for the 2030 Comprehensive Plan.

Sincerely,

  
William Blesener

Mayor



April 28, 2014

Metropolitan Council  
Att: Lisa Barajas  
390 Robert Street North  
St. Paul, Minnesota 55101

Ms. Barajas,

We appreciate the opportunity to review the draft ThriveMSP 2040 document and offer the following comments:

1. While we recognize this type of document is intended to be an overarching plan, including a little more detail in the policy statements (community's role) is desired. The City of Mahtomedi has concern over the potential implications on the City's Comprehensive Plan and what the requirements outlined in Thrive will have on this planning process. What will the Metropolitan Council require the City to do in this regard? Are the "Community Role" statements items that the Metropolitan Council will be enforcing such as stormwater management, wellhead protection, groundwater reduction, climate change, access management and so on? What criteria will you evaluate our local plan on? How will you determine (and how will we know) if you agree/disagree with our Plan and the policies therein, if we are unclear about what the expectation from the Council is?
2. Page 46, paragraph 2 states that "In 2005, the Minnesota State Legislature authorized the Metropolitan Council to take on planning and management of the regional water supply issues." State Statute 473.1565 does not authorize the Metropolitan Council to manage the water supply, rather to carry out planning activities addressing the water supply needs of the metropolitan area. Again, the City is concerned over this and many other statements pertaining to the Metropolitan Council's role as it relates to water supply and other areas. Is this an indication of the Metropolitan Council's plan to enforce these types of things?
3. Page 74, "Groundwater Resources" paragraph has many statements such as "groundwater levels are declining" and "in some cases, it is affecting or has the potential to affect, lake levels." While we acknowledge that there are concerns over these issues, we also recognize that these statements are not fact, rather additional study is ongoing.
4. The Metropolitan Council states that they will "investigate and assess cost-effective options for regional water supply infrastructure". A number of state and local agencies currently exist with a role in water and groundwater management that communities must coordinate with. As such, the City encourages the Metropolitan Council to work closely with the communities, especially

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**<http://www.ci.mahtomedi.mn.us>**

public water suppliers, as this option is explored. In addition, the City encourages the Metropolitan Council to closely examine its role in water supply, before expanding it, to ensure it's not duplicative of existing regulatory powers and burdensome.

5. Page 74, "Managing Subsurface Sewage Treatment Systems" states a policy to "Collaborate and convene with state, regional, and local partners to protect, maintain, and enhance natural resources protection and protection of the quality and quantity of the region's water resources and water supply". While we agree that this should occur, the City also encourages the Metropolitan Council to examine its role in this to ensure that it's not duplicative of existing regulatory powers, thus creating an additional layer of approval or another regional system.
6. Additionally, ThriveMSP 2040 identifies operations improvements related to sustainability including the Metropolitan Council's role to promote "the wise use of water"; however it does not mention reuse and conservation for the communities. The City encourages the Council to incorporate reuse and conservation policy to the community role section. It should also understand and encourages changes that may be necessary for reuse and conservation techniques to be implemented, including amendments to the building and plumbing codes, as well as watershed district regulations.
7. Page 93, Building in Resilience, Community Role policy second bullet states "participate in federal, state, and local utility programs that incentivize the implementation of wind and solar power generation". While we strongly support and encourage the use of green technologies such as wind and solar power, we recommend including the words "consider participation" prior to the full statement.
8. The City of Mahtomedi does not support the requirement to adopt a complete street policy, and believes cities should be allowed to determine what projects should incorporate complete streets ideals such as bicycle and pedestrian infrastructure.

Again, we appreciate your consideration in our comments on the Council's draft ThriveMSP 2040 Comprehensive Development Guide. If you have any questions please contact me at 763-287-8521 or at [kjohnson@wsbeng.com](mailto:kjohnson@wsbeng.com).

Sincerely,



Kelsey Johnson, AICP  
City Planner



CITY OFFICE

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PUBLIC SAFETY

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March 31, 2014

Freya Thamman  
Sector Representative  
Metropolitan Council  
390 North Robert Street  
St. Paul, Minnesota 55110

RE: Metropolitan Council Local Population Forecast for 2040

Dear Freya,

I am providing feedback on behalf of the Medina City Council regarding the 2040 Metropolitan Council local forecast of population. The forecast shows the City of Medina at a total population of 9,000 residents by 2040. While Medina accepts the 9,000 resident growth projection, the City Council respectfully requests that this figure is not increased before Thrive 2040 is finalized, due to acute transportation needs.

Medina's sewer availability is in the vicinity of Highway 55, and MnDOT predicts no transportation funding to improve the Highway 55 corridor until after 2050. The existing Highway receives a failing grade during rush hours. Also, County Roads 116 and 101, which feed into the Highway, are heavily congested, and Hennepin County has not committed to improving County roads outside the I 494 shoulder.

Understanding that traffic congestion is an increasing problem in Medina, the City Council and staff will plan to accommodate 9,000 new residents by 2040 but asks for that number not to be increased until transportation problems have been addressed to support additional population. Please contact me at (763) 473-8840 if you have any questions.

Yours sincerely,

Elizabeth Weir Mayor

cc. Katie Rodriguez



## City Council

### Elizabeth Glidden

Council Member, Eighth Ward  
City Council Vice President  
Chair, Intergovernmental Relations

### Lisa Bender

Council Member, Tenth Ward  
Chair, Zoning & Planning

350 South 5th Street – Room 307  
Minneapolis MN 55415-1383

Libby Starling, Manager of Regional Policy and Research  
Metropolitan Council  
390 Robert Street North  
St. Paul, MN 55101

April 28, 2014

Dear Ms. Starling,

The City of Minneapolis is pleased to submit comments on Thrive MSP 2040 Draft for Public Comment (last revised February 26, 2014) and the Revised Regional Forecast (released on February 12, 2014) as the Metropolitan Council prepares to finalize and adopt this new guiding policy. This letter is organized thematically, as follows:

1. Regional Forecasts
2. Thrive MSP Policy & Guidance
  - 2.1. Outcomes and Special Features
  - 2.2. Policy Themes

Our comments reflect the City's values, especially concerning how the region grows, how we achieve equity, and how to maximize the efficiency and effectiveness of our regional systems.

With regard to how the region grows, our comments reflect the City's interest in focused investment to encourage economic development and job growth in activity centers; promotion of responsible land use patterns; a housing strategy that will address the coming demographic changes; and a commitment to connectivity including all modes of transit and transit-supportive densities.

With regard to equity, we reflect a commitment to closing the gap between white people and people of color in Minneapolis, and providing opportunity and choice to every resident. The City seeks clear goals and criteria in order to transform this shared value into an implementable reality.

With regard to the effectiveness of our regional systems, we reflect the City's support for Metropolitan Council's pivoting away from expansion of infrastructure and toward maintenance and efficient utilization of the existing systems. The City offers suggestions for achieving some of the policy intent in these areas.

### 1. Regional Forecasts

Minneapolis recognizes that we are anticipated to see a larger share of growth than any other municipality in the region. Minneapolis is also pleased to see the more discrete community designations then were previously used in the 2030 Framework.



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We are concerned with how the growth in population, housing and employment is distributed across the region especially the allocation of *Urban Center Cities* compared to the *Suburban Edge* and *Emerging Suburban Edge* communities. As is, the regional forecast projects continued decentralization and a status quo “grow in place” outcome. The *Suburban* communities are projected to receive the largest share of employment growth and the *Emerging Suburban Edge* communities are projected to receive the largest share of the population growth. Because this allocation of growth directly impacts regional projects, for instance the impact of transit modeling and investment over the next decade, this is an issue that requires more attention regarding (1) its assumptions and (2) to what degree the projections reflect the intentions and values expressed in Thrive MSP 2040.

Given that the City issued 25% of the entire region’s building permits over the past 5 years, we question the assumption that the region will continue to decentralize. We are adding population to Minneapolis at rates we haven’t seen in decades. The City of Minneapolis added 3 billion dollars of value to its tax base in 2013, over a half a billion of it in new construction of multifamily apartment rentals alone. This boom of population and its expression in dense, multifamily residential development in the urban core tracks with a broader “return to the city” trend, nationally and internationally. We would posit that as a nation, we have entered into a new urban era – one driven by preferences for amenity rich urban neighborhoods and informed by the values embedded in current best practices like compact development, green infrastructure, car and bike sharing, and transit. We believe the value placed on these amenities as well as the fact that these recently observed trends in Minneapolis are local evidence of more sustained nationwide trends that require more attention in the modeling. Modeling based on the old assumptions of an expanding suburban future may not serve the region well and will certainly make it more difficult to realize some of the exciting policy directions outlined in Thrive MSP 2040, which places a high value on transit oriented development, appropriate density, climate action, and more efficient utilization of infrastructure.

The City of Minneapolis has the capacity, the market, and the adopted City policy guidance to accept and accommodate more growth than is currently projected within our boundaries. It is the City’s view that Minneapolis will outperform these current projections and the hope that revised projections are reflective of these comments.

## **2. Thrive MSP 2040 Policies and Guidance**

The City agrees with many aspects of the policies outlined in Thrive MSP 2040, which we see as broadly supportive of values that Minneapolis shares with the region - namely equity; connectedness; smart land use patterns and growth; vitality; and the promotion of a livable, healthy, people-centered city and region. The City is strongly supportive of the expression of these values and their express inter-relationships in the five *Outcomes*, through specific policy guidance, and in some cases through a stated intention to develop supporting programs and funding mechanisms. The City welcomes the region’s new areas of policy focus on climate change and economic competitiveness; these both comprise systems and flows that require a holistic and multi-scaled strategy in order to deliver the benefits that are implied by the social, environmental, and economic value proposition for each. The City additionally welcomes the region’s new policy focus on equity, including guidance related to *Racially Concentrated Areas of Poverty* (RCAP) and *Areas of Concentrated Poverty* (ACP). The region’s attention to these matters is significant and the City welcomes next steps on all fronts.

In the City’s estimation, Thrive policies promote an integrated view with multiple lenses, acknowledging for instance that transit is not only a transportation issue, but is a significant contributor to future land use patterns and how they relate to equity and to climate change goals; or that *Racially Concentrated Areas of Poverty* require active consideration when shaping policy direction related to economic development, housing, and regional parks.

The City of Minneapolis finds that much of the policy document represents values that we share with the region. However, we do perceive a disconnect between the stated policy intent of Thrive MSP 2040 as written, and the allocation and distribution of growth as depicted in numbers in the regional forecast.

## 2.1 Outcomes

The City of Minneapolis supports the five *Outcomes* identified by Thrive – stewardship, prosperity, equity, livability, and sustainability. We support the Metropolitan Council’s stated intent to utilize qualitative outcomes rather than siloed programs as a way to communicate and measure progress on goals. The *Outcomes* successfully weave regional values together with the Metropolitan Council’s core policy authorities and activities.

The introduction of accountability through the adoption of a data-driven approach and the development of metrics and indicators is consistent with the direction the City of Minneapolis has taken in its recent City goal setting as well as its participation in the IBM Smarter Cities Initiative and the development of an Intelligent Operations Platform. The City of Minneapolis shares the accountability value and recognizes the importance of being results-driven, utilizing technology, and measuring progress. The City looks forward to an ongoing dialogue with the Metropolitan Council on what will be measured and how indicators will be developed.

The City of Minneapolis appreciates the specific incorporation of *integration* and *collaboration* as Thrive principles overlaying the five *Outcomes*.

**Stewardship.** The City supports the Metropolitan Council’s express intent to pivot away from the expansion of water and highway infrastructure and focus more on utilizing existing infrastructure more efficiently. The region’s intent to leverage infrastructural investments to encourage higher expectations of land use patterns is consistent with current City policy. However, the City needs more information to better understand how preferred land use patterns will be defined and communicated.

**Prosperity.** The City is very supportive of the development of an economic competitiveness lens as noted in this section. Also notable and of interest to the City as a coordination item is the region’s intent to identify and prioritize regionally significant development and redevelopment opportunities. The City is supportive of this section’s reference to protecting the building blocks of prosperity, namely including natural resources such as soils, water, and aggregate.

**Equity.** The City supports the regional plan’s guidance to specifically address disparities and concentrated poverty, including racially concentrated areas of poverty. The *Equity* section is consistent with adopted city goals and policies.

The City supports Thrive’s goal to connect residents of *Regionally Concentrated Areas of Poverty* (RCAP) and *Areas of Concentrated Poverty* (ACP) to jobs & opportunity, and to address this through land use patterns and an integrated multi-modal transportation system, facilitating connectivity of residents to jobs and addressing the unique needs of transit-dependent communities.

The City supports an equity lens on regional resources, but seeks much more clarity on the criteria and thresholds Metropolitan Council will apply in its Livable Cities grant program, as well as much more detail about possible new programs.

The City acknowledges that there are many ways that public policies and programs at the regional and municipal scale can impact equity, including access to and affordability of transit and housing, access to jobs, to programs



and services, and safe and healthy neighborhoods. Equity also implies new ways to consider redevelopment policies and investments, and importantly, the ability of disempowered residents to participate in and influence decision-making. We support and our encouraged by the statement, "*The Metropolitan Council will use equity as a lens to evaluate its operations, planning, and investments, and explore its authority to use its resources and roles to mitigate the place-based dimension of racial, ethnic and income-based disparities.*" However, we recommend that the Metropolitan Council include a stronger wording and adopt a stronger position than the term "explore" implies. (p.20)

The City observes that decision-making can be influenced in two ways: one, which Thrive states explicitly, is through full democratic engagement; two - and this is not present in Thrive but is an area the City of Minneapolis has been working to implement through the development of an Equity Toolkit - is to ensure that social and equity impacts are assessed in the course of decision-making. The City supports Thrive's guidance on engagement as it is outlined on page 23, but the process will need refinement. It is the City's experience that in areas of persistent private disinvestment, democratic engagement doesn't always overcome the differential of power, or the methods by which investment successes are measured and decisions are made. The City would support the region's inclination to develop new indicators and new measures of success that consider social benefits and impacts (measured in ways yet to be determined) as well as economic benefits and impacts (measured in dollars) of policy and project decisions. The City would welcome the opportunity to develop equity assessment, metrics, and indicators in collaboration with the region.

We support including a measure of households who do not own a private automobile as one of the elements driving the Council's *Transit Market Areas* and defining the level of transit service neighborhoods expect to receive. Further, we strongly support prioritizing transportation investments that connect lower-income areas to job opportunities. (p. 22)

**Livability.** Attracting and retaining residents and businesses is directly tied to our economic competitiveness. The City of Minneapolis is committed to providing a good quality of life for all residents. Thrive's proposed *Livability* values, which include promoting healthy communities, aligning resources around transit-oriented development, increasing access to parks and open space, providing choices in housing and mode for all, and ensuring access to amenities, are consistent with Minneapolis policies. We are pleased to see the Metropolitan Council express an interest in bicycle and pedestrian concerns; Minneapolis welcomes the stated intent to aggregate and organize local bicycle and pedestrian plans through the lens of regional transportation, and to encourage local governments to produce bicycle and pedestrian plans as a component of their comprehensive plans.

**Sustainability.** The City of Minneapolis supports the Metropolitan Council's goals around water conservation, climate change mitigation, and sustainable operations of the region's wastewater and transit systems. We look forward to continuing conversations about water supply planning, including topics of conservation, resiliency, security and regional coordination. (p.29) Additional comments on water issues can be found in the *Special Features* section of this letter below, and later in the *Water Sustainability* section.

We strongly support Metropolitan Council's proposed role as a convener and technical resource for communities planning to adapt to climate change. Minnesota currently lacks such a resource, and communities will face significant challenges, particularly in the areas of stormwater management, water supply planning, and public health, as the climate continues to change. Metropolitan Council should also carefully consider how planning decisions, at the regional system or local government level, present varying levels of risk given climate trends. (p.30)

We would suggest that agriculture needs a broader lens than provided in the following statement: "*protection of local agricultural land and Land Use Policies.*" While farmland preservation is an important part of the planning process, a creative approach to utilizing vacant land or identifying other appropriate growing space in urban and peri-urban areas is also critical. There is a shortage of growing space, particularly in low fresh food access areas, where the ability to grow fresh produce would improve food security. Also, many of the people desiring access to growing space have limited transportation options which preclude them traveling outside of the city to grow food. (p.31) The City has included additional comments on agriculture and food security in the *Natural Resources* comments later in this letter.

## **Special Features**

These six overlays are a useful tool for local governments. The City appreciates these values-based overlays that allow for local strategies with granular variation on issues that transcend community borders.

1. *Racially Concentrated Areas of Poverty.* The City is supportive of the Council's commitment to guide resources toward catalyzing investment in these areas and to improve access to opportunity for these residents. The City looks forward to exploring what that means in real, actionable terms going forward.
2. *Station Areas on Existing and Planned Transitways* (listed modes: commuter rail, light rail, BRT, arterial BRT, potentially streetcars). The City supports the Council's policy to "prioritize investment at locations that have city and corridor commitment to transit-supportive development patterns." The City of Minneapolis recommends that Thrive MSP 2040 directly recognizes streetcars as a mode of transportation. On page 45, The City of Minneapolis recommends that the word "potentially" before "streetcar" be removed in the list of modes that might be on transitways. The City of Minneapolis has adopted streetcar as its preferred mode in two corridors and they are being studied as a possible mode in at least one other corridor in the region.
3. *Water Supply Considerations.* The City welcomes the region's attention on the critical issue of water. Thrive rightly focuses on the need to establish a strategy for our regional water resource with the knowledge that the region is projected to add over 800,000 people over the life of the plan. The City notes that it will be useful to evaluate the varied water sources that different communities are depending on, and their varying levels of sustainability. Minneapolis is identified as a "High Recharge Potential" area in Figure 1 on page 46; the City looks forward to learning more about what this means when the 2040 Water Resources Policy Plan is completed. The implications of this overlay could be significant when taken in conjunction with other sustainability goals related to green infrastructure, urban tree canopy, and the park system.
4. *Job and Activity Centers.* In principle, the City welcomes the region's commitment to "partner with key stakeholders to promote job placement and growth in Job Centers." The City would like to know more about what that means in terms of programs or actions.
5. *Wastewater Service Areas.* The City is in general agreement and supports the region's intention to pivot away from expansion of wastewater infrastructure and to more efficiently utilize and maintain the system in place. Viewing this as a Special Feature is useful, and the City encourages the region to look at local concerns related to Sewer Availability Charges, especially with regard to the impacts on small business.
6. *Regionally Significant Ecological Resources.* The City is in general agreement with the region's focus on protecting the region's ecology.

## **2.2 Policy Themes**

The following comments are organized around topics that are discussed throughout the document. They include: Housing, Transportation, Natural Resources, Water Sustainability, Sustainability and Resilience, and Economic Competitiveness.

## Housing

Housing policy in Thrive focuses on affordability and choice. The City supports these goals, which are consistent with Minneapolis policies. The City sees some need for additional clarity and guidance in housing at the regional level. The City sees potential value in a broader view on housing policy (beyond affordable housing), particularly in addressing specific trends. Housing policy could more specifically address the implications of growing interest in amenity rich density (multifamily preferences in the center city), proximity of housing to jobs and all of the benefits that this proximity entails, and other significant projected housing needs including senior housing tied to services.

The City supports the policy for the production of newly constructed affordable housing, and strategies for leveraging the sustained value of existing housing stock including selective infill, preservation, live/work units, accessory dwelling units, and adaptive reuse. We believe more focus is needed on connecting the housing needs of the current and project populations with housing types and locations. In particular additional analysis or discussion on the housing needs for seniors would not only inform the housing discussion, but bridge the discussion about transportation and access to activity centers and natural areas.

Many of the desired location specific amenities outlined in the descriptive summaries of seniors, millennials, and new Americans can be found in Minneapolis. We feel that that the City of Minneapolis currently has the amenities desired and will only continue to enhance these attributes with our current policies. This is just one aspect of what leads us to believe that our share of the region's population will be larger than the current forecasts project.

In Thrive's housing policy guidance, the City actively supports:

- Preservation and creation of new affordable housing,
- Promoting affordable and workforce housing in transit station areas and other transit rich areas with access and proximity to job and activity centers
- Investing in affordable housing in higher income areas
- Increasing housing options
- Encouraging increased resources for preserving and producing more affordable housing
- Metropolitan Council's interest in building technical capacity in housing finance

Areas where the City supports housing policy direction but needs more clarity in order to envision implementation:

- The region's definition of "equity" and how to reflect equity in policies is not defined, but is recommended for use as benchmark. For instance: *"Require that local jurisdictions applying for Livable Communities transit-oriented development grants adopt local policies reflecting equity in the proposed grant area."* This needs further definition and collaboration with the various stakeholders through the subsequent policy plans as well as additional operationalizing through changes to grant programs. We look forward to this future collaboration.
- With regard to funding decisions: the region values "catalytic" private investment in RCAP, equity, and affordable housing; the City is interested in how the region will define "catalytic," and what programs and grants will look like based on this criteria.

- The following policy presents a new direction in addressing regional equity; "*Work with communities to create more income-diverse neighborhoods, including strategically targeted subsidies to develop market-rate housing in select areas.*" Minneapolis is interested in exploring this further with the Metropolitan Council through the development of the Housing Policy Plan, and implementation opportunities that might arise from that work.

The City observes a need for more attention in these areas:

- Thrive observes the surge of demand for multifamily housing and the trend of movement back to central cities, but stops short of exploring the demographic “why” of housing trends. The regional forecast seems to imply that cities should actively address the housing needs of growing families, millennials, and seniors, but the policy direction for housing does not propose guidance or programs that would enable cities to better address these trends.
- Overarching value statements throughout Thrive broadly support compact and sustainable development, but the housing policy guidance does not propose ways to impact land use patterns that would reduce Vehicle Miles Traveled (VMT) or encourage housing proximate to employment. The only spatial lens applied to Housing seems to be transit station areas.
- Thrive also acknowledges the value of housing in close proximity to job opportunities, which implies a density and mix of uses common in more urban areas - but again stops short in both its policies and its projections of any guidance that would privilege the creation of a denser and stronger urban core.
- The City of Minneapolis is not formally represented on the Housing Policy Working Group. The City looks forward to evaluating the framework this group is shaping.

## Transportation

The City is very supportive of the vision laid out in Thrive for a multi-modal, interconnected regional transportation system. The vision for integrated movement from mode to mode, provision for multiple modes within the right of way, and the attention to walking as an important consideration as evidenced by guidance for an interconnected public street system (especially calling out the importance of walkable connections from transit to a place of employment) demonstrates shared values and opportunities for collaboration at several scales. The vision on pages 27-28 related to supporting bicycle and pedestrian facilities and creating walkable transit-oriented places is consistent with our policies.

We’d like to see a map of regional industrial assets along with freight, air, and logistics infrastructure so that we can plan effectively to contribute to a regional strategy. It would serve the region well to visualize, in map form, industrial and export infrastructure in detail along with the industrial land inventory. The City anticipates that Metropolitan Council will consider land, assets, and infrastructure in an integrated way; specifically, in conjunction with some of the Council Role items in the *Economic Competitiveness* section (p. 80) and the goals outlined in the *Prosperity* section under *Planning for and Investing in Infrastructure* (p. 15). It may be useful to cross-reference these sections of the regional plan as they are all related but not clearly correlated with regard to what guidance or opportunities for support will be given to local governments.

In Thrive’s transportation policy guidance, the City supports:

- The strong attention on transit investment and services in transit-dependent communities.

- The decision to stop expansion of the highway system and refocus efforts on maintenance and efficient utilization.
- The region's perspective on the need for regional level bicycle coordination.
- The Metropolitan Council's desire to prioritize transportation investments that connect lower-income areas to jobs. (p.22)
- The Metropolitan Council's interest in developing a regional bicycle plan

Areas where the City supports transportation policy direction but needs more clarity in order to envision implementation:

- The City supports the vision for an integrated multi-modal system that considers commuter rail, **streetcar**, light rail, BRT, arterial BRT, bike, and pedestrian modes, but notes that "streetcar" is not currently listed as a mode in the Special Features map of the transportation system. We would like to see it represented, as this is the adopted preferred mode in two cases within the City of Minneapolis.
- The criteria are unclear for how the region would evaluate readiness to support a successful transit system as it prioritizes its investments; the City would like to see specific criteria noted where the plan says on page 16 that the region will *"Prioritize transit investments in areas where infrastructure and development patterns to support a successful transit system are either in place or committed to in the planning or development process, balancing transit ridership with added connectivity."*
- The City seeks further clarity on this statement, also on page 16: *"Stage transit modes, coverage, and service levels to match the intensity of development to both minimize the risk to public resources and maximize return on public investments."*

The City observes a need for more attention in these areas:

- It would serve the region well to explore industrial and export mobility infrastructure visually and in conjunction with regionally significant industrial lands and assets. Currently, these highly interrelated topics are addressed well separately, but not seemingly envisioned as a combined deliverable. Combining and mapping them would create a valuable resource for cities.
- The statement *"Consider the role of railroads in promoting economic activity and identify an adequate supply of land in comprehensive plans to meet existing and future demand for users requiring rail access."* is only under the community role. There should be a corollary for the Metropolitan Council that follows the policy identified in the *Prosperity* section that looks at regional system issues (i.e. supply and access) and the communities following the role as outlined. (p.86)
- Minneapolis recognizes that the Minneapolis-St. Paul International Airport is a regional economic asset and essential to our regional vitality. We support a thriving and successful airport. We are also aware that a regional asset like the airport has costs to the local community including noise, nuisance, and pollution. We appreciate Metropolitan Council's recognition of such impacts and commitment to help monitor and manage them.
- Effectively managing issues such as airplane noise contributes to the Thrive principle of Livability which is directly connected to the economic success of our city. It is important to the metro that Minneapolis remains a desirable place to live and that we maintain or grow the value of our housing stock and our tax base. Managing noise is also important to protect the value of regional assets like the Minneapolis Chain of Lakes. The enjoyment of the lakes adds value to our housing stock, draws visitors and encourages residents to walk and bike, which promotes good health. We recommend that the Metropolitan Council

join us to advocate for airport operations which are safe and efficient but also mindful of the impacts on neighboring communities. Minneapolis continues to desire enhanced coordination and conversation across the regional aviation system. (p.16, 79)

- A Title IV service equity analysis is a great start in operationalizing equity, but it denotes a net neutral, "do no harm" approach versus prioritizing benefits from transit services for these communities. The latter should be considered.
- We support the development of more regional bicycle infrastructure, and support the Metropolitan Council in its efforts to coordinate this infrastructure between local jurisdictions. Recognizing that expanded bicycle mode share has the potential to assist the Metropolitan Council in meeting a number of its other goals, including promoting active communities, addressing greenhouse gas pollution, and connecting residents to jobs, we encourage the Metropolitan Council to align its funding priorities with local government's non-motorized infrastructure needs. (p. 27)
- We are supportive of the policy to "*invest in transit to expand transportation options, particularly to connect workers to jobs throughout the region.*" However, we are concerned that the forecasted housing and jobs growth might make this very difficult to realize due to how these areas of growth match up with planned and existing regional investments.

## Natural Resources

As noted in Thrive MSP 2040, a 2012 survey of metropolitan residents found that nearly half of those polled identified parks, trails or the natural environment as the most attractive feature of the region. These natural features, including the Minneapolis Chain of Lakes, are critical to the livability and economic success of Minneapolis and the region. We support the Metropolitan Council's commitment to conserve or expand these resources.

We recommend that Thrive MSP 2040 include a section related to urban agriculture. There is a growing desire as well as a sustainability imperative for the advancement of locally grown nutritious foods, food security and food access. This regional system of food production could be guided by policy and programs across the spectrum of community designations defined by the region, from *Urban Center* to *Agricultural*. The Agricultural Preserves Program and the Green Acres Program highlighted in the *Natural Resources Protection* section, both geared toward preservation of large tracts of traditional farmland, are important commitments that could be added to and enhanced by additional programs incentivizing scalable agriculture within urban and suburban contexts. The only mention of "safe and healthy food" in the document (as opposed to *agriculture* as a land use) is on page 25, "*Encourage access to safe and healthy food.*" It appears as a bulleted goal in the *Livability* section.

The City of Minneapolis would like to see Metropolitan Council forward specific metrics and a strategy for parks and open space to be a substantial contributing system to all five *Outcomes*. The City assumes that this will be a value that emerges in the coming Regional Parks Policy Plan. Still, a cohesive statement in Thrive that calls this out in one place may be useful, beyond what is alluded to in "*Role of Regional Parks*" on page 71. Specifically, Metropolitan Council could provide more guidance on how the park system could contribute to intermodal transportation (commuting and connectivity), climate change and sustainability (carbon capture and other stacked values of pervious surfaces and urban tree canopy), equity (local amenities as a part of the equity toolkit), water resource goals (rain capture and water quality, groundwater recharge), and so on. This seems worthy of much more attention.

In Thrive's natural resources protection policy direction, the City actively supports:

- Thrive’s observation that urban trees and the regional park system both have a significant role in assuring our region’s quality of life and protecting our natural resources.
- The creation of an ecological resources overlay and other map resources to guide local action on conservation and preservation.
- Protection of aggregate resources and agricultural resources as key natural resources.
- Unified guidance for the multiple regional parks agencies to conserve, maintain, and connect natural resources identified as high quality or of regional importance; the City looks forward to specifics on this in the 2040 Regional Parks Policy Plan.

Areas where the City supports natural resource protection policy direction but needs more clarity in order to envision implementation:

- Under *The Role of Regional Parks* on page 71, the plan states: “many people are using regional trails for commuting.” This is the only statement on the subject in this section. The City suggests that further and more specific guidance is needed to encourage or require park agencies to proactively create system plans that consider how parks and trails can contribute to the integrated multi-modal transportation system and acknowledge parks’ role in moving people from home to work or other destinations. The City anticipates that this may be part of the 2040 Regional Parks Policy Plan, but a reference to the value of an integrated system could be included in Thrive.
- Policy guidance in Thrive MSP 2040 seems to suggest that maintaining industrial assets along the river and adding parkland to serve all users as well as ecological function are not complimentary activities, but we would suggest that they can and should be.

The City observes a need for more attention in these areas:

- Equity is mainly addressed through housing, access to jobs and transit. The role of regional parks and our natural resources and how they contribute to or impact equity is omitted and should be included.
- Local parks, open space, and the street network contribute to the accessibility and utilization of regional parks. There is a need to look beyond what is considered a “regional park” to fulfill broader policy objectives.
- The City of Minneapolis would like to see the region forward specific metrics and a strategy for parks and open space to be a substantial contributing system to all five outcomes. The City assumes that this will be a value that emerges in the coming 2040 Regional Parks Policy Plan. Still, a cohesive statement in Thrive that calls this out in one place may be useful (beyond what is alluded to in “Role of Regional Parks” on page 71) of how the park system could contribute to intermodal transportation (commuting and connectivity), climate change and sustainability (carbon capture and other stacked values of pervious surfaces and urban tree canopy), equity (local amenities as a part of the equity toolkit), and water resource goals (rain capture and recharge).
- Urban agriculture and locally produced food needs to be more adequately addressed.

### **Water Sustainability**

The City of Minneapolis has a substantial interest in water issues. The City supports the values contained in the *Water Sustainability* section. We would add that water resources are projected to become more valuable in the future, with more population depending on the same resource volume. Water sustainability is not only an issue of

local resource protection; it is also significant in projecting the cost of imported food in a water-scarce future (see additional comments on food security under Natural Resources, above).

The City agrees that protecting our quality of water and ensuring that groundwater is being recharged is of paramount importance. The City welcomes the region's interest in establishing policy guidance on water resource management. The City looks forward to shared strategies on this front.

Wastewater infrastructure is an issue that the City of Minneapolis has a substantial interest in. We support Metropolitan Council moving away from expansion of infrastructure and toward maintenance of existing infrastructure. The City of Minneapolis currently has excess capacity in its wastewater infrastructure system and our greatest needs relate to maintenance. The City sees a need for clarity and action on the part of the Metropolitan Council to establish fair and thoughtful policies around funding wastewater infrastructure.

In the water sustainability policy direction, the City supports:

- Regional guidance based on our shared value that water resources must be responsibly managed for future generations. Depleting groundwater is not sustainable, especially in the context of a growing population. Best practices are needed to conserve and maintain our water supply and quality.
- Providing cost-effective and efficient wastewater treatment.
- Pivoting from an emphasis on expanding wastewater systems to maintaining the existing infrastructure; this is a wise approach that will maximize the impact of limited dollars.
- The City has proactively encouraged the use of environmentally-sensitive development techniques and incentivized good storm water practices for public and private efforts. These efforts are important to the protection of our water bodies, the prevention of flooding, and the replenishment of ground water. While the Environmental Protection Agency (EPA) and Minnesota Pollution Control Agency (MPCA) already provide expectations and guidelines in this area, we appreciate the support that Met Council could provide.

Areas where the City supports water sustainability policy direction but needs more clarity in order to envision implementation:

- As a joint Combined Sewer Overflow (CSO) permittee with Metropolitan Council Environmental Services, the City of Minneapolis understands the ongoing goal of reducing Inflow and Infiltration (I/I). We appreciate Metropolitan Council's intentions to offer grants to assist with regional and local public projects as well as private citizen opportunities. We would also appreciate the Metropolitan Council's partnership to advocate for alternative funding for these efforts. With limited resources available, it may be prudent for the region to invest where the capacity of systems is most threatened.
- As noted above, the topic of groundwater is important to the City and region and is new territory for the Metropolitan Council. The city recognizes the need to work together across jurisdictions on issues such as water supply. We look forward to talking in more specific and actionable terms about this subject and learning more about the role that the Council will take as the next Water Resources Management Policy is developed.

The City observes a need for more attention in these areas:

- While Thrive MSP 2040 does not address Sewer Availability Charges, we appreciate the effort that the Met Council has made to work with communities like Minneapolis to examine this program and make



improvements. We look forward to ongoing conversations with the Met Council to make additional improvements. A program that is more user-friendly and predictable will be particularly valuable to small businesses and helping businesses to succeed is a value that we share. (p.11)

## **Sustainability and Resilience**

The City is supportive of new regional guidance on resilience and climate change. The City appreciates Thrive's focus on land use patterns as a means to move the region toward state mandated emissions reduction. The guidance for compact redevelopment near regional job and activity centers and transit is consistent with the adopted policies of Minneapolis. The specific mention of green infrastructure as a means to improve the resiliency of the built environment (examples given related to the benefits of some plant species to stormwater mitigation or the stacked benefits of urban tree canopy) are welcome observations. Recent findings by the IPCC on global climate change impacts suggest a more urgent need than ever for cities and regions to take significant steps on both emissions and carbon capture. Energy consumption and water usage are equally important and worthy of policy attention. The City welcomes the opportunity to work with the regional government on this important policy directive.

Under Sustainability and Resilience, the City actively supports:

- Climate change as an issue that merits regional and local attention to develop new guidance for land use patterns, commuting patterns, and systems design.
- Metropolitan Council's proposed role as a convener and technical resource for communities planning to address climate change issues, including emissions reduction, carbon capture, and adaptation.

Areas where the City supports sustainability and resilience policy direction but needs more clarity in order to envision implementation:

- Careful consideration of the methodologies employed to complete regional and local greenhouse gas inventories.
- The Council should not only "recognize" the State of Minnesota's statutory goal for greenhouse gas emissions reduction, it should clearly define the metro systems' contribution to statewide greenhouse gas emissions, and adopt a regional plan and systems plans that will adequately contribute to those goals consistent with the region's contribution to statewide emissions. The Metropolitan Council should identify how changes in regional systems, based on different development scenarios, would impact greenhouse gas emissions. This analysis should be used to shape transportation, land use and other regional systems policy. Regional planning is only conducted once every ten years, and infrastructure decisions made today will impact our contribution to climate change for decades to come. The Metropolitan Council should use this opportunity to put the metro on a path to meeting state goals.
- Thrive makes the statement "*Encourage access to safe and healthy food.*" This statement is one we support and would like to see developed more fully, as described above in the Natural Resources comments. The programs that address conservation of rural agricultural land (Agricultural Preserves Program, Green Acres Program) could be joined by programs that incentivize food production in urban and suburban locations.
- We support the Metropolitan Council taking a leadership role on addressing climate change in our region and state. The regional systems Metropolitan Council is charged with operating will both be

significantly impacted by a changing climate, as well as contribute both to the causes of climate change, and potentially the mitigation of those causes. While we are strongly supportive of Metropolitan Council's efforts to inventory regional greenhouse gases and promote efforts by local governments to both mitigate and adapt to climate change, we suggest additional refining the focus of the Council's work as currently defined in the Thrive draft - particularly how climate change can be impacted by policy plans and the desired outcomes identified in the Thrive document.

- In addressing solar resources in Thrive MSP 2040, the Metropolitan Council should take care to appropriately describe the statutory requirements in the context of current opportunities and best practices for resource protection and development. Historical treatment of solar resources in the Metropolitan Council's regional plans has focused on the work "access", assuming the primary planning and ordinance tools for enabling solar development was mitigating conflicts between adjoining property owners regarding solar resources. This effort should focus on the words "protection and development."

The City observes a need for more attention in these areas:

- The Metropolitan Council should engage fully with the process to revise the Minnesota Climate Change Advisory Group (MCCAG) recommendations, now underway and led by the Department of Commerce and Minnesota Pollution Control Agency. The Council should use this process to identify and vet climate change mitigation strategies, particularly in the areas of land use and transportation. The Council should incorporate the results of the process into system planning.
- While we support the Metropolitan Council's development of both regional and local greenhouse gas inventories, we urge careful consideration of the methodologies employed to complete these inventories. There are few national standards for community emissions inventories, and care must be taken to develop a robust process which serves the goal of driving effective emissions reduction policy. Assigning emissions from regional travel patterns through inventories is a topic of particular interest for Minneapolis. We urge the Council to engage experts and local communities in the process of determining appropriate inventory techniques. (p.30)
- The Metropolitan Council should use its authority over regional aviation systems to encourage continued energy conservation and development of renewable resources at MAC, and the transition to low-carbon aviation fuels by associated airlines. Based on our community's use of the airport, MAC and its associated air travel contribute about 7% of Minneapolis' annual greenhouse gas emissions. This is more than the emissions from solid waste disposal and treatment of our wastewater combined. All metro communities utilize the airport in some fashion, but have little direct or indirect influence over this source of emissions.

### **Economic Competitiveness**

The City is supportive of Metropolitan Council's decision to address economic competitiveness at a regional scale. It is now commonly understood that the national and international economy is primarily urban: an organized network of metropolitan economies. McKinsey recently reported that 60% of global GDP was produced in just 100 cities around the world. The City of Minneapolis applauds this new initiative of the regional plan and underscores the need for an economic strategy that views the metropolitan area as an integrated network of economic assets that can and will benefit from an informed regional perspective. Visualizing that network and establishing resources, including technical resources, analysis, and research, will be a valuable contribution by the region. The City is interested to learn more about what this may mean with regard to programs, funding, or other resources.

We suggest a strong correlation between the goals outlined in Economic Competitiveness and the challenges outlined on page 2 of the plan related to crumbling infrastructure.

In Thrive's economic competitiveness policy guidance, the City supports:

- The stated need for an economic strategy that views the region as an integrated network of economic assets.
- Development of strategies customized to needs in different types of strong and weak markets, and attracting and retaining a skilled labor force.

Areas where the City supports economic competitiveness policy direction but needs more clarity in order to envision implementation:

- Regional assessment and prioritization of sites for development and redevelopment. The City supports this goal, but wonders whether this will be supported by funding and resource allocations on priority sites; we look forward to learning more about how the Council envisions implementing these priorities.
- The study of industrial assets and inventory; the City welcomes this regional assessment, which should result in a visualization of the network which includes consideration of industrial and export infrastructure and mobility as described above in the Transportation comments.
- Engaging businesses in comprehensive planning is a good idea; the City looks forward to more detailed information about how this could be achieved.
- Inserting equity into the grant application processes is good, but the lack of definition of criteria to evaluate equity impacts creates challenges for applicants and reviewers.
- The statement "*Prioritize regional investment in places that are drivers of economic innovation and growth for the region.*" More clarity is needed to understand how these are defined and operationalized. Are these all of the Job and Activity Centers identified on p. 47 or just a subset, such as "major"? The City of Minneapolis looks forward to future discussion about this topic. While it appears that this will be discussed more in the Transportation Policy Plan, this policy, other similar policies, and the 2040 forecasts should be indicative of a more cohesive regional economic development strategy. (p.80)
- The following statement is only listed under Community Role, but previously in the document "investing in remediation" was stated as a Council role too. "*Support the cleanup and re-use of contaminated land by utilizing regional, county, and local funding programs and financing tools.*" We encourage the inclusion of language under the Council Role as a corollary to this item. Programs administered by the Metropolitan Council are very important in achieving site remediation and supporting redevelopment. (p.88)

The City observes a need for more attention in these areas:

- The *Freight* section should also address air freight, which is crucial for the logistics of some businesses.
- "*Analyzing the land use and infrastructure needs of the region's leading industry clusters*" is important. It would be good to include emerging industry clusters (i.e. potential future strengths) in this analysis as well. (p.39) The City of Minneapolis looks forward to future conversations with the Metropolitan Council on this effort.
- Consider adding a policy here that reinforces previous statements about supporting regional economic development that is equitable and connected to areas of concentrated poverty. (p.81)
- We appreciate the need to achieve balance in investments and activities across the region and understand that the region is diverse and has varying needs. However, the City of Minneapolis would

encourage the Metropolitan Council to strategize investments to create and sustain a vibrant region that is nationally and internationally competitive. A strategy would clarify how investments in one part of the region are not isolated investments but rather part of a broader defined objective with clear benefits, demonstrated and ultimately realized. We are supportive of the Metropolitan Council's interest in creating a regional economic competitiveness strategy. (p.14)

- The Metropolitan Council should recognize the importance of local food processing to economic development efforts and job training. (p.14)
- Minneapolis is supportive of the identification of the multimodal freight system as an asset to our region's competitive advantage. We appreciate the identification of CP Shoreham Yards as part of this system as well as the need for industrial land to support businesses dependent upon these operations. We believe that the Air Freight should be included under the list of the four components. We have learned that it is a crucial piece of logistics infrastructure for small parts and products including medical tech device components and products. (p.14)
- Looking at assets such as freight and identifying future needs is important. While the document has addressed this, it could go further by identifying research topics regarding the future of industrial land use; including space, access, and infrastructure needs of growing and functionally necessary industries. (p. 16)
- The City would encourage the region to become a technical leader in thinking beyond just residential/commercial mixed use to see how some industrial uses can be integrated with more traditional commercial (boutique ice cream) or potentially, where appropriate, even residential uses (consider the small scale "makers"). Thrive refers to industrial lands and the supply thereof, but does not focus on zoning and land use patterns that could be changed to accommodate industrial uses in non-traditional industrial settings. This might allow for more intensive use of land that might be more transit supportive than the sprawling industrial development that is so common. The City suggests that there may be TOD support for industrial in addition to office and residential uses. Existing transit infrastructure could reduce the need for scarce industrial land to be devoted to employee parking. Minneapolis looks forward to future collaborations around this topic. (p. 16,17)
- We support the Metropolitan Council's goals to preserve industrial uses and freight facilities and their willingness to help avoid land use conflicts that might present future conflicts. However, Minneapolis believes that not all of the uses listed as potential conflicts are necessarily potential conflicts, in particular there are ways to for industrial land and park land to be complimentary and not in conflict. (p.16)
- The City of Minneapolis suggests that that the document should address "accessibility" rather than "location" of industrial land. Without transit and other supportive infrastructure proximity might not mean much. We believe it is relevant to discuss industrial lands not businesses as industrial areas are often a diverse mix of business types, with the common denominator being a need for moderately priced, flexible space (this includes incubator space for smaller scale/innovative startups that will host the next generation of businesses). (p.21)

## **Funding**

The City understands that declining federal support has led to the adoption of the principle of *integration* in the Council's funding activities through its express interest in efficiency under the "*Moving beyond organizational silos*" section (p. 35). The City understands that Metropolitan Council wants to get the most out of each invested dollar, and will therefore look for investment opportunities that address multiple outcomes with the same dollar. The Council seeks to find greater efficiency in investments, and to "*address problems that single approaches*

*cannot address.*" Finally, the City understands that Thrive seeks to look at the points of integration between and among its regional systems and local activities. This seems to suggest that these points of overlap and integration will compete well for regional investment. Minneapolis sees many opportunities for local and regional goals and systems to overlap. With so many shared values and shared interests, whether in deconcentrating poverty, growing economic competitiveness, achieving density around transit, or addressing sustainability, we look forward to collaboration knowing that our success is your success.

Thrive sets out some clear values in its investment priorities. We note that the Livable Communities Program is specifically guided to catalyze private investment in RCAP zones, encourage applicants to consider an equity lens in their projects (p. 21), require local jurisdictions applying for grants to adopt local policies reflecting equity in the proposed grant area (p. 23), and provide affordable housing. The City suggests an additional investment value here. It will be important for *area readiness* to be an eligible platform for regional grants and resources, such that applications can be planning-driven, not only developer-driven. We see this as a much needed tool for cities who want to proactively prepare areas for growth, especially in areas where significant hurdles to development interest exist such as brownfields or high voltage power lines.

The City noted that infrastructure investments are also guided based on stated values, including higher expectations of land use (p. 9), maintenance and improvement as opposed to expansion [highways and wastewater] (p. 9, 10-11), fostering prosperity across the region through balanced investment (p. 13), fostering economic competitiveness and providing amenities and quality of life needed for economic competitiveness (p. 15, 17), creating and preserving racially integrated mixed-income neighborhoods (p. 22), connecting lower income areas to job opportunities (p. 22), preserving a mix of housing affordability along transit routes (p. 23), and pursuing local renewable energy generation for operations, including large scale solar facilities (p. 31). The City looks forward to learning more about how the Council will evaluate candidate investments based these values.

Thrive also contemplates funding set-asides or special investment resources contemplated to create opportunities in RCAPs/ACPs (p. 21). We would support and utilize such a tool and look forward to more information as it becomes available.

Parks and Open Space investments are guided to expand the park system considering high quality or regionally significant resources (p. 25), promote expanded multimodal access to regional parks, trails, and the transit system (p. 25), and strengthen equitable usage (p. 26). The City suggests referring back to comments on the regional park system, under Natural Resources earlier in this letter, to consider what other *Outcomes* the park system could be guided to support, and to consider investment across the greater spectrum of values.

### **In Closing**

Minneapolis recognizes the importance of Thrive 2040 MSP and the hard work of Metropolitan Council staff in preparing an ambitious new policy direction for the region. We look forward to continuing collaboration on these important issues and themes as we prepare for the next steps and ultimately our own Comprehensive Plan update. We look forward to working with Met Council on some of our key concerns, including important points of clarity around transit (including streetcar), wastewater infrastructure, responsible and sustainable growth, and demographic changes.

One issue that may merit more attention is the seeming disconnect between the policy document, Thrive MSP 2040, and the Regional Forecast. One divergence is related to the distribution of jobs and households, which in the forecast may suggest increasing decentralization. However many of the policies in Thrive seem to clearly prefer

density, transit, and livability. Of particular importance to us is what the forecast of continued decentralization implies for land use patterns, regional economic strategy, climate change, and municipalities' bottom line.

A second divergence is apparent in what the forecast projects with regard to demographics, as opposed to what the policies focus on in terms of meeting the needs of a growing population. For instance, while aggressively pursuing housing affordability and location choice is important, and something that Minneapolis supports, Thrive MSP 2040 does not acknowledge the diverse housing needs and demands of the population demographic projected to grow (for instance, seniors). The guidance that appears in Thrive on what demographics imply for housing and transportation, which is provided on page 26 under "Providing housing and transportation choices for a range of demographic characteristics and economic means," does not provide significant clarity on the characteristics of the needed housing inventory, land use patterns, or other key considerations.

Thank you again for this opportunity to comment on Thrive MSP 2040. Minneapolis looks forward to collaborating with the Metropolitan Council on these important goals for our region.

Additional information and questions related to this document should be directed to Kjersti Monson, Director of Long Range Planning, Community Planning and Economic Development Department, at [kjersti.monson@minneapolismn.gov](mailto:kjersti.monson@minneapolismn.gov).

Regards,

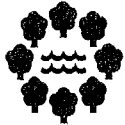


City Council Vice President Elizabeth Glidden  
*Chair, Intergovernmental Relations Committee*



City Council Member Lisa Bender  
*Chair, Zoning & Planning Committee*

cc: Betsy Hodges, Mayor  
Paul Aasen, City Coordinator  
Chuck Lutz, Executive Director, Community Planning & Economic Development Department  
Gene Ranieri, Director, Intergovernmental Relations  
Kjersti Monson, Director, Long Range Planning  
Lisa Barajas, Manager of Local Planning Assistance, Metropolitan Council  
Michael Larson, Sector Representative, Metropolitan Council



**Minneapolis  
Park & Recreation Board**

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April 28, 2014

Metropolitan Council  
390 N Robert Street  
Saint Paul, MN 55101

**Re: Minneapolis Park and Recreation Board Comments on Thrive MSP  
2040**

Dear Metropolitan Council Members:

Thank you for the opportunity to comment on the draft Thrive MSP 2014 (Thrive) document. The Minneapolis Park & Recreation Board (MPRB) is proud to be one of the ten implementing agencies of the metropolitan area that, collectively, own, maintain, and operate the Regional Park and Open Space System. The MPRB also owns, maintains, and operates an extensive neighborhood park system. In 2013, Minneapolis was named by the Trust for Public Land as the #1 park system in the United States – a recognition that speaks to the qualities of the Minneapolis park system as well as the value this region places on parks and open space.

The draft outcomes of stewardship, prosperity, equity, livability, and sustainability that are articulated in Thrive provide many possible strong and supportive connections to park and open space in the region. The MPRB encourages the Metropolitan Council to consider a number of factors as Thrive progresses:

1. Parks and open space are fundamental regional infrastructure, critical to future success. As such, parks and open space need strategic investment in order to best serve region-wide needs and share of forecasted growth. Therefore, the “Changes and challenges that lie ahead for the region” section should reflect how the changes and challenges will impact regional parks.
2. While the Metropolitan Council has a specific relationship to regional parks and trails, achieving the desired outcomes of Thrive require looking beyond regional parks toward the full spectrum of what qualifies as open spaces, such as local parks, green corridors, and boulevards. Thrive should encourage local governments to conserve, protect, and interconnect more open space, not just regional parks. This

*President*  
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*Vice President*  
Scott Vreeland

*Commissioners*  
Brad Bourn  
John Erwin  
Meg Forney  
Steffanie Musich  
Jon C. Olson  
Anita Tabb  
M. Annie Young

*Superintendent*  
Jayne Miller

*Secretary to the Board*  
Pamela French

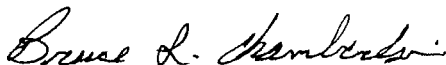


is especially relevant in high-density environments where natural resources and ecological system experience urban stressors.

3. Thrive seems to suggest that maintaining industrial assets along the Mississippi River and adding parkland to serve and increase ecological performance are not complimentary. Redevelopment of industrial land, especially along the Mississippi River, should consider parks and open space as a viable development option for local agencies and be in balance, not contrary to, the other types of assets serving region-wide needs. The MPRB's RiverFirst project is an example of a vision for riverfront parkland that is interwoven with surrounding land uses, including industrial ones.
4. Transportation and quality of life amenities are needed to attract and retain top talent, yet parks and trails are not specifically identified as key elements of bicycling networks and in discussions of housing. Parks and trails should be considered valuable assets of the transportation system, transit-oriented development, and affordable housing.
5. While Thrive strives to display the importance of integration between the Council's core policy authorities, parks, trails, and opens spaces should be more easily identified and emphasized as primary contributors to each desired outcome. Specifically:
  - More directly articulate the valuable ecological services provided by regional parks in combination with other open spaces. This includes such things as groundwater recharge, climate change mitigation, wildlife habitat and movement, and carbon sequestration.
  - Include parks and open space investment strategies to support equity and mitigate the place-based dimension of racial, ethnic, and income-based disparities of the region, similar to how jobs, transit, and housing are considered in the plan.

Thank you again for the opportunity to comment on Thrive MSP 2040. We look forward to working with staff on the Regional Park Policy Plan and comprehensive planning.

Sincerely,



Bruce L. Chamberlain, ASLA  
Assistant Superintendent for Planning



Metropolitan Council

APR 28 2014

Received Chair's Office



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April 24, 2014

Ms. Susan Haigh  
Thrive MSP 2040  
Metropolitan Council  
390 N. Robert Street  
St. Paul, MN 55101

Dear Ms. Haigh,

As a fully developed community, confined to less than three square miles, the City of Mound is very concerned about the level of growth projected for the community in Thrive MSP 2040. The concern is regarding the proposed increased expectation for density, going from three units per acre to an average residential density of five units per acre for a suburban community.

The City of Mound is one of the most affordable urban communities around Lake Minnetonka. Intrinsic to the City's goals are the commitment to find the balance between accommodating its fair share of regional growth and protecting the valuable natural water resource that is integral to the community's character. The City of Mound was developed with relatively small lots sizes. More than half of the city's single-family residential lots are zoned with a minimum lot size of 6,000 square feet. In addition, in its 2030 Comprehensive Plan the City designated much of its downtown core for mixed used development with medium and high density residential.

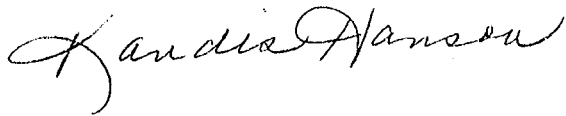
As the community looks to 2040, there are concerns about where additional household growth and density can be accommodated. This tiny community is nearly fully developed with only a few small infill lots remaining. The 2030 Comprehensive Plan designated a sufficient amount of land to accommodate a more than 20% increase in households from 2010. This level of growth is significant given that households grew by only 7% between 1990 and 2000 and went down slightly between 2000 and 2010. The City anticipates that accommodating another 4% growth in households will be challenging, if not impossible, given the sheer lack of land.

The City of Mound continues to be supportive of diversifying its housing options and providing its fair share of regional housing needs. As a developed community, however, there are

significant local implications for accommodating additional household growth when there are no undeveloped or redevelopment areas available.

Mound Counselors highly encourage the Metropolitan Council to recognize and take into careful consideration local conditions as it establishes requirements for individual communities. We also encourage the development of global strategies that take into account jobs and transportation conjointly with housing that will comprehensively support communities as they attempt to meet regional needs.

Sincerely,

A handwritten signature in cursive script that reads "Kandis Hanson". The signature is fluid and elegant, with a large initial 'K' and a long, sweeping underline.

Kandis Hanson  
City Manager

**From:** Corrin Wendell [<mailto:Corrin.Wendell@ci.north-saint-paul.mn.us>]  
**Sent:** Friday, April 25, 2014 3:06 PM  
**To:** Barajas, Lisa  
**Subject:** ThriveMSP 2040 comments

Hello Lisa,

We were able to read through the document and collect some comments from Jason, Paul and myself. I know the deadline is Monday so I thought I would pass these along to you all. Overall we felt that it was a very effective document and it relates well to North St. Paul and the future growth that we will be experiencing. We appreciate the opportunity to comment.

- It would be great to have more information on where North St. Paul is specifically on the Racially Concentrated Areas of Poverty map and the Station Areas on Existing and Planning Transitways map? This will aid in our planning efforts. Maybe we can work with someone to get the specific maps for our city.
- Within the overall text, we would like to make sure that the priorities of the MetC are with both the prosperous and non-prosperous cities and that resources, tools and growth potential are equally distributed.
- It would be great to see a focus on secondary opportunities for transit, it seems the already heavy areas and anticipated growth areas are represented. This would help provide service and represent those alternative routes.
- Is there a regional recycling program for all cities to participate?
- It would be nice to have included how the ideal job/activity center areas can be supported by the outlier communities.
- It would be nice to see a section on how redevelopment can re-establish eco-systems.
- Can the MetC help identify and fund travel corridors and opportunities for local connections - that maybe the Cities might be eligible for regional monies to help support the build-out of those local systems?
- It would be nice to see the implementation section expanded with each goal, objective, priority (each section) tied to groups responsible for each (implementers) then tied to funding sources, resources and grants, then tied to indicators (to measure success). This approach would help guide the region to help assign tasks and know when they are achieved.

Thank you again for visiting with us!

Thanks,  
Corrin

Corrin Hoegen Wendell, AICP  
City Planner

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April 15, 2014

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Re: City of Oak Grove Comments on Draft Thrive MSP 2040

In the City of Oak Grove's 2030 Comprehensive Plan the City was required to include a designated future MUSA in the southeastern corner of the City. This designation has limited all the property owners in that area to 1 home per 10 acre density development until urban services become available. For decades previously, the Met Council routinely approved Comp Plan amendments permitting Oak Grove property owners to develop at 2.5 acre density. This change was not welcomed by the City Council, Planning Commission or the residents of Oak Grove, but was demanded by the Met Council during the City's Comp Plan update in exchange for preserving the Rural Residential designation in the remainder of the City.

The sewer system that is planned to extend to and serve the southeastern corner of Oak Grove is now in service and struggling to find users in East Bethel. The City of East Bethel is tasked with creating development to pay for that new system through connection and user fees. The focus is along Highway 65 which runs north/south and lies to the east and well outside Oak Grove's borders. Even when this corridor is fully developed there will be a significant gap of non-sewered residential area between East Bethel's newly sewerred areas and Oak Grove's future MUSA. Oak Grove's MUSA area is not on a main transit way and is well beyond the emerging suburban edge.

In the current draft of Thrive MSP 2040 one of the outcomes discussed is "stewardship." Within the definition of stewardship in Thrive MSP 2040 it states "pivoting from expanding to maintaining our region's wastewater and highway infrastructure." The expansion of the sewer system into Oak Grove would be in direct contradiction to the goal of "stewardship" as described. Expansion of this system into Oak Grove is based on past principles from past plans that focused on expansion.

The draft of Thrive MSP 2040 also states that the size of the current wastewater system is adequate to serve metro area "at least" through 2040 with minimal need to expand its geographic footprint. This further confirms that restricting the development of property in Oak Grove to accommodate future sewer system expansion is unreasonable. Property owners in that area were originally given the expectation that utilities may be available post 2030 while the reality now is likely well past 2040.

There are several references in Thrive MSP 2040 to preserving natural resources and sensitive environmental areas; most notably under the outcomes of stewardship and prosperity. The area designated for future MUSA in our City is nearly 50% wetlands and includes Swan Lake which is a



natural environment lake. This area is also bordered on the west side by Cedar Creek which is a protected natural corridor. Natural wetlands serve as recharging stations for surface and groundwater which is paramount to the sustainability of the aquifers which are the sole source of water for the residents in Oak Grove and in adjacent communities. Adding density to this area does not protect this resource. When these natural areas, flood plains and shoreland districts are factored in, the buildable area becomes limited and non-contiguous. The Rural Residential designation explanation specifically states that these areas typically have development limitations and "do not support economical extension of wastewater services." The designated future MUSA in Oak Grove in particular has significant limitations. This further justifies review of the existing MUSA to determine whether the extension of sewer services in that area is even financially feasible.

Other key focuses of Thrive include greenhouse gas reduction and transit oriented development. These notions also contradict reserving areas for urbanized development which are not on main transit ways and away from the emerging suburban edge.

Within the Land Use Policies section of Thrive MSP 2040 it calls for orderly and efficient land use. The East Bethel sewer system is considered by some to be neither orderly nor efficient. Continuing to plan for its expansion contradicts several different statements made within Thrive MSP 2040. Oak Grove realizes that the Met Council has made considerable investments in East Bethel. But property owners in Oak Grove did not request this project and may not receive sewer services for 30 to 40 years, if ever. Oak Grove residents should not be burdened by development limitations due to a costly project requested by and completed in another municipality.

Oak Grove consistently reviews and amends its SSTS ordinance to stay in line with the County and State. 2.5 acre density development has proven to be sustainable in our community. Topographical limitations will continue to decrease the overall density of development in Oak Grove just as it has throughout its history. The Rural Residential designation should be consistent throughout all of Oak Grove as the demographic that is generally attracted to our City is not interested in living on an urban sized lot.

The City of Oak Grove formally requests that the future MUSA designation in the southeast corner of the City be removed and the entire City be designated Rural Residential.

Sincerely,



Rick Juba  
City Administrator



*Adding Quality to Life*

April 28, 2014

Susan Haigh, Chair  
Metropolitan Council  
390 N. Robert Street  
St. Paul, MN 55101

**Metropolitan Council**

MAY 01 2014

Received Chair's Office

Subject: Comments on Thrive MSP 2040

Dear Chair Haigh:

Thank you for the opportunity to comment on the draft Thrive MSP 2040 document. The members of the Plymouth City Council have reviewed the document and provide the following comments for your consideration.

General Comments

The Legislature established the Metropolitan Council to address specific regional concerns that cross municipal boundaries and cannot be addressed by individual communities. Plymouth urges the Metropolitan Council to focus its resources on planning for and implementing plans for transportation, wastewater and regional parks. This is your core mission, and carrying out that mission with transparency, fairness and equity throughout the region, we believe, would be the best path to realize a growing, thriving region. In this era of scarce resources, focusing resources in this way just makes sense.

Thrive MSP 2040 introduces many ideas but does not provide much detail. Our concern is how these ideas will be developed in the forthcoming updates to the system and policy plans. Because it is the details that cities will need to respond to, it concerns us that the Metropolitan Council will be adopting a guiding document that provides little measurable guidance.

Perhaps Plymouth's greatest concern with the Thrive document is that we see in it an investment priority that creates winners and losers among communities, which is antithetical to the goal of achieving an overall healthy region. We would be the first to recognize that there are differences among communities, some are better situated to provide opportunities for additional job growth while others may provide more affordable housing or open space. Regardless of those differences, all are part of the region and deserve the opportunity to thrive. We ask that the Metropolitan Council re-look at its priorities to ensure that they can achieve balance in regional investments in our region.



### Forecasts

The cornerstone of the Thrive document is the Metropolitan Council's forecasts for population, households and employment. Your revised household forecasts more closely align with Plymouth's projections. However, over the next three years as we embark on the update of our comprehensive plan, we expect to further refine our numbers. We look forward to the Metropolitan Council's same open review and analysis of any further revisions to our household forecasts.

We would ask that the Metropolitan Council take a further look at Plymouth's population numbers as the city continues to view them as high, based on the number of multi-family units in the city and older homes with fewer persons per household offsetting the higher numbers in recently developed areas.

While Plymouth hopes we can accommodate and realize the additional employment numbers you are forecasting, we continue to view them as high. The City Council firmly believes in order for the numbers to increase, we will need the assistance of the Metropolitan Council in supporting the transportation improvements necessary to accommodate employment growth.

### Housing

In the Thrive document, the Metropolitan Council has recognized that there are differences in the level of development and development patterns among communities in the region. The Council must also recognize that these differences can also limit a city's ability to support the creation of affordable housing. In Plymouth's case, raw land is selling for over \$200,000 per acre, which makes new affordable single family homes nearly impossible, if not impossible to achieve. Given the scarce resources at the local, state and federal level, focusing these funds on the production of single family homes is not prudent. Further complicating this picture, most of the areas of our city with vacant land are not suited for the higher density housing that does make economic sense. They are far from jobs, services and major transportation facilities. Although redevelopment has started in parts of Plymouth, it too is subject to the same market forces. The Metropolitan Council must recognize that some cities simply will not be able to respond to the regional need for affordable housing to the same extent as others. What Plymouth can provide is jobs, but we will need assistance with transit funding to help bring lower income residents to those jobs.

### Community Designation

Thrive describes development in Suburban Edge communities such as Plymouth as auto-oriented. The document states that the Metropolitan Council's role in access, mobility and transportation choice for Suburban Edge communities is to invest in high capacity transit and transportation improvements. However, the Thrive document also signals a change from expanding to maintaining the region's highway infrastructure. It further states that density will drive transit investment. We see these statements as contradictory. On the transit side, we see a "chicken and egg" issue – density drives transit, but transit also drives density. On the highway side, we see a continuing need for highway expansion, particularly to support job expansion.



Conclusion

One of the three Thrive principles is collaboration. In that vein, Plymouth asks that the Metropolitan Council carefully consider our comments and concerns as you finalize Thrive MSP 2040 and move forward with updates to the system and policy plans.

The Plymouth City Council is always open to meeting with you, our Metropolitan Council member and pertinent Metropolitan Council staff to discuss the details of the plan. Please let me know if you have an interest in meeting.

Thank you for continuing to strive to build a stronger region.

Sincerely,

A handwritten signature in black ink, appearing to read "Kelli Slavik". The signature is fluid and cursive, with the first name "Kelli" and last name "Slavik" clearly distinguishable.

Kelli Slavik, Mayor  
City of Plymouth

cc: Plymouth City Council members  
Metropolitan Council members



4646 Dakota Street SE  
Prior Lake, MN 55372

---

April 28, 2014

Metropolitan Council  
390 M. Robert St.  
St. Paul, MN 55101

**RE: Comments on Thrive MSP 2040 Comprehensive Development Guide**

Dear Council Members,

On behalf of the Prior Lake City Council, I would like to offer the following ten local comments on the draft Thrive MSP 2040 Comprehensive Development Guide dated February 26, 2014:

1. The document expands Metropolitan Council's authority into areas beyond its core planning and service functions. Expansions include water, solar energy, climate change and poverty. The Metropolitan Council should continue to focus and improve upon existing core competencies before considering new areas.
2. The document provides no metrics to explain Metropolitan Council direction, including when targets are met.
3. The document has no fiscal note for either the Metropolitan Council or for cities that are subject to expansive and ongoing requirements.
4. The Emerging Suburban Edge classification is not an accurate description of Prior Lake due to the city having over 60% of its land area developed versus the "less than 40%" described for Emerging Suburban Edge communities.
5. If one assumes that regional investments become less as you move from the Urban Core to the Suburban Edge, then there should not be two "edge" community classifications.
6. The three largest cities in Scott County (Shakopee, Savage, Prior Lake), work as equal partners through SCALE on many initiatives and projects. Due to that history of cooperation, Prior Lake views itself as more similar than different to Shakopee and Savage. However, the Metropolitan Council's guide separates Prior Lake from them in terms of the community classification. Prior Lake should match whatever classifications are given to Savage and Shakopee so that the roles of the cities and the Metropolitan Council, with respect to one another, are the same.
7. Prior Lake's average housing density should change from 3-5 units to 3 units per net acre due to limited sewer capacity and the extent of wetlands, shoreland and riparian lots in Prior Lake.
8. The guide should give recognition of land use impacts within the city on residential density, transportation and sewer/water infrastructure because of SMSC's extensive land holdings and its average one unit per acre residential densities.
9. Prior Lake supports a subregional "Job and Activity Center" designation for Scott County within Shakopee's US Highway 169 east-west corridor. Savage, Shakopee and Prior Lake currently

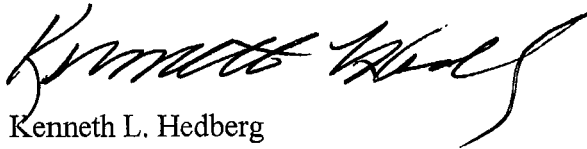
have a combined employment level of approximately 27,000. Mystic Lake Casino Hotel alone employs over 4,000 persons in Prior Lake, and Shakopee will soon have large new employers including Shutterfly, Emerson and Compass. The full extent of entertainment attractions in Scott County serve nearly twice as many tourists per year as the Wisconsin Dells. The combination of employment and visitors should easily support northern Scott County as a job and activity center.

10. Prior Lake agrees with the most recent Metropolitan Council's 2040 forecasts for its population at 39,300 (550/year), households at 15,700 (245/year), and employment at 12,500 (160/year).

In addition, the City supports comments submitted by the Scott County Association for Leadership and Efficiency (SCALE).

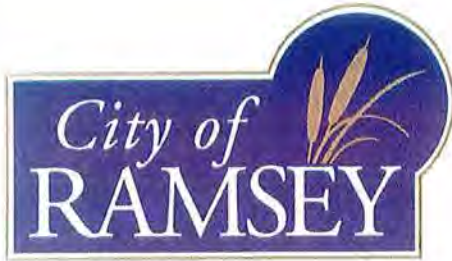
We appreciate the opportunity to provide input on the policy directions set forth in the draft Thrive MSP 2040 plan document, and we look forward to your review of our comments. Should you have any questions regarding our comments, please contact Frank Boyles, City Manager, at 952-447-9801, or at [fboyles@cityofpriorlake.com](mailto:fboyles@cityofpriorlake.com).

Sincerely,



Kenneth L. Hedberg  
Mayor, City of Prior Lake

Cc: Brad Tabke, Mayor, City of Shakopee  
Janet Williams, Mayor, City of Savage  
Tom Wolf, Scott County Board Chair



7550 Sunwood Drive NW • Ramsey, Minnesota 55303  
City Hall: 763-427-1410 • Fax: 763-427-5543  
[www.cityoframsey.com](http://www.cityoframsey.com)

April 8, 2014

Metropolitan Council  
Attn: ThriveMSP 2040  
390 Robert St North  
Saint Paul, MN 55101

RE: ThriveMSP 2040 Draft Comments – City of Ramsey

To Whom It May Concern:

To begin, thank you for the opportunity to participate in a variety of citizen engagement and public input sessions surrounding ThriveMSP 2040 (“Thrive”), the Metropolitan Council’s new Regional Development Framework. The City of Ramsey appreciates the opportunity to have additional opportunities to review and comment on the goals of the plan and the growth forecasts that are included (population, households, and employment).

As opposed to a line by line or page by page comment of the Thrive draft, the City of Ramsey would like to share with you key land use and land use related goals we have developed to ensure that our goals remain compatible and heard as part of the Thrive draft and the upcoming System Plans.

Through an extensive and robust citizen engagement process, the City of Ramsey has identified two (2) major categories that we feel important to make as part of the public record in implementing Thrive. While we acknowledge that our Future Land Use Map has the capacity to experience the forecasted growth, we are not convinced that this growth will be experienced under current infrastructure capacity. These categories include the following, and will most likely impact our future growth forecasts if left unaddressed:

1. Transportation:
  - a. Regional Priority #1: US Highway 10
  - b. Regional Priority #2: TH Highway 47
  - c. Regional Priority #3: Future River Crossing (Mississippi River Crossing to City of Dayton)
2. Water Supply
  - a. Balance of groundwater supply and surface water supply along with water conservation efforts

## Transportation

As Ramsey reviewed the draft of Thrive, there was nothing specific identified that is in direct conflict with our goals as identified as above, but could be construed as conflicting if the interpretation was within certain context. Ramsey would expect that the System Plan for Transportation reflect the revised growth forecasts and identify project needs for the northwest metro and Highway 10 corridor to supplement the existing conditions, current studies, and Northstar Commuter Rail. Ramsey is pleased to be pursuing the

Armstrong Boulevard Interchange as well as participating in the current Highway 10 Access Planning Study. Both of these scenarios will help address existing development patterns and highway levels of service (note: most of Highway 10 is currently operating as Level of Service 'F' at peak periods).

That being said, the Metropolitan Council and Minnesota Department of Transportation should still consider long-term planning and designing improvements in the area to allow for future capacity improvements.

Secondarily, when considering origin and destinations of many of Ramsey's future growth areas, the importance of addressing Highway 47 becomes an important component of our transportation plan and goals. It will take the partnership of the cities of Ramsey and Anoka, Anoka County, Mn/DOT, and the Metropolitan Council to address this difficult, yet important transportation priority.

Finally, a piece of Ramsey's regional transportation priorities is a future river crossing of the Mississippi River to create a connection to the City of Dayton. Due to anticipated future growth, coupled with existing congestion on the US Highway 169 river crossing at the cities of Anoka and Dayton, it will be important for the success of the area and the region from the perspective of affordable housing, life-cycle housing, economic development, and the inter-related connections between them all, to eliminate this existing barrier and allow for the creation of un-tapped economic development potential.

## Water Supply

Ramsey is very encouraged to see that the Metropolitan Council is providing consideration of water supply as a regional issue. Although not as clearly visible as in other areas of the region, the issue of reduced ground water supply is still clearly a concern of our community for a multitude of reasons. We are blessed to be bordered by not one (1), but two (2) rivers; the Mississippi River and the Rum River. We hope that the emphasis placed thus far leads to effective policy, followed by true implementation. Ramsey is willing to work together with others in the region to address this important issue, but we feel that the burden of implementation should not be Ramsey's alone, but rather be shared by the greater region. Although we are located in close proximity to a surface water supply and that we are just now entering as part of the emerging suburban edge, it should not be our burden alone to implement alternative supply and reduced reliance on groundwater supply.

## Community Designation

Ramsey also is encouraged to see a new classification of community designations. A key land use goal and priority for Ramsey is to maintain a balance of urban and rural development patterns to provide variety and respect the unique urban, rural, and natural environment character. Generally speaking, Ramsey finds the designation of 'Emerging Suburban Edge' as appropriate. This is with the assumption that Ramsey can maintain the balance of urban and rural character as currently reflected in our Future Land Use Map and Comprehensive Plan as well as maintaining the ability for future MUSA expansions. We desire the ability for local control to make future adjustments only as identified through citizen-focused collaborative processes. We acknowledge the need to work through regional planning processes and partnerships with the Metropolitan Council to identify strategic investments to reach our common goals.

## Growth Forecasts

Ramsey appreciates the efforts to revise local forecasts based off our previous response. Ramsey recently hosted a public workshop to take a new look at our Future Land Use Map. At this time, no significant changes were identified as part of that process. The general rate of growth forecasted appears to be more relevant to the current market rate and historical average growth. However, as noted above, we acknowledge that our Future Land Use Map has the capacity to experience this growth, but are not convinced that the existing infrastructure, most notably transportation and water supply, can sustain this growth unless future capacity improvements are made and the current model and distribution is adjusted to provide equity in the region as it relates to strategic infrastructure improvements.

As previously identified, Ramsey has focused on the key land use policy topics of water supply and transportation capacity. Before Ramsey will extend its support to the published forecasts, we feel that it is important to model several scenarios that will illustrate the outcomes of our land use decisions if investments in these two (2) categories are not made.

First, as would be anticipated, we believe that general statistical analysis demonstrates a strong correlation between congestion levels on Highway 10 and growth rates of new development. We feel that, at minimum, an alternative analysis that models forecasts with the assumption that improvements to Highway 10 are not made should be completed. We assume these improvements will be made at some point in the future; however, we do desire to better understand the outcomes of our land use decisions if these improvements are not made in the short term and how that directly relates to these draft forecasts.

Additionally, based on a general recalibration of our 2012 Water Supply Study and substituting average growth rate from the Thrive forecasts to ensure consistency, our future growth will be significantly impacted if the current water supply assumptions and formulas are not adjusted and regional investment is not made. This factor is anticipated to begin impacting Ramsey somewhere between the year 2020 and 2025. In other words, if the issue of water supply is not addressed in the next several years, we would anticipate our growth forecasts to reduce significantly. Ramsey has taken several proactive steps to attempt to reduce our water consumption, including completing surface water supply studies and implementing various water conservation measures such as standing odd/even watering restrictions and organic-rich topsoil requirements for new development. Ramsey is also an active member of the Northwest Metro Water Supply Work Group, and is participating in the Metropolitan Council's Northwest Metro Water Supply Study.

Separately, Ramsey acknowledges several planning efforts that are currently underway, but are not complete. With that in mind, the outcomes of these processes do have the potential to impact our forecasts. We have adopted a more iterative model, continually refining our Comprehensive Plan throughout the regional planning cycle to ensure that is up to date, market relevant, and consistent with our land use goals.

As identified in our previous response, Ramsey is working on three (3) small area plans below:

1. Old Municipal Center
2. 167/47 Node (soon to be re-named)
3. Armstrong West-Future Business Park

## Old Municipal Center

Ramsey is considering uses that could bring additional employment opportunities to this twenty (20) acre site. Ramsey is also providing consideration for single-family residential on this site, which could lead to approximately 45 new detached single-family homes. Neither alternative would bring significant changes to the community's forecasts. The City Council will be considering next steps within the next few months, following the recent completion of a citizen study group process.

## 167/47 Node

This circa-1970s retail node has experienced continual increases in vacancy. The City is in the process of looking at a multitude of options to facilitate the private market's revitalization of this node. Although no significant changes to employment forecasts are anticipated at this stage, the broader land use review could result in changes to housing forecasts specific to this area. There is not sufficient direction at this point to comment directly as part of this stage of the regional planning process.

## Armstrong West – Future Business Park

Ramsey has been extremely successful in economic development and redevelopment and has become a well-respected option for future business growth. Ramsey has all but exhausted existing future business park growth identified in our Comprehensive Plan, and is reasonably well served by adjacent infrastructure. Through a holistic land use review, the City expects to forward a Comprehensive Plan Amendment in the very near future. Through this holistic approach, we expect to be able to accomplish this with little to no adjustment to our forecasts. Based on previous conversations, we anticipate this land use exercise to fit within our existing employment forecasts.

## Potential Comments on Upcoming System Plans

In an effort to continue the open lines of communication, Ramsey thought it would be helpful to give a preview of some of our comments that are more appropriate at the System Plan stage, but help frame our review of the Thrive document.

### Transportation

As noted before, we will likely be commenting on Highway 10, Highway 47, and a future river crossing. Each of these will require to continue to coordinate with Anoka County to ensure each of our plans is properly aligned.

### Parks and Open Space

Ramsey has had preliminary discussions with the Anoka County Parks Department on each of these strategies, and additional review is necessary before formal policy direction is provided. Ramsey sees an opportunity to provide for alternative route analysis for the Central Anoka County and Rum River Regional Trails. Ramsey feels with minor modifications to the alignment of these approved regional trails, the region can maximize origin and destination. Additionally, Ramsey would like the regional system plans to identify a future study area to create a greenway and trail corridor along the Trott Brook Greenway connecting a great deal of local, regional, and broader amenities.

### Water Supply

As noted above, Ramsey will be seeking to work with the Metropolitan Council to identify and define an implementation strategy surrounding regional groundwater and surface water supply and conservation.



## In Closing

Again, our sincerest gratitude for allowing us to participate early in the process of this round of regional planning. We appreciate this opportunity to comment and for the Metropolitan Council to allow us to express our thoughts on the coordination of local and regional planning. We are pleased to provide a Future Land Use Map built on a collaborative public process and community support. We hope that the Metropolitan Council will continue to work with Ramsey to address our infrastructure capacity concerns. Please note that our concerns with the draft forecasts are not about our future land use vision, but how that vision relates to current infrastructure capacity and future infrastructure investment.

We feel we have grown as a community since our last Comprehensive Plan Update and have a better understanding and respect for the process. We have committed to participating early in the process to ensure our goals and priorities are aligned and that we participate in the appropriate stages to ensure our voices are heard. We look forward to the next stages in the process.

Sincerely,

CITY OF RAMSEY



Tim Gladhill

Development Services Manager



**From:** Jeff Pearson [<mailto:JPearson@cityofrichfield.org>]  
**Sent:** Monday, April 28, 2014 3:22 PM  
**To:** PublicInfo  
**Subject:** Draft Thrive 2040 Comments

On behalf of the Richfield Public Works Department I submit the following comments:

- P.2 “From 2030 onward all state transportation funding will be devoted to preservation of the existing system.”
  - Note this is “existing funding” without any new funding sources/packages.
- P.3 “We have long assumed that our region has plenty of water...”
  - This bullet statement is questionable, not conclusive and not in your authority.
- P.9 “Pivoting from expanding to maintaining our regional... transportation infrastructure.”
  - Abandoning all discussion of any expansion is shortsighted and unnecessarily limiting.
- P.11 “-to maintaining the infrastructure we have and maximizing the impact of limited dollars.”
  - Agree with maintaining but there needs to be smart expansion to complete the system.
- P.11 “Our region’s highway investment strategy exemplifies the need and the opportunity for thoughtful and strategic stewardship of resources. While some gaps remain, the region’s highway network is essentially complete and must now be rebuilt.”
  - Identify and address gaps, make priority.
  - Highway ROW is a resource. So, as highways are rebuilt, designers should actively investigate opportunities to add capacity within the ROW as a wise use of this ROW asset.
  - Examples of this expanded capacity within existing ROW include:
    - Crosstown Highway 62 from Highway 169 to Highway 77 Cedar Ave
    - I-494 from Highway 100 to Highway 77 Cedar Ave
    - I-35W south of 98<sup>th</sup> Street
- P.29 “Promoting the wise use of water”
  - There is no evidence of affecting lake and wetland levels. If so include specifics. Where? What %? What evidence is there that this is a real problem? Our experience shows otherwise.
  - Agree with emphasis to recharge groundwater system.
  - Needs to me major emphasis on agricultural impacts to water quality. Major potential for Met Council to set a national example on how to be responsible with Ag and find win-win.

Thank you for allowing us the opportunity to provide comments.



**Jeff Pearson** | Transportation Engineer  
City of Richfield  
Tel: (612) 861-9791  
[jpearson@cityofrichfield.org](mailto:jpearson@cityofrichfield.org)



## City of Robbinsdale

4100 Lakeview Avenue North  
Robbinsdale, Minnesota 55422-2280  
Phone: (763) 537-4534  
Fax: (763) 537-7344  
www.robbinsdalemn.com



April 17, 2014

Michael Larson  
Metropolitan Council  
390 N. Robert St.  
St. Paul, MN 55101

### **RE: Community Designations in “Thrive 2040”**

Dear Mr. Larson:

In reviewing the draft “Thrive 2040” document, Robbinsdale along with other first tier suburbs considered “Urban Center Communities” would now be expected to develop or redevelop at a minimum average net density of 20 units per acre. I question if this is realistic.

If one were to review the redevelopment projects of the last 10-15 years, taking into account single family, townhouse and multi-family developments, my guess is the average performance may be as low as 10 units per acre. It would take more time to get precise numbers. Some (re)development opportunities have resulted from acquisition of excess highway right-of-way for single-family residential development where multi-family development would not be desirable.

A fundamental question is: does scattered site single family redevelopment get included in the calculation? Robbinsdale’s scattered site redevelopment has been robust going back at least 20 years which averages about 5 dwelling units per acre (high for single family).

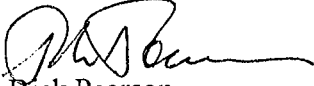
A comparatively small sampling of higher density developments occurring in the same time frame include:

- 157 townhouses (including a stormwater pond) @ 11 du/ac.
- A 57 unit apartment bldg @ 48 du/ac.
- A 36 unit apartment bldg @ 23 du/ac.
- An anticipated 36 unit assisted building @ 52 du/ac.
- A hypothetical development of about 126 apartment units @ 40 du/ac.

While these developments increase overall average density, they are complex with acquisition from multiple owners, expensive and often require not only demolition, but site clean-up of hazardous materials (brownfields). It is impossible to predict the performance of these projects enough to guarantee that their frequencies will sustain a minimum average net density of 20 dwelling units per acre, especially if scattered site redevelopment is included in the calculation.

The challenge is that the city is fully developed with about 80% of the land parceled out at 5 single family homes per acre. In order to do a higher density project, developers say they need a site of at least an acre. We are open to higher density, unfortunately there are very few one-owner sites in town and condemnation isn't available for site assembly anymore. And of course, redevelopment is expensive meaning grants or other assistance is likely needed to bridge the gap from site acquisition/clearance to what developers will pay for land.

Thank you for this opportunity to comment.



Rick Pearson

Community Development Coordinator  
City of Robbinsdale



City Offices

6000 McColl Drive, Savage, MN 55378-1800 Telephone: 952-882-2660 Fax: 952-882-2656

April 24, 2014

Metropolitan Council  
390 N. Robert St.  
St. Paul, MN 55101

RE: Comments on Thrive MSP 2040 Comprehensive Development Guide

Dear Council Members,

On behalf of the Savage City Council we would like to offer our support for the comments that have been submitted on the draft THRIVE MSP 2040 Comprehensive Development Guide by the Scott County Association for Leadership and Efficiency. (SCALE) In addition, we would appreciate your consideration of several other concerns that we believe should be addressed prior to the adoption of the final Thrive 2040 document.

The City of Savage is located in northern Scott County ideally situated between 35W and the 169 Bridge along TH 13. Once a small hamlet of less than one square mile we have grown into a community that encompasses over 17 sq. miles, including employment offerings for over 5000 and a wide variety of housing options for our 28,000 residents.

The City of Savage has followed a disciplined planned approach in providing adequate local infrastructure to accommodate the needs of our residents at full build out. Less than 15% of the buildable land area within Savage remains undeveloped. Development activity is again brisk following the great recession. The City has adequate sewer and water capacity and infrastructure to respond to the development resurgence that is now underway and we anticipate that if current development trends hold steady we could achieve full build out within the next decade.

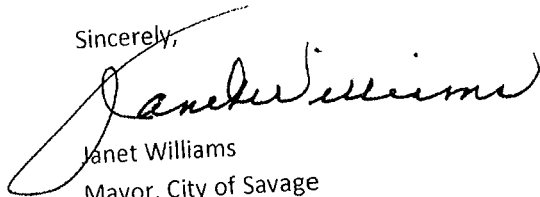
In reviewing the section of the development guide that classifies the urban planning categories of communities in the region, we are perplexed by the placement of Savage in the Suburban Edge category. Our neighbor to the west, Shakopee has also similarly been placed into this category. Given the fact that between our two communities we serve in excess of 19,000 jobs and a combined population of over 65,000 residents, we believe that the "Suburb" designation more aptly describes our present condition. It seems that once again, the Minnesota River is being used as an isolation barrier to thwart growth and future regional investments related to transit and transportation. We would hope

that our community designation and that of Shakopee be revised to more accurately reflect our present and future condition.

Other considerations that we believe warrant further review include our desire to have northern Scott County designated as a job and activity center. I noted earlier that between Shakopee and Savage alone over 19,000 jobs exist. When the City of Prior Lake's job offerings are included that figure increases to 27,000. We must take into consideration that with the entertainment attractions in Scott County we serve nearly twice as many tourists per year as the Wisconsin Dells! The combination of employment offerings and tourists would seem to logically imply that northern Scott County should be included as a job and activity center.

We appreciate the opportunity to provide input on the policy directions set forth in the draft Thrive MSP 2040 plan document and we look forward to your review of our comments. Should you have any questions regarding our comments I would be happy to speak with any member of the Council at your convenience. I can be reached by calling 952-890-1669.

Sincerely,



Janet Williams  
Mayor, City of Savage

Cc: Brad Tabke, Mayor, City of Shakopee  
Ken Hedberg, Mayor, City of Prior Lake  
Tom Wolf, Scott County Board Chair



# SHAKOPEE

April 25, 2014

Metropolitan Council  
390 N. Robert Street  
St. Paul, MN 55101

RE: Comments on *Thrive MSP 2040 Comprehensive Development Guide*

Dear Council Members:

I am writing on behalf of the City of Shakopee. We thank you for the opportunity to review and comment on the *Thrive MSP 2040* plan. Many other Scott County cities will be providing you with written comments as well as the Scott County Association for Leadership and Efficiency (SCALE). The City of Shakopee encourages the Metropolitan Council to review and follow-up on SCALE's and each community's input and ideas. We share a vested interest in ensuring the Twin Cities metropolitan area remains a thriving place to live, work, raise a family and do business.

In this letter I am sharing some common themes that have been expressed by our communities in reviewing the draft *Thrive MSP 2040* plan.

- **Jobs and Employment Growth:** SCALE has established a goal of creating enough jobs in Scott County to accommodate 50% of our resident labor force by 2030. At least 50% of these jobs are projected to be in the City of Shakopee, which currently is home to about 20,000 jobs. Under current labor force projections provided by the state, this means by 2030 we want to have 78,270 jobs, again about 50% of them projected to be in Shakopee. Scott County, and Shakopee in particular, has undergone a recent surge in economic development and job growth in the past two years, and we are on track to reach the SCALE target goal by 2030. Shakopee is confident this goal can be reached given our community's available land for economic development, great access to the regional transportation system, quality workforce, excellent schools and neighborhoods, and unmatched customer service in the delivery of local government services. Like SCALE, the City of Shakopee does not see this job growth potential appropriately reflected in the *Thrive* plan, particularly in two specific sections: 1.) the preliminary employment forecast for Scott County in 2040 is 62,680 – well below the target goal set for 2030, and 2.) excluding Scott County altogether on the map of Job and Activity Centers in the region. ***The City of Shakopee encourages the Council to respond especially to these projections because Shakopee has demonstrated in the last few years the potential for an increased job center concentrations and overall employment growth in Shakopee.***
- **One Size Does Not Fit All:** The City of Shakopee agrees with a statement in *Thrive* that it's time to move beyond the "one size fits all" mentality in the region. *Thrive* correctly states that within our region, communities are growing, developing and redeveloping in different ways. But it then seems *Thrive* advances a contradictory policy stating that the Council is pivoting from expanding to maintaining the region's wastewater and highway infrastructure. Halting wastewater and highways infrastructure expansion in growing areas of the region like Shakopee and Scott County could harm public health and safety. Under-investing in these areas

COMMUNITY PRIDE SINCE 1857

129 Holmes Street South • Shakopee, Minnesota • 55379-1351 • 952-233-9300 • FAX 952-233-3801 • [www.ShakopeeMN.gov](http://www.ShakopeeMN.gov)

could lead to inappropriate development patterns. Shakopee firmly believes parts of the Twin Cities metropolitan area will continue to need these types of regional investments. ***The City of Shakopee encourages the Council to respond to those communities (like Shakopee) that have demonstrated their need for continued expansion, not just maintenance, of these important regional infrastructure investments.***

- **Growth and Investment Should Be Focused on All Transportation Corridors, Not Just Transitways.** *Thrive's* geographic focus on growth and investment seem to follow existing and future transitways, but ignores actual places in the region where there are existing homes, jobs and businesses. The TH 169 corridor from Shakopee to Maple Grove is an example. This stretch of highway corridor contains some of the highest concentration of employment in the state. Yet, some of the large communities along this corridor (Plymouth, Maple Grove, Shakopee) are designated Suburban Edge, where growth and investment is not as strongly promoted as in Suburban communities with transitways. This is especially striking in the case of Shakopee, which has been one of the fastest growing cities in the Region, and which now houses about 40,000 people and 20,000 jobs, and continues to grow. The City of Shakopee believes the Met Council should be promoting growth and investment equally in all of these communities along this existing corridor and other important corridors in the Twin Cities, regardless of whether or not the corridor is targeted for new regional transit investments. ***Shakopee encourages the Council to respond to those communities, like Shakopee, that have demonstrated in detail their vision for growth and development along key transportation corridors like TH 169, which runs straight through our cities.***
- **New Community Designations:** The 2030 regional framework plan had two urban planning categories: Developing Area and Developed Area. It was easy to understand the distinctions between these two categories, the differences in density expectations and development patterns, and the variation in the level of regional investments. Communities understood the path to move from one category to the next over the 30-year planning horizon. *Thrive* has proposed five urban planning categories: Urban Center, Urban, Suburban, Suburban Edge, and Emerging Suburban Edge. It is difficult to understand the distinctions between these planning areas and to understand how some community designations were established. It appears that regional infrastructure investments will depend on which category communities fall into.

It also appears that important policies in the draft Transportation Policy Plan (TPP) are directly tied to these community categories. Community categories should reflect the desired region in 2040, not today. If a community is ultimately envisioned to be Suburban – that should be the designation today so it starts developing to those densities, appropriate transportation spacing, appropriate transit system and ultimate water/sewer. To come back and retrofit is very difficult and leads to health and safety issues along the way. Shakopee also notes that the Council's role in economic competitiveness for Suburban communities is different than the other categories. Only in the Suburban communities does it clearly state that it's the Council's role to "invest in regional amenities and services, including transit, regional parks and trails and bikeways to support the Suburban area as an attractive place to locate and do business." ***To best position our growing communities for continued regional infrastructure investments and to keep our communities economically competitive in the region, Shakopee encourages the Council to respond to those communities requesting a different community designation. Specifically, Shakopee believes that it and the City of Savage should both be reclassified to Suburban from Suburban Edge. We also believe that our neighbor, the City of Prior Lake, should be reclassified from Emerging Suburban Edge to Suburban Edge.***

We look forward to continuing our dialogue on these important policy directions in the draft *Thrive MSP 2040* plan and again appreciate the opportunity to share SCALE's ideas and input into this important planning process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad Tabke', written in a cursive style.

Brad Tabke, Mayor  
City of Shakopee, Minnesota

cc: Janet Williams, Mayor of Savage  
Ken Hedberg, Mayor of Prior Lake





**NORTHWEST ASSOCIATED CONSULTANTS, INC.**

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4800 Olson Memorial Highway, Suite 202, Golden Valley, MN 55422  
Telephone: 763.231.2555 Facsimile: 763.231.2561 planners@nacplanning.com

April 28, 2014

Freya Thamman  
Sector Representative  
Metropolitan Council  
390 North Robert Street  
St. Paul, MN, 55101

**RE: Spring Park: Request for 2040 Employment Forecast Revision**

FILE: 175.01

Dear Ms. Thamman,

Thank you for your assistance with a review of the forecast employment numbers for Spring Park. Based on discussions with Todd Graham, it appears that the initial forecast model had captured land area outside of the city boundaries for the purpose of determining projected employment. Spring Park is officially requesting a revision of the 2040 employment forecast for the city to reflect only the commercial and industrial land within city boundaries.

The city requests that the revised forecast recognize that Spring Park's current employment numbers show approximately 600 jobs and the city is fully developed. Our major employer is Presbyterian Homes, a healthcare facility in the C-3 Health Care Facility zoning district. Beyond the Presbyterian Homes site, there are approximately 42 acres of commercial land and 9 acres of industrial land (which are fully developed) providing employment in the city.

The industrial land significantly contributes to the 2010 employment count of 583 and while the city is supportive of this use in the near-term, the 2030 Comprehensive Plan anticipates the eventual redevelopment of the site as mixed use consisting of high density residential and commercial retail, services, and offices. The site fronts on County Road 15, but traffic accessing the site from any major highway must travel through other communities and residential neighborhoods. The site falls within the 1,000-foot Shoreland District of Lake Minnetonka and is only 9 acres in size. These characteristics suggest that from a market perspective, industrial use may become obsolete in the future and an alternative land use may be better suited for the site.

The city acknowledges that the forecast model utilizes planned land use and that this site is currently guided for industrial use. However, Spring Park would like it to be noted that it is anticipated that the land owner may at some time in the future pursue a redevelopment project and as such the employment number should provide flexibility to accommodate this potential land use change. Spring Park expects that a 2040 employment forecast number of approximately 600 jobs would better reflect the current and planned land use for the city.

Thank you again for your assistance with this review; we appreciate your consideration of our request for an adjustment to the 2040 employment forecast for Spring Park.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Brixius". The signature is fluid and cursive, with the first name "Alan" and last name "Brixius" clearly distinguishable.

Alan Brixius, AICP  
Consulting City Planner, City of Spring Park



April 28, 2014

Metropolitan Council  
Att: Michael Larson  
390 Robert Street North  
St. Paul, Minnesota 55101

Mr. Larson,

We appreciate the opportunity to review the draft ThriveMSP 2040 document and offer the following comments:

1. While we recognize this type of document is intended to be an overarching plan, including a little more detail in the policy statements (community's role) is desired. The City of St. Anthony Village has concern over the potential implications on the City's Comprehensive Plan and what the requirements outlined in Thrive will have on this planning process. What will the Metropolitan Council require the City to do in this regard? Are the "Community Role" statements items that the Metropolitan Council will be enforcing such as stormwater management, wellhead protection, groundwater reduction, climate change, access management and so on? What criteria will you evaluate our local plan on? How will you determine (and how will we know) if you agree/disagree with our Plan and the policies therein, if we are unclear about what the expectation from the Council is?

2. Page 46, paragraph 2 states that "In 2005, the Minnesota State Legislature authorized the Metropolitan Council to take on planning and management of the regional water supply issues."

State Statute 473.1565 does not authorize the Metropolitan Council to manage the water supply, rather to carry out planning activities addressing the water supply needs of the metropolitan area. Again, the City is concerned over this and many other statements pertaining to the Metropolitan Council's role as it relates to water supply and other areas. Is this an indication of the Metropolitan Council's plan to enforce these types of things?

3. Page 74, "Groundwater Resources" paragraph has many statements such as "groundwater levels are declining" and "in some cases, it is affecting or has the potential to affect, lake levels." While we acknowledge that there are concerns over these issues, we also recognize that these statements are not fact, rather additional study is ongoing.
4. The Metropolitan Council states that they will "investigate and assess cost-effective options for regional water supply infrastructure". A number of state and local agencies currently exist with a role in water and groundwater management that communities must coordinate with. As such, the City encourages the Metropolitan Council to work closely with the communities, especially public water suppliers, as this option is explored. In addition, the City encourages the Metropolitan Council to closely examine its role

in water supply, before expanding it, to ensure it's not duplicative of existing regulatory powers and burdensome.

5. Page 74, "Managing Subsurface Sewage Treatment Systems" states a policy to "Collaborate and convene with state, regional, and local partners to protect, maintain, and enhance natural resources protection and protection of the quality and quantity of the region's water resources and water supply". While we agree that this should occur, the City also encourages the Metropolitan Council to examine its role in this to ensure that it's not duplicative of existing regulatory powers, thus creating an additional layer of approval or another regional system.
6. Additionally, ThriveMSP 2040 identifies operations improvements related to sustainability including the Metropolitan Council's role to promote "the wise use of water"; however it does not mention reuse and conservation for the communities. The City encourages the Council to incorporate reuse and conservation policy to the community role section. It should also understand and encourages changes that may be necessary for reuse and conservation techniques to be implemented, including amendments to the building and plumbing codes, as well as watershed district regulations.
7. Page 93, Building in Resilience, Community Role policy second bullet states "participate in federal, state, and local utility programs that incentivize the implementation of wind and solar power generation". While we strongly support and encourage the use of green technologies such as wind and solar power, we recommend including the words "consider participation" prior to the full statement.
8. The City of St. Anthony Village does not support the requirement to adopt a complete street policy, and believes cities should be allowed to determine what projects should incorporate complete streets ideals such as bicycle and pedestrian infrastructure.

Again, we appreciate your consideration in our comments on the Council's draft ThriveMSP 2040 Comprehensive Development Guide. If you have any questions please contact me at 763-287-8521 or at [kjohnson@wsbeng.com](mailto:kjohnson@wsbeng.com).

Sincerely,



Kelsey Johnson, AICP  
City Planner

## St. Louis Park - Comments for Thrive MSP

- There are portions of our city that do fit, and portions that do not fit with the “Urban Center” designation. Is it possible to have two designations for St. Louis Park? Perhaps “Urban” for the portion that fits that designation (approximately northern third) and Urban Center for the balance?
- Most redevelopment of the city will likely be medium to high density, especially along the transit corridors. However, St. Louis Park wants the option to develop at a low density at appropriate locations if the opportunity arises. There are a few areas, i.e. golf courses where redevelopment at low densities in the future would make the most sense for a development pattern and fit within the city geography and policies. Providing additional single-family housing is a priority for St. Louis Park and if the opportunity arises the city does not want to be penalized because the density would not fit the Met Council’s expectation of development at 20 units/acre.
- St. Louis Park has been designated “Urban Center.” This nomenclature would be new for St. Louis Park - differs from the city’s identity as a first ring suburb with a variety of development patterns from urban to suburban.

### Page 82 - Orderly & Efficient Land Use Strategies

- *Community Role - Plan for forecasted population and household growth at average densities of at least 20 units per acre, and target opportunities for more intensive development near regional transit investments, at densities and in a manner articulated in the 2040 Transportation Policy Plan.*

A majority of St. Louis Park’s redevelopment will take place near transit corridors at medium to high densities. What is meant by “at densities and in a manner articulated in the 2040 Transportation Policy Plan?” More specifics are needed.

- *Identify opportunities for land assembly to prepare sites that will attract future private reinvestment, especially in racially concentrated areas of poverty.*

St. Louis Park currently identifies opportunities for attracting private reinvestment on sites throughout the city; however St. Louis Park does not have racially concentrated areas of poverty (RCAP) at this time.

### Page 83 – Natural Resources Protection

- The strategies found in Urban Communities: “Support the continued development of the regional trail system” and “Promote multi-modal access to regional parks, trails and the transit network, where appropriate” should be added as strategies in Urban Center-Natural Resources Protection sections as well as “Urban.” These strategies continue to be a high priority for St. Louis Park. For example, Metropolitan Council, Hennepin County, and several cities identified a search corridor for a future regional trail along the CP Railroad corridor to connect from Bloomington to Crystal and fill a gap in the regional trail system.

Page 84 - Housing Affordability and Choice

- *Plan for an adequate supply of affordable housing along regional transitways at station areas. Address the relationship of local industries to the affordability of housing in the community.*

What is the definition of adequate? What will this determination be based upon? The City of St. Louis Park is committed to promoting high-density development in appropriate locations near identified transitways, major roadways, retail and employment centers and commercial mixed use districts.

- *Use state, regional, and federal sources of funding and/or financing and development tools allowed by state law to assist the feasibility of the development of new lifecycle and affordable housing.*

St. Louis Park is in the process of revising its City Housing Goals which include developing polices related to affordable housing. Once these polices are finalized, the City will explore the development of local, regional and federal tools and strategies to support the City's expectations for affordable housing.

- The strategy found in Urban Communities: *“Develop or use programs to preserve the existing stock of naturally-occurring affordable housing”* should be added as a strategy in Urban Center-Housing Affordability and Choice.

Page 85 –Building in Resilience

- *Consider subscribing to community solar gardens for municipal electric load, or providing sites for gardens.*

This strategy is quite specific and should be revised to a more general sustainability policy statement to increasing energy efficiency and reducing energy costs. Another option would be to consider policies for adding renewable energy sources (i.e. solar or wind) to the electric grid.

2040 Employment Forecasts for St. Louis Park

| <u>2000</u> | <u>2010</u> | <u>2040</u> |
|-------------|-------------|-------------|
| 40,696      | 40,485      | 49,100      |

The decrease for employment forecasts from 2000 to 2010 is understandable in light of the recent economic recession; however the 2040 Employment forecast of 49,500 is significantly lower than the 2030 forecast of 52,500. While employment figures took a dip during the economic recession, employment continues to increase since.

DEED Quarterly Census of Employment and Wages (QCEW) for 2013 show increases in each quarter: 2013 QCEW:

| <u>Q1</u> | <u>Q2</u> | <u>Q3</u> |
|-----------|-----------|-----------|
| 40,954    | 41,784    | 42,393    |

The data for 2012 is from the 3<sup>rd</sup> quarter of DEED’s annual average employment.

In addition, Maxfield Research has conducted demographic research for a housing study in St. Louis Park and has estimated employment for 2012 as 51,015 and has forecast employment for 2020 as 56,450. The 2020 forecast is based on 2010-2020 industry projections for the Twin Cities published by DEED. Maxfield arrived at the 2020 forecast for Hennepin County based on the proportion of the Metro Area jobs that were located in the County in 2012. They then estimated the future employment for St. Louis Park based on the 2012 proportion of jobs located in the city. When looking at Hennepin County job figures, Maxfield determined that in 2010 and 2012 St. Louis Park had 6.1% of all Hennepin County jobs. Since St. Louis Park's ratio of jobs in Hennepin County has been increasing in the last 10 years, Maxfield increased St. Louis Park's percentage of Hennepin County jobs to 6.3% in 2020. Information from Maxfield's report that further explains how they arrived at these figures (please see attached information).

Maxfield's projections for 2020 far exceed the Council's 2040 draft forecasts.

Taking into account the above and community trends of increased redevelopment interest and job growth, particularly in light of the proposed SWLRT, St. Louis Park believes the 2040 employment forecasts should be reconsidered and increased.

### Employment Trends

Employment characteristics are an important component in assessing housing needs in any given market area. These trends are important to consider since job growth can generally fuel household and population growth as people generally desire to live near where they work. Long commute times and the redevelopment of core cities have encouraged households to move closer to major employment centers.

### Employment Growth

Table E-1 shows employment growth trends and projections from 2000 to 2020 based on the most recent information available from the Minnesota Department of Employment and Economic Development (DEED). Data for 2000 and 2010 represents the annual average employment for that year while 2012 data is from the 3rd Quarter. The 2020 forecast is based on 2010-2020 industry projections for the Twin Cities published by DEED, the most recent employment forecast available for the region. Maxfield Research applied the projected ten-year growth rate of 12.0% for the Twin Cities to the 2010 employment data to arrive at the 2020 forecast for the Metro Area. We arrived at the 2020 forecast for Hennepin County based on the proportion of the Metro Area jobs that were located in the County in 2012. We then estimate future employment for St. Louis Park based on the 2012 proportion of jobs located in the City.

- In 2000, there were 40,714 jobs in St. Louis Park, 877,693 jobs in Hennepin County and 1,607,916 jobs in the Metro Area. In light of the economic recession, by 2010 employment declined -8.4% (-73,511 jobs) in Hennepin County and -3.9% (-63,303 jobs) in the Metro Area. However, the City of St. Louis Park added 3,923 (+10.7%) jobs.
- Data from the Quarterly Census of Employment and Wages indicates that St. Louis Park gained 2,038 jobs (+4.2%) between 2010 and the third quarter of 2012. During that time, the number of jobs increased +4.2% in Hennepin County and +3.4% in the Metro Area. Much of the Market Area job growth between 2010 and the third quarter of 2012 occurred in the Education and Health Services and Information sector.
- Solid job growth is expected between 2010 and 2020. St. Louis Park is projected to experience a 15.3% gain (+7,473 jobs) during the decade while Hennepin County employment is also expected to increase by 12.3%. Employment in the Metro Area is projected to expand by 12.0%.



**EMPLOYMENT TRENDS**

**TABLE E-1  
EMPLOYMENT GROWTH TRENDS AND PROJECTIONS  
ST. LOUIS PARK ANALYSIS AREA  
1990-2020**

|                        | Employment |           |           |           | Change    |         |           |         |           |         |       |
|------------------------|------------|-----------|-----------|-----------|-----------|---------|-----------|---------|-----------|---------|-------|
|                        | Actual     |           | Estimate  | Forecast  | 1990-2000 |         | 2000-2010 |         | 2010-2020 |         |       |
|                        | 1990       | 2000      | 2010      | 2012 Q3   | 2020      | No.     | Pct.      | No.     | Pct.      | No.     | Pct.  |
| St. Louis Park         | 36,791     | 40,714    | 48,977    | 51,015    | 56,450    | 3,923   | 10.7%     | 8,263   | 20.3%     | 7,473   | 15.3% |
| Hennepin County        | 733,391    | 877,693   | 804,182   | 837,649   | 903,100   | 144,302 | 19.7%     | -73,511 | -8.4%     | 98,918  | 12.3% |
| Twin Cities Metro Area | 1,272,773  | 1,607,916 | 1,544,613 | 1,597,543 | 1,729,967 | 335,143 | 26.3%     | -63,303 | -3.9%     | 185,354 | 12.0% |

Note: Twin Cities Metro represents the 7-County planning region

Sources: MN Dept of Employment and Economic Development; Metropolitan Council; Maxfield Research, Inc.



CITY OF SAINT PAUL  
Mayor Christopher B. Coleman

390 City Hall  
15 West Kellogg Boulevard

Telephone: 651-266-8510  
Facsimile: 651-228-8521

April 25, 2014

The Honorable Sue Haigh, Chair  
Metropolitan Council  
390 North Robert Street  
Saint Paul, MN 55101

**Re: City of Saint Paul Comments on Thrive MSP 2040**

Dear Chair Haigh and Members of the Metropolitan Council:

I am pleased to submit the attached City of Saint Paul comments regarding the draft *Thrive MSP 2040* regional vision. They were developed by an interdepartmental City staff group and reviewed and recommended by the Saint Paul Planning Commission. The comments address a variety of topics, including land use, economic development, affordable housing and racially concentrated areas of poverty, transportation, parks and open space, water resources, and climate change.

We believe that *Thrive* identifies the right goals and guiding principles for our region. We applaud the focus on equity and eliminating racial disparities in income, employment, poverty, homeownership and education. We believe that economic development, supported by education, job training, transit and affordable housing investments, would be a powerful tool in reducing these disparities and urge the Metropolitan Council to play a convening role in bringing the region's public jurisdictions and private interests together to create a strong regional economic competitiveness strategy.

The Metropolitan Council's preliminary forecasts for Saint Paul indicate significant growth from 2010-2040, with the city growing by nearly 50,000 people and over 42,000 jobs. We support these forecasts and believe that changing demographics and market preferences for more urban, walkable, and mixed-use neighborhoods served by transit are major factors that will contribute to our realizing these forecasted levels. Increased density in already developed areas must also be supported by increased investment in brownfield clean-up and the amenities that make density work, such as bike and pedestrian facilities, parks and recreational trails. We hope that the Metropolitan Council will recognize the need to support growth focused in the region's core by making the public investments that are needed to facilitate that growth.

Thank you for the opportunity to comment. The City of Saint Paul looks forward to continuing to work with you and your staff as the Thrive MSP 2040 process moves forward.

Sincerely,

Christopher B. Coleman  
Mayor

Attachment

## **Comments on the THRIVE MSP 2040 Plan –04/25/14**

To: Metropolitan Council

From: City of Saint Paul

### **Overall Comments:**

#### **The Right Direction**

THRIVE MSP 2040 is organized around five outcomes: Stewardship, Prosperity, Equity, Livability, and Sustainability, with three guiding principles to inform the way they will be achieved: Integration, Collaboration, and Accountability. The City of Saint Paul believes these are the right goals for our region, with the right tools to help us achieve them. And in general, the City believes that the THRIVE plan represents a great step forward for the region.

However, the implementation policies outlined in THRIVE should be strengthened. The density goals are uninspiring, and there is insufficient leadership on economic development. The balance between providing regional guidance and allowing local governments to develop policies that are right for their communities is a difficult one to find, but not enough effort has been made to push local governments to think strategically, sustainably, and regionally about their decisions. The challenge needs to be put to communities to think about how they will be growing, particularly if low-density developments are not a regional priority. Measurable and significant metrics should be put in place for the various systems to assure that regional investments are providing regional benefits, and are moving the region in the direction laid out by THRIVE MSP 2040.

#### **Role of the Metropolitan Council**

The Metropolitan Council's role is laid out in state legislation, and focuses on systems plans for transportation, regional parks, and wastewater. However, state law also calls on the Met Council to more generally address the physical, social, and economic needs of the region. In that regard, the Met Council is uniquely positioned to take on the role as a convener on key issues, as the Thrive draft acknowledges. However, consideration should be given to expanding the list of issues to include economic development. This is a politically difficult task, but the absence of this leadership has left the region lagging behind its peers. The City recommends that the Met Council seriously consider how its role can evolve to help us all face the challenges of the coming decade.

The following comments are organized around major topics addressed in THRIVE, including Land Use, Economic Development, Affordable Housing and Racially Concentrated Areas of Poverty, Transportation, Parks and Open Space, Water Resources, and Climate Change.

#### **Land Use**

THRIVE emphasizes the importance of redevelopment and infill development. This is an important priority, and one the City of Saint Paul strongly supports.

**Density expectations.** The density expectation of 20 units/acre for the Urban Core is certainly achievable for Saint Paul. Virtually all of the city's new residential developments exceed this standard. However, the average density goals of 3-5 units/acre for the Suburban, Suburban Edge, and Emerging Suburban Edge are clearly insufficient to achieve development that can support transit investments or create walkable, mixed use neighborhoods. There is little guidance or direction to these communities to prevent continuation of the same pattern of single-family residential subdivisions where residents must use a car to get to virtually any destination for work, shopping, recreational or cultural activities.

**Job and activity centers.** The focus on job and activity centers in THRIVE is very much appreciated from a sustainability, a livability, and an economic competitiveness standpoint. However, as stated elsewhere in these comments, the City strongly believes there should be an increased focus on facilitating redevelopment and infill development for new business development rather than expansion onto green fields at the fringes of the metropolitan area.

**Orderly and efficient land use.** The community roles identified for the Urban Core are appropriate and consistent with the way the City has approached planning for redevelopment:

- As stated above, the City is exceeding the 20 units/acre average for new residential development.
- The City has identified opportunity areas and is actively planning for areas with the potential for major redevelopment and intensification, including the West Midway Industrial Area, West Side Flats, and the Ford Plant site.
- The City has aggressively planned for increased density and the creation of walkable, mixed-use development along Central Corridor and is initiating station area planning along the Gateway Corridor. Page 45 of THRIVE references technical assistance to communities to support station area planning. The City's greatest needs are for financial resources to build the public infrastructure needed to create a walkable, urban and connected street network adjacent to and connected to transit.
- The City's Land Use Plan identifies opportunity areas for new development and guides growth to downtown and our major commercial corridors.
- The City has approached consideration of industrial uses along the Mississippi River with a more nuanced approach than p. 16 of THRIVE recommends, focusing on retaining industrial businesses that need a riverfront location but generally encouraging redevelopment for greater intensity of job-producing uses at key riverfront locations.

### **Economic Development**

**Regional economic development strategy.** THRIVE identifies regions as the primary drivers of economic growth in today's economy and states the importance of a regional economic development strategy for the Twin Cities, calling on the region's public jurisdictions and private interests to work together. The City endorses this direction, as laid out in the Economic Competitiveness section on pages 80-81.

- The Metropolitan Council should play a stronger convening role in bringing together cities, counties, business chambers, Greater MSP, schools, workforce training providers, and non-profit and philanthropic organizations to create a regional economic development strategy that goes beyond a real estate and marketing focus to include education, workforce development, and targeted investments in key industry clusters. Greater MSP is actively working with the cities of Saint Paul and Minneapolis on an “urban core strategy” and this effort should be incorporated into the larger regional strategy.
- Without a strong regional economic competitiveness strategy, or similar, it is hard for local communities to understand their role in the regional economy, or to understand it with any consistency among various local communities. The Met Council should consider offering technical assistance to local communities to understand their place in the regional economy and require that comprehensive plans address regional economic competitiveness.
- Many other regions have developed successful regional economic development strategies such as San Diego, Pittsburgh, Portland, Seattle, Charlotte, and New York State’s 10 regional development councils.
- The City of Saint Paul’s Department of Planning and Economic Development is considering including an Economic Development chapter in the City’s next Comprehensive Plan update. Guidance from the Metropolitan Council, will assure that the economic development perspective uses a regional lens.

**Financial tools for redevelopment.** THRIVE emphasizes the importance of redevelopment and infill development to take better advantage of existing public infrastructure investments. This is an important priority, and one the City of Saint Paul supports.

- The City is working toward a more comprehensive and aggressive approach for redevelopment of industrial lands. The City takes the growth projection (for 43,000 new jobs) very seriously and is developing redevelopment strategies for two industrial areas (West Side Flats and West Midway). The City and its primary industrial and manufacturing economic development partner the Saint Paul Port Authority are able to attract new development to any parcel that has been assembled, cleared and cleaned-up. More such parcels are needed for industrial development.
- The City needs more financial tools and resources to prepare sites, particularly industrial sites, for redevelopment. Business location decisions are typically made in a 6-12 month time frame, and cannot wait the 24-36 months it might take to assemble, clear, and clean-up a site so it is ready for development. Companies are naturally drawn to green field sites that are ready to go. For the region to take better advantage of existing infrastructure and avoid further sprawl, more tools and financial resources are needed to prepare shovel-ready sites in redevelopment areas. Existing state and regional resources for redevelopment (Metropolitan Council and DEED) require that a developer be in hand in order to apply. Serious consideration should be given to doing a pilot program that prepares sites for redevelopment prior to having an identified end user.

- Industrial jobs have higher average wages than retail or service jobs with lower barriers to entry than white collar jobs. Aggressively redeveloping and intensifying the job density of our industrial areas along with job training and education may be one of the best ways to address the pressing problem of racially concentrated areas of poverty in the region.
- Explore advocating for limited legal authority for site assembly to purchase from recalcitrant property owners – within the context of assembling a larger site.

### **Affordable Housing and RCAPs**

The City agrees with the need to address the dramatic racial disparities in income, employment, poverty, homeownership, and education in the Twin Cities. These problems will undoubtedly worsen as the region becomes increasingly diverse unless they are seriously addressed. THRIVE rightly identifies *Equity* as one of the five desired outcomes of this regional vision. Racially concentrated areas of poverty is a critical issue for Saint Paul and one that the City is addressing in a multitude of ways, from after-school programming to targeted investments in single-family housing rehabilitation. We welcome a more focused regional effort to address these issues. In that spirit, we offer these comments:

- THRIVE is inconsistent on the topic of concentrating subsidized affordable housing, stating that affordable housing should generally be available throughout the region but also that affordable housing should be focused along transit corridors. Concentrating investment in affordable housing along transit corridors helps lower the *Housing + Transportation Cost* total, leaving more income for other basics like food, clothing, child care, and health care, and provides more access to jobs throughout the region.
- Affordable housing investment along the Green Line LRT is bringing high-quality new construction housing to Saint Paul's RCAP. This is meeting the need for housing in neighborhoods where people want to stay and thrive, close to cultural and religious institutions and communities they are connected to. The City believes these visible investments will create confidence and demonstrate success in the marketplace, leading the way for private market investment that will result in mixed-income neighborhoods.
- A regional economic development strategy that is focused on bringing new companies into the region that offer household supporting entry-level jobs and locating them along transit corridors would be a strong tool to address RCAPs.
- The map showing the specific boundaries of RCAPs on p. 44 could potentially cause more harm than good, causing redlining. While Saint Paul wants to help facilitate the flow of investments into these areas, removing the map from the body of this document may be a way of avoiding this potential pitfall.

### **Transportation**

**Road and highway infrastructure.** THRIVE talks of “pivoting from expanding to maintaining” the region’s highway infrastructure, noting that certain lower-cost/high benefit safety and

capacity improvement projects on existing highways should also be pursued. THRIVE also notes the insufficient financial resources available for maintenance.

- The City supports these directions but THRIVE should include much stronger language identifying the need for more transportation funding from the state and federal governments to adequately maintain the region's existing road and highway infrastructure. This is critical to the region's economic growth and sustainability in the future. For example, the City of Saint Paul has 191 miles of arterial roads that are aging and in dire need of being rebuilt due to the heavy use placed upon them as key transportation links in a densely developed urban area. Yet, the City only receives enough Municipal State Aid funding to rebuild approximately four miles of arterial roadways per year, which translates to a 50 year timeline to rebuild the network.
- The definition of capacity improvement projects on existing highways should include projects that improve the capacity of existing urban roadway networks to function efficiently and handle future demands from the increased density forecast by the Metropolitan Council. For Saint Paul, this would include projects such as bringing an Ayd Mill Road connection to Interstate 94, and extending Pierce Butler Route to the east to connect with Interstate 35E.
- Page 78 (and 87) includes language about distinctions between regional and local transportation systems. It includes the language that County arterial roadways should not be carrying short distance trips, that they are designed to provide faster travel, and that the local roadways are ultimately providing the destinations. This does not accurately describe the role of the A-minor and B-minor arterials (and even some principal arterials) in Saint Paul. This language is perhaps appropriate for more suburban communities, where development is often discouraged adjacent to minor arterials (or with direct access to minor arterials), but it is not appropriate for Saint Paul. The role of minor arterials and CSAH's in Saint Paul is much more complex. On one hand, they are handling longer trips, as they tend to be the through roadways that make connections across barriers (like railroads). On the other hand, it is not to Saint Paul's advantage for these to be high-speed trips, and these also tend to be highly commercial corridors, where the City is also encouraging more density, slower speeds, and a greater emphasis on non-motorized transportation and transit. MnDOT's Snelling Multi-modal study is a good example of a recent study that places emphasis on lower speeds and increasing densities. Higher speeds are not advantageous for county and state arterial corridors such as Maryland, Marshall, Arcade, White Bear, University, W 7th, E 7th etc. On these corridors, faster speeds are viewed as problematic by surrounding residents, and are a deterrent to the City accomplishing its land-use goals. The Council is applying a one-size-fits-all approach to minor arterials. THRIVE should acknowledge that minor arterials in the Urban Core are playing a substantially different role than minor arterials in suburban communities, rather than suggesting that they play a similar function, as this has significant funding implications and puts urban arterials at a disadvantage in funding allocations. This speaks to a need for the Transportation Policy Plan to define the roadway classification system in a way that incorporates anticipated land use objectives and urban design along the minor arterials.

**Transit investments and Transit-Oriented Development.** THRIVE clearly acknowledges the importance of transit for the region, but missing is a strong and clear statement of intent to build out the regional transitway network laid out in the current Transportation Policy Plan. The City calls for a balanced and equitable approach to future transit investments throughout the region. In addition, consider these changes to strengthen wording around support of TOD:

- **Page 68: Orderly and efficient land use - Council role.** Add a stronger statement about continuing to fund strategic investment along transit corridors.
- **Page 79: Access, mobility and transportation choice – Council role.** Support TOD as a way to build and grow ridership.
- **Page 85: Urban center: Orderly and efficient land use – Community role.** Implement station area plans.
- **Page 87: Urban center: Access, mobility and transportation choice – Council role.** Support TOD as a way to grow ridership.

### Parks and Open Space

**Equity of access.** The City supports the Met Council taking the lead in providing and coordinating equity of access to the regional parks and trail system across the metropolitan area for under-represented populations so that they may benefit from the system's educational, health and recreational opportunities. The THRIVE draft supports this, calling for strengthening equitable usage of regional parks and trails by all the region's residents on p. 49. To accomplish this, the Met Council should:

- Develop better tools for engaging these communities through improved methods of outreach. We know that we need to appeal to different people in a variety of ways, including asking questions and providing information in different ways. Use surveys, focus groups, interviews, existing community media outlets, and other applicable methods to make sure the methods are working, and revise if needed. Follow up with information on how their input has been used.
- Provide, coordinate and implement marketing plans, programs and activities that will attract under-represented populations to the more 'natural' parks, so they can have experience of being truly immersed in nature.
- Fund and coordinate studies to determine why some parks are more attractive to various demographic groups than others.
- Work with schools and other partners to combat "Nature Deficit Disorder."
- Leverage new and emerging technologies that are in wide use, such as smartphones, to connect and educate residents about the regional parks system.

**Improve multi-modal transit access.** The Metropolitan Council should take the lead in the coordination of multi-modal transit options to encourage more visits by all populations to the regional parks and trails. In order to accomplish this, the Met Council should:



- Form a trail management organization that coordinates system wide trail development with all other forms of transit. Both local and regional trails should be integrated into the overall transportation system plan to realize the best efficiencies in system design.
- The Met Council should provide leadership in marketing the regional parks system, developing strategies and leveraging partnerships (e.g., Explore Minnesota) that will encourage visibility and the perception of safety and welcoming access, in order to bridge cultural barriers. Research and promote the benefits of using transit, including cost savings over car ownership, pollution reduction, congestion, etc.
- Invest in infrastructure that overcomes natural and artificial barriers to visiting the regional parks and trails, and helps to attract multiple groups and cultures to each facility. Advocate for state funding amounts sufficient to match other major programs. For example, federal TIGER grants require a minimum request of \$10 million with a 20% or larger local match. In reality, only a small fraction of all applications are approved, and those applications that can show a local match of 3 times the federal request stand a much better chance of being approved.

**Resources for stewardship of natural areas.** The City of Saint Paul supports the Metropolitan Council taking the lead in providing more resources for stewardship of natural areas such as lakes, forests, prairies and wetlands; operations and maintenance (O&M), sustainability, and resiliency against climate change. Preventive maintenance can be much less costly over the long run and extend the life of a project significantly, compared to simply letting a facility fall into severe disrepair, eventually causing the much more expensive need for complete replacement. In order to accomplish this, the Met Council should:

- Lead advocacy with the 10 Implementing Agencies (IAs) at the legislature to appropriate the approved 40% state match level for local operations and maintenance (O&M) spending on regional parks. Historically, the state has never appropriated the 40% match to local O&M investments.
- Advocate with the IAs to greatly increase the metro. area's share of Legacy Lessard-Sams Outdoor Heritage Council funds, since there are many natural areas in the metro. area that need to be acquired and/or restored. Since most of the state's population resides in or near the metro. area, this would provide the greatest benefit per capita, as well as save some areas from being lost forever to development. Many bird and other species also use the metro. area as part of their Mississippi River migration route, therefore, maximizing natural areas in the metro. area benefits the entire state and all residents and park visitors, as well as the environment. This issue should also be viewed through an equity lens, given the diverse population living in the metro. area.
- Encourage a balanced allocation of some Clean Water, Land and Legacy Amendment Park and Trail funds for operations and maintenance, as most is now used for acquisitions and development. Education and volunteer coordinators have wages accounted for, but no budget for supplies, marketing, transportation and programs.
- The Met Council should consider other methods to increase funding. This can encourage long range planning for lower maintenance, natural ecosystems, such as a prairie restoration, that doesn't need as much upkeep (e.g., mowing, weeding, spraying,

fertilizing, and other inputs that also introduce their own pollutants into the environment). Such natural systems are also more effective at controlling stormwater runoff and quality, and have a much higher wildlife value as well.

### **Water Resources**

THRIVE recognizes that appropriate management of water resources is critical to the future health of the region. The City strongly agrees, and offers these additional comments:

- The plan should be direct in stating the role of impervious surfaces in water resource management and sustainability. There is no place in the entire document that includes the word impervious. Instead, euphemisms such as “land use patterns” or “loss of natural areas” are used.
- Green infrastructure is only referenced twice in the plan and defined as integrating natural resources into our development patterns. The plan should more thoroughly include a green infrastructure discussion as well as policies, for instance, in areas referencing stormwater runoff or best management practices. This is critical to adequately frame the 2040 Water Resources Policy Plan.
- The section title “Promoting the Wise Use of Water” seems myopic and could be better phrased as “Respecting Water.”
- The water sustainability definition, and bulleted actions, is overly focused on use and supply. The plan should more clearly position strategies for achieving sustainable water resources which transcends dimensions of water use, supply and consumption behaviors. The plan needs to more genuinely and explicitly acknowledge the critical link between land use and surface water health.

### **Climate Change**

The effects of climate change are already being seen around the globe, across the country, and right here in the Twin Cities. The Metropolitan Council lays out actions it is willing to take to address this issue, but it can and should do more. From page 32: “The Council’s approach to climate change will focus on softer approaches... unless and until the lack of action poses a threat to orderly and economical development or portends a significant collective financial cost.” This time has arrived. Climate change has been exacerbated by the metropolitan area’s pattern of sprawl that the Council has permitted and supported with public infrastructure over the last 40 years. Recent extreme weather events have imposed tremendous costs across the country, more so than here in the Twin Cities. Will we wait until our own Hurricane Sandy imposes billions of dollars of costs before attempting to do something to stem the tide? Will we only begin thinking of resiliency when drought decimates our region’s agriculture? Or are we ready to change the way we do business?

There are a number of policies the City supports in particular, which are listed below. There is an opportunity to expand on some of them, and provide more specific guidance as appropriate.

**Page 12: Leveraging transit infrastructure investments with higher expectations of land use.** This is an essential component of transitway planning that must be emphasized, and must be discussed in detail with any local authority planning for such investments.

**Page 18: Encouraging redevelopment and infill development across the region.** Redevelopment and infill development provide opportunities to intensify areas that have infrastructure in place to support those developments, and to limit the region's impact on the environment.

**Page 27-8: Supporting the region's bicycle and pedestrian facilities to promote bicycling for transportation, recreation and healthy lifestyles.** Communities should be strongly encouraged to actively plan for improving their bicycle and pedestrian facilities in their comprehensive plan updates.

**Page 28: Aligning resources to support transit-oriented development and walkable places.** This is critical in the urban center. For those communities beyond the urban center, there should be more aggressive support for transit investments and the densities that make them feasible.

**Page 79: Access, Mobility and Transportation Choice**

The language below **must** be preserved or even strengthened as this moves through drafts. "Use Council investments and policies to reduce vehicle miles traveled (VMT) and carbon per unit of fuel, which are key drivers of the region's generation of greenhouse gas emissions."

**Page 83: Building in Resilience**

This section should be strengthened. The Council Roles are essential in two areas in particular:

- "Use the Council's investments and planning authorities to contribute toward meeting statutory goals for reductions in the generation of regional greenhouse gas emissions, and convene regional discussions about goals for climate change mitigation and adaptation." These contributions should be spelled out more clearly. The Met Council should recognize the role it can and should play in curbing the region's sprawling pattern of development, which has been a major contributor to this problem.
- "Develop, collect, and disseminate information about climate change, including energy and climate data, GreenSteps best practices, the next generation of the Regional Indicators data, and potentially a regional greenhouse gas inventory."

It is also important to maintain language about the Community Roles:

- "Address climate change mitigation and adaptation throughout the local comprehensive plan."

"Identify local measures that would result in reductions in water use, energy consumption, and emission of greenhouse gases."

**From:** Lorrie J. Louder [mailto:[ljl@sppa.com](mailto:ljl@sppa.com)]  
**Sent:** Monday, April 28, 2014 4:59 PM  
**To:** PublicInfo  
**Subject:** Comments on THRIVE MSP 2040 Draft

Dear Chair Haigh and Metropolitan Council Members:

Thank you very much for the opportunity to provide some comments on your draft comprehensive development guide. We appreciate this opportunity to offer some feedback and to make a few suggestions.

The Saint Paul Port Authority's mission is to create quality job opportunities, expand the tax base, and advance sustainable development. Our comments here are therefore about economic development and related matters.

First, kudos to you and your staff for developing this document---a truly herculean task---a for providing a good length of time for public review and comment.

Economic Competitiveness and Economic Development:

The Saint Paul Port Authority agrees that a vibrant and globally competitive economy creates opportunities for residents and employers. And we believe that the Council especially is key in creating enhanced economic competitiveness through Land Use, Infrastructure, and policy alignment with economic prosperity goals.

The Council should, through this document, provide a very clear commitment to local economic development efforts, both in policy and in its Fund Distribution Plan. A balance needs to be struck with the Council's commitment to housing efforts; it should bring its economic development policies and activities up to parity with those in the housing arena.

--We strongly suggest that the Council take this opportunity afforded by this process to amend its Administrative practices regarding funding decisions through the Livable Communities program, which is a very fine program in statute.

**MN Statute 473.25 (approved in 1995)** cites Met Council fund usage that should include, for example, projects that create and preserve living wage jobs in the fully developed area; that interrelate redevelopment and transit; that interrelate affordable housing and employment growth areas; that intensify land use that leads to more compact development or redevelopment; that attract private sector redevelopment investment in commercial and residential properties adjacent to public improvement and provide project area residents with expanded opportunities for private sector employment. Funds are typically provided to mostly housing projects; the Port Authority, for example, has been turned down several times for LCA funding on a qualifying Brownfield project in a distressed neighborhood area. Changing the Fund Distribution Plan in this program would bring the Council into compliance and would help achieve the balance so needed, as mentioned above.

We are pleased that this document includes a discussion of global and regional competitiveness; racial disparity; jobs; freight and multi-modal components of transportation and competitiveness; and the intersection of Economic, Community, and Workforce Development. These and other related components add a rich texture and also very important business growth and competitiveness elements to this document.

--We suggest that you continue this conversation as part of Met Council's expanded discussion on economic development.

--It is especially important that the Council have discussions and develop policies on the connections among: Land Use, Public Sector Revenues, and Public Sector Expenditures.

--Continued Council investment in Brownfields remediation should be stated as a key economic development strategy within a suggested Economic Development Plan. And this should be tied into business growth and jobs that result.

--It is positive that this draft mentions jobs; the definition of a "good job" should be provided, in concert with cities and special purpose units of government in the economic development business; wages should be part of this definition.

--Investments made by the Council should reflect the economic competitiveness focus; adding more economic development resources, for example, is more important than the stated wish to study the marketplace and development sites.

--It will be important for the Met Council to develop policies with the cities, counties, and economic development entities that address racial disparity.

--Economic development cuts across many functional areas, and because of this, everything on which the Council works should reflect the drive towards redevelopment, business growth, and overall positive gains in competitiveness.

### Transportation:

We are pleased to see language in the draft that indicates that a multi-modal transportation system safely and reliably connects people and freight with destinations in the region and beyond. And adding the freight component to the draft has great added value to the document and reflects a current and dynamic element of today's transportation system.

This section appears to strike a good balance across modes and priorities; the summary bullets on pages 11 and 12 provide a good synopsis of the elements. The "corridor approach" seems quite appropriate, as well.

The connection of land use with transit infrastructure use is a positive. And the specific reference under Prosperity to development of infill across the region is widely accepted among economic development practitioners and provides, we believe, a more efficient way for people (especially important for lower income persons) who depend on transit to commute to their jobs. This makes excellent land development and infrastructure efficiency sense, as well.

We are pleased to see the reference to the multi-modal freight system in this draft, a good explanation of its existence and benefits, and the relationship to our Harbor operations. Very good addition, and fundamentally important to address this part of economic development.

Page 22: We are also pleased to see the reference to transportation choices and the call for investments that connect lower income areas with job opportunities

Thank you again for the opportunity for the Port Authority to provide comments on this draft document. It is very much appreciated.

Sincerely,



**Lorrie Louder, Senior Vice President**  
Business & Intergovernmental Affairs  
**Saint Paul Port Authority**  
380 St. Peter Street, Suite 850  
Saint Paul, MN 55102  
**(651) 204-6236 (direct)**  
[ljl@sppa.com](mailto:ljl@sppa.com)  
[www.sppa.com](http://www.sppa.com)





April 25, 2014

Lisa Barajas  
Metropolitan Council  
390 Robert Street N  
St. Paul, MN 55101

Re: Thrive MSP 2040

Lisa:

The City of Stillwater is designated as "suburban" in the public review draft of Thrive MSP 2040. We do not believe that the City meets the description of a "suburban" community as defined in the draft development guide. We are therefore unsure that the associated suburban development guidelines are appropriate for this community.

On Page 55 of the draft guide, "suburban" is described as having seen its primary era of development in the 1980s and 90s. While over half of Stillwater's housing, commercial and industrial development did occur in the 1980s and 1990s, the core of the City was developed prior to WWII. And a significant portion was developed prior to WWI.

On the same page of the document, suburban development is noted to have reached incorporated places that were once resort destinations connected from the Twin Cities by streetcar. The St. Croix River is mentioned as an example of this and perhaps was intended to apply to Stillwater. The City does not fit in this category either. Stillwater has never served as a resort community for the Twin Cities. In fact during the mid-19<sup>th</sup> Century Stillwater was an economic center competing with the Twin Cities. But, as the 19<sup>th</sup> Century waned, so too did Stillwater's lumbering and industrial base. Its economy quieted and shifted to a rural support center. But neither of these economies were resort oriented.

In summary, Stillwater's history and development are not consistent with the draft development guideline's description of "suburban". Consequently, Thrive MSP 2040 should include at least a footnoted recognition of the poor designation fit for Stillwater, or a sub-category should be created that is a better fit.

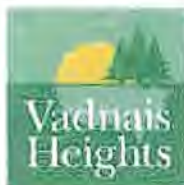
Sincerely,

CITY OF STILLWATER

A handwritten signature in black ink, appearing to read "Bill Tumblad", is written over the typed name.

Bill Tumblad  
Community Development Director





April 25, 2014

Metropolitan Council  
390 N. Robert St.  
St. Paul, 55101

Re: Comments on *Thrive MSP 2040*

Gentlemen and Ladies:

We have reviewed the draft of *Thrive MSP 2040* and offer these comments:

### Forecast of Population, Households and Employment

Our detailed analysis of the potential for residential land development has resulted in forecasts of population and households that are slightly lower than those of the Metropolitan Council. However, we do not dispute the Council's year 2040 forecast for employment, as the City has plenty of capacity for job growth but we are not in a position to accurately forecast that component. Our forecasts are compared to those of the Council in the following table.

|                                     | POPULATION    |               |               |               |               |
|-------------------------------------|---------------|---------------|---------------|---------------|---------------|
|                                     | 2000          | 2010          | 2020          | 2030          | 2040          |
| Metropolitan Council 2013           | 13,069        | 12,302        |               |               | 14,900        |
| City of Vadnais Heights 2010        | 13,069        | 13,200        | 13,800        | 14,500        |               |
| <b>City of Vadnais Heights 2014</b> | <b>13,069</b> | <b>12,302</b> | <b>12,900</b> | <b>13,600</b> | <b>14,300</b> |

|                                     | HOUSEHOLDS   |              |              |              |              |
|-------------------------------------|--------------|--------------|--------------|--------------|--------------|
|                                     | 2000         | 2010         | 2020         | 2030         | 2040         |
| Metropolitan Council 2013           | 5,064        | 5,066        |              |              | 6,500        |
| City of Vadnais Heights 2010        | 5,064        | 5,300        | 5,700        | 6,100        |              |
| <b>City of Vadnais Heights 2014</b> | <b>5,064</b> | <b>5,066</b> | <b>5,550</b> | <b>5,950</b> | <b>6,300</b> |

|                                     | EMPLOYMENT   |              |              |               |               |
|-------------------------------------|--------------|--------------|--------------|---------------|---------------|
|                                     | 2000         | 2010         | 2020         | 2030          | 2040          |
| Metropolitan Council 2013           | 7,164        | 6,678        |              |               | 13,700        |
| City of Vadnais Heights 2010        | 7,119        | 7,100        | 9,100        | 10,100        |               |
| <b>City of Vadnais Heights 2014</b> | <b>7,119</b> | <b>6,678</b> | <b>8,700</b> | <b>10,400</b> | <b>12,600</b> |

Thank you for your consideration.

Sincerely,  
**CITY OF VADNAIS HEIGHTS**

Kevin Watson  
City Administrator





## City of Victoria

Ph. 952.443.4210

Fax 952.443.2110

**DATE:** April 28, 2014

**TO:** Gary Van Eyll, Met Council Representative; Angela Torres, Area Sector Representative

**CC:** Planning Commission; Mayor and Council; City Manager, Don Uram

**FROM:** Holly J. Kreft, Community Development Director

**RE:** Review of Draft Thrive MSP 2040 Document

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City staff has reviewed the public comment draft of Thrive MSP. The City appreciates the opportunity to provide comments and would welcome additional dialogue with Met Council staff relative to our concerns detailed below. The draft is concerning to local government officials since it continues to erode local control of future growth.

### Expansion of Metropolitan Council Mission

- The Council is responsible for the plans for three statutory regional systems – water, transportation, and regional parks as noted on page 5. The overall tone of the document reflects a mission creep in the organization that vastly expands on those three statutory systems.
- On page 18, the Plan reads as though the Council will take a more active role in marketing properties that support redevelopment and infill development. Will this place communities such as Victoria at a disadvantage since we wouldn't meet that criteria? It is clear that the Council is going to be more supportive of redevelopment and infill development to create a "denser, more compact region". Does this contradict with earlier statements of providing a wide variety of housing types, including for residents that choose to live in suburbs with more green space?
- Starting on page 19, the draft includes language regarding disparities that expands the Council's role beyond the three statutory systems and appears to incentivize development in areas that are currently considered areas of poverty versus more equitably sharing financial incentives with communities throughout the region.
- Overall we are supportive of sustainability, particularly as it relates to the water supply, but it appears that the Council is overreaching its mission with statements such as "investing in and pursuing local renewable energy generation for operations, including large scale solar facilities."
- What mechanism does the Council plan to use to "create incentives to reward local governments that set and make progress on local greenhouse gas reduction goals"?
- Additional clarification is needed on the community role of "Plan land use patterns that facilitate groundwater recharge, reuse, and reduce per capita water use." We understand that

these will be addressed in the local water supply plan, but need more details on how the Council would like these tied specifically to land use patterns.

- It is unclear how the Council expects communities to “address climate change mitigation and adaptation through the local comprehensive plan”. This section appears to place additional burden on local communities as part of the comprehensive plan update outside of the three statutory regional systems.

### Sanitary Sewer

- On page 11, the document states “the Council’s attention will increasingly turn from managing the edge of the system to ensuring adequate maintenance and capacity in the redeveloping areas of the region...”. As one of those communities that would be considered “the edge of the system”, this statement is troubling. Is the Met Council stating that they will no longer invest in existing systems on the edge or will be focusing their funds on the Urban Center and Urban communities?

### Transportation

- Since the Plan notes that the Council will “expand the geographic coverage of transit service in areas with a local commitment”, will this impact the geographic allocation of affordable housing? Page 17 states “encourage workforce housing that is affordable to a variety of income levels across the region, especially in proximity to job centers and transit”.
- The transportation section focuses on transit and managed lanes. In our community, and probably others in similar areas, there is a significant portion of telecommuters. We have a number of residents that have home-based offices and only travel occasionally or for out-of-state/overseas flights. Based on the expanded role of technology, it would be appropriate to include a statement relative to telecommuting and its impact on regional transportation.
- On page 28, the Plan offers a range of planning for transit-oriented development. Will the Council be defining which of these three areas a community represents?
- We support the Council’s role in providing technical assistance including aggregation of local bike plans and maintenance of an up-to-date regional natural resources inventory and assessment.

### Affordable Housing

- The bullet points on page 22 seem to conflict with one another. The second bullet point states that the Council will “encourage new additions to the affordable housing stock in areas that have an inadequate supply of existing affordable housing and are experiencing new housing construction – particularly in areas that are well-connected to jobs and transit” versus the third bullet “invest in affordable housing construction and preservation in higher-income areas of the region”. We are supportive of preserving existing affordable housing already located in our community, but continue to have concerns about introducing significant amounts of affordable housing without access to transit or job centers.
- There appears to be conflicting language between what the Council is expecting of communities versus what the Council will be requiring in the next generation of



## City of Victoria

Ph. 952.443.4210

Fax 952.443.2110

Comprehensive Plans. For example, on page 26 it states “each jurisdiction will have to examine whether it offers satisfying living options for its current and future residents”, but on page 101 under the Housing Affordability and Choice it states a community role as “designate land in the comprehensive plan to support household growth forecasts and address the community’s share of the region’s affordable housing need through development and redevelopment at a range of densities”. It is difficult to ascertain if the Council is encouraging or requiring these facets of the Comprehensive Plan.

### Community Classification and Densities

- Victoria is listed as an Emerging Suburban Edge with a minimum average density range of 3-5 units per acre. The City supports increased densities in locations that provide the needed infrastructure such as transportation, jobs, and services. The City continues to be placed at a crossroads of competing requirements. With twelve lakes within City limits, a significant portion of the City is located within a shoreland district. The DNR shoreland district requirements include standard minimum lot sizes of one acre for riparian lots and 20,000 square feet for nonriparian lots. Coupled with this is a significant amount of wetlands and wooded areas that the City aggressively protects through regulation. Because we require wetlands and their buffers to be placed in an outlot and deeded to the City, this reduces the amount of buildable land available. Most communities allow these features within a drainage and utility easement, thereby increasing the amount of land included within lot sizes and the number of units available. We feel that placing these features in public ownership better protects the resource.

Please let me know if you have questions or need additional information. I can be reached at [hkref@ci.victoria.mn.us](mailto:hkreft@ci.victoria.mn.us) or (952) 443-4218.

Best wishes-

Holly J. Kreft  
Community Development Director



# City of Waconia

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April 25, 2014

Susan Haigh, Chair  
Metropolitan Council  
390 Robert St. N  
St. Paul, MN 55101

Re: Comments regarding Updated 2040 Projections

Dear Chair Haigh:

The purpose of this letter is to provide comments regarding the updated 2040 projections for our community. Thank you for reviewing the previous projections. While modifications were made to the projections, we continue to be concerned that the proposed 2040 numbers are too low and are unsure of how the Met Council will use the community designations in their decision making.

We continue to recognize that current growth may be slower, but believe that our previously adopted 2030 population projection of 25,000 should be moved to 2040, rather than reducing our projected 2040 population to 16,100. We find the proposed reductions too significant for the way in which Waconia continues to evolve and grow.

Based on how our community continues to develop and the housing types that continue to be built, our persons per household will continue to be 2.6 or greater. Reducing our persons per household to 2.33 is projecting growth too low for the way in which our community will develop.

Since last fall, we are now in the process of reviewing additional development plans and annexation of parcels of land on the east side of Waconia. The table, attached, has been updated to reflect the planned development changes since last fall.

We understand that the projections will be the basis for making decisions about infrastructure and other investments by the Met Council. We ask that the Met Council engage our community before altering decisions about various planned projects.

---

City Hall  
201 South Vine Street  
Waconia, MN 55387  
952-442-2184

Public Services  
310 10<sup>th</sup> Street East  
Waconia, MN 55387  
952-442-2615

Fire Station  
26 Maple Street South  
Waconia, MN 55387  
952-442-2316

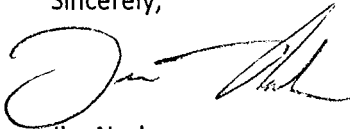
Safari Island Community Center  
1600 Community Drive  
Waconia, MN 55387  
952-442-0695

Ice Arena  
1250 Oak Avenue  
Waconia, MN 55387  
952-442-RINK (7465)

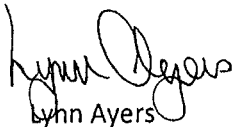
The section of the Thrive 2040 document that creates the community designations also gives us some pause. We are unclear of how these designations will be used by the Council and how they will affect future decisions (grants, infrastructure investments, plan amendments, etc.). What kind of flexibility do these designations have as communities continue to change and grow?

We want to work with the Met Council Members and staff to review the final projections and understand how the Council will use the community designations for our community.

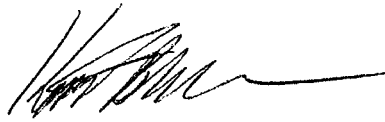
Sincerely,



Jim Nash  
Mayor



Lynn Ayers  
City Council Member, Ward 1



Kent Bloudek  
City Council Member, Ward II



Marc Carrier  
City Council Member, Ward I



Charles Erickson  
City Council Member, Ward II

cc: Gary Van Eyll, Met Council Member, District 4  
Angela Torres, Sector Representative  
Todd Graham, Principal Forecaster  
Dennis Farmer, Principal Forecaster

| <b>Development Since 2010</b>                            |             |              |                                 |                                |              |
|--|-------------|--------------|---------------------------------|--------------------------------|--------------|
| <b>Subdivision</b>                                       | <b>Year</b> | <b>Acres</b> | <b>Single Family Households</b> | <b>Multi-Family Households</b> | <b>Total</b> |
| Interlaken 5 <sup>th</sup>                               | 2012        |              | 13                              | 0                              | 13           |
| Interlaken 6 <sup>th</sup>                               | 2013        |              | 26                              | 0                              | 26           |
| Interlaken 7 <sup>th</sup>                               | 2013        |              | 26                              | 0                              | 26           |
| Crosswinds (Final Plat to be approved summer 2014)       | 2014        | 40           | 96                              | 0                              | 96           |
| <b>Development Planned</b>                               |             |              |                                 |                                |              |
| Interlaken Woods (Final Plat to be approved summer 2014) | 2014        | 66.77        | 74                              | 0                              | 74           |
| Towns Edge Apts. (approved not built)                    | 2015        |              | 0                               | 78                             | 78           |
| East Lake Development                                    | 2015        | 211          | 314-628                         | 216-540                        | 530-1,168    |
| Interlaken Parcels                                       | 2015        | 27           | 81                              | 0                              | 81           |
| Paradise Partners  | 2016        | 26           | 78                              | 0                              | 78           |
| Waterford (approved not built)                           | 2016        | 97           | 290                             | 35                             | 325          |
| Legacy Village   | 2017        | 6.28         | 0                               | 36                             | 36           |
| Burandt Property   | 2018        | 160          | 480                             | 0                              | 480          |



April 24, 2014

Angela Torres, Sector Representative  
Metropolitan Council  
300 Robert Street North  
St. Paul, MN 55101

RE: Revised Preliminary Metropolitan Council 2040 Forecasts

Dear Ms. Torres,

The City of Watertown appreciates the opportunity to comment on the revised preliminary 2040 local forecasts released by the Metropolitan Council on February 19, 2014. Watertown understands that the Metropolitan Council has a monumental task in working to allocate the anticipated population of a region to the many communities within the metropolitan area. We appreciated your desire to listen and consider our comments and feedback relating to the forecasts.

The City of Watertown City Council has reviewed the projected households and population included in the development guide. The projections made indicate that the City of Watertown will have a 2040 population of 3,900 along with 1,700 households. The City believes that these projections are low and could negatively influence the ability of the City to grow and develop. The City of Watertown has spent a considerable amount of time reviewing historical growth trends, person per household estimates, and planned infrastructure improvements both within and outside of the City. Based on the information that was reviewed and the local expectations, the City would like the Metropolitan Council to consider revising the projected forecasts.

The City of Watertown would like the Metropolitan Council to revise the growth forecasts for the City as follows:

**Population: 8,000**

**Households: 2,963**

Watertown believes that an increase in both population and households is warranted given the historic growth rates of the City and surrounding areas (see attached), the current number of available (service ready – 710 lots available) residential lots and the pending or proposed transportation improvements. In addition, the City of Watertown's proximity (based on peak travel times, see attached) to Minneapolis and St. Paul, is considerably closer than that of many Cities often considered to be in a superior geographic position.

The City would also like you to consider a revision to the average household size projected in Watertown. The City believes that the projected 2.1 persons per household is lower than that which we will continue to attract. Historically, the City of Watertown has seen an average household size of 2.7 persons per household or greater. It is anticipated that the City will continue to experience an average household size that is 2.7 persons per household. Please consider revising your projection to include a household size that reflects historic, current and future housing trends specific to our City.

The City of Watertown recognizes that local forecasts will continue to be revised as policy plans and systems statements are developed. The City looks forward to continuing discussions related to 2040 forecasts as the numbers are refined based on future planning efforts.

Sincerely,

Charlotte Johnson, Mayor

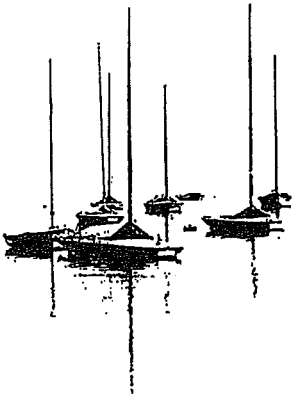
Attachments





### Average Peak Travel Times - AM Commute from City to Destination

| City        | Year | Time | Commute | Destination                           |
|-------------|------|------|---------|---------------------------------------|
| Carver      | 2010 | AM   | 79.84   | Saint Paul Central Business District  |
| Carver      | 2010 | AM   | 59.36   | Mall of America                       |
| Carver      | 2010 | AM   | 63.12   | Minneapolis Central Business District |
| Mayer       | 2010 | AM   | 80.67   | Saint Paul Central Business District  |
| Mayer       | 2010 | AM   | 79.27   | Mall of America                       |
| Mayer       | 2010 | AM   | 63.94   | Minneapolis Central Business District |
| Minnetrissa | 2010 | AM   | 62.69   | Saint Paul Central Business District  |
| Minnetrissa | 2010 | AM   | 64.68   | Mall of America                       |
| Minnetrissa | 2010 | AM   | 45.96   | Minneapolis Central Business District |
| Victoria    | 2010 | AM   | 70.47   | Saint Paul Central Business District  |
| Victoria    | 2010 | AM   | 59.28   | Mall of America                       |
| Victoria    | 2010 | AM   | 53.75   | Minneapolis Central Business District |
| Waconia     | 2010 | AM   | 72.38   | Saint Paul Central Business District  |
| Waconia     | 2010 | AM   | 67.31   | Mall of America                       |
| Waconia     | 2010 | AM   | 55.65   | Minneapolis Central Business District |
| Watertown   | 2010 | AM   | 68.28   | Saint Paul Central Business District  |
| Watertown   | 2010 | AM   | 70.49   | Mall of America                       |
| Watertown   | 2010 | AM   | 51.56   | Minneapolis Central Business District |



# City of White Bear Lake

4701 Highway 61 • White Bear Lake, Minnesota 55110  
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April 28, 2014

*Via Electronic Mail Only*

Ms. Susan Haigh, Chair  
Metropolitan Council  
390 Robert Street North  
St. Paul, MN 55101

**Re: *Thrive MSP 2040/Public Input Comments***

Dear Chairman Haigh:

Thank you for the opportunity to submit written comments on behalf of the City of White Bear Lake regarding the draft *Thrive MSP 2040*, the comprehensive development guide for the Twin Cities metropolitan region over the next 25 years. We appreciate the Council's commitment to establishing a framework to ensure decisions made at both the regional and local level balance the impact on both the built and natural environments. The City has been an active participant in Metro Cities' Advisory Group reviewing *Thrive MSP 2040* and in addition to the public comments submitted by Metro Cities, the City of White Bear would like to forward the following comments and suggestions for your consideration prior to formal adoption of the Plan.

## **Water Sustainability**

The City has serious concerns regarding the long term sustainability of the regional wastewater treatment system. We question whether the Metropolitan Council's longstanding mission of "orderly and economical development through responsible management of the region's natural resources" is best served through the continued practice of discharging all treated wastewater to the Mississippi River.

While the Plan indicates there is "adequate capacity and service coverage through at least 2040" and a focus of the desired outcome of Stewardship suggests over the next 25 years the Council should pivot "from expanding to maintaining our region's wastewater infrastructure", we question whether this is the best stewardship of this finite natural resource for generations beyond 2040? We encourage the study or examination of decentralization of the regional facility allow both ground and surface waters to be treated sub-regionally and allowed to infiltrate and recharge the regional aquifers here in the Twin Cities rather than exported down the Mississippi River. In our estimation, this would offer the most sustainable solution for the long term viability and guarantee that the metropolitan region continues to thrive well beyond 2040.

Moreover, it seems increasingly clear that groundwater sustainability objectives may only be met through increased use of surface water to meet increasing residential, institutional, commercial and industrial demand. Local water supply planning for areas of growth must in part utilize surface water as an alternative to groundwater where practical.

### **Livability, Housing Affordability and Choice**

Contributing to vitality of the Twin Cities' poly-nodal urban model, White Bear Lake embraces its rich history and values the resulting foundation of having first been a city unto itself long before it was absorbed into the suburban fabric of the region. Not unlike the region's two central core cities, downtown White Bear Lake, along with many other historic nodes including Anoka, Stillwater, Hastings, Hopkins, Shakopee and Wayzata, offers a desirable array of shops, restaurants, professional services, civic institutions and cultural amenities, along with a wide selection of housing opportunities in an authentic, compact and walkable mixed-use district. It adds considerably to the City's sense of place and community while expanding options for residents of the region.

The City appreciates the Guide's direction to "foster the conditions for shared economic vitality by balancing major investments across the region" and encourages the Council to remain committed to appropriating investments that fosters livability, seeks equity, and promotes shared prosperity in all quadrants and all communities. White Bear Lake is grateful for the partnership and key financial contributions provided by the Metropolitan Council that have allowed the City to facilitate redevelopment to provide higher density housing along strategic regional corridors through our city.

As a community, White Bear Lake is committed to facilitating opportunities that provide housing and transportation choices for residents that represent a wide spectrum of demographics and income levels. Through a number of channels, we will encourage continued investment and ongoing maintenance of our City's existing inventory of affordable housing stock. The City respectfully requests *Thrive MSP 2040* be revised to recognize communities for their existing inventory which, along with the creation of new units, be counted towards their allocated share of the regional affordable housing need.

### **Access, Mobility and Transportation Choice**

*Thrive MSP 2040* promotes a "multi-modal transportation system to support regional growth, maintain regional economic competitiveness, and provide choices and reliability for the system's users", and the City recognizes that the local network, whether designed for bicycles, pedestrians and/or vehicles, is a critical component of an effective and efficient regional transportation system. The City has worked diligently to create an interconnected street network that supports a walkable and bicycle-friendly environment, and participates in a variety of planning forums to ensure future investments in regional transit and transportation are reflected in local land use decisions.

*Thrive MSP 2040* includes specific direction to "preserve sites for rail-dependent manufacturing and freight transportation" which on the surface appears to be sound planning. However, past application of this provision has unfortunately thwarted a multi-jurisdictional effort to extend the

Bruce Vento Regional Trail through White Bear Lake and we urge the Council to consider caveats that establish minimum usage thresholds to warrant continued operation of underutilized segments of the region's freight rail network, which would allow conversion of these corridors to other transportation modes (i.e. transit and trails).

**Economic Competitiveness**

The City concurs with the need to “foster connected land use options to provide businesses and industries with access to materials, markets, and talent”, and strives to accomplish the same on a local level. The City requests that consideration be given towards equitable distribution of regional investments that impact one quadrant's economic competitiveness over another. The Council should strive to achieve a more balanced distribution of the region's transit investments and infrastructure by 2040.

The City is presently confronted with the challenge of balancing local job attraction with other regional priorities, including natural resource protection—an issue we fear would likely not factor in other municipalities' economic development decisions. If the City of White Bear Lake is going to remain economically competitive in the region through 2040 and beyond, we need the Council to “support cost-effective sub-regional infrastructure investments in efforts to promote sustainable water use and protect the region's water supplies.” As previously stated, the City encourages the study of decentralization of the regional waste water treatment facilities to allow both ground and surface waters to be treated sub-regionally and allowed to infiltrate and recharge the regional aquifers here in the Twin Cities metropolitan region rather than exported down the Mississippi River.

Thank you for the opportunity to share our thoughts and perspectives of this long-range regional planning document. We look forward to our on-going partnership at both the regional and local level to collectively promote a world-class metropolitan region that enables all residents, communities, and infrastructure systems to thrive for generations to come and well beyond 2040.

Sincerely,

**CITY OF WHITE BEAR LAKE**



Jo Emerson  
Mayor

cc: Sandy Rummel, Metropolitan Council Member – District 11  
Lisa Barajas, District 11 Staff Representative  
Patricia Nauman, Executive Director, Metro Cities



*A leading community in which to live, work and thrive.*

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8301 Valley Creek Road • Woodbury, Minnesota 55125-3330 • [www.ci.woodbury.mn.us](http://www.ci.woodbury.mn.us)  
651/714-3500 • TDD 651/714-3568 • FAX 651/714-3501

April 25, 2014

Susan Haigh, Chair  
Metropolitan Council  
390 Robert Street North  
St. Paul, MN 55101

**Re: Draft Thrive MSP 2040 Plan**

Dear Chair Haigh:

The City of Woodbury appreciates the opportunity to comment on the Draft Thrive MSP 2040 Plan (“Thrive”). The City looks forward to continuing its partnership with the Metropolitan Council (“Council”) to make the Twin Cities area a great place to live, work and prosper for the next 30 years and beyond. Below is a brief summary of review comments of your draft plan. This list is not intended as an exhaustive list of all of the City’s comments. We look forward to meeting with the Metropolitan Council leadership and staff to further discuss these points and others throughout the continued open and transparent process.

General

- The document appropriately identifies regional challenges. However, a broader question is what role, if any, the Council should play in areas not previously under the purview of the Council.
- The Outcomes and Principles are appropriate as a tool for discussion and further study. However, utilizing them as lens for all public policy decisions may lead to unintended consequences and overregulation.
- To implement a guide that is successful it will be critical for the Council to create a process that aims for balance, transparency, adherence to the Council’s core mission, and provides engagement with partners and stakeholders at every step of its implementation.

Climate Change

- Thrive notes that the Council will take a stronger approach if necessary regarding climate change, but does not provide any specifics for what such approach might look like. More thought and detail on this initiative is needed with an understanding that the Council should maintain and adhere to its mission and core functions and responsibilities.

### Groundwater

- While consolidation of groundwater regulation would be beneficial, the Metropolitan Council cannot do it alone.
- If the Council becomes more involved in groundwater issues, other state and local agencies with regulatory authority must relinquish some or all of that authority or else the situation will become even more fractured and complicated.
- Groundwater supply planning must also factor surface water management (i.e. stormwater infiltration) into sustainability calculations.

### Housing

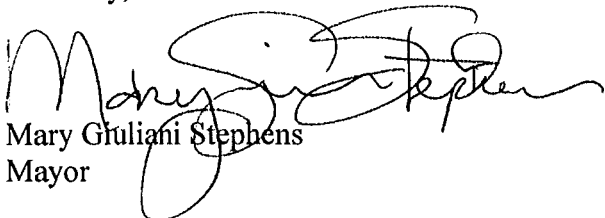
- The Housing Policy Plan should more closely align with market-based realities of the home building and real estate industries.
- The LCDA housing goals should consider existing housing stock in addition to new development.
- When allocating the region's fair share of affordable housing units, the Met Council should define affordable housing as those housing units at 80% of area median income rather than 60% of area median income.

### Transportation

- Thrive identifies that the 2013 Minnesota State Highway Investment Plan shows \$52 million annually from 2014 to 2022 for highway mobility improvements. Thrive accepts this funding approach and identifies transit as the solution to mobility issues created by the lack of annual funding for the highway system. The Thrive plan should identify the Council as an advocate for both transit improvements as well as a vocal advocate for increased funding for transportation improvements to the regional network.

Thank you for seeking comments on the draft Thrive MSP 2040 Plan. Should you have any questions regarding this letter, please contact Dwight Picha, Community Development Director, at (651) 714-3533.

Sincerely,



Mary Giuliani Stephens  
Mayor

May 5, 2014



Comments on Thrive MSP 2040 were received from the following counties/county entities:

- Carver County
- Community Health Improvement Partnership in Hennepin County
- Dakota County
- Hennepin County
- Hennepin County Staff Comments
- Ramsey and Washington Counties (joint)
- Scott County
- Three Rivers Park District
- Washington County
- Washington County HRA

Carver County staff comments are available on request (approximately 61 pages)





**Office of County Commissioners**  
Carver County Government Center  
Human Services Building  
602 East Fourth Street  
Chaska, MN 55318-1202  
Phone: 952 361-1510  
Fax: 952 361-1581

**Metropolitan Council**

APR 21 2014

Received **Chair's Office**

April 15, 2014

Susan Haigh, Chair  
Metropolitan Council  
300 Robert Street North  
St. Paul, MN 55101

**RE: Draft Thrive MSP 2040**

Dear Chairwoman Haigh:

Carver County appreciates the opportunity to comment on the Draft Thrive 2040 regional plan released February 26, 2014. Looking forward to 2040, Carver County is a community seeking balance as it honors its agricultural roots while meeting the demands of significant future growth. From a regional perspective, Carver County largely supports the ambitious regional policy goals and vision of Thrive MSP to create a more globally competitive region that seeks to leverage investments in order to enhance quality of life, drive business attraction and development, and attract a workforce that supports our future economy. At the same time the County wants to emphasize progress in these areas will look very different to Carver County compared to other communities.

The following lists key topics that Carver County recognizes could impact its ability to plan for anticipated growth as the Metropolitan Council develops its policy plans and systems statements in preparation for local comprehensive plan updates.

*Investment in roadway infrastructure:*

Developing areas are forecasted to accommodate approximately 30% of the regions' growth. Accordingly, Carver County is poised for significant population growth into 2040. This will result in increased congestion as demand increases on the existing roadway infrastructure. Additionally, key corridors such as Hwy 212 continue to experience increased freight traffic as business and industry in Southwest Minnesota seek to reach Twin Cities markets. Transportation system planning should reflect this current and future need and invest appropriately.

Carver County supports not only the maintenance and improvement of existing infrastructure, but also roadway network expansion investments to eliminate bottlenecks, and meet the commuter, freight, transit, and all traffic demands of current and planned growth.

Specifically,

- Hwy 212 will need to be completed as a four-lane highway with adequate interchanges.
- The County's A-minor arterial system will require additional capacity to accommodate orderly growth, improve access through the entire County, and connect the region to Greater Minnesota.
- Carver County supports the comments submitted to the Metropolitan Council by the SouthWest Corridor Transportation Coalition which are attached to this letter.

*Localized Transit Service: SouthWest Transit is recognized as Carver County's transit provider.*

As investments are planned for BRT, new park and rides, transit oriented development, and other transit connections, Carver County supports SouthWest Transit as central to these important efforts. History and community input have shown that the closer the local municipalities are connected to the transit provider, the better the system can meet local demands. On September 3, 2013, the Carver County Board approved resolution 48-13 supporting SouthWest Transit as the primary transit service provider in Carver County.

*Equitable housing investment:*

By 2040, Carver County will experience substantial population growth, increased diversity, and a larger aging population. For Carver County to remain an attractive place to live, work, and play for all its residents, significant investment in housing options will be needed to attract and retain a competitive workforce and meet the changing needs of seniors. Although Carver County's numbers are smaller for these populations, maintaining and expanding affordable options, and encouraging aging in place are crucial. A regional housing policy plan and investments should be attentive to local dynamics.

*Land use policy areas and density requirements:*

Carver County has a well-established land management policy in its Townships that has successfully protected valuable agricultural land and promoted orderly growth since the 1970's. Carver County's leadership in the Agriculture Preserve Program serves as evidence of the County's success with growth management. Much of this success stems from the County's 1 per 40 acres zoning policy. Importantly, this policy allows for higher densities of 4 per 40 in agriculture areas that contain amenities like wooded areas and lakeshores. These options provide a financial incentive to property owners to preserve prime agriculture lands, develop amenities wisely, and conserve sensitive areas. Regional land use designations and policy areas should reflect these incentives as they have been contained and approved in previous County Comprehensive Plans.

*Diversification of drinking water supply sources:*

Carver County strives to protect water resources both for today's population need and for the future. A clean and healthy water supply is important to supporting Carver County residents, businesses, farmers, and natural resources. Carver County supports drinking water policies that are sensitive to the ecological realities and resource demands of local areas within the region. Water supply issues and sources of drinking water vary widely across the region and planning efforts should recognize this.

*Parks & Trails investments*

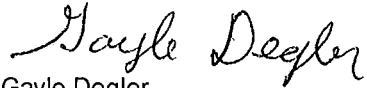
Regional parks and trails in Carver County contribute to quality of life and to the region's competitiveness by attracting a competitive workforce. Trails also offer an alternative to automobiles, and can augment transit trips that often begin or end at park and rides. Furthermore, the County's unique natural resources (Lake Waconia, Seminary Fen, the University of MN Landscape Arboretum, multiple regional trails and parks) and its rural feel offer an "escape" for people living in the central city. As the Region's population continues to grow, Carver County supports balanced regional policies and investment that improve trail linkages to regional attractions and transits hubs in the County, encourage preservation of unique natural resources ahead of development, meet the demand of a locally growing population, and attract a regional audience.

*Emphasis on measured outcomes:*

Carver County currently uses metrics to inform decision making, and measure implementation of its Comprehensive Plan and other strategic initiatives. Measuring outcomes can help to identify useful strategies and align effort toward a common goal. Successful outcome measurement relies on solid respected data sources, and approaches that have been vetted by the community to develop buy-in and gain consensus. At the regional level, Carver County supports outcome measures that recognize and align with differing local goals, draw from sound and well-vetted data, and are developed based on community input and consensus.

Carver County recognizes that policy plans and systems statements will continue to define the broader policies described in Thrive 2040. The Board and County Staff look forward to continuing discussions, and an open process in the development of regional policy plans and system statements – one that allows for, and accepts input as the details of regional policy are flushed out. County staff also intend to follow up with Metropolitan Council staff with specific comments and suggestions.

Sincerely,

A handwritten signature in cursive script that reads "Gayle Degler".

Gayle Degler  
Carver County Board Chair

cc. Gary Van Eyll, District 4 Council Member  
Jennifer Munt, District 3 Council Member  
Angela Torres, Sector Representative

April 9, 2014

Metropolitan Council

APR 14 2014

Received Chair's Office

Susan Haigh, Chair  
Metropolitan Council  
390 N. Robert St.  
Saint Paul, MN 55101

Dear Chair Haigh:

We are writing to you on behalf of the Steering Committee of the Community Health Improvement Partnership (CHIP) in Hennepin County. The CHIP Initiative is a partnership of organizations that are working together to align our efforts to improve the health of the residents in our county. CHIP has used a rigorous community engagement process to determine its priority health issues, which include: nutrition, obesity and physical activity; child school readiness; community and social connectedness; health care access; and social conditions that impact health.

Our steering committee has reviewed the Thrive MSP 2040 draft and wishes to respond to your request for public input with a hearty endorsement of the plan. We value the identified themes and related action steps related to *equity and livability, and the emphasis on cross-sector collaborations and accountability*. These priorities align well with those of CHIP in some important ways:

Equity – we believe that:

- Improving the equity in Hennepin County would reduce health disparities.
- Assuring access to transportation improves access to healthy food options and allows for improved community and social connectedness.
- Concentrated areas of poverty are detrimental to the well-being of residents.

Livability – we believe that:

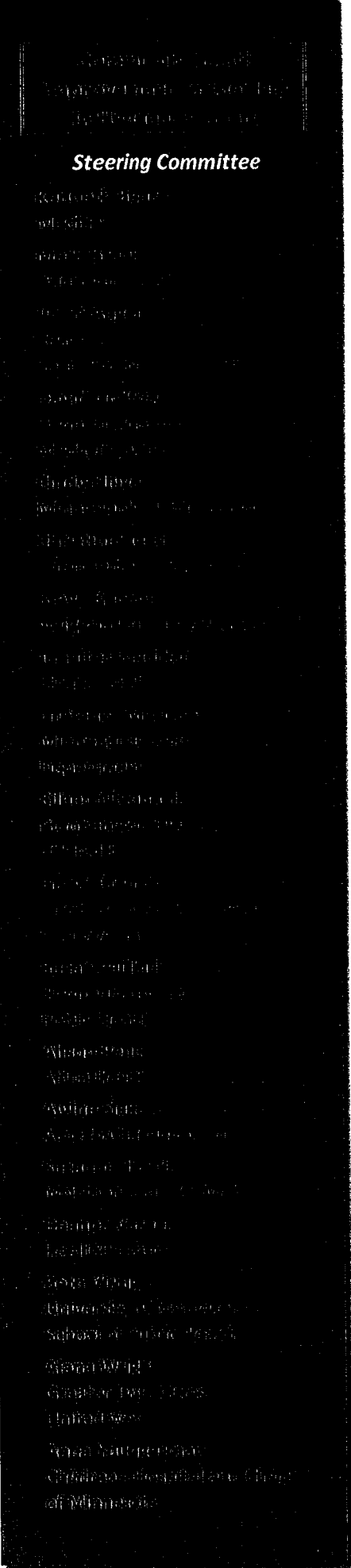
- Physical environments impact obesity and other health concerns, and support community investments in bicycle and pedestrian routes.
- Safety, including safety from violence, winter issues such as ice on the sidewalks, and traffic management safety, promotes higher levels of activity and thereby improves health.

Cross-Sector Collaborations – we believe that:

- Cross-sector collaborations improve the likelihood that policies will be effective and sustainable.
- In addition to working with the Department of Health, Metropolitan Council collaborations should include the Department of Education and the Department of Human Services, as well as local health departments and health systems. We also wish to collaborate with the Met Council.

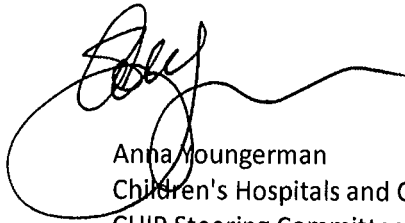
Accountability – we believe that:

- Data-driven approaches should be used to measure progress. The Department of Health, the Minnesota Center for Community Health, Hennepin County Public Health and others have developed we population-level measures of well-being and can assist with these efforts.
- Health disparities are an important indicator of equity and we suggest you include health metrics as a means of tracking your success in reducing general disparities among groups.



The CHIP steering committee wishes to thank you for your draft Thrive MSP 2040 plan and your continuing commitment to the health and well-being of all Minnesota residents.

Sincerely,



Anna Youngerman  
Children's Hospitals and Clinics  
CHIP Steering Committee Co-Chair



Susan Palchick  
Hennepin County Public Health  
CHIP Steering Committee Co-Chair

*Community Health Improvement Partnership in Hennepin is coordinated by Hennepin County Public Health.  
For more information contact 612.543.5262 or go to the CHIP website at [www.hennepin.us/CHIP](http://www.hennepin.us/CHIP)*



Metropolitan Council

APR 28 2014

Received Chair's Office

Office of the  
County Board

April 24, 2014

**Liz Workman**

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Susan Haigh, Chair  
Metropolitan Council  
390 Robert Street North  
St. Paul, MN 55101-1805

Dear Ms. Haigh,

Thank you for the opportunity to comment on the draft Thrive MSP 2040 comprehensive development guide. The Dakota County Board of Commissioners recognizes the value of creating a long-range vision for the region and appreciates the work that has been done by the Metropolitan Council. On Tuesday, April 15, 2014, Metropolitan Council staff presented an overview of the Thrive MSP 2040, and Dakota County staff presented an overview of implications related to the Plan to the Dakota County Board. The Dakota County Board of Commissioners discussed the proposed policies and how they may affect Dakota County and the region as a whole, and respectfully submits the following comments:

**Population and Land Use Projections for Dakota County**

The Metropolitan Council should continue to work with Dakota County cities to address the questions that have been raised and to refine forecasts so that they are mutually agreeable.

**Racial Equity and Poverty**

The Dakota County Board of Commissioners appreciates the Metropolitan Council's attempts to stem the forces of poverty, inequity, and blight in the region. Similar to other areas in the region, Dakota County has areas of poverty that are of concern, and while these areas of poverty may be associated with racial concentrations, they may also be associated with ethnicity, or age. Dakota County recognizes the goal of improving the lives of individuals, and in some cases entire neighborhoods in poverty, the Dakota County Board of Commissioners requests that the Council be clearer about how regional policies and funding may potentially



be affected, specifically, whether or not the proposed policies have been applied in other regions and if they have proved effective. The Dakota County Board of Commissioners requests clear rationale upon which to rely, including data and demonstrated results from other agencies that have applied similar policies. Isolated from other initiatives (i.e. school reform, job training, etc.), it is questionable whether or not these policies will be effective. If data suggests these types of policies have not been effective, it is possible that a shift in regional investment policy may harm job growth, mobility, and development in the region to the detriment of all of its residents.

### **Parks and Open Space**

The Dakota County Board of Commissioners supports the policy direction of the Metropolitan Council that they will collaborate with the regional park implementing agencies and State partners to strengthen equitable usage of regional parks and trails by all our region's residents across race, ethnicity, class, age, ability and immigrant status.

The Dakota County Board of Commissioners does not support the Metropolitan Council's current policy idea of creating a set-aside grant program with existing Metropolitan Council funds to address equitable usage of the regional parks system. Dakota County and system-wide regional parks and greenways have current needs that exceed the available funding. Using existing funding for this new policy direction would impact current needs and would require new funding.

The process to date has not included a meeting of all agencies to discuss these policy ideas, merit and to offer other policy approaches. Regional park providers could share current approaches, planned efforts, and agency assets to be inclusive to under-served populations.

The Dakota County Board of Commissioners supports the use of Acquisition Opportunity Fund (AOF) grants to provide 75% funding for acquisition of inholdings within approved master plans using eminent domain, including all acquisition expenses that are eligible under the current policy apply, and the Acquisition Opportunity Fund grant would be based on the value of either the court or negotiated settlement.

### **Water Resources**

The Dakota County Board of Commissioners concurs with the concerns raised in the Thrive MSP 2040 plan regarding the availability of groundwater in the future, and looks forward to the opportunity to work with the Council and local units of government to address these challenges by exploring conservation and other alternatives.

### **Transportation**

Thrive MSP 2040 is inconsistent in how it envisions various modes of transportation supporting the plan. It envisions a substantial investment in transit and pedestrian facilities but does not describe what the region's vision, or need, for highway investment should be to adequately support plan outcomes. Instead, it references, accurately, the financially constrained highway investment documented in Mn/DOT's MNSHIP. As such it is a highway investment program rather than a vision for the region. The plan should take a consistent approach to describing the vision for the region's

long-term transportation system regardless of mode. The transit vision suggests substantial investment to expand service, the transitway system, park and rides, and bike and pedestrian facilities. However, the Governors Transportation Finance Advisory Committee (TFAC) identified a \$200 million annual funding gap to meet regional transit needs. The plan should also take a consistent approach to how financial feasibility and constraints are applied to the region's transportation vision.

The transportation vision does not recognize that transportation needs of suburban, suburban edge, emerging suburban edge, and rural communities will see substantial growth based on planned land use and existing utility services. Specifically Dakota County is forecast to grow by 130,000 by 2040 with much of this growth coming in these community designations. The transportation vision should match planned growth in the entire region. Further, it is unlikely these areas will see the density, have adequate transit funding, or connectivity to the rest of the region via river crossings to rely solely on the transit based investments envisioned, yet unfunded, to adequately support this planned growth. Transit in many of these areas will run on highways rather than rail or dedicated lanes. Both new highways and additional lanes on arterial routes will be necessary to meet this demand. Despite the financial constraints, the plan should include a vision of strategic highway expansion (lane additions and new highways) as a way to help meet the diverse needs of the region.

The Plan places a major emphasis on transit corridors. While the development of transit corridors is good regional policy, it is also important for the region to address other transit challenges. Dakota County is particularly concerned about the functionality of the Mall of America (the busiest transit station in the region) and Cedar Grove Transit Stations. The current bottlenecks inhibit transit use and should be addressed as soon as possible. Many of Dakota County's residents live outside of the identified regional transit corridors, and there is a lack of east-west transit corridors in Dakota County and along I-494. As such, park and ride facilities will be important to many residents, as well as the expansion of regular bus service.

Thrive MSP 2040 mentions the importance of the Minneapolis St. Paul International Airport to the economic development of the region. The County concurs and would like to see more emphasis placed on the value of the airport in the plan, including the need to reduce congestion at the terminal so as not to deter commerce or the competitiveness of the region.

There are references throughout the plan about the importance of moving freight, goods, and providing access to commodities such as aggregate, crops, and other commodities. The plan references the importance of mobility and dependable travel times. However, the transportation vision as proposed will do little to provide the necessary capacity to support these needs.

Given the significance of underfunded needs of the region's transportation system, it seems the premise of diverting transportation funding based on equity considerations as outlined in the plan has the potential to remove already insufficient funding from investments that would occur based on actual prioritization of transportation and infrastructure needs further reducing our ability to meet regional transportation demands.



The Dakota County Board of Commissioners agrees with the statements in Thrive MSP 2040 to develop interconnected local street networks and access spacing as these are important elements of maximizing our highway system performance and investment.

### **Housing**

The Dakota County Board of Commissioners is concerned that the emphasis on funding affordable housing near transit will adversely affect our ability to meet affordable housing needs in other areas within the County where transit is not available.

The Metropolitan Council's affordable housing goals have not been met due to lack of funding. The Metropolitan Council should direct more of the Livable Communities Act funding to provide gap financing for affordable housing to help provide additional resources. These resources should be distributed to the CDBG entitlement communities via existing population formulas.

### **Thrive MSP 2040 Process and Elected Official Engagement**

Given the magnitude of the policies and funding implications of Thrive MSP 2040 for the region, the Dakota County Board of Commissioners would like to see the following improvements to the public process:

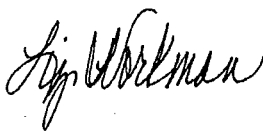
- 1) The Dakota County Board of Commissioners and other local elected officials need to be better included in the development of the region's policies. This is especially important given that the Metropolitan Council itself is not made up of elected officials, and because many of these regional policies will need to be implemented by counties and cities. While the Dakota County Board of Commissioners appreciates the ability to submit written comments, elected officials should play a more prominent role in the development of regional policies and policy plans.
- 2) There should be more consistency in the structure of the advisory groups established for each of the major policy areas (parks, water resources, housing, transportation) in Thrive MSP 2014. In some cases these groups are made up of staff, in other cases elected officials, and in some cases the groups are a blend of elected officials, staff and non-profit organizations. There is not clear rationale for the structure of the advisory groups, nor for what agencies are represented. There is still an opportunity to address these inconsistencies between these groups prior to the preparation and adoption of the upcoming policy plans. For example, the Dakota County Community Development Agency (CDA) was not included in the Housing Policy Plan Work Group, and it is the largest county community development authority or housing redevelopment authority (HRA) in the metropolitan area, including Hennepin and Ramsey counties. The Dakota County CDA provides the most diverse scope of housing and community development programs (30) in the five state area.

Susan Haigh, Chair  
April 24, 2014  
Page 5

- 3) The timeframe for the development of the upcoming policy plans is not coordinated. Some plans are proposed to be finished this summer, others this fall, and still others in early 2015. As such, there does not appear to be coordination between the advisory groups in the development of comprehensive policy plans for the region. These important policy plans should be developed on a common timeframe, with coordination between the advisory committees. More representative advisory committees and common review periods are recommended given that this is a comprehensive development guide with interrelationships between the policy plan areas.
- 4) The role of the Metropolitan Council as a service provider may be in conflict with the role of the Metropolitan Council as a regional planning and visioning agency. This potential conflict should be recognized by the Metropolitan Council along with efforts to separate the Council's operational challenges from its responsibility to facilitate regional visioning and planning.
- 5) The timeframe for adoption of the Thrive MSP 2040 plan on May 28, 2014 does not seem to allow enough time for Metropolitan Council staff to revise the document based on comments received in collaboration with the region's stakeholders. The Dakota County Board of Commissioners encourages the Metropolitan Council to extend the review and comment period for Thrive MSP 2040.

The Dakota County Board of Commissioners sincerely appreciates the opportunity to submit these comments to improve Thrive MSP 2014, and the upcoming process for the development of the policy plans. If you have any questions about our comments or would like clarification, please contact Kurt Chatfield (952-891-7022) [kurt.chatfield@co.dakota.mn.us](mailto:kurt.chatfield@co.dakota.mn.us) at the Dakota County Planning Office.

Sincerely yours,



Liz Workman, Chair  
Dakota County Board of Commissioners

cc: Dakota County Board of Commissioners  
Brandt Richardson, Dakota County Administrator



BOARD OF HENNEPIN COUNTY COMMISSIONERS

A-2400 GOVERNMENT CENTER  
MINNEAPOLIS, MINNESOTA 55487-0240

April 28, 2014

Metropolitan Council

MAY 1 2014

Received Chair's Office

Chairperson Susan Haigh  
Metropolitan Council  
390 South Robert  
St. Paul, MN 55101-1810

RE: THRIVE MSP 2040 comments

Dear Chair Haigh:

On behalf of Hennepin County, I'd like to thank you for the opportunity to review and comment on the Metropolitan Council's THRIVE MSP 2040 (THRIVE) draft document. Hennepin County staff has reviewed THRIVE and have had one high level opportunity to brief the Hennepin County Board of Commissioners. In light of the abbreviated response timeframe and the general lack of specificity regarding system and policy plans, Hennepin County offers these general comments.

As previously stated, the first overarching comment is that the document is quite high level and most of the system and policy plans that will include more detailed requirements have not yet been released for comment. This lack of detail makes it challenging to accurately assess the impact of the framework laid out in THRIVE. Second, there was general support of the document, often identifying Hennepin County objectives, goals and programs that align with those put forth in THRIVE. The document's framework is aligned and integrated (i.e., outcomes, stewardship, prosperity, equity, livability and sustainability, principles, integration, collaboration, and accountability). Finally, we understand the 'special features', community designations and land use requirements are all interwoven, but specific GIS data is lacking to be able to analyze the potential impact of a community designation and a job activity center, for example. We would like to request that Metropolitan Council release this data prior to approval of THRIVE so we can more accurately assess the impact of the proposed changes.

The following represents Hennepin County's comments by topic.



### **Air Quality**

THRIVE does not address the immediate impacts to nonattainment of the National Ambient Air Quality Standards (NAAQS) and the consequences this could have to our economic competitiveness. Automobiles (cars, trucks and buses) are the primary source of the air pollutants; the Metropolitan Council needs to make a bolder and stronger commitment to ensuring attainment through its transportation investments, and other activities.

### **Community Designations**

The impacts of the new community designations and issues that may arise from using municipal boundaries for the community designation borders are imprecise and speculative. Many communities, such as Bloomington, are internally diverse and could easily be assigned different community designations within city limits. It is difficult to assess the impacts of the community designations when most of the requirements that use community designations as criteria will be included in the forthcoming system and policy plans.

### **Aviation**

Aviation is included with transportation as one of the three statutory regional systems under the jurisdiction of the Metropolitan Council. THRIVE includes the following goals surrounding aviation, "Plan for adequate capacity at Minneapolis-Saint Paul International Airport, and maintain, improve and preserve our system of reliever airports," and to "Plan for compatible land uses and air space adjacent to the system of regional airports."

THRIVE does not discuss any individual reliever airports; however, due to declining demand for this type of aviation facility, both in the Twin Cities metropolitan region and nationally, Hennepin County supports closure of Crystal Airport and redevelopment of the 436 acre site for a mixture of job-creating commercial and industrial development as well as new residential development consistent with the city's housing goals. Currently, there are 114 single family houses, 14 multi-family dwelling units, many local streets and two minor arterial roads (CSAH 81 and 10), as well as a planned LRT line, that are located within close proximity to the Crystal Airport that would not be allowed under current FAA safety regulations.

### **Equitable Access to Regional Parks and Trails**

THRIVE lists parks, recreational trails, conserved open space and natural resources as a significant asset to the region. The Livability outcome includes the goal of strengthening, "Equitable usage of regional parks and trails by all our region's residents, such as across race, ethnicity, class, age, ability and immigrant status." This goal should be expanded to include equitable access to regional parks and trails. Large gaps in the regional park system exist in the first ring suburbs and the Metropolitan Council should discuss plans to mitigate this inequity over the next thirty years.

### **Fiscal Disparities**

A discussion on the Fiscal Disparities program should be included in THRIVE as a primary objective. The program is based on the economic and geographic conditions of the region of the 1970s, when communities within the Twin Cities were competing for development with each other. Today the competition is often between areas within the county and region. A proposed fiscal disparities program should focus and redirect financial resources to the priorities of the region as a whole to make it more competitive with other metro areas rather than redistributing resources to cities within the region without any consideration of how those cities are using the money. At a minimum, Hennepin County recommends doing an analysis of the impact of fiscal disparities.

### **Healthy Community Planning**

Health objectives should have a larger voice in the document. There are opportunities in most of the objectives and principles to incorporate healthy community planning and active living. Examples of this include the interface of bicycle and pedestrian trips with transit, and bicycle and pedestrian trips as a way to reduce congestion and air pollutants. Health should be included in the equity section, as a transportation factor for those who do not own a car as well as the interconnectedness of health equity with other equities. Lastly, when appropriate, there should be consistency identifying bicycle and pedestrian amenities.

### **Housing**

THRIVE is one of three Metropolitan Council documents addressing housing; the other two are "Choice, Place and Opportunity: An equity assessment of the Twin Cities region" and the "2040 Housing Policy Plan." THRIVE references the 2040 Housing Policy Plan and housing policy goals, but is light on details. Hennepin County recommends that the 2040 Housing Policy Plan be completed and reviewed before THRIVE is finalized.

The land use policy in THRIVE relating to housing (Housing Affordability and Choice: Promote housing options to give people in all life stages and of all economic means viable choices for safe, stable, and affordable homes) is consistent with the goals of Hennepin County. To achieve those goals, Hennepin County encourages the Metropolitan Council to provide communities with sufficient financial resources to meet the growing need for affordable housing.

Lastly, Hennepin County supports THRIVE's equity goals and the promotion of equitable investment throughout the region, but asks how Racially Concentrated Areas of Poverty (RCAPs) will shape current and future Metropolitan Council Housing Performance Scores.

### **Local Forecasts**

THRIVE should include more information about how the forecast data was developed, the models used and their inputs, and how and when the forecasts are amended.

### **Natural Resources**

There are two noticeable omissions in THRIVE. The first is Emerald Ash Borer (EAB) and its inevitable impacts to the region. The deforestation of the region as a result of EAB will have a significant impact on the region over the next ten years and the Metropolitan Council should lead a regional approach and action plan.

Also omitted is a discussion about the Clean Water Land and Legacy Amendment funding. There is a significant discrepancy between the income generated in Hennepin County thru income tax revenue (29%) and what percentage (12.6%) of the funding has been allocated to projects within Hennepin County. Further, there is a similar and larger disparity between what is contributed and what is allocated of the Lessard-Sams Outdoor Heritage Council (LSOHC) funds. Hennepin County projects receive about 10% of the LSOHC funding while generating the majority of the state's income tax through which LSOHC is funded.

### **Transportation & Transit**

It is recommended that the discussion of transportation choices be expanded to include the differences between community types, e.g., bicycling now represents one in eleven work commutes in the central cities, but what is the total percentage in the region as a whole? THRIVE states that the Metropolitan Council will "Work with partners to plan, construct and maintain bicycle and pedestrian connections to regional systems (such as transit stations, highways or regional parks)." Highways may not necessarily be a destination but often provide the bike and pedestrian facilities and must support safe crossing for all modes of transportation to other destinations.

In regards to pedestrian facilities, they are currently supported as connections to other facilities, e.g. transit. Pedestrian facilities should be intrinsic and distinguished from bicycle facilities where appropriate. Lastly, the transit discussion appears to refine existing ideas but not provide new innovative ideas or options. If this document is meant to be the regional development framework through 2040, there should be a stronger, more innovative voice and perspective on transit.

### **Wastewater Services**

Hennepin County understands that the Metropolitan Council's wastewater infrastructure work will focus on maintenance over expansion. Obviously, preservation of existing assets is critical. Nonetheless, Hennepin County is interested in staying informed on changes to the existing service area and having an opportunity to review and comment as these changes may impact development and consequently natural resource protection.

Chairperson Susan Haigh

April 28, 2014

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### **Water Supply**

THRIVE addresses the region's reliance on ground water as a pressing concern. Although our region has an abundance of high quality ground and surface water, our groundwater supply is decreasing and beginning to impact our surface waters. Hennepin County agrees that this is a significant regional issue and supports the implementation of the sustainable water supply goals described in THRIVE. The plan does not address the impact the water supply may have on regional economic competitiveness and future development in Hennepin County and we recommend that the Metropolitan Council address this concern.

### **Conclusion**

Collaboration and cooperation among governmental units is critical to the vitality and sustainability of the region. Hennepin County is appreciative of the Metropolitan Council's attempts to develop a strategic framework in the THRIVE MSP 2040 draft document. We are appreciative of the opportunity to respond and provide feedback. It is Hennepin County's hope that the Metropolitan Council will be open to suggestions and constructive feedback from its constituents. The Metropolitan Council's willingness to accept recommendations and modify THRIVE will make this plan an enduring and important document.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Mike Opat". The signature is written in a cursive, slightly slanted style.

Mike Opat, Chair  
Hennepin County Board of Commissioners

cc: Hennepin County Board of Commissioners  
David J. Hough, County Administrator

| Hennepin County Staff Comments on Thrive MSP 2040 |               |
|---|---------------|
| Chapter   | Thrive Page # |
| Table of Contents                                 | TOC           |
| Thriving Region                                   | 1             |
| Thriving Region                                   | 4             |
| Prosperity  | 17            |
| Livability  | 24            |
| Livability  | 26            |
| Equity  | 21            |
| Livability  | 27            |
| Livability  | 27            |
| Collaboration                                     | 39            |

| Chapter           | Comment   | Recommendation  |
|-------------------|---|---|
| Table of Contents | The table of contents is difficult to read.<br>The section reads, "Healthy residents enjoy active lifestyles." Should this sentence be more inclusive?  | Number chapters and make them bold so they stand out. Alternatively, "Residents enjoy active living and year-round outdoor activity options."   |
| Thriving Region   | After light rail / commuter comment, it should discuss bicycling and walking as preferred modes of travel as well.  | Consider adding a bullet point: "Increased interest in bicycling and walking have changed traditional transportation patterns and offer more choices and options for how people conduct their daily activities."  |
| Prosperity        | Biking and walking are not mentioned as something the Council will invest in to increase economic competitiveness.  | Consider adding a bullet point about how investing in bike / ped infrastructure is a quality of life issue that increases economic competitiveness.   |
| Livability        | The third bullet point defining enhanced livability says, "Providing housing and transportation choices for a range of demographic characteristics and economic means."   | The discussion about providing transportation choices should include a broader spectrum of all transportation modes. The use of single-occupancy vehicles should be acknowledged as a predominant mode choice and should be supported, as well as carpools, transit, bike/walk, etc. We recognize that the urban core is an exception where transit, bikes and pedestrians account for a substantial percentage of trips. |
| Livability        | Several cohorts (e.g., Silver Tsunami and Millennial generation) are described as contributing to the region's demographic change.  | To provide clarity, include the age ranges for the various groups discussed and their percentage of the population.   |
| Equity            | Typo in the first paragraph.  | "The process of developing this assignment has LED to..."   |
| Livability        | The section under "Supporting the region's bicycle and pedestrian facilities to promote bicycling for transportation, recreation and healthy lifestyles" should go further to mention safety and making physical activity a part of daily life. | Consider speaking about creating SAFE opportunities for people to walk and bike. Safety is a big deterrent of whether a place is walkable and/or bikeable. In addition, consider adding a sentence about providing multi-modal transportation options for utilitarian purposes is vital for an active lifestyle. The importance of access should also be mentioned; ADA, winter maintenance, etc.                         |
| Livability        | The bullet point about approaches to support Complete Streets should be strengthened.   | Consider replacing "support" with encourage.  |
| Collaboration     | Pedestrian plans should also be aggregated.   | Change first bullet point at bottom of the page to "aggregating local bike AND PEDESTRIAN plans into..."  |



| Hennepin County Staff Comments on Thrive MSP 2040 |               | April 25, 2014   |  |
|---|---------------|--|--|
| Chapter   | Thrive Page # | Comment  | Recommendation   |
| Accountability                                    | 42            | Thrive only discusses changes to systems and policy plans. Reference is made to pages 64 and 74 in the second and third bullet points.   | Consider mentioning Policy, System and Environmental changes (PSE) instead of just systems and policy plans.   |
| Special Features                                  | 45            |  | Page numbers should be changed to 65 and 77, respectively. It should be acknowledged that housing is mostly provided by the private sector. The government's role includes ordinances as well as support and guidance for the development of housing within the community. |
| Livability  | 24            | The third bullet point defining enhanced livability is, "Providing housing and transportation choices for a range of demographic characteristics and economic means."              |  |
| Land Use Policies                                 | 79            | Council Role under the Access, Mobility, and Transportation Choice land use policy.  | Support for maintenance and strategic expansion for the arterial roadway system should be included under the Council Role.   |
| Strategies for Community Designations             | 87            | The fourth bullet point under the Community Role states, "Engage private sector stakeholders that depend on or are affected by the local transportation system."                   | Provide clarity on what type of stakeholder engagement / action are envisioned.  |
| Strategies for Community Designations             | 87            | The fifth bullet point under the Community Role states, "Adopt development requirements that improve the user experience, circulation, and access for bicyclists and pedestrians." | Replace the word "requirements" with guidelines to provide flexibility.  |
| Strategies for Community Designations             |               | The bullet points on pages 79 and 87 referenced above are repeated throughout the various community designations.  | Our comments are apply to each occurrence.   |



April 28, 2014

Susan Haigh, Chair  
Metropolitan Council  
390 Robert Street North  
St. Paul, MN 55101

Chair Haigh:

The Twin Cities metropolitan region is at a pivotal moment in its long term-development as it seeks to continue growing and adapting within a connected and competitive global environment. In recognition of the future opportunities and challenges facing the region, the draft publication of Thrive MSP 2040 lays out an ambitious, equitable and sustainable vision that, if implemented, will result in expanded opportunity for our residents and greater resiliency for our communities. The long-term planning effort that has led to the draft Thrive MSP 2040 deserves the region's support. The support is deserved not because of the specific planning details catalogued in the document that will surely require modification over time to adapt to unforeseen circumstances, but because of Thrive MSP 2040's steadfast commitment to stewardship, prosperity, equity, livability and sustainability as the region's foundational pillars for future growth. Ultimately, so long as the region remains steadfastly committed to its five core principles, implementation challenges associated with infrastructure, land use and natural resources will be resolved without losing sight of why regional partnership and planning is integral to solving significant challenges that are too big for individual communities to address on their own.

This letter, prepared jointly by the County Boards of Ramsey County and Washington County, highlights the importance of the issues that are facing the eastern portion of the metropolitan region and the two counties' willingness and commitment to work together and in partnership with the Metropolitan Council to ensure that all residents in all areas of our metropolitan region experience opportunities to prosper. The important themes contained within this comment letter focus on the broad vision and implementation of MSP Thrive 2040. Due to specific issues also requiring comment, each County has also submitted comments on various aspects of the Plan at different times in the process. Ramsey County previously submitted comments on the Choice, Place and Opportunity portion of the plan as requested by the Metropolitan Council, and Washington County is submitting additional comments on individual sections pertaining to the full MSP Thrive 2040 draft.

Ramsey County and Washington County recognize that the region will only be as strong as its individual neighborhoods, cities and counties. To that end, a strong east metro is vital to the region's long-term success and ability to adhere to the core principles contained within MSP Thrive 2040, and it is as committed

partners that Ramsey County and Washington County will work with the Metropolitan Council to ensure that the regional vision outlined in MSP Thrive 2040 ultimately drives Metropolitan Council staff efforts to implement the plan during the coming years.

In this letter, the counties have chosen to focus on the underlying vision within the plan by applying that vision to three key issue areas that will greatly contribute to defining the success of our communities and the broader region through 2040: transit development, affordable housing and economic development. By applying the plan's broad vision to three specific issue areas, Ramsey County and Washington County demonstrate that the vision for Thrive MSP 2040 is certainly laudable, but that there is significantly less certainty about the Metropolitan Council's willingness to carry that vision through to implementation.

### **Transit Development**

The Metropolitan Council recognizes that future transit investments will generate greater prosperity for communities and equity for residents, and Ramsey County and Washington County agree with that assessment. However, when the vision for a regional transit system transitions into the reality of implementation, recent history along the Gateway Corridor highlights the challenges that remain. Ramsey County and Washington County continue to hear from Metropolitan Council staff that the Gateway Corridor struggles to meet certain metric-based assessments that would trigger a more robust transit investment. There is little dispute that a higher level of investment would spur a higher level of economic development within the Corridor and greater opportunities to bring equity to groups of people that have historically been isolated from major regional investments. Other east metro corridors have faced similar narratives during the planning phases. The planning and opportunities for transit and economic development in this important corridor, along with other east metro corridors, should not be constrained by the current funding limitations.

Ramsey County and Washington County recognize the importance of metrics in making informed decisions about regional projects, but encourage the Metropolitan Council to also recognize that MSP Thrive 2040's pillar of equity is predicated on the notion that past regional investments were not equally dispersed across the region to benefit all individuals. Decades of investments in certain neighborhoods while not in others created a scenario in which today's development markets skew toward particular areas within the region's geography, thus creating stronger metrics for those areas that now can be used to justify even greater regional investments in those areas in the coming years. A singular metric-based approach by the Metropolitan Council for future investment, no matter how well intentioned, could therefore exacerbate the inequitable outcomes residents currently experience today. This has significant implications when a corridor (like the Gateway Corridor) includes areas of concentrated poverty within its geography. Ramsey County and Washington County encourage the Metropolitan Council to consider that regional investments like transit should be quantified for value either as a *reinforcing investment* (building off an already strong foundation) within an area or a *catalytic investment* (used to broker equity and generate a strong future foundation) within an area. Both are equally important to achieving MSP Thrive 2040's vision of a thriving, connected region, but the implementation and evaluation of each investment category must account for these very important differences.

### **Affordable Housing**

Ramsey County and Washington County agree with the Metropolitan Council that mixed income communities should be the vision for future development within our region. Mixed income communities are proven to be more inclusive and resilient than their income segregated counterparts, but it is important to note that this vision is far from becoming reality within the region in 2014. There is no single factor that explains why the region has experienced growth in many areas while some neighborhoods have been disconnected from that broader growth. However, the region's affordable housing investments offer one significant example of how particular regional investments, when over concentrated into particular areas, make it more difficult to cultivate mixed income communities that are connected to broader job growth and regional vitality.

Today Ramsey County has the highest proportion of affordable housing units of any community within the region, while Washington County has comparatively little affordable housing within its borders. This data seems to suggest that the two counties have very little in common on the issue of affordable housing, but the opposite is in fact true as both communities have large pockets lacking mixed income communities. Washington County employers therefore struggle to find an available workforce to participate in one of the region's fastest growing employment areas, while Ramsey County residents experience the highest rate of unemployment amongst its neighboring counties. In order to counter this dynamic and ensure that all workers can fill all of the available jobs in all parts of the region, the Metropolitan Council must move away from historical implementation practices regarding affordable housing toward the new vision--outlined in *Choice, Place and Opportunity*-- that is fully committed to building mixed income communities throughout the entire region.

### **Economic Development**

In an effort to bolster region-wide, market based economic development, Ramsey County and Washington County agree with MSP Thrive 2040's vision to more intentionally align future public infrastructure investments with land use plans across the region. Ramsey County and Washington County excitedly note that, with the availability of near-term, large-scale economic development opportunities at the TCAAP site in Arden Hills, Ford Plant site in Saint Paul and State Farm site in Woodbury, the east metro portion of the region currently has some of the most sought after development opportunities in the entire nation.


This land availability and private developer interest presents a once-in-a-generation opportunity for the region to link multiple large-scale economic development projects near the urban core into integrated infrastructure plans that will greatly benefit the region's residents. To transform vision into reality, however, implementation details remain. The region's first arterial bus rapid transit line, already scheduled to run along Snelling Avenue, could link the Ford Plant site to the TCAAP site with only a two mile project extension, yet Metropolitan Council staff have remained resistant to fully embracing a vision that the line offers an opportunity to make a *catalytic investment* in the east metro. Looking east out of downtown St. Paul, the Gateway Corridor shares a similar dynamic with the State Farm site. Developers at all of these sites continue to cite transit service uncertainty as one of the only remaining barriers to higher and better use development at each location, and Ramsey

County and Washington County strongly urge the Metropolitan Council to keep that market-focused dynamic--as well as MSP Thrive 2040's pillar of prosperity--in mind when making implementation decisions that stand to impact thousands of potential workers at those three sites and more than three quarters of a million residents spread across the two counties.

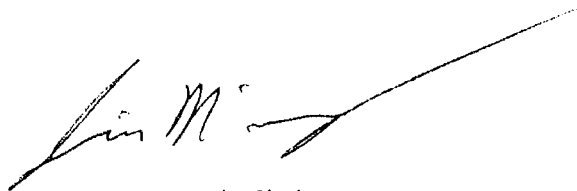
All three of the issues listed above demonstrate that principles must transition into practices for MSP Thrive 2040 to achieve its stated objective of supporting a high quality of life throughout the region for all residents of future generations. Moreover, Ramsey County and Washington County recognize that the Metropolitan Council cannot be solely responsible for the successful implementation of MSP Thrive 2040. Both counties commit to working in partnership with one another, their cities and townships, other counties within the region and the Metropolitan Council to ensure that all organizations remain accountable for upholding MSP Thrive 2040's pillars of stewardship, prosperity, equity, livability and sustainability. Ramsey County and Washington County both commit to continuing to work with their cities to enhance land use plans so that they fully support future regional investment, focusing all county-specific efforts on the same five pillars cited in MSP Thrive 2040, and in generating a stronger community narrative around the importance of transit development for residents and employers within the east metro. Ultimately, both counties recognize that the commitment for delivering on this work cannot rest solely with elected officials, staff or community members; significant progress requires a shared commitment across all parties to collective action (as indicated by this joint letter) and a belief that together we can bring opportunity and prosperity to the doorstep of every resident in every corner of our great region.

Finally, recognizing the breadth and depth of the issues outlined in the draft plan and its importance to this region, we would encourage the Metropolitan Council to extend the review and comment period for Thrive. The current plan to adopt the plan by the end of May leaves little time for the Metropolitan Council to review the comments it will be receiving and adequately revise the plan based on those comments.

Sincerely,



Autumn Lehrke, Chair  
Washington County Board of Commissioners



Jim McDonough, Chair  
Ramsey County Board of Commissioners

Cc: Ramsey County Board of Commissioners  
Washington County Board of Commissioners  
Julie Kleinschmidt, Ramsey County Manager  
Molly O'Rourke, Washington County Administrator



## SCOTT COUNTY BOARD OF COMMISSIONERS

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JON ULRICH, DISTRICT 5

Metropolitan Council

APR 23 2014

Received Chair's Office

April 15, 2014

Ms. Susan Haigh, Chair  
Metropolitan Council  
390 North Robert Street  
St. Paul, MN 55101

**RE: ThriveMSP 2040  
Transmittal of Scott County Board Resolution  
Technical Comments Attachment**

Dear Ms. Haigh:

On behalf of the Scott County Board of Commissioners, I would like to thank you for the opportunity to comment on the ThriveMSP 2040 plan. Scott County appreciates the effort and outreach activities that have occurred as a part of the plan update process. Developing a plan that focuses on measurement, outcomes and data driven decisions, will lead a more robust regional discourse about policy and direction of infrastructure investment in the Region. This is an important discussion that all leaders throughout the region need to be engaged in to ensure the best outcome. We understand that resources are limited, and a thoughtful approach that keeps the entire region healthy and vibrant will require different planning and investment strategies for all parts of the region.

The County Board discussed the draft ThriveMSP 2040 plan in a workshop setting on April 1<sup>st</sup> and on April 15<sup>th</sup> passed a resolution highlighting our areas of support and concern. A summary of the key areas in the Board's resolution are:

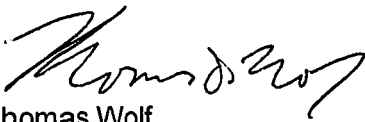
- Supporting that a one size fits all approach cannot be applied throughout the region. We whole heartedly agree.
- Recognition of Metropolitan Council for its past streamlining efforts. Scott County strongly encourages the identification of new areas to consider so that we all can be more responsive and better stewards of the public resources.
- We support regional transitway investments, but we are concerned that the Council is singularly focused on these investments with not enough focus on the rest of the region's transportation system and other infrastructure needs. While we know the region can't build its way out of congestion, there certainly needs to be a vision for parts of the region that are developing and not expected to be served by transitways as well. There are many parts of the inner ring suburbs and core that will not be served by the investments identified. People all over the region need access to jobs and other destinations.

*An Equal Opportunity/Safety Aware Employer*

- The focus on regional community and job activity centers is a good approach, but we ask the question about how engaged the private sector has been in providing input to this discourse?
- We question the multitude of suburban designations in the plan and feel this fine-grained categorization of communities may have an unintended outcome, if implemented as presented.
- We also have concerns that the plan makes broad brush statements about natural resources and groundwater protection, some of which are provided in the resolution. We also have attached a separate attachment from our County staff which provides technical comments, especially on this issue.

We thank you for your attention to these comments, and welcome your interest in addressing the concerns of Scott County.

Sincerely,



Thomas Wolf  
Chairman of the Scott County Board

C: Gary Van Eyll, Metropolitan Council, District 4  
Wendy Wulff, Metropolitan Council, District 16  
Gary Shelton, County Administrator  
Lezlie Vermillion, Community Services Division Director  
Mitchell Rasmussen, County Engineer, Physical Development Director  
Lisa Freese, Transportation Program Director, Physical Development  
Brad Davis, Planning Manager, Community Services  
Paul Nelson, Water Resources Manager, Physical Development  
Mark Themig, Parks Manager, Physical Development

**BOARD OF COUNTY COMMISSIONERS  
SCOTT COUNTY, MINNESOTA**

|                                  |                |
|----------------------------------|----------------|
| <b>Date:</b>                     | April 15, 2014 |
| <b>Resolution No.:</b>           | 2014-065       |
| <b>Motion by Commissioner:</b>   | Ulrich         |
| <b>Seconded by Commissioner:</b> | Menden         |

**RESOLUTION NO. 2014-065; AUTHORIZING SUBMITTAL OF COMMENTS ON THE  
METROPOLITAN COUNCIL'S THRIVE MSP 2040 PLAN**

WHEREAS, the Metropolitan Council has prepared the Draft Thrive MSP 2040 Plan as the region's comprehensive development guide; and

WHEREAS, the Metropolitan Council has requested comments from local governments regarding the Draft Thrive MSP 2040 Plan; and

WHEREAS, the the Draft Thrive MSP 2040 Plan will guide the regional policy plans and ultimately the local comprehensive plans; and

WHEREAS, the the Draft Thrive MSP 2040 Plan 2010 update drives policy in a new direction; and

WHEREAS, Scott County supports the statement that "one size does not fit all"; and

WHEREAS, Scott County supports the efforts to streamline activities such as comprehensive plan amendments and environmental services permits; and

WHEREAS, Scott County is concerned about the community designations and their implications to the regional policy plans; and

WHEREAS, it appears that regional transportation and development investments will correlate to new transitway corridors and designated job centers; and

WHEREAS, it is not clear what criteria were utilized in designating the communities and job activity centers; and

WHEREAS, the Draft Thrive MSP 2040 Plan is painting too fine a picture in the suburban designation: and

WHEREAS, the Draft Thrive MSP 2040 Plan makes very broadbrush statements regarding natural resource and groundwater protections.

NOW THEREFORE BE IT RESOLVED, by the Board of Commissioners in and for the County of Scott, Minnesota, thanks the Metropolitan Council for the opportunity to participate and comment on the development of the Thrive MSP 2040 Plan and believes that the following proposed policies/designations should be revised in the final document; and



**BOARD OF COUNTY COMMISSIONERS  
SCOTT COUNTY, MINNESOTA**

|                                  |                |
|----------------------------------|----------------|
| <b>Date:</b>                     | April 15, 2014 |
| <b>Resolution No.:</b>           | 2014-065       |
| <b>Motion by Commissioner:</b>   | Ulrich         |
| <b>Seconded by Commissioner:</b> | Menden         |

BE IT FURTHER RESOLVED, that the Scott County Board of Commissioners believes that:

1. There should be one designation for Suburban Communities as planning should be supported from a financial and policy standpoint towards that goal. The ability to later retrofit is very difficult and expensive and leads to potential health and safety issues in the intermittent periods. Scott County believes that the Cities of Prior Lake, Savage and Shakopee all fit the "suburban" designation and how communities were designated is unclear. The implications in the transportation plan are very clear though as the terminology changes in how the Met Council will view investment in those areas. Scott County also believes that Jackson, Louisville and a portion of Credit River Townships need to be re-designated as there is planned sewer expansion. Scott County support the direction the plan is moving for rural residential and agricultural communities.
2. The Met Council should support their statement of "one size does not fit all" and be promoting appropriate growth and investment equally in all communities who are developing in alignment with the regional vision for their community designation. This means investing along existing corridors such as TH 169 and other important existing inter-regional corridors in the Twin Cities, regardless of whether or not the corridor is targeted for new regional transit investments. The plan's geographic focus on growth and investment seem to follow future transitways, but ignores actual places in the region where there are existing homes, jobs and businesses and the transportation and redevelopment costs to the region may be less.
3. Scott County has a major job center and we would like to better understand the analysis and methodology that will be needed to formally designate these areas as job concentration areas on the map and in the longer-term regional investment program.
4. The plan correctly states that within our region, communities are growing, developing and redeveloping in different ways. But then there is the contradicting policy on page 9 that the Council is throttling back on any planned expansion to the region's wastewater and highway infrastructure.

Halting wastewater and highways infrastructure expansion in growing areas of the region could harm public health and safety. Under-investing in these areas could lead to inappropriate development patterns. With no future investments in regional sewer infrastructure, existing development served by on-site septic in these growth areas will need to remain on private septic systems, rather than hooking up to the regional treatment system. This poses public health and environmental concerns. With no future investments in regional highway infrastructure, existing development served by direct access onto Principal and A-Minor Arterials will remain, rather than diverting onto frontage and backage roads served by new interchange or overpass highway investments. This poses public safety concerns. There are parts of the region that will continue to need these types of investments.

**BOARD OF COUNTY COMMISSIONERS  
SCOTT COUNTY, MINNESOTA**

|                                  |                |
|----------------------------------|----------------|
| <b>Date:</b>                     | April 15, 2014 |
| <b>Resolution No.:</b>           | 2014-065       |
| <b>Motion by Commissioner:</b>   | Ulrich         |
| <b>Seconded by Commissioner:</b> | Menden         |

Growing areas of the region do not agree that while some gaps remain, the region's highway network is essentially complete and must now be rebuilt (page 11). Between now and 2040, there are several minor arterials in Scott County that will need regional investments to help elevate them into Principal Arterial functionality to serve the growing population. We believe this goes beyond "re-building" to true expansion of the region's highway network.

5. The document makes a very broad-brush statement regarding urban development protecting our environment best. This is not necessarily always true and why we support the statement that not one size fits all. Different areas have different needs/protections and they should be protected in that manner.

The document insinuates that new development is creating an issue with sustaining ground water supplies. We believe the Met Council should analyze the magnitude of existing development without water conservation technology and that may be as large a contributing factor or as important as new development with respect to sustaining ground water supplies. Page 29 discussion of the wise use of water second paragraph last sentence expresses concern about the impact of future development on the reliability of groundwater as a drinking water source. Use of the term "drinking water" limits this discussion because one of the most problematic questions in this is the use of these sources for lawn irrigation.

Finally we believe the Met Council should be looking at the future economies of centralized versus decentralized waste water treatment. At what point do decentralized waste water systems make sense from a fiscal or environmental standpoint. The discussion on pages 29 and 30 regarding Sustainability with respect to water should include Met Council looking at the future economies of centralized versus decentralized waste water treatment. Part of the issue is that waste water collection and treatment creates an institutional diversion for water such that it does not get put back into the environment close to where it is used. The framing in the document makes this seem like just a supply/ municipal pumping issue. If waste water reuse is to be something considered for the future it seems that the Met Council should at least do an analysis of having more decentralized wastewater facilities higher in the landscape versus large facilities low in the landscape. At some point the economies change with reuse brought into consideration. The infrastructure cost to move reuse water from large centralized facilities is probably more expensive than from decentralized facilities.

BE IT FURTHER RESOLVED, that the Scott County Board of Commissioners supports and appreciates the Metropolitan Council's efforts to streamline and collaborate on processes that reduce cost and time such as comprehensive plan amendments and believe there is more opportunity for streamlining in the transportation areas such as TIP amendments and the regional solicitation could move towards a streamlined submittal process based on projects identified in the agencies plans as priorities for those communities; and

**BOARD OF COUNTY COMMISSIONERS  
SCOTT COUNTY, MINNESOTA**

|                                  |                |
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| <b>Motion by Commissioner:</b>   | Ulrich         |
| <b>Seconded by Commissioner:</b> | Menden         |

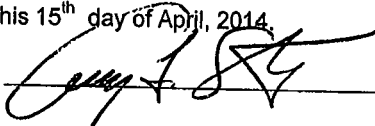
BE IT FURTHER RESOLVED, that the Scott County Board of Commissioners authorizes submitting the attached letter requesting the Metropolitan Council to consider policy refinements and additions the Thrive 2040 MSP Plan.

| COMMISSIONERS | VOTE                                    |                             |                                 |                                  |
|---------------|---|-----------------------------|---------------------------------|----------------------------------|
| Wagner        | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Absent | <input type="checkbox"/> Abstain |
| Wolf          | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Absent | <input type="checkbox"/> Abstain |
| Menden        | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Absent | <input type="checkbox"/> Abstain |
| Marschall     | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Absent | <input type="checkbox"/> Abstain |
| Ulrich        | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Absent | <input type="checkbox"/> Abstain |

**State of Minnesota)**  
**County of Scott )**

I, Gary L. Shelton, duly appointed qualified County Administrator for the County of Scott, State of Minnesota, do hereby certify that I have compared the foregoing copy of a resolution with the original minutes of the proceedings of the Board of County Commissioners, Scott County, Minnesota, at their session held on the 15<sup>th</sup> day of April, 2014 now on file in my office, and have found the same to be a true and correct copy thereof.

Witness my hand and official seal at Shakopee, Minnesota, this 15<sup>th</sup> day of April, 2014.

  
\_\_\_\_\_

County Administrator

Administrator's Designee



## SCOTT COUNTY COMMUNITY SERVICES

GOVERNMENT CENTER · 200 FOURTH AVENUE WEST · SHAKOPEE, MN 55379-1220

### Technical Comments Attachment to Scott County Resolution #2014-065

Scott County staff from Planning, Parks and Transportation functional areas reviewed the draft Thrive MSP 2040 document. Technical comments that were not included in the County Board Resolution are listed below in this memorandum. If you or your staff would like to follow up on these comments please contact Brad Davis. Brad will assist you in connecting with the appropriate technical experts on the county staff. He can be reached at 952-496-8654 or [bdavis@co.scott.mn.us](mailto:bdavis@co.scott.mn.us).

Technical comments are as follows::

1. The Ports of Savage and MN River should be identified as regionally important for shipping. Missing in the shipping discussion. Page 16
2. What about investments in water resource improvement and recharge and natural resources which are likely to be in rural areas – will the region invest?
3. In general Figures are not well done. They are not numbered, many do not include legends and it's difficult to discern what they are trying to show.
4. Page 46 the figure is confusing and it's not clear what the intent is with respect to corresponding language in the text. The Figure is also not consistent with Scott County Atlas C-17 Subsurface Recharge and Surface Infiltration for Scott County, Tipping R.G. 2006. Should be clear that the management/planning for high recharge potential area is most important, and that low recharge potential areas already by definition have low potential for recharge.
5. Page 49 figure shows a shaded area indicating a band of some significant ecological resource near the southern county line in the Belle Plaine and Helena Twp. areas – what this would be is a mystery to us.
6. Page 60 third paragraph specifically calls out the potential for damage to the environment with Rural Residential. We don't recall this language for other more dense types of development where the potential for environmental damage to natural resources and the environment is greater. Need to be consistent.
7. Page 65 Council Role-consider adding something about assessing centralized versus decentralized water-water.
8. Pages 66 through 69 Natural Resources discussion talks about natural resources prime for preservation and protection. Usually this means government acquisition of either the land or a conservation easement. This needs to be expanded to be clear that the Council will also support conservation stewardship by private land owners. Many private land owners are good stewards, and others can be with some assistance. Also most land is private so this will have greater overall impact at a lower cost.
9. Page 79 is just focused on the benefits of denser development. While this provides benefits in many areas regarding resilience its missing a discussion of the benefits of lower density development and agriculture in combination with natural resources management, native grass, woodlots, and soil health initiatives that will sequester carbon.
10. Page 108 as part of the Council Role it would be helpful for the Council to work to remove the state legislative restriction that County's in the Metropolitan area cannot

*Memo*

do Subordinate Service districts (at least where the Council is not planning to provide services). Currently this is a constraint to establishing some of the community type systems identified.

11. Page 111 the title of this subsection "Rural Residential: Limiting unsustainable growth patterns" has a negative connotation and is not necessarily true with respect to natural and water resources. The title, section and policies should be revised to reflect that.
12. Page 112 Water Sustainability Council Role – same comment as page 108 above.

Thank you for the opportunity to comment and we look forward to seeing the final plan within the next few months.

Cc: Angela Torres, District 4 Sector Representative  
Patrick Boylan, District 13,14,15,& 16 Sector Representative  
Lisa Freese, Transportation Program Director  
Paul Nelson, Water Resources Manager  
Mark Themig, Parks Program Manager



April 28, 2014

**Three Rivers  
Park District  
Board of  
Commissioners**

Penny Steele  
District 1

Thrive MSP 2040 Comments  
Metropolitan Council  
390 N. Robert St.  
St. Paul, MN 55101

Email: [public.info@metc.state.mn.us](mailto:public.info@metc.state.mn.us)

Jennifer DeJournett  
District 2

Metropolitan Council:

Thank you for the opportunity to review and comment on the draft Thrive MSP 2040 Plan.

Daniel Freeman,  
Vice Chair  
District 3

Three Rivers Park District is one of the ten Regional Parks System Implementing Agencies. Together, these ten agencies own and operate the regional parks system. Three Rivers is responsible for roughly one-half of all of the acreage, parks and trails within the regional system, with parks in Hennepin, Carver, Scott and Dakota Counties. The Metropolitan Council (Council) plays an important role in the Regional Parks System, providing partial funding of capital projects, and tying together parks with the other regional systems. Three Rivers enjoys a strong collaborative partnership with the Council.

John Gunyou,  
Chair  
District 4

My comments are organized in the following manner:

John Gibbs  
District 5

- A. General observations
- B. Thematic suggestions

Larry Blackstad  
Appointed  
At Large

**A. General observations and suggestions :**

Steve Antolak  
Appointed  
At Large

1. Thrive MSP 2040 presents a progressive plan that will help move the region towards economic, environmental and social sustainability. I participated in many of the public meetings that helped develop this plan, and was impressed with the depth and extent of outreach used by Council staff to gather ideas from the public and from the Council's partners. Council staff and the Council are to be commended for the thorough process involved in development of the Thrive plan, and for the ideas and actions detailed within the plan.

Cris Gears  
Superintendent

2. The plan would benefit from an Executive Summary. As currently drafted, it is difficult to identify the primary goals and strategies.

## B. Thematic Suggestions

1. Collaboration and integration are primary themes throughout the Plan. Historically, one of the greatest perceived challenges for the Council has been to work successfully in an integrative and collaborative manner across systems. Thrive begins to address this challenge. Thrive would benefit from additional introspective assessments of past Council practices, and through provision of more specific directives on how to improve the integration and collaboration process across systems and agencies.
2. Equity is important. Three Rivers' 2010 Vision Plan recognized the need to provide additional service and opportunities to minority populations, teens, the aging population, and to the residents of the first ring of Hennepin County suburbs where there are no regional parks. Three Rivers embarked on several efforts to address the needs of these underrepresented populations. Preliminary data from Three Rivers' 2013 Park Visitor Study shows that those efforts have been successful, with significant increases from 2008 in underrepresented populations' visitation to core recreation facilities such as picnic areas, swim areas and creative play areas. However, much work remains to be done, and the Council can play an important role in collaboration with its ten Park Implementing Agency partners. Specifically, the Council can:
  - i. **Provide flexibility in the updated Regional Parks Policy Plan to be able to try new ideas.**
    - For example, development of new parks that meet the needs of underrepresented populations may require that the minimum acreage of regional parks be waived. Regional trails in the urban and urban core areas may need to have "Pocket Parks" or "Nature Nodes" within the trail's master plan boundaries to provide specific regional facilities geared to meet equity needs. Repurposing existing local parks as regional parks currently requires 40 percent of visitation of the local park to already be regional, but does not take into account that the repurposing may lead to that goal of 40 percent regional visitation. Creative solutions and experimentation should be encouraged, and not bound by the Park Policy Plan.
  - ii. **Show the Council's commitment to equity in the regional park system by providing new funding for development of facilities and programs to meet the needs of underrepresented populations.**
    - The regional parks system has been chronically underfunded in the last two decades, and there is a considerable backlog of projects already approved by the Council within park Master Plans. Thrive recognizes that the parks system is the keystone to the quality of life in the region. To date, the discussions at the Council have focused on how to redirect existing park funding streams from already approved projects to undefined equity projects. The Council's direct funding to the regional parks system has declined over the past 12 years, and there is simply not enough funding to do a good job on existing and equity projects. The Council can show its commitment to equity by providing new regional funding specifically for equity projects within the parks system.

iii. **Coordinate region-level actions that address equity in the regional parks system.**

- Some actions that will address equity in the regional parks system will have the best results if pursued at the regional level, rather than having ten park agencies take actions that are duplicative, or worse, confusing to the potential park user. Suggested regional actions by the Council include:
  - a. Implementing a region-wide marketing campaign to increase awareness of parks.
  - b. Provide regional-level parks research related to changing recreation preferences and demographics, including region-wide visitor studies every five years.
  - c. Assess the supply and demand for recreation facilities across all providers, including local, regional, state and federal facilities within the region.
  - d. Commit to exploring creative connections between transit and the regional parks. Currently, most transit stops are not close to the main recreation areas of regional parks, making it difficult to access parks by transit. Fixed-line transit such as LRT could benefit from development of regional park facilities adjacent to stops.

3. The Regional Bicycle Transportation Network (RBTN) is critical to the development of a fully functional multi-modal transportation network. The Council and its staff should take pride in this important first step. The strategies related to the RBTN outlined on Page 27 are solid. However, Thrive can go even further in its support of the development of the RBTN. Specifically, Thrive should:

i. **Direct the Council to lead exploration of regional funding mechanisms/structures for development, operations and maintenance of the RBTN.**

- The RBTN is operated by a wide mix of agencies, with different design, development and operation standards, and with different levels of funding availability and commitments. While regional coordination is beneficial, an on-going regional funding stream would provide much greater success in coordinating the development and operation of a seamless system with shared standards. Options could range from regional coordination and funding through a regional bicycle-licensing program, to an overseeing body with funding authority similar to the Counties Transit Improvement Board. This discussion has been ongoing within the alternative transportation community for some time, and the RBTN would benefit by the Council taking the lead on exploring different options.

Thank you for the opportunity to comment on Thrive and for your consideration my suggestions.

Respectfully,



Jonathan Vlaming, Associate Superintendent  
Division of Planning, Design and Technology





Metropolitan Council

APR 23 2014

Received Chair's Office

Board of Commissioners

Fran Miron, District 1

Ted Bearth, District 2

Gary Kriesel, District 3

Autumn Lehrke, Chair, District 4

Lisa Weik, District 5

April 22, 2014

Susan Haigh, Chair  
Metropolitan Council  
390 Robert Street N  
St Paul, MN 55101

Chair Haigh:

On behalf of the Washington County Board, thank you for the opportunity to submit comments on Thrive MSP 2040. Washington County looks forward to continuing its partnership with the Metropolitan Council to make the Twin Cities area a great place to live, work and play for the next 30 years and beyond. Included in this letter are the County's comments on the draft plan, divided into four sections. The first outlines concerns about the public review process and timeline. The second is general comments on governance. The third is comments on the overall structure, principles, and outcomes of the plan. The fourth is specific comments on topic areas. Bolded items are requested changes to Thrive MSP 2040 to be made before adoption.

### **Public Review Process and Timeline**

Overall, Washington County supports the general direction of Thrive, but has serious concerns about specific policy statements and guidance as outlined in this letter. As such, Washington County is troubled by the Metropolitan Council's intent to adopt Thrive MSP 2040 on May 28, 2014. This leaves little time for Council staff to revise Thrive based on comments received and in collaboration with Washington County and other stakeholders. Furthermore, Washington County is deeply troubled by the Council's current actions to draft policy plans and update the regional solicitation funding criteria based on Thrive prior to its full vetting and adoption. These documents should be written in sequence with one informing the other rather than in parallel. **Washington County encourages the Council to extend the review and comment period for Thrive and proceed with updates to policy plans and the regional solicitation after Thrive's adoption.**

### **Comments on Governance**

There is a lack of information in Thrive about what the Council is and what statutes, rules, laws, or legislative direction enables the Council's authority to create this plan and govern the items included in it. **This information should be added to an introduction section of Thrive. Furthermore, Thrive needs to clarify the Council authority for each directive it puts forth.**

Overall, Thrive lacks specificity. Thrive makes multiple broad policy statements about items that will need to be addressed in local comprehensive plans with little additional guidance. For example, Thrive states that local comprehensive plans will need to address climate change mitigation, adaption, and resilience, but offers no discussion about what this means. It is difficult for the County to understand and comment on broad policy statements without the corresponding guidance about how the policies will be

implemented. **Thrive must provide a clearer understanding of how policies will impact local comprehensive plans, who is responsible for carrying out the overall principles and outcomes in Thrive, and how these activities will be funded.**

There is frequent discussion about the role of local governments in implementing Thrive, but no distinction between the roles of cities and counties. **Thrive should address County roles that are necessary to address both the special features and community wide policies put forth in Thrive.**

### **Comments on Document Structure**

The County supports Thrive's great departure from past regional development frameworks. It shifts away from the silos of planning (housing, transportation, land use, and water resources). The recognition that these areas are inextricably linked is a great direction for our region. The County commends the Metropolitan Council for recognizing that 21<sup>st</sup> century success demands integration and collaboration across planning functions.

Thrive is structured based on the following five outcomes: stewardship, prosperity, equity, livability, and sustainability and the following three principles: integration, collaboration, accountability. While the County agrees that all of these concepts are important for consideration by our region and local communities, Thrive needs to acknowledge that local communities have their own established mission, vision, goals and values. **Thrive should address how regional outcomes and principles relate to these already established local objectives.**

Overall, there seems to be a disconnect between terms that are truly outcomes, others that are processes, and others that are values. **The County recommends the following edits to the structure of Thrive:**

- The County believes that the Council's role in stewardship and sustainability should be incorporated into a vision statement. The document provides thoughtful introductory material, but the clear articulation of a vision could be stronger. **The County recommends creating a strong vision statement in Thrive around the Council being a steward for regional sustainability to drive economic success for all communities.**
- It is more logical for the reader to understand the overall principles of the Council before reading the outcomes of these principles. **The County recommends moving the principles before the outcomes in the document.**
- Integration is a process oriented concept while collaboration and accountability are presented as values in other types of planning documents. **The County recommends revising the principles to be consistent in concept.**

With these suggestions, the document could be structured in the following way:

- Stronger vision statement around being a steward for sustainability
- Revised principles based on the existing concepts (integration, collaboration, accountability)
- Prosperity, equity, and livability as outcomes

## Comments on Topic Areas

### *Accountability*

The County supports the Council's accountability principle, which includes a data driven approach and the creation of a set of indicators for the outcomes of the plan. However, there is no discussion about how the indicators will be created or applied to local communities. **Thrive should describe the process the Council will use to engage local governments in the development of these indicators and how they are applied. In future planning documents, the County recommends that the indicators are developed in advance and included in the report in the spirit of public engagement.**

### *Economic Development*

Washington County believes Thrive does not provide a vision for economic development as it focuses on historical information not the future state. The Council's mapping of regional job and activity centers is based on 2011 data. None of the 42 regional job and activity centers in 2011 are within Washington County. This approach advocates for the preservation of 2011 more than it acts as a long-term guide for regional economic growth and development. Communities within Washington County are actively planning for increased development and redevelopment along major transportation corridors with a long-term vision for one or more regional job and activity centers within the County.

On July 25, 2013, the Metropolitan Council Land Use Advisory Committee was presented with information regarding land use designations. This report included a map, attached to this letter, which designated redevelopment areas throughout the region, many of which are located on major transportation corridors. This map more accurately captures the growing nature of many job centers in the region. **Thrive should include a map forecasting 2040 job and activity centers, including areas for potential development and redevelopment, and put forth policies and initiatives for a 2040 vision around regionally balanced economic development along major transportation corridors.**

Washington County recently completed an economic development study, also attached to this letter. The study shows that Washington County is a competitive, job-creating economy with 80% employment growth between 1990 and 2012. The study also found that jobs in Washington County pay relatively low wages, yet residents from Washington County have relatively high wages, primarily from outside the county. The combination of high incomes and low wages results in a difficult housing market for low-income earners and a strong need for transit that supports all day service and a reverse commute. Also, Washington County's Workforce Investment Board (WIB) helps foster employees and connects them to employment opportunities. **It is important to recognize that job centers cannot be created without considering the availability of employees and access to educational institutions. Thrive should call for strong connections between people and job and activity centers, not just connections between centers, to support the thousands of people that are leaving and entering Washington County each day for work.**

The County also has concerns about the wage level within these job centers. Low and medium-wage jobs, important to Washington County's economy, typically don't appear at densities greater than 7,000 jobs per acre. For example, major employers such as Andersen Windows in Bayport (3,500 employees), 3M Chemolite in Cottage Grove (700 employees) and Woodwinds Health Campus in Woodbury (900

employees) are not recognized as job and activity centers in Thrive. Transit is needed to connect people to all types of jobs, not just high wage jobs. **Thrive should recognize the importance of connecting people to all types of jobs, particularly low and medium-wage jobs, even at densities lower than 7,000 jobs, is an important factor in transportation equity.**

Washington County is concerned about Thrive's lack of connections to regional economic development partners and recognized economic development strategy. GREATER MSP (Minneapolis Saint Paul Regional Economic Development Partnership) is a private non-profit organization dedicated to providing public and private sector leadership, coordination and engagement to grow the economy of the Twin Cities region. GREATER MSP is advancing a coordinated regional economic development strategy; a coordinated regional brand to promote the region's assets; and a coordinated regional business retention, expansion, and recruitment program to stimulate capital investment and job creation in the region. This strategy is anchored in the needs of business community, key attributes of the Twin Cities, and expanding/emerging key industries such as food, water and health, all of which have a strong presence in Washington County. **The County encourages the Metropolitan Council to work with Greater MSP and the Washington County WIB on developing a broader strategy for economic development beyond "working with key stakeholders to promote job placement growth in Job Centers" as currently defined by the Council and Thrive.**

#### *Transitway Development*

Thrive provides numerous references to the role of transitways in economic development, in particular attracting talented young workers that "favor access to transit over auto-oriented subdivisions." However, Thrive lacks a vision for transitway expansion in the Twin Cities, deferring its position to the Transportation Policy Plan, which only puts forth three new transitways within the borders of Hennepin County and no call for transitways serving Washington County. It will be challenging for local communities in Washington County to respond to Thrive's call for transit-oriented development when there is no corresponding vision to bring transitways to the East Metro area. **Thrive should present an aggressive and regionally balanced vision for transitway expansion, which in turn will drive transformative land use policies and economic development.**

The Counties Transit Improvement Board (CTIB) is leading local alternative analysis processes, selection of preferred alternatives and environmental work to advance transitway development in the region. **Thrive should reference CTIB's role in transitway planning and project development and the Metropolitan Council's partnership with counties through CTIB should be highlighted in the Integration and Collaboration principals put forth by Thrive.**

#### *Community Transportation*

There is a lack of information regarding community transportation in Thrive, especially for the disability populations that require a door-to-door level of service. The County sees a growing gap in these services, both within Washington County and in the region, and fully expects that this gap will continue to grow. Currently, clients face challenges in scheduling rides at convenient times or a trip without excessive ride time. With the Minnesota Department of Human Services strongly encouraging more independent, community-based housing options for disability populations, there will be a greater

demand for accessible, affordable and efficient transportation in all communities. A greater need for collaboration between local governments, service providers and the Metropolitan Council will be essential in order to meet this increasing demand. **Thrive should highlight this challenge and put forth a call for greater collaboration and additional resources to meet the challenge.**

#### *Water Resources and Water Sustainability*

Washington County has and continues to play a leadership role in groundwater protection, through the groundwater planning authority granted to metro counties under Minnesota State Statute 103B.255. Washington County is currently the only metro county that utilizes the groundwater planning authority and has a board adopted groundwater plan. The County recognizes that groundwater is one of its most valuable natural resources. High quality drinking water, healthy streams and lakes, and economic vitality all depend on protecting and conserving groundwater resources. Groundwater provides 100 percent of the County's water supply, and we already face serious groundwater quality issues due to our unique geologic conditions and a long history of groundwater contamination issues. Guided by the County groundwater plan and annual work plans we have been implementing groundwater protection activities in a collaborative manner with local governments (cities, townships, soil and water conservation district, watershed districts and others), state agencies and the Council, since the plan's adoption in 2003.

The County's strong leadership role in groundwater protection demonstrates our commitment to sound management of the resource. The County looks forward to working with our communities, as well as the Council, state agencies, and other partners, to address groundwater sustainability and supply issues in our region.

The County supports the Council's goals to:

- "Require local governments to address water sustainability in their local comprehensive plans," and working with "regional and local partners to identify subregional and local solutions to water sustainability that balance regional needs and local objectives."
- Promote adequate and high quality ground and surface water supplies, including the wise use of water through conservation, reuse, aquifer recharge and other practices, and
- Plan for sustainable water supply options and groundwater recharge areas.

The Council states that they will "investigate and assess cost-effective options for regional water supply infrastructure." There are already a number of state and local agencies with a role in water and groundwater management that communities must navigate, including the Minnesota Board of Water and Soil Resources, the Minnesota Department of Health, the Minnesota Department of Natural Resources, the Minnesota Pollution Control Agency and watershed districts. **The County strongly encourages the Council to work closely with communities, especially public water suppliers, as this option is explored. In addition, the County encourages the Council to closely examine its role in water supply, before expanding it, to ensure it's not duplicative of existing regulatory powers and burdensome.**

Thrive identifies operations improvements related to sustainability. By estimates, the Council releases 91 billion gallons of wastewater per year into the region's rivers (250 million gallons per day), of which 70% was initially pumped out of the aquifer. **If the Council is asking communities to explore alternative water supply sources and promotes the 'wise use' of water, Thrive should also make a commitment to explore beneficial use of wastewater from the Council's own wastewater treatment plants. In addition, the Council should work with state agencies to explore the best uses for groundwater that is pumped for pollution containment, such as for recharge or reuse.** In Washington County, the single highest groundwater pumping permit is for pollution containment, with an annual pumped amount equivalent to the baseline (winter time) water use of a growing community of 60,000 people.

While the Council role includes promoting the wise use of water, the community role does not mention reuse and conservation. **Thrive should add reuse and conservation to the community role section.**

Thrive calls for Suburban Edge and Emerging Suburban Edge communities "to explore alternative water supply sources to ensure adequate water resources beyond 2040." **Thrive should make the same request of Urban and/or Suburban communities that are in many cases using the same groundwater sources as Suburban Edge and Emerging Suburban Edge communities.**

#### *Subsurface Sewage Treatment Systems (SSTS) and Wastewater Services*

Regarding the Council role for water sustainability section for Diversified Rural and Rural Residential, how does the Council recognize the county role with regards to oversight and regulation of 'alternative treatment systems'? Counties have responsibility for enforcing SSTS rules (via ordinance). Washington County provides permitting and compliance functions on behalf of the majority of local communities.

**The County role in SSTS should be recognized and supported in Thrive MSP.**

Washington County understands that the Metropolitan Council's wastewater infrastructure work will focus on maintenance over expansion. **Nonetheless, the County wishes to be informed of changes to the existing service area and be offered an opportunity to review and comment as these changes may impact development and consequently natural resource protection, including the operation of 'dump sites' for adding pumped septage to the regional system.**

The wastewater treatment map on page 48 is vague. **The County would like clarification on the boundaries of this map, specifically to ensure that wastewater services are provided in Stillwater, Bayport and Oak Park Heights.**

#### *Healthy Communities*

The County supports the Council's role in incorporating active living considerations for funding, infrastructure, and operations, as well as encouraging access to local foods. The County also supports the Council's desire to support complete streets approaches that will enhance transportation choices. The County supports encouraging communities to incorporate active living into land use decisions, including seeking opportunities to improve local street and pedestrian connections, implementing complete streets

policies, working with partners to overcome barriers to transportation and improving pedestrian and bicycle connections across jurisdictional boundaries.

The County supports the Council's inclusion of an equity outcome, identifying a number of racial and ethnic disparities which exist in our metro area related to home ownership, poverty rates, income, education level and unemployment. What is missing from this section, and from the plan as a whole, is how these inequities impact health. The Minnesota Department of Health (MDH) recently completed the report Advancing Health Equity in Minnesota, which identifies the following determinants of health: social and economic (40%), healthy behaviors (30%), clinical care (10%), physical environment (10%) and genes and biology (10%). While the County recognizes the Council has a limited role in public health, the Council does make long-term policy decisions regarding transit, land use development, parks, natural resources, and housing – all of which have an opportunity to influence, either directly or indirectly, many of these determinants.

**The Council should review the MDH report, which includes a 'health in all policies' approach, and make a stronger link in Thrive between social and economic inequities and their lifelong impact on health. Additional statistics that recognize healthy inequity should be included on page 19 and a statement addressing health impacts and land use should be included in the list of seven 'Land Use Policies' (page 66).**

The County supports the Council for incorporating livability as an outcome, particularly in the context of promoting healthy communities and active living. **Thrive should broadly define livability to be inclusive of all ages, ability levels, and incomes.**

#### *Regional Parks and Trails*

The County places great value on our local and regional parks. **The County believes strongly that access to regional parks needs to be a strong piece of the equity and livability chapters of Thrive.** Both chapters are currently silent on this factor.

Additionally, the County supports Thrive's recognition that the region is facing aging wastewater and transportation systems but the region is also facing aging park infrastructure. **Thrive should recognize this as one of the major challenges ahead.**

The overall format of Thrive makes strong connections between the land use, housing, and transportation systems in the region. There is no link between regional trail, transit and highway systems. **Page 31 of Thrive should be changed to reflect the following: Identifying critical relationships between regional trail, transit, and highway systems and fostering closer planning and implementation.**

#### *Housing*

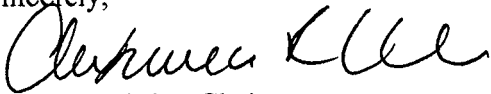
The County recognizes that the Washington County Housing Redevelopment Authority will provide comments on the pertinent housing information in Thrive. Adequate affordable housing needs to be

available throughout the entire region, not just in suburban and urban areas. **The Plan should address the need for affordable housing in rural areas along with suburban and urban areas.**

*Community Designations and Land Use*

Washington County has concerns regarding some of the community designations and has contacted those communities. The local communities may be contacting the Council directly with their questions and concerns about community designation.

Sincerely,

A handwritten signature in black ink, appearing to read "Autumn Lehrke". The signature is fluid and cursive, with the first name being more prominent.

Autumn Lehrke, Chair

Washington County Board of Commissioners

cc: Molly O'Rourke, County Administrator  
Kevin Corbid, Deputy County Administrator



April 28, 2014



Susan Haigh, Chair  
Metropolitan Council  
390 Robert Street N  
St. Paul, MN 55101

Dear Chair Haigh:

The Washington County Housing and Redevelopment Authority (the “Authority”) appreciates the opportunity to comment on the Metropolitan Council’s draft Thrive MSP 2040. The Authority recognizes the important role that the Council plays through planning documents like Thrive to guide growth and development in an orderly and efficient manner in order for the Twin Cities area to be a competitive, healthy and prosperous place for its residents and businesses. This is especially true for Washington County because it has a wide range of communities at different stages of development from “Urban”, to largely agricultural defined as “Diversified Rural”, to fast growing “Suburban Edge” communities, and fully developed “Suburban” communities. With this diversity of community types comes a variety of development and housing needs that should be addressed in Thrive.

The comments below are informed by a recent countywide housing market analysis completed by Maxfield Research Inc. (<http://www.wchra.com/2013HousingNeedsreport.php>). On behalf of the Authority Board, I submit the comments below for consideration about the following three topic areas: 1) rural housing affordability, 2) redevelopment in older communities impacted by regional infrastructure, and 3) the interrelationship of economic competitiveness, workforce housing and housing policy.

### **1. Rural Housing Affordability**

Communities like Scandia and Lakeland that lie outside the Municipal Urban Service Boundary, in the northeast and southeast portions of the county, are unsewered and directed not to “attract or promote new affordable housing development” (Diversified Rural and Rural Residential). This position does not recognize the need to diversify the existing housing stock to enable seniors to remain in the community as their housing needs change and the need to attract new families to regenerate the community. The northeast and southeast market areas of the county have the lowest number of households aged 34 and younger. The rising price of land in these areas contributes to higher home values which can make it difficult for seniors to remain in their homes while at the same time creating a barrier for new middle income families to enter the community. For example, the Authority owns a small senior housing development in Scandia which enables local seniors to remain in their community (it is on a community based septic system). Communities in these parts of the county want to ensure that their communities are able to attract younger families and they recognize the need for a balanced housing supply appealing to all economic life stages.

The Authority certainly recognizes that this policy statement on page 77 is intended to align wastewater infrastructure with appropriate densities; however, it is suggested that the Council recognize in the policy statement that where feasible, communities in these areas should plan for a reasonable amount affordable housing where it is needed to address local housing problems and to ensure long term community vitality and strength.

fax 651.458.1696 | tel. 651.458.0936 | [www.wchra.com](http://www.wchra.com) | 7645 Currell Boulevard | Woodbury, MN 55125

## **2. Redevelopment in Older Communities Impacted by Regional Infrastructure**

The “Urban” community of Newport has been impacted by the reconstruction of the Highway 61, the Wacouta Bridge, and the Pigs Eye sewage treatment plant. The city is bifurcated by Highway 61 making key parts of its commercial areas difficult to access. The City has lost several businesses as a result of the highway construction and is attempting to redevelop a critical interchange at 494 and Highway 61. It is our understanding that there are many improvements pending for the treatment facility at Pig’s Eye, which will help mitigate odors from this facility. In total, however, this infrastructure that serves the region but has impacted the City of Newport will necessitate significant city and county investment to redevelop, not only at the interchange of 494 and highway 61, but elsewhere along both sides of Highway 61. The Council should support communities like Newport who must address the negative impacts from regional infrastructure with technical assistance, priority in funding applications, or other mean to assist local redevelopment efforts.

Further, any community undertaking redevelopment efforts should receive additional consideration in the Livable Communities Demonstration Account program or Housing Performance Scores for its local investment, subsidy, and/or holding costs associated with long term redevelopment efforts. Ultimately, redeveloped areas will promote compact development and mixed use, which will be more cost efficient for the region.

## **3. Economic Competitiveness, Workforce Housing, and Housing Policy Plan**

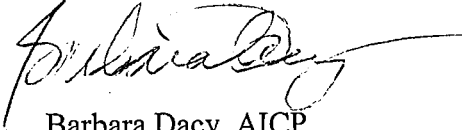
Last year the Authority commissioned a Housing Needs Assessment by Maxfield Research. One of its key findings is that workers in the county do not earn enough to afford to live in the county. The demand is significant over the next twenty years, both rental and owner occupied. The average wage for workers in the county is 40% lower than that of the metropolitan area, and this was true in each area of the county. The relationship between housing and economic competitiveness and its positive impacts should have more consistent language in the various geographies:

- a. The Economic Competitiveness section on pages 80-81 should highlight the interconnection, impact and role of workforce housing in increasing economic strength (housing creates tax base and people spend three-fifths of their income in a community). Further, there is only one area where the Council role is to support workforce housing and that is in the Suburban Edge communities. It is suggested that the Council add this to all of the geographic designations or be more explicit. There are many examples in the county where various forms of workforce housing by Twin Cities Habitat, Two Rivers CLT, private owners, or HRA programs are supporting local economic development efforts.
- b. It is understood that the Housing Policy Plan that is forthcoming in the fall of 2014 will address housing and housing affordability in more detail; however, the Housing Affordability and Choice section on page 76 and 77 should recognize the limited resources available to counties and cities to accomplish the community’s share of regional need for affordable housing. Communities that adopt reasonable land use and implementation plans should not be penalized due to the significant competition for affordable housing funding, and the length of time it takes to put together a feasible financing plan.
- c. The allocation of housing need across the proposed geographies should include consideration of the affordability level of the existing housing stock and current and projected market trends for the various markets. The definition of affordable housing must also be carefully defined, and the range of federal, state, and local programs should be surveyed in regard to eligible income levels as they drive the funding sources used by counties and cities. Despite the success of Twin Cities Habitat for Humanity and various community land trusts, for example, achieving a 60% AMI

level for owner occupied homes requires a substantial subsidy per unit and depending on land costs may not be cost effective in some communities as opposed to others. Many federal programs define 'low income' as 80% AMI while others, including state or local programs, may require 60% AMI or 30% AMI.

Thank you for your consideration of these comments, and do not hesitate to contact me if I can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Barbara Dacy', with a long, sweeping horizontal line extending to the right.

Barbara Dacy, AICP  
Executive Director

May 5, 2014



Comments on Thrive MSP 2040 were received from the following elected officials:

Jeff Johnson, Hennepin County Commissioner  
Representative Diane Loeffler



BOARD OF HENNEPIN COUNTY COMMISSIONERS  
A-2400 GOVERNMENT CENTER  
MINNEAPOLIS, MINNESOTA 55487-0240

April 28, 2014

Chairperson Susan Haigh  
Metropolitan Council  
390 South Robert  
St. Paul, MN 55101-1801

RE: THRIVE MSP 2040 comments

Dear Chair Haigh:

Thank you for the opportunity to review and comment on the Council's 2040 Thrive draft guiding principles.

The lack of specificity regarding the local system statements makes identifying the impacts of this high-level plan difficult. Additional details surrounding Thrive Principles should be released and thoroughly discussed before the Met Council considers adopting this document.

In reviewing Thrive 2040, it is clear that the Council is eager to exercise more control in land use decisions in the metropolitan area. This is a concerning shift that will diminish local control, increase costs and decrease accountability. But more importantly, it will create unfair redistribution of public resources and imbalance across our region.

The Council should re-evaluate this power-grab and focus instead on decreasing traffic congestion region-wide and connecting the many recreational and open spaces that are spread across the metro.

The draft document provides little practical guidance for local governments to use for future planning, yet contains predetermined prescriptions for transitways and community densification. These "top-down" prescriptions will be ineffective in meeting the region's goals.

**Densification:**

The plan's emphasis on densification of the metro is very concerning. Numerous surveys have determined that most Americans aspire to low-density housing and its

associated lifestyle. Minnesota is no different. The most recent Regional Benchmarks show that 79 percent of the net housing growth in the metro occurred in the developing and rural areas. Thrive predicts this trend will slow to 53 percent by 2040, but lower density single family housing will remain the dominant choice for most Minnesotans.

A policy shift away from growth to densification diverts resources from expanding the region's wastewater and highway infrastructure that would promote regional balance and affordable housing. Just under half of the anticipated 824,093 new residents and the corresponding household growth is anticipated to occur in the Suburban Edge and the Emerging Suburban Edge, where little, if any, public facility infrastructure has been built and local funding for collector and arterial roadways and other necessary public infrastructure does not exist. Ignoring the reality of where Minnesotans aspire to live will not eliminate the need to build the necessary infrastructure.

Eliminating public facility improvement funding will result in development "leap-frogging" outside of the Met Council's jurisdictional boundary, which will in turn increase housing costs and reduce family's discretionary income.

### **Housing:**

The council's policies regarding housing have not improved affordability, nor will they in the future. In fact, if the Council prohibits the expansion of public facilities, the problems of affordability will be exacerbated because of the higher cost of limited available land. If the council really wants to promote affordable housing, they would promote a reduction in land-use regulations increasing housing options and making housing more affordable for everyone. People who want to live in multi-family housing may choose to do so, but those who want to live in less expensive homes may purchase smaller single-family homes.

Thrive's call to "invest in affordable housing construction and preservation in higher-income areas of the region" and its requirement that "a mix of housing affordability along the region's transit corridors" appears to be nothing other than a call to subsidize the construction of high-density housing along transit corridors and wealthy neighborhoods.

Despite this region's past focus on affordable housing, the percentage of affordable homes sold compared to the national average continues to erode. Allowing the free market the flexibility to build smaller, more efficient and affordable homes will increase affordable housing stock; as we've already seen, more government planning will not.

### **Transit Corridors:**

Transit and future transitways that include land use intensification take the lead position in the Thrive guiding principles. Throughout Thrive, it is clear that the Council's emphasis on transit corridors is the major solution to many urban problems. This new bias by the Met Council has predetermined municipal winners and losers by promising to reward municipalities that "...prioritize locations that have city and corridor commitment to transit-supportive development patterns near stations, including higher levels of density and development".<sup>1</sup>

The Met Council has invested heavily in rail transit at the expense of maintaining and improving the region's bus system (and, of course, at the expense of maintaining or expanding the road system upon which every citizen in the region relies). Diverting additional resources from areas that do not have transitways will result in unequal and unfair development patterns and fail to advance regional balance or reduce regional congestion.

With 67 percent of the projected regional growth forecast to occur in the Suburban, Suburban Edge and Emerging Suburban Edge communities, the Council's refusal to add additional highway lanes will increase congestion, limit productivity and decrease discretionary income.

**Conclusion:**

Favoring one development pattern or corridor in regional planning at the expense of others risks housing affordability and increases traffic congestion, both of which reduce families' discretionary income.

Unlike previous region guides, Thrive prescribes the adoption of densification, imposes an urban growth boundary by refusing to extend necessary public improvements and predetermines which municipalities will receive funding through transit-oriented development. For the Council to call this approach "balanced and fair" is ridiculous.

The Council should jettison its top-down "Grand Vision" and actually work collaboratively with the *elected officials* in every local government in the region to promote policies that those officials deem most beneficial to their own constituents.

Sincerely,



Jeff Johnson  
Commissioner, District 7

---

<sup>1</sup> Thrive MSP – Draft for Public Review and Comment. Rev. Feb. 26, 2014 (page 46)

**From:** Diane Loeffler [<mailto:rep.diane.loeffler@house.mn>]  
**Sent:** Monday, April 28, 2014 10:20 PM  
**To:** PublicInfo  
**Subject:** Thrive 2040 plan comments

In closing out a document, I realized I had copied and pasted an earlier, not yet final version. The points are the same. Just a few spell checks/grammar adjustments. If this could be the final official document, I would be grateful. IF not, I understand. Thanks!

I am writing after a brief review of the Thrive MSP 2040 draft. I must say I was disappointed in it not robustly and clearly dealing with a variety of issues facing our region.

#### Our people

While equity and disparities were mentioned as concerns, the response to that in planning proposals was tepid at best. It does not note or celebrate our international multi-lingual population and how that can help us achieve connections and prominence in the global market of today and the future.

#### Transit disparities

There are major disparities in all sectors of life, but the Metro Council should take special responsibility for inequities in the services it administers and runs. The lack of attention to the needs of the basic bus rider did not get any mention. In fact, I'm not sure the word "bus" is even mentioned. Certainly "bus shelters" are not mentioned though the perceived need for park and ride lots for people with cars was.

After this past winter, it is shameful that so many are expected to walk long distances and wait without a windbreak when those with cars who "choose" to commute based on savings are given free access to a \$25,000 parking stall and wait in a geothermal heated and cooled waiting room. Others are offered "door to door" customized service without having to be certified disabled. Travel between communities in our core cities and inner ring suburbs often requires back and forth travel with transfers while suburban residents get express bus service that can get them downtown faster than someone living a few miles away.

#### Smart growth

There is an assumption that it is good to develop far flung new regional job clusters as long as "the reverse commute" is available and they happen along transit corridors. I have seen in the House Tax Committee the colorful and attractive developer plans for millions of square feet of new office and light industry space at these locations. They appear before the tax committee seeking special tax provisions to help finance their new campus. When asked where the new businesses are coming from to fill them, it is usually a plan to recruit businesses from other parts of the metro. (Leaving behind vacant properties that will then seek tax advantages to compete in an uneven playing field).

Your projections of population and job growth do not support the amount of new development currently being planned. Yet I did not see in your draft plan a way to guide "smart growth" that



matches that development with real growth, not just the expensive rearranging of corporate addresses.

## Transportation

Very little depth on this topic – too much reference to other plans.

I would like a more serious discussion of the need for and risks of railroad services. There is a mention of a potential desire to expand freight rail operations. Yet the federal government is considering rerouting trains around population centers because of the serious risk that some cargos (oil, ammonia, other chemicals) present and the inability of even professionally staffed first responders to adequately deal with accidents. We should weigh a metro ring option or policy provisions to minimize that risk. It might mean relocating some businesses, but that would be a reasonable price for increased public and environmental safety.

## Housing

Your housing plan touches upon affordable housing. But it doesn't analyze the current housing market and its needs. Only publicly subsidized housing is outlined. In my area there are a lot of affordable housing units that have never gotten a public subsidy but are old and in need of restoration and rehabilitation, especially in small scale rental. But that need is not identified, although there is mention of multi-family housing built in the 1950-60s needing rehab. The worst condition housing in the region is likely the oldest housing and yet the focus seems to be on new, not renew.

No mention is made of the need for dispersed and varied housing for persons with disabilities. Please refer to the state's Olmstead Plan for guidance on the huge unmet needs in this area for independent and integrated housing options.

Study after study shows that Boomers want to live in age integrated housing. They have similar interests to the millennials. Yet you do not advocate for age integrated housing in areas with good transit and walkable shopping.

## Sustainability and Environmental Quality

The greenest building is the one that is already built. The sustainability section needs to address how rehabilitation and restoration (and incentives for companies to locate in these repurposed building) should be a part of our economic development plan. They do not need new infrastructure or transit and are more affordable to small businesses, the major job creators of the future.

Air quality is a HUGE issue. Where are the robust goals and plans to eliminate the need for Air Alerts that tell our kids and seniors to stay inside?

Reclaiming the mighty Mississippi as a recreational and tourism magnet and environmental treasure is also missing. Yet it is what helps people from foreign countries put us on the map.

They want to experience what Tom Sawyer saw - one of the world's greatest rivers and seasonal bird flyways.

Incentives for rewarding people to live close to their work (so they have less environmental impact and more time to enjoy their families and the amenities of the region) merits serious analysis. Workers then would buy into the community they work in and contribute to its economic and civic vitality. That is not true of many long distance commuters whose transit or driving schedule allows for no extra time in our region.

Overall

The lack of data analysis and policy priorities was disappointing for such an important project. I hope the public will be able to be better served as the more detailed sections emerge and are shared for public comment and input.

I would prefer a plan based on policy and service goals. Such as any area in which over x% of the population is transit dependent should expect seven day a week service that can get meet their needs without a car. As a reward for their reduced environmental impact, bus frequency shall not be less than every 15 minutes during weekdays 'til 9 pm and every half hour thereafter. (Many work second shift or in retail/service industries). Bus shelters shall be available every three blocks.

Business campuses in which over y% of the employees take transit or live within x miles of the work location shall be given priority for connecting commuter bus routes.

Our goal is a x% reduction in Air Quality Alert days and we will achieve this by....

Affordable housing proposals will be rated according to their ability to have up to x% of their units available to persons with disabilities (not just physical disabilities) and y% of the new multi-family housing stock should have "universal design" and allow for aging in place.

The number of businesses doing international trade should increase from x% to y% through....

By creating measurable goals, we will be better able to create and sustain momentum in building a robust future for all.

Thanks for your work and the opportunity for feedback.

Representative Diane Loeffler  
District 60A - The fifteen neighborhoods of Northeast and northern Southeast Minneapolis  
(651)296-4219  
503 State Office Building  
St Paul, MN 55155  
Sign up for my email updates!  
<http://www.house.leg.state.mn.us/members/join.asp?id=12270>

May 5, 2014



Comments on Thrive MSP 2040 were received from the following state agencies:

MN Department of Agriculture  
MN Department of Health  
MN Pollution Control Agency  
MN State Council on Disability

April 28, 2014

Susan Haigh, Chair  
Metropolitan Council  
390 N. Robert St.  
St. Paul, MN 55101

RE: Draft Thrive MSP 2040

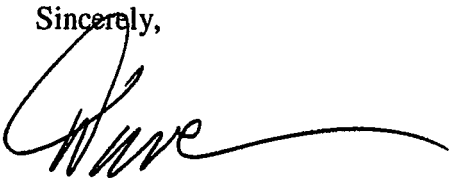
Dear Ms. Haigh: <sup>Sue,</sup>

The Minnesota Department of Agriculture (MDA) would like to applaud the Metropolitan Council's "Thrive MSP 2040" report on its support for agriculture. As you know, agriculture is an important part of Minnesota's economy; it provides jobs on farms and in food processing and related industries. It provides for opportunities for economic development and food security. Markets for locally grown and processed foods are expanding across Minnesota, including the metropolitan area. These markets depend on land remaining productive and available for agriculture. In addition to the health, environmental and economic benefits of growing food and raising animals in the metropolitan area, it helps us to retain and enhance the ability to feed ourselves and future generations. There are also the intangible benefits associated with farmland, including aesthetics and open space. It's a finite natural resource, which could be lost without careful planning and protection.

The report also does a good job recognizing the availability and types of land that can be used for agriculture within the metropolitan area, which varies widely between municipalities, as does the type of agriculture appropriate to each area.

Please count on the MDA for its continued support and help in guiding "Thrive MSP 2040" and future growth to enhance and protect agriculture.

Sincerely,



David J. Frederickson  
Commissioner



*Protecting, maintaining and improving the health of all Minnesotans*

April 28, 2014

Metropolitan Council  
390 N. Robert St.  
St. Paul, MN 55101

RE: Comments on Thrive MSP 2040

Dear Metropolitan Council,

The Minnesota Department of Health (MDH) Climate & Health Program commends the Metropolitan Council for this progressive document, particularly for the discussion of Equity, Livability and Sustainability outcomes. MDH has recently started an Office of Health Equity, inspired by the compelling data of health and racial disparities in our state. Thrive MSP 2040 does a great job describing the issue of equity and disparities, and making the case for why equity should be a value integrated throughout the document. The Livability outcome section aligns with MDH's activities in health promotion through active living and active transportation. MDH - Climate & Health Program recognizes the influence of the built environment, and that partnering with local planners is the key to making environmental change to support positive health behaviors and outcomes. Finally, MDH - Climate & Health Program is supportive of the inclusion of climate change in the Sustainability outcome section, specifically how Thrive addresses mitigation, adaptation and resilience, and identifies policies and strategies throughout the report that support these actions. Specific comments on each section of the Thrive MSP 2040 Outcomes follows below.

### **Stewardship**

The last two paragraphs on page 9 approach but ultimately shy away from drawing the connection between "the benefits that would be costly to replace" and health outcomes. Impacts on health can be a persuasive argument for protecting natural assets, often more compelling for some people than arguing for nature simply for nature's sake. For example, Thrive describes that "tree canopies shade our buildings and absorb carbon dioxide and pollutants." MDH recommends that this statement be followed with language about how lower levels of pollutants will positively impacts human health, especially for children, older adults, and persons with respiratory illness, such as asthma. Additionally, complementary arguments for parks, in addition to increased property values, include the physical activity and mental health benefits that people experience. To take it one step further, Thrive could include dollar figures associated with these health burdens.

The statement "Proper management of subsurface sewage treatment systems is needed to minimize impacts on surface water, groundwater and public health" on page 10 begs for more context. This is the first mention of public health, and readers may not draw the connection between stormwater runoff and health outcomes.

Alternately, Thrive could take a fiscal-conservation lens to make the argument for Met Council's actions to protect natural resources. These actions mitigate the costly effects of non-compliance

Environmental Health Division • 625 Robert St. N • PO Box 64975 • St. Paul, MN, 55164  
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<http://www.health.state.mn.us>

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with EPA's standards; prevent costly damage from flooding; and increase infiltration so that communities are not dependent on costly emergency supply systems in times of drought.

### **Prosperity**

Please clarify the statement on page 14 "The issue of regional balance has several multiple dimensions; sometimes the issue is north and east vs. southwest, other times the issue is suburban edge vs. suburban vs. urban center." What is Thrive referring to when it talks about a balance between north and east versus southwest and/or suburban edge versus urban center? A couple examples would be great.

### **Equity**

The discussion on "engaging a full cross-section of the community in decision making" is critical. Thank you for including this in Thrive.

### **Livability**

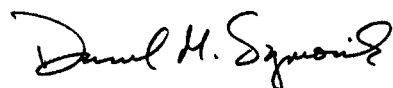
Overall, MDH-Climate & Health supports this section. As mentioned in this document, there are a finite amount of high-quality natural resources in this region. In order to equitably create access to regional outdoor spaces for all segments of the population and areas of the region, please consider expanding the scope of the Regional Parks and Open Space system to include additional types of parks and natural spaces. For example, currently, new pieces of the system have to be over 100 acres in size to be funded, a limitation that excludes almost all land in the urban and most suburban sections of the region which have been partially or completely developed for decades but which continue to grow in popularity and population. To make high population areas livable, a goal of Thrive 2040, the requirements for Regional Recreation Features need to be more flexible and include more types of open space such as linear parks or a series of connected smaller sites. In addition, allowing for acquisition and funding of restoration for formerly contaminated sites to restore them to natural areas fit for visitors should be considered. Continuing to overwhelmingly dedicate acquisition funds in areas that require a personal vehicle to reach (or a 60-90 minute transit trip) creates a significant barrier to low-income populations particularly in high and medium density areas that don't have an excess of undeveloped land to create attractive natural open spaces.

### **Sustainability**

MDH-Climate & Health is supportive of the inclusion of climate change in the Sustainability outcome section, specifically how Thrive addresses climate change mitigation, adaptation and resilience, and identifies policies and strategies throughout the report that support these actions.

Thank you for your consideration of these comments from the MDH Climate & Health Program.

Sincerely,



Daniel Symonik, PhD  
Environmental Impacts Analysis Unit Supervisor  
Minnesota Department of Health



# Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

800-657-3864 | 651-282-5332 TTY | [www.pca.state.mn.us](http://www.pca.state.mn.us) | Equal Opportunity Employer

April 28, 2014

Ms. Susan Haigh  
Chair  
Metropolitan Council  
390 N. Robert  
St. Paul, MN 55101

RE: Preliminary Draft of the Thrive MSP 2040 Regional Planning Document

Dear Ms. Haigh:

The Minnesota Pollution Control Agency (MPCA) appreciates the opportunity given to provide input and comment on the February 2014 Draft of the Thrive MSP 2040 Regional Planning document (Plan). The Plan sets a vision that is applied by four policy plans: the Transportation Policy Plan, Water Resources Policy Plan, Regional Park Policy Plan, and Housing Policy Plan. We expect these policy plans will provide much greater detail than what is presented in the overall Plan. Each of these policy plans are currently being developed by the Metropolitan Council (Council) and will be available for public review and subsequent Council's adoption throughout 2014 and early 2015. The MPCA plans to comment on those policy plans relevant to the MPCA's mission when they are released.

The MPCA compliments the Council for improvements made during the drafting process to address matters for which the MPCA has regulatory responsibility and other interests. The MPCA supports the Five Desired Outcomes and the Integrated Approach proposed in the Council's Plan, along with many of the Council and community-based actions stated to achieve environmental and sustainable development goals. Notable strategies and actions from the Draft Plan that should be emphasized and enhanced include:

- providing leadership to support climate change mitigation, adaptation and resilience
- encouraging communities to participate in regional programs which support efforts to inform, plan, mitigate, adapt, and respond to climate change issues of local significance such as water conservation, storm water infrastructure adaptation, greenhouse gas reduction, use of alternative energy sources, and infrastructure planning
- reducing criteria pollutants as well as greenhouse gas emissions from the transportation sector
- Prioritizing transit investments in areas where infrastructure and development patterns are in place, committed to, or in development to support successful transit systems, by balancing transit ridership with added connectivity
- providing technical assistance to the region's local governments, including the identification of risks, best practices and model ordinances for climate change mitigation and adaptation and working in partnership with the MPCA's Minnesota GreenStep Cities Program
- incorporating water sustainability considerations in all areas of Council policy and actions, including overall development patterns, water management, transportation, and housing and regional parks

- supporting the region's bicycle and pedestrian facilities to promote bicycling for transportation, recreation and healthy lifestyles, and
- establishing a regional vision and approach to managing water resources considering the interrelationships of land use, development patterns, transportation and other regional services, and water resource protection

While the policies found in the Plan are generally in line with many of the MPCA's existing policies and initiatives, the MPCA has identified some issues below that the Council should address or strengthen before moving with adoption of this document. The issues include:

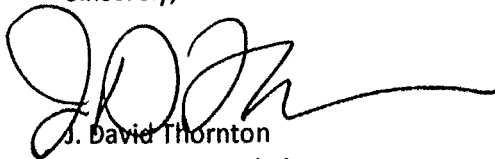
- The lack of detailed information on other criteria pollutants as well as mobile source air toxics (MSATs). Although the Plan mentioned that the region is at risk of failing to maintain air quality attainment status for fine particulate matter, the Plan did not provide any emissions reduction approaches from the transportation sector. Currently, nearly all areas of Minnesota are in compliance with the federal ambient air quality standards. However, in recent years the U.S. Environmental Protection Agency has strengthened or proposed to strengthen the federal ambient standards for ozone, fine particulate matter (PM<sub>2.5</sub>), nitrogen dioxide (NO<sub>2</sub>), lead and sulfur dioxide (SO<sub>2</sub>). As a result, despite overall improvements in air quality, Minnesota is at risk of being out of compliance with federal standards for ozone and PM<sub>2.5</sub> that may lead to federal requirements and expensive regulatory action. Therefore, the Council should address in the Plan how they will work with their partner agencies including the MPCA, Minnesota Department of Transportation and local governments, by focusing on the most efficient and effective ways to reduce emissions from these transportation sources. Reductions in these pollutants could also contribute or result in various health benefits.
- Achieving the greenhouse gas reduction goal. The Plan needs to include more specificity on how the Council's investment priorities and planning authorities can contribute toward meeting statutory goals for reductions in the generation of greenhouse gas emissions. The Council's approach to climate change should not only be based on "softer approaches" as stated in the Plan. Consideration of bolder and a wider range of reduction strategies to be implemented within the transportation planning process should be part of the solution. Although the state is making progress in reduction of transportation emissions, Minnesota is not currently on track to meet the "2007 Next Generation Energy Act" that called for cutting the state's greenhouse gas emissions to 15 percent below 2005 base levels by 2015. Achieving the state's reductions will present unique challenges for the Council, however, working in partnership with other stakeholders to find ways to reduce air emissions from some of the sources not traditionally regulated by the MPCA will help towards reaching these goals and in reducing health risks. The MPCA also appreciates the Council's involvement in the Climate Strategies and Economic Opportunities Workgroup.
- Vehicles miles traveled (VMT) reduction goal. The Plan identifies the goal of reducing VMT in the region. Reducing VMT is one of the strategies to reduce transportation greenhouse gases. The MPCA fully supports this goal and its implications for land use and planning. This outcome, when incorporated with increased transit access, would advance all of the Plan's five key outcomes. The only concern is that the Council did not address what they will do to achieve this outcome to match the policy intent stated in the Plan. We hope the Council will provide greater detail on specific strategies in the soon to be released 2040 Transportation Policy Plan.



- Health impacts from transportation-related emissions. The Plan did not address how transportation partners will avoid, minimize and mitigate the disproportionately high and adverse impacts of transportation projects, and their related health impacts, to the region's minority and low-income populations. Several studies show that people on the lower end of the socio-economic scale and some minorities, especially those that live and work near heavy traffic corridors, are disproportionately exposed to traffic emissions and bear disproportionately higher health risks as a result. The reduction in health impacts of near-road air pollution should be included as part of the strategies in the Plan. Potential strategies include: planning land uses to minimize pollution exposure; informing the public about the near-road pollution problems; and identifying higher-risk areas for potential mitigation efforts. (See study by MPCA's Dr. Greg Pratt in *Journal of Exposure Science and Environmental Epidemiology*. Advance online publication 18 September 2013; doi: 10.1038/jes.2013.51 Referenced at this link: <http://www.nature.com/jes/journal/vaop/ncurrent/abs/jes201351a.html>).
- Lack of information on environmental justice. The Plan discussed the Council's Choice, Place and Opportunity: An Equity Assessment of the Twin Cities Region (2014), which identified Racially Concentrated Areas of Poverty, but there were no discussions on environmental justice. The Council should include environmental justice strategies in the Equity chapter of its Plan and discuss steps the Council will take to avoid disproportionately high and adverse impacts of transportation projects to the region's minority and low-income populations. The MPCA will work with the Council to strengthen its fair treatment principle which means that the MPCA or the Council will seek to ensure that no group of people bears a disproportionate share of negative environmental consequences resulting from industrial, government, and commercial operations or policies.

We look forward to continuing our partnership with the Council to accomplish the goals of the Council in an environmentally sound and sustainable way. If you have any questions regarding the MPCA's comments, please contact Innocent Eyoh of my staff at 651-757-2347 or [Innocent.Eyoh@state.mn.us](mailto:Innocent.Eyoh@state.mn.us).

Sincerely,



J. David Thornton  
Assistant Commissioner  
Minnesota Pollution Control Agency

JDT/IE:ld

**From:** Stemper, Colin (MSCOD) [<mailto:Colin.Stemper@state.mn.us>]  
**Sent:** Thursday, April 24, 2014 11:52 AM  
**To:** PublicInfo  
**Subject:** Thrive MSP 2040 Public Comment

April 24, 2014

To whom it may concern,

The Minnesota State Council on Disability (MSCOD) was established in 1973 to advise the governor, state agencies, state legislature, and the public on disability policy. MSCOD advocates for policies and programs that advance the rights of Minnesotans with disabilities. In fulfilling, MSCOD appreciates the opportunity to provide comment on the Thrive MSP 2040 draft.

Overall, the draft has key positive aspects. MSCOD appreciates the attention that is paid to connecting affordable housing, accessible public transportation, job centers, and low-income communities. Minnesotans with disabilities rely on these systems working together in order to have independent lives. MSCOD also supports the five selected outcomes in the draft. Outcomes of prosperity, equity, and livability are especially important concepts for the region's disability community.

Other portions of the draft leave room for improvement. One specific area that could benefit from more detail is the equity outcome. MSCOD supports the statement that "the Council will work to create and protect viable housing and transportation options for the region's residents, regardless of race, ethnicity, income, immigrant status, or disability" (p. 22). Yet, this notion does not seem to permeate the rest of the equity outcome. Most of the focus seems to be on solving racial disparities that exist in the region. This is a very worthy pursuit, but there are disparities that exist beyond race, like disability.

This outcome mentions that the Council will expand transportation choices for transit dependent households and low-income areas. While both of these categories may include people with disabilities, they are not mentioned as other populations are in this section. Many Minnesotans with disabilities rely on accessible public transportation options to travel to work, school, church, and other important places in their lives. MSCOD believes that more research must be done to expand the equity outcome beyond race. It is one thing to say that transportation options will be available regardless of disability. It is another to present a plan for how this will be done.

The second area that could be improved is the way prosperity is looked at in its section. Oftentimes, this section seems most focused on creating a prosperous region for businesses, especially with the focus on freight and highway maintenance. Again, these are important aspects of the metro area's economic vitality. But there is an alarming lack of focus on the way our region's transportation infrastructure may benefit employees, especially employees of color and those with disabilities.

Page 17 mentions that residents should be provided options to commute to work. Yet, the next sentence mentions how “transit is of particular interest to office-based employers.” This is true, but transit is also of interest to people with disabilities, low-income individuals, people of color, students, and more. MSCOD recommends that the next draft of Thrive take a broader view of prosperity. We believe it is the goal of our region and state that employers and employees, especially those in the populations mentioned above, should be simultaneously prosperous. Thrive should reflect this goal.

The Thrive MSP 2040 draft is heading in a direction that will benefit our region. However, important populations in our region are largely absent from this document. The term “disability” is only explicitly mentioned once, on page 22, while people with disabilities make up 20 percent of Minnesota’s population. Regional planning must reflect the fact that our state will grow older and disability will become a more frequent experience. MSCOD hopes the draft document be enhanced by these suggestions and to reflect this reality.

Sincerely,

Colin Stemper  
Legislative Specialist  
Minnesota State Council on Disability (MSCOD)  
O: (651) 361-7809 C: (651) 587-3899  
[www.disability.state.mn.us](http://www.disability.state.mn.us)

May 5, 2014



Comments on Thrive MSP 2040 were received from the following organizations:

Blue Cross and Blue Shield of Minnesota  
Builders Association of the Twin Cities  
Catholic Charities  
Center of the American Experiment  
Fresh Energy  
Growth and Justice  
Housing Preservation Project and Supporters  
Institute on Metropolitan Opportunity  
ISAIAH  
Metro Cities  
Metropolitan Interfaith Council on Affordable Housing  
Mid-Minnesota Legal Aid  
Minnesota Center for Environmental Advocacy  
Scott County Association for Leadership and Efficiency  
Sierra Club  
Southwest Corridor Transportation Coalition  
Transit for Livable Communities  
Trust for Public Land  
West Side Community Organization and Supporters

Blue Cross and Blue Shield of Minnesota

P.O. Box 64560  
St. Paul, MN 55164-0560  
(651) 662-8000 / (800) 382-2000



April 24, 2014

Metropolitan Council  
390 N. Robert St.  
St. Paul, MN 55101

Subject: Draft Comments on *Thrive MSP 2040 – Public Review Draft*

Thank you for the opportunity to comment on Thrive 2040, a document that will shape the region's prosperity and health. This letter is organized into four sections, A) General Feedback B) Opportunities C) Specific Recommendations and D) General Recommendation.

### **A) General Feedback**

Recognizing that most determinants of health occur in the social and physical environment, we applaud the Council's recognition of how its vision, planning, and policy making impact a healthy and equitable community design. We commend the Council for explicitly identifying "equity" and "livability" as two of your key outcomes and weaving both values throughout the document's approach and content. Your earnest effort to integrate equity into the community input process and various issues (transportation, housing, land use, etc.) conveys a sophisticated understanding of this region's changing demographics, socioeconomic needs, and commitment to the long term common good. Furthermore, your livability section clearly calls out active living, complete streets, and healthy food access commitments. Seeing community planning in relation to active transportation/transit connectivity, healthy food proximity, and deep community engagement are paramount to for public health. This integrative and interdisciplinary approach is vital to creating optimal defaults in the environments in which we live, learn, work, play, and travel. Blue Cross stands staunchly behind the Council's continued work on normalizing health equity criteria into its scope of vision and policy making.

### **B) Opportunities**

#### **Commitment to Long Term Practice and Policy Change**

Thrive 2040 is intended to be a foundational and visionary plan, so we feel an explicit commitment to health and equity through policy change will lead to the institutionalization and full operationalization of all 5 intended outcomes (stewardship, sustainability, prosperity, livability, and equity). Adopting and implementing a formal policy that creates accountability and dedicated resources will be necessary for durable practice of health equity. Thrive 2040 identifies promising and best practices already, but can express language and action to systematize the intent. We

[bluecrossmn.com](http://bluecrossmn.com)

encourage you to look at other MPOs and communities nationwide who have led on this step, such as Seattle King County and Memphis MPO.

Furthermore, the Council's Choice, Place and Opportunity: An Equity Assessment of the Twin Cities Region document highlights inequities in the region and particularly housing. Yet, we know these are structure inequities across sectors and domains. We support a comprehensive application of the equity assessment for your entire jurisdiction. The insights gleaned in the housing equity arena are important and relevant to transportation, land use, waste management, open space access, and the entire Thrive 2040 scope.

### **C) Specific Feedback to Enhance Active Living, Healthy Eating, and Health Equity**

- Replace the word “~~support~~” with require complete streets approaches to enhance transportation choices” and also add and improve safety for all users (pg. 27, bullet 4, top of page).
- Increased attention to the Council's role in addressing racial and economic disparities. Identification/implementation of specific strategies to reduce the region's racially concentrated areas of poverty (RCAPs) including: a) using “transit dependency” as one of the three criteria to identify transit markets areas and levels of service, b) expansion of affordable housing in transit station areas, use of criteria to prioritize investment in the RCAPs (pages 19-23, 38, 44, others).
- Prioritizing preservation of the remaining agricultural land in the region for local food production of healthy foods and for local access, aggregation, and distribution (pages 14, 31, others).
- Inclusion of priority and inclusion of language on active lifestyles, and access to local food and identification of a regional bicycle system (page 25).
- Aligning resources to support transit oriented development and walkable places as explained on page 28; more detail on what resources are being aligned would be helpful.
- Active living section. The plan should say more specifically what land use decisions will make it easier for people to walk to destinations - more compact development and higher densities (Page 25).
- Explicitly connect equitable transit-oriented development with equitable food access, which includes healthy and culturally appropriate food. It is one thing to have a grocery store across the road; it is another whether it carries the foods that support your family's health and culture, and another issue entirely whether the road is safe for a family to cross. When considering options in housing and transit development, ensure that communities are able to access food markets that serve their physical and cultural health.

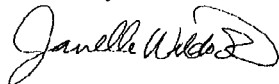
### **D) General Recommendation: Health in All Policy Approach (HiAP)**

Our health is determined by where we live, work, learn, play and how we get there. Recognizing that the contributing problems and solutions to health exist beyond the conventional public health arena, upstream integration of health considerations is required. Early and authentic consideration of health effects into program, project, or policy decisions is the crux of prevention because it addresses health threats and benefits from the outset.

- Create a HiAP Work Group: Interagency, interdisciplinary, and intercultural collaboration on health. Facilitate collaboration among diverse sectors (e.g., planning, housing, transportation, energy, education, environmental regulation, agriculture, business associations, labor organizations, health and public health) when making decisions likely to have a significant effect on health. For example, Chair Haigh, Com. Ehlinger, and relevant cabinet members could create a HiAP cabinet to coordinate resources, discover efficiencies, and develop strategies that address interconnected health solutions. This would allow the state to leverage intellectual capital, financial resources, and community wisdom for co-benefits of effectiveness, equity, and efficiency. Thrive 2040 draws out the need for integration and breaking down silos, but an accountability structure is needed this approach has authority and resources to sustain itself.
- Institutionalize the expectation and accountability for improving health equity and cultural competency among members, staff, grantees, contractors, and others focused on implementing Thrive 2040. Embedding equity and livability criteria into both your internal operations (human and financial resources) and policy documents will be important to reaching declared outcomes and principles in Thrive 2040.
- Establish criteria and routine practice of health and equity impact assessments for policy, systems, and environmental decisions, where identified as relevant and appropriate. Include health criteria as a component of decision making (e.g., policy making, land use and transportation planning).

The magnitude and complexity of chronic disease and health inequities cannot be effectively addressed by public health alone. It is intertwined with place, income, race, education, housing, transportation, and ultimately how we design our communities. While there is no single solution, ensuring health equity is both culturally targeted and universally designed into formal and foundational policies like Thrive 2040 is a significant step forward.

Sincerely,



Janelle Waldock MS,MPA  
Director, Center for Prevention  
Blue Cross and Blue Shield of Minnesota



April 28, 2014

Chair Susan Haigh  
Metropolitan Council  
390 Robert St. N  
St. Paul, MN 55101

**VIA E-MAIL**

**Re: Draft Thrive 2040 Comment**

Dear Chair Haigh,

I am submitting this letter on behalf of the Builders Association of the Twin Cities (BATC), in response to the Metropolitan Council's ("Council") release of the *Thrive MSP 2040* framework document. By way of background, BATC represents nearly 1,100 member firms engaged in all phases of the home building, land development and remodeling industries in the Twin Cities area, including contractors, sub-contractors and suppliers. BATC is dedicated to providing a diverse selection of quality and affordably-priced homes in our region.

### **General Observations**

BATC is encouraged by the general themes of stakeholder collaboration and data-driven accountability measures in *Thrive*. Emphasis of these themes creates an opportunity for the Council to utilize the perspectives of the region's local governments and industry experts as *Thrive* is implemented. The Council's commitment to monitor and evaluate the effectiveness of the policies and practices is important and should be carried throughout the life of this document.

BATC joins the Council in recognizing the importance of regional competitiveness and the strong link between growth opportunities, economic strength and prosperity. BATC believes meeting our market's demand for housing by providing the largest array of housing choices at all price points across our region is a key factor in maintaining a competitive region.

In reviewing *Thrive*, BATC was pleased to see improvements in the distribution of population which better reflects our region's likely pattern of growth. However, the prediction of a denser, transit-oriented growth pattern is not shared by BATC. Based on long experience, we see nuanced changes to the well-established market pattern, which will include some transit-oriented and dense-growth opportunities. BATC strongly believes these opportunities will be more modest than substantial, given



our market's current land availability, the prohibitive costs of redevelopment, market preference, and the substantial limitations on access to and use of transit in our market.

*Thrive* is presented as a value-based document that attempts to synthesize a shared vision for our region. BATC agrees with many elements of the shared vision, but recognizes that as the Council increasingly reaches beyond its statutorily authorized core functions, maintaining that vision becomes much more difficult. *Thrive* is long on ideas, but in many areas, short on specifics which are necessary for a full public discussion on policy, planning and regional growth. We question the need for and appropriateness of the Council's effort to insert itself into policy areas that are outside of its identified mission. For *Thrive* to ultimately succeed the Council must engage stakeholders consistently, utilize data-driven approaches, and adhere to the core functions of the Council.

## **Housing**

BATC joins the Council in supporting a housing market that meets the diverse and wide ranging needs across our region. Despite our consistent message to the Council regarding the growing regulatory crisis, *Thrive* has focused almost solely on subsidized affordable housing policies. There is undoubtedly a need for subsidized housing and BATC encourages the Council to equip local governments with the tools to address this need. But there is a broader housing affordability issue which affects all residents of our region and could impede regional vitality and growth.

BATC's vision of creating a more efficient housing regulatory structure advances the goals of housing affordability for our entire region. This approach maximizes housing access and enhances the competitiveness of our region. The need for this approach across our region is growing and we ask the Council to join us in this effort.

Minnesota has the highest housing regulatory burden in the Midwest and is among the highest in the United States, according to the Housing Supply Regulation Index. Twenty-five to thirty percent (25-30%) of the final price point of a home is attributable to regulatory costs. These range from environmental regulations during the earliest phases of development, to the building code requirements in place during construction, to the fees and taxes due at the time of closing.

Of greatest concern to BATC is that the momentum is heading the wrong way. Instead of decreasing regulations, the homebuilding industry is consistently addressing new regulations that add thousands of dollars to the final price point of a home. This is not sustainable and is a direct threat to our shared goal of housing affordability for all Minnesotans.

Items like duplicative or unreasonable fees required by local governments, or the current proposal to mandate indoor sprinkler systems in single family homes are examples of issues where the Council could use its influence as a housing advocate to elevate these affordability discussions. BATC recognizes that these are difficult discussions between government entities, but if housing affordability is a regional priority then this is where the emphasis ought to begin. *Thrive* is silent on these issues, which is a missed opportunity for our region and a weakness of the document.

## **Redevelopment**

The Council's emphasis on in-fill and TOD opportunities will require a substantial increase in redevelopment for our region. On page 18 the Council acknowledges a primary barrier, "Infill development and redevelopment require less new regional infrastructure but can cost more for the developer up front." The cost to the developer is always built into the project costs and is passed onto the homebuyer, but it also represents a significant risk factor and barrier to financing, as many costs associated with redevelopment do not add to the appraised value of the home. Cost is a primary factor in a homeowner's choice when building a new home and cost will be a steep challenge for pursuing all redevelopment projects.

*Thrive* places a priority on streamlining the redevelopment process. BATC is interested in details on how the Council proposes to achieve this. Local governments control the entitlement process which is substantially more cumbersome, time-consuming and politically charged in redevelopment scenarios. Resource efficiencies from redevelopment are an admirable goal, but pinning a substantial portion of our region's long-term growth on the speculation that redevelopment will shoulder a sizeable increase of the region's growth is not realistic.

## **Land Use**

BATC has long supported the Council's mission of ensuring orderly and economical land development. *Thrive* states that the Council will create higher expectations for land use by directing growth where infrastructure already exists. This approach is reasonable and efficient, provided the market demand exists for growth in these areas. However, creating infrastructure investments where market demand does exist for growth is also an important priority that is not adequately addressed in *Thrive*. In fact, there are contradictions in approach throughout its land use planning objectives.

On page 13 it states, "The Council will use its authority and capacity to plan and invest in community development and consider prosperity and economic competitiveness as a lens through which to evaluate its planning, operations and investment decisions." BATC concurs with this approach but finds it contrary to others, including limiting changes to MUSA, which the Council states is adequate through 2040. BATC strongly believes that flexibility is required in this critical area to respond to market conditions, which may very well challenge the MUSA assumptions of today in the coming years.

On page 14 it states, "Advancing regional balance will be a consideration that helps all parts of the region receive investments that promote prosperity at their stage and level of development." Again, BATC supports this statement but it is at odds with the umbrella statements directing growth where infrastructure already exists and limiting any MUSA expansion. BATC strongly believes that we need all types of housing for the variety of preferences in our markets, which span across all of the Council's regional designations. The Council's statutory jurisdiction as a planning agency does not extend to making decisions about market allocation or market choices. Failure to make balanced and timely growth investments will result in leapfrog development and further threaten housing affordability.

In *Thrive*, the Council states that the region is able to provide cost-effective infrastructure when it is able to anticipate where, when, and to what extent regional growth can occur. This issue was at the heart of BATC's concern and opposition to the preliminary population forecasts published by the Council in late 2013. While the updated forecasts are greatly improved and now better reflect our region's growth pattern, the wide-ranging results from the Council's modeling casts doubt about the effectiveness of the

Council's ability to anticipate where, when, and to what extent growth is likely to occur. BATC believes that our historical growth pattern and analysis of land availability give us the best indicators for growth patterns for the foreseeable future. *Thrive* should be further amended to better reflect this growth pattern which is shaped by land availability, affordability, access to transportation, strong schools, natural amenities, cultural attractions and safety.

In *Thrive*, each city is captured into one of ten land use designations. While the designations are a reasonable starting point for regional land use discussions, the accompanying average density minimums has increased for many cities. BATC believes that the densities proposed will create challenges for many cities by forcing higher density, multi-family projects that will face market acceptance challenges, neighborhood resistance, and feasibility barriers for developers. This, too, will result in leapfrog development to cities with less proscriptive growth requirements.

The attached exhibits were prepared to demonstrate what a typical residential block would look like using the proposed density described in *Thrive*. The exhibits compared an urban block with a similar size block from a suburban neighborhood. Both exhibits consist of approximately 10 acres of single family homes served by a local street that met city standards. The comparison exhibits demonstrate that an existing urban block consisting of 56, 6,000 Sq ft (42x128) would need to double in density to meet the proposed 10 unit per acre criteria for urban development. Also, a suburban neighborhood, consisting of 26, 10,000 Sq ft lots (80x200) would also need to double the number of lots to meet the proposed density of 5 units per acre. Simply stated, the proposed policies would require Minneapolis neighborhoods in suburban cities and suburban neighborhoods in suburban edge cities.

The exhibits provide a simple example of the impact of the proposed policies within our communities. What they are unable to illustrate is that our region is not made up of square, pad-ready blocks, nor do they show the impacts of environmental constraints, local ordinances and the many encumbrances that are part of any development. Enforcing these densities in real world environments will drastically change the existing built landscape of our cities and the ability for homebuilders to meet the housing demands of those cities and the market.

### **Transportation/Transit**

*Thrive* describes many highway-specific policies that will guide the Transportation Policy Plan. This emphasis is important given that nearly 85% of our residents use this infrastructure by automobile. What's missing in the document is any mention of expansion possibilities. The outsized emphasis on transit opportunities understates the need for consideration of broader transportation infrastructure investments and, at a minimum, transportation planning flexibility looking toward 2040. Our region requires substantial resources to meet future demand for transportation infrastructure. The Council's focus should be on more flexible and market-responsive solutions versus its attempt to drive the market toward transit and TOD opportunities. Frankly, our geographic diversity and lack of transit options are significant impediments.

On page 27, emphasis is given toward the adoption of Complete Streets solutions. BATC supports Complete Streets consideration for certain corridors, but believes their use is limited and should not be positioned as a one-size fits all approach in all transportation planning.

*Thrive* states that light rail, commuter rail and bus rapid transit lines are changing the landscape by attracting new real estate development and creating more choices for how people move about the

region. BATC strongly supports the implementation of transit systems wherever ridership exists to support it. However, the fact remains that the means of travel within our region will remain, for some time to come, the automobile. Projected growth along transit corridors has supported only incremental housing growth, as demonstrated by growth patterns along the Hiawatha Line and other major transit corridors.

There are indications that the planned Southwest LRT Line will attract greater development interest, but this project is unique given the features of the corridor. Even in the most optimistic TOD scenario, the regional usage of transit systems will continue to be a small fraction of the overall travel choice of our region's residents. As the Council reported in its most recent Travel Behavior Inventory, transit use makes up just 3% of the travel for our residents, while 84% of the trips are made by automobile. While it's likely that these numbers will marginally adjust over time, there is a disconnect between the Council's promotion of TOD and the market's interest and acceptance of it as a viable option for a substantial segment of our marketplace.

### **Water**

BATC joins the Council in placing water sustainability as a growing priority. In *Thrive* the Council states a goal of incorporation of "water sustainability considerations in all areas of policy and actions, including overall development patterns, water management, transportation, and housing and regional parks." This statement is extremely broad and proposes a host of possible regulatory scenarios, many of which will be problematic from a cost, implementation, and property rights standpoint. Greater specificity is needed on what specific, collaborative steps are necessary to address our emerging water sustainability issues.

On page 3 of *Thrive*, emphasis is placed on actively promoting infiltration. BATC has been at the forefront of exploring low-impact development techniques to find the appropriate balance of resource protection and affordability. We believe the Council must proceed with caution in terms of promoting a specific management practice like infiltration, which has been in use by developers for less than a decade. Some areas of the region allow for infiltration techniques but many areas do not, due to soil types. BATC urges flexibility and more time to better assess the effectiveness and cost impacts of infiltration and other stormwater management practices prior to any requirement for their use on a regional basis.

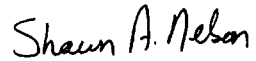
### **Conclusion**

*Thrive* is an ambitious and forward-looking effort. BATC recognizes the Council and staff for their work in staking out a vision for a vibrant region. BATC shares the priorities of regional competitiveness, housing affordability, efficient land use planning, resource efficiency, collaboration and inclusiveness.

Much of *Thrive* is devoted to broad policy statements that aren't connected with detail which would provide a clear and transparent direction on how policies will impact planning and growth, and whether or not the Council has the authority to regulate in a given issue area. BATC believes strongly that the Council's adherence to its core missions is critical to our region's success. There also needs to be clear accountability between the Council and cities in the region for ensuring that established policies achieve goals of housing affordability and accessibility. We strongly recommend that *Thrive* be amended to include greater detail, including statutory authority and directive, wherever possible.

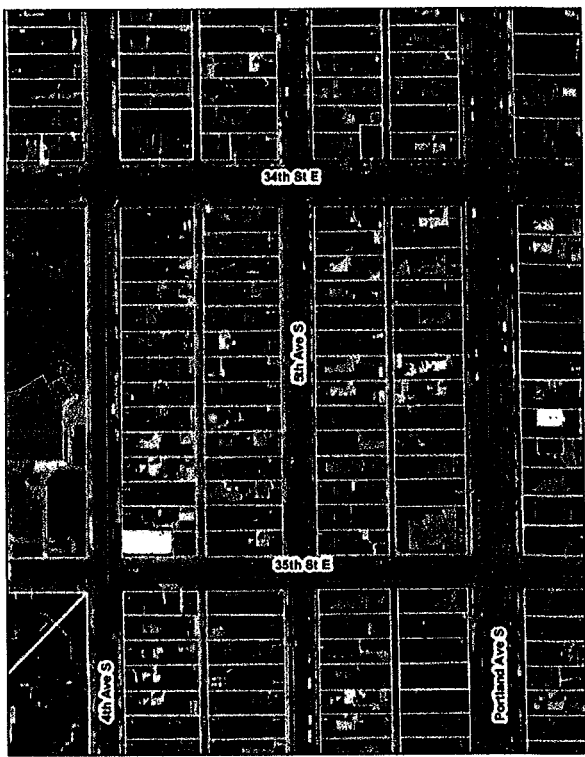
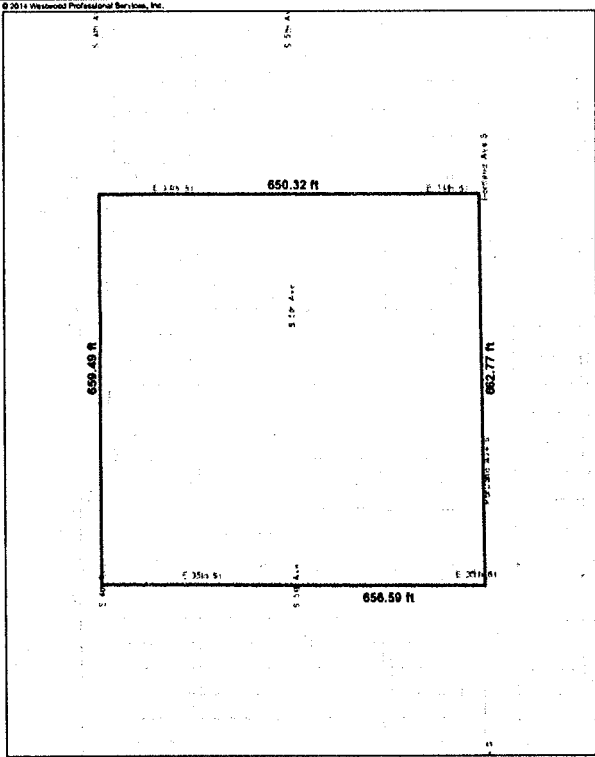
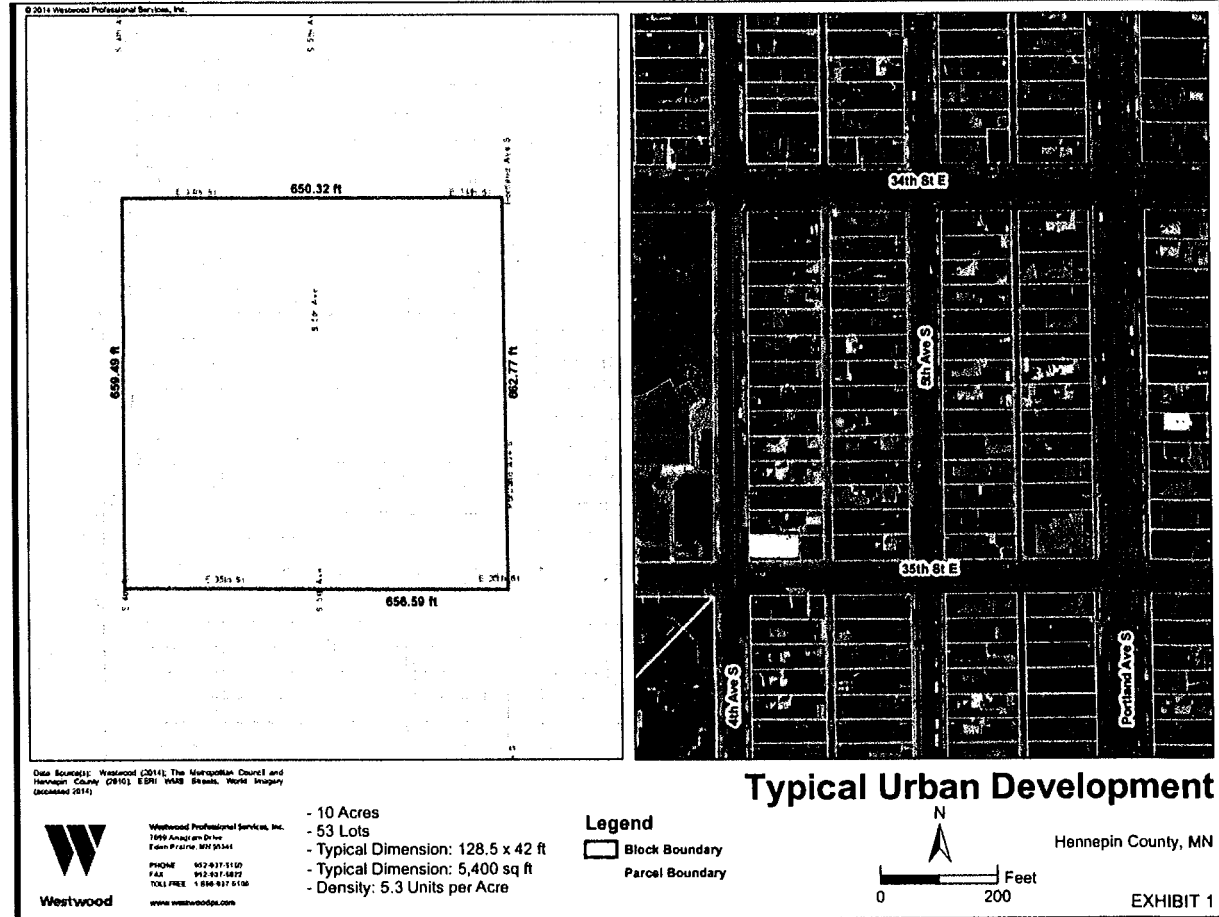
BATC is concerned that *Thrive* falls short in key areas, including the critical areas of land use and housing affordability. At the heart of our concern is an on-going disagreement about the levels of density, redevelopment, and TOD that can be reasonably expected in our market over the next 25 years. We feel strongly that overstating this demand and directing resources toward it will ultimately result in stranded investment and leap-frog development. That is an unacceptable outcome for our region. BATC is committed to continuing to work with Council and other stakeholders to improve our understanding of our region's market and the development of a regulatory structure to meet the region's goals.

Sincerely,

A handwritten signature in black ink that reads "Shawn A. Nelson". The signature is written in a cursive, slightly slanted style.

Shawn Nelson  
2014 President

Enclosures (2):  
Exhibits 1 & 2



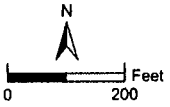
Data Source(s): Westwood (2014); The Metropolitan Council and Hennepin County (2010); ESRI World Streets, World Imagery (updated 2014)

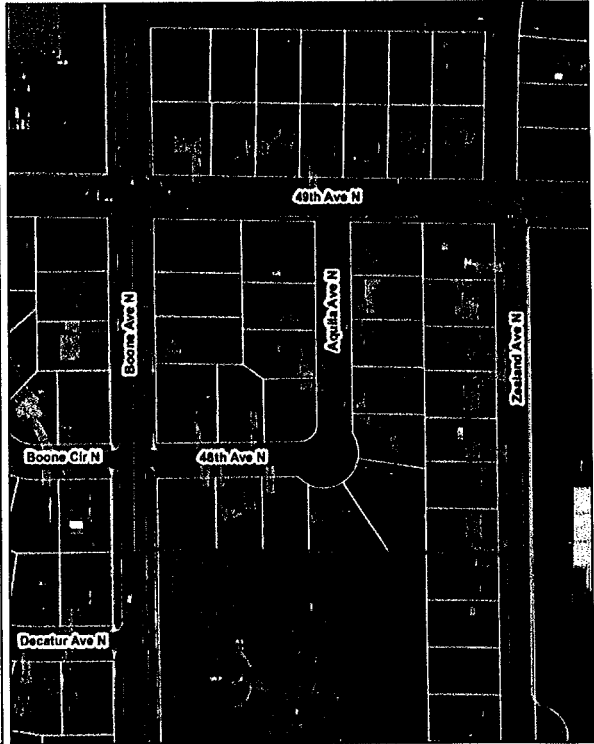
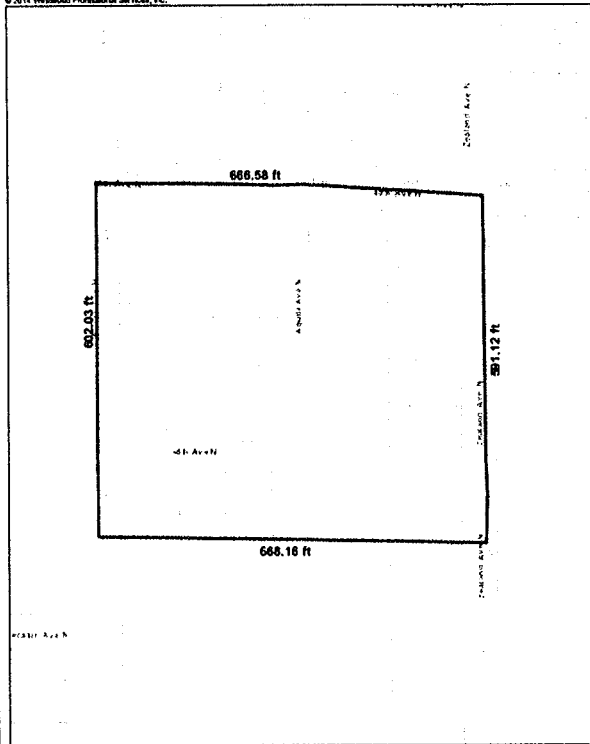


Westwood Professional Services, Inc.  
 1699 Annapolis Drive  
 Eden Prairie, MN 55344  
 PHONE 952-937-5100  
 FAX 952-937-6822  
 TOLL FREE 1-866-937-6108  
 www.westwoodps.com

- 10 Acres
- 53 Lots
- Typical Dimension: 128.5 x 42 ft
- Typical Dimension: 5,400 sq ft
- Density: 5.3 Units per Acre

**Legend**  
 [Symbol] Block Boundary  
 [Symbol] Parcel Boundary





Data Source(s): Westwood (2014), The Metropolitan Council and Hennepin County (2010), ESRI VMLB Base, World Imagery (unknown 2014)



Westwood Professional Services, Inc.  
 7090 Arnegard Drive  
 Eden Prairie, MN 55424  
 PHONE 952-877-5100  
 FAX 952-877-5822  
 TOLL FREE 1-888-877-5100  
 www.westwoodps.com

- 9 Acres
- 26 Lots
- Typical Dimension: 120 x 80 ft
- Typical Size: 9,600 sq ft
- Density: 2.9 Units per Acre

**Legend**  
 Block Boundary  
 Parcel Boundary



Hennepin County, MN

EXHIBIT 2

## Typical Suburban Development



CATHOLIC CHARITIES  
of St. Paul and Minneapolis

## Memorandum

**DATE:** April 22, 2014

**TO:** Met Council, Thrive 2040 Planning Committee

**FROM:** Kathleen Tomlin, Vice President of Catholic Charities

**Re:** Public Comment Response on Thrive 2040 Document of February 26, 2014

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Catholic Charities participates in the health of the metropolitan region with a vision toward "poverty for no one, opportunity for all." This is the context for our comments regarding the Thrive 2040 Draft of February 26, 2014.

We commend the Council for creating a process that allowed the opportunity for all residents of the metro area to participate in the development of this plan. As an agency we invited the staff of our programs to participate in regional meetings and in meetings that were issue specific to the development of this plan. We appreciated that opportunity because we have a stake in the health and vibrancy of the region.

We particularly appreciated the balanced lens offered in the outcomes: Stewardship, Prosperity, Equity, Livability and Sustainability are important values to the staff, board and clients of Catholic Charities as they should be for the entire metro region. The principles of integration, collaboration and accountability are clearly significant if we are to have a region that thrives.

Significant themes that give NEW direction to the region include:

- Shifting from managing the edge to being good stewards of what is already developed and re-investing in infrastructure like aging sewers and roads;
- Avoiding premature expansion of roads and sewers and preserving agricultural areas;
- Focusing on community development and regional balance;
- Promoting affordable housing at all levels of income throughout the region;
- Planning for infill development;
- Reversing the disparities by race and ethnicity that have increased significantly over the last decade through community dialogue and financial investment in the creation of greater opportunities;
- Clear concern for concentrated poverty and the isolation and opportunity gaps that result;
- Combining collaboration and legal enforcement in the implementation of community plans throughout the region;
- Highlighting both the role of the Council and the local community in the development of this regional vision.

Our concerns as the largest comprehensive social service agency in the Greater MSP region, are based on both our vision of "poverty for no one, opportunity for all" and our mission, "Catholic Charities serves



those most in need. We are a leader at solving poverty, creating opportunity and advocating for justice in the community" include:

- Increased opportunity in areas of concentrated poverty requires a significant investment in transit that can move people to where the jobs are. Building light rail is certainly important, but we need to make sure that the bus transit connections to the rail lines work for people too distant from the rail who need to get to and from jobs, day and night.
- Working with local communities and businesses to invest public and private funds in employment growth and job training in urban communities is also an important contribution to narrowing the opportunity gap that currently exists.
- While the concentration of poverty is clearly a critical issue to address, so too are the scattered poverty pockets throughout the region. It would be easy for areas of the region of more modest and wealthy means to dismiss the issue of poverty as an core urban problem and therefore, not "in my neighborhood."
- While housing construction has taken off in cities like Minneapolis, affordable housing for young workers, young families and seniors with modest or low incomes is in very short supply. Redevelopment in urban infrastructure needs to include many more units of low income affordable housing.
- Relying on individual communities to implement growth and investment plans based on the Council's vision may require the Council to use its authority (carrots and sticks) to "force" greater participation in strategic regional development that benefits the whole rather than one community.

We understand that this first draft of Thrive 2040 lays out a framework to guide the more detailed policy plans that will follow over the next year. It is our hope that these plans will suggest specific solutions that can garner local community and regional support. We agree that the region will only be economically competitive and healthy if the entire metro area benefits from strategic planning and investments.

As the planning takes place, it is important to identify some specific measurements that will evaluate the health of the region as we move toward 2040; poverty rates, racial disparity, median household income, economic growth and others will be important benchmarks to assess.

We understand that economic and job growth must be pursued simultaneously with social inclusion and equity. One pursued at the expense of the other will result in neither being achieved. There won't be any losers if the region is more sustainable and attractive for a diverse population and business climate.

We look forward to the next phase and the specific plans to follow. If Catholic Charities can assist in any way, please do not hesitate to call on us. We will continue to monitor and participate in the process as it continues.

**From:** Katherine Kersten [mailto:kersten1@comcast.net]

**Sent:** Monday, April 28, 2014 11:31 AM

**To:** PublicInfo

**Subject:** Comments on Thrive MSP 2040 by Katherine Kersten

I am a Senior Fellow at Center of the American Experiment in Minneapolis. I would like to offer the following articles I have written for the Star Tribune as comments on Thrive MSP 2040:

<http://www.startribune.com/opinion/commentaries/218173402.html>

<http://www.startribune.com/opinion/commentaries/232121261.html>

<http://www.startribune.com/opinion/commentaries/235805691.html>

<http://www.startribune.com/opinion/commentaries/254975911.html>

I am also submitting the following paper by Randal O'Toole of the Cato Institute, entitled "Ten Fallacies of the Thrive Plan: Faulty Assumptions Are Leading to an Unsustainable Plan for the Twin Cities Region."

<http://www.americanexperiment.org/issues/culture-religion/ten-fallacies-of-the-thrive-plan>

Thank you. Please contact me at kersten1@comcast.net or 612 801 1851 with any questions.

Katherine Kersten



Star Tribune Op-Eds

on the

Met Council's

30-Year Plan

# The Met Council will burden you now

STAR TRIBUNE • SUNDAY, APRIL 13, 2014

• With its Thrive MSP 2040 plan, this unelected body would play disruptive games with the daily lives of Twin Cities residents.

By KATHERINE KERSTEN

Twin Cities.

The Metropolitan Council sees economic storm clouds on the horizon. We are in danger of losing jobs and creative young professionals to more enlightened metro areas, like Portland and Seattle, the council warns.

Its proposed solution? "Thrive MSP 2040"—the council's new 30-year comprehensive plan for development in our seven-county region. The council has released a draft for public comment and will vote on the plan in May.

In fact, Thrive will likely do the opposite of what the council promises. It will raise our cost of living, lower our quality of life, and drive people and jobs to less-regulated regions, like Atlanta and Houston, which are already growing much faster than the

power grab as the price the Twin Cities region must pay to remain "economically competitive" with peer regions. We're all in favor of prosperity, right?

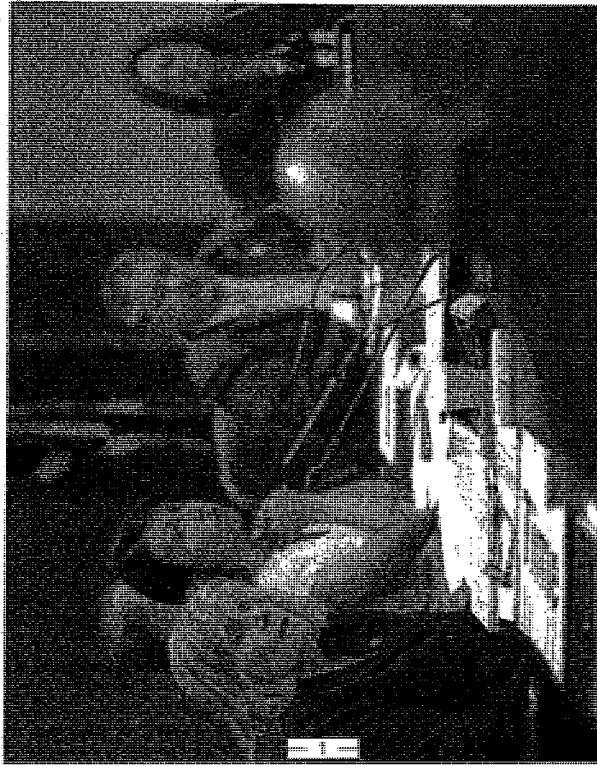
Thrive's premise is that in the future, social planning by supersmart unelected bureaucrats will be the key to economic growth. But the facts on the ground tell a different story.

One of the best measures of a region's economic vitality is domestic migration: the number of people who move there from other parts of the country vs. the number who leave. People don't move to a metro area for light rail. They move for opportunity.

Which metro areas are attracting people today, and which are not?

**Kersten continues on OP3 ▶**

JEFF WHEELER • Star Tribune  
The Metropolitan Council, led by Chairwoman Susan Haigh, discussed the Northwest Corridor light-rail project before a vote last week. Rail transit is part of the council's long-term goals as outlined in its Thrive MSP 2040 plan.



Katherine Kersten is a senior fellow at the Center of the American Experiment. The views expressed here are her own. She is at [kkersten@gmail.com](mailto:kkersten@gmail.com).

# Council would play 'Sim City' with our daily lives

◀ KERSTEN FROM OPI

median house price in a region divided by the median household income. In the Twin Cities, the median multiple is 3.1, while in Atlanta and Indianapolis — both thriving metros with little land use regulation — it is 2.7.

On the other hand, in Portland and Seattle — which have stringent urban growth boundaries and strict densification policies — the median multiple is 4.8 and 5.3, respectively. In San Jose, Calif., it is a breathtaking 8.7.

Over time, the Met Council's densification crusade will likely drive up Twin Cities-area housing prices, reducing discretionary income and the standard of living for all. Our region will become less attractive to businesses, which will have to pay workers more to get them to come here.

•••

Thrive's second major component is "transit-oriented development," or TOD, which the Met Council describes as an "enormous undertaking." The goal is to reduce automobile use by increasing density, funneling public dollars into transit, increasing congestion, limiting parking, and generally make driving more inconvenient and expensive.

Like housing densification, TOD drives up the cost of living. People come to a metro region for jobs. Research makes clear that a key to regional growth and prosperity is how many jobs they can access within a normal commute time of 30 minutes or so. The Met Council's obsession with rail transit is problematic in this respect. Rail transit is enormously expensive and heavily subsidized by taxpayers.

The measure of housing affordability is the median multiple — the

## Transportation policy would grossly privilege light rail over the personal mobility and freedom of the automobile, and density would drive up housing costs.

Rail may make sense in a handful of older cities, like New York and Philadelphia, where a significant proportion of jobs are in the central business district. But in the Twin Cities, as in most regions, fewer than 10 percent of jobs (7 percent) are located in the principal downtown (Minneapolis), and even fewer (4 percent) in downtown St. Paul. The dispersion of jobs across metro areas is a strong historic trend.

In this situation, cars are by far the fastest and most convenient way to get to the vast majority of jobs here, and will remain so. Transit is not time-competitive with automobiles — transit's average work trip travel time is at least 1.5 times that of driving alone. Thrive's focus on transit-oriented development, which disfavors cars and favors rail transit, will reduce opportunity and sap prosperity.

In the Twin Cities region, the average employee can reach only 7 percent of jobs by transit within 45 minutes, according to the Brookings Institution. Drivers, on the other hand, get to their jobs in an average of about 25 minutes. The Twin Cities is now the nation's 16th-most-congested region. Congestion decreases productivity and increases freight costs. The Met Council's densification policies will only make congestion worse, since traffic is heavier in denser areas.

•••

The Met Council professes great concern about the economic plight of our region's low-income households. Ironically, these households

are likely to suffer most from its misguided policies.

The council deplores our region's lack of "affordable housing." Yet its drive for densification likely will significantly increase housing prices, which will harm low-income residents. Rents will rise, too. In Portland, for example, income-adjusted median gross rents in high-poverty areas rose more than 2.5 times the increase in the rest of the metro area during densification from 1999 to 2009.

The "gentrification" that accompanies transit-oriented development often disproportionately displaces low-income households, driving them from the urban core to more dispersed areas with less transit. Low-income families also suffer disproportionately when bus service must be cut to pay for light rail serving well-heeled suburbanites, as frequently occurs.

In the future, the metro areas that flourish will generally be those where opportunity can grow unburdened by counterproductive government regulation. The Twin Cities region has many assets — a relatively highly educated population, a strong work ethic and an enviable quality of life. But in an era of global competition, we can't rest on our past. We have a very low rate of business formation and, in recent years, taxes as well as labor, property and energy costs have escalated substantially. And then there's our frigid weather.

The Met Council's new plan will add greatly to the challenges we face. If we want to thrive, Thrive MSP 2040 is the last way to do it.

## Where we're going, we need roads

• And bridges. And that's all we need. Beware urban activists who'd burden your daily lives with their vision.

By KIM CROCKETT and DAVID STROM

**T**here is a reason the Minnesota Constitution devotes a lengthy and separate section to the state highway system. It really is that central to our economy and quality of life.

The highway system was overwhelmingly created by constitutional amendment in 1920 and refined in subsequent years to provide dedicated funding. State leaders worried that politics would trump good policy, so the Constitution is unusually specific about how your gas and vehicle taxes are to be collected and spent. They were right to be concerned: Besides our mobility, there are big dollars at stake, and lots of pork-barrel politics at play.

Large sums of money attract a lot of interested parties competing for a slice of the funding pie, lobbying to make it bigger but also to direct how and where our transportation dollars get spent.

As the 2014 legislative session revs up, keep an eye out for savvy PR campaigns like "Move MN" aimed at convincing legislators to enact new spending measures and launch new projects (e.g., bonding and taxes for light rail championed by the Metropolitan Council). The Minnesota Department of Transportation has a campaign of its own called "Minnesota GO." Tellingly, the logos and "visions" for both campaigns emphasize the environment, trains and bikes — while the economy, cars, roads and bridges take a middle or back seat.

And therein lies the problem.

Most of us think little of it, but on average we travel thousands of miles a year just doing our daily tasks. Most of us travel by car, and the goods and services we buy arrive by truck. According to MnDOT, state highways comprise less than 10 percent of the roads, but we travel 60 percent of our miles on them. Whether we travel by car or not, we all rely on the goods and services that demand efficient, modern highways.

While you are going about your daily life, the conversation about transportation has been captured by a loud and well-funded

lobby. For lack of a better phrase, we'll call it "greenback urbanism."

### Crockett continues on OP4 ▶

"Greenback urbanism" is Hoovering up federal, state and local tax dollars to support a downtown-centric economic model for our state. There has been a big shift to spending on trains and "amenities" like commuter bike lanes. The goal is to create density along train lines to bring growth and jobs to the cities.

This unproven model has a very high "cool factor," but we just don't have the density to support these trains. Bike lanes can create danger for riders and congestion for cars. We admire hardy bikers, but how many of us commute by bike?

Light rail is expensive to build, costing \$80 million to \$90 million per mile, compared with \$10 million a mile to add a lane to an existing freeway — or \$40 million per mile for a new four-lane freeway. Once built, trains operate at big losses that require taxpayer subsidies.

Minneapolis has only about 390,000 residents; St. Paul has 290,000. Promoters of greenback urbanism know they need more people living in and around the cities to support their vision.

That vision goes something like this: Build it and they will come. And if they don't, we will make them.

The greenback urbanites use their big voice in St. Paul and Washington to insist on a way of life that includes all modes of transit for their communities — with a major shift from cars and even commuter buses to trains, bikes and walking. Former Minneapolis Mayor R.T. Rybak recently talked about growing Minneapolis to 450,000 people without putting a single additional car on the street.

Even if he gets his streetcars at \$60 million per mile, is he going to give up his car? Are you?

Minneapolis is welcome to its vision. The question is how many

of our transportation dollars it should get to support it.

Right now, MnDOT does not have a clear eye on the roads that serve the entire state. In particular, the roads connected to the main freeways are not being maintained or expanded, and there is limited expansion on the freeways that connect the Twin Cities, St. Cloud and Duluth. MnDOT is spending more than 10 percent of our road funds on trendy "multi-modal networks." That sounds very hip until it's 15 below and you need to get to work on time. It is a confused and expensive approach, especially when you consider our harsh winters and hot summers.

With MnDOT projecting a \$12 billion funding shortfall over 20 years, why would the state veer away from fully meeting our basic transportation needs by including billions for light-rail lines that operate for fewer people and hundreds of millions for bicycles and pedestrians?

"Move MN" is an appealing and expensive PR campaign that dovetails nicely with the Met Council's plan for transit-oriented housing.

But like MnDOT's 20-year plan, these approaches are fundamentally flawed because they serve too few people. Besides, most Minnesotans don't want government and advocates spending our own money to re-engineer how or where we live.

We want MnDOT focused on getting the most people and goods from where they are to where they need to be, as efficiently and cost-effectively as possible. Given our limited but ample resources, this means providing well-maintained roads and bridges that serve cars, buses and trucks. That focus is the best way to grow a 21st-century economy that delivers jobs and opportunity throughout the state, along with new technologies that point the way to cleaner and better transportation.

### Most of us don't want our lives re-engineered.

Kim Crockett is the chief operating officer and David Strom is a senior fellow at the [Center of the American Experiment](#), a nonprofit dedicated to building a culture of prosperity in Minnesota.

# Met Council: A master of imposition

- Its 30-year plan would control how you live and how you get around.



**katherine kersten**  
contributing writer

Do you like the way you live now? Well, the folks at the Metropolitan Council don't. In their view, far too many of us live in single-family homes

when we should be content with high-density apartments. Far too many of us get to work and leisure activities in our cars when we should be taking public transit, biking or walking.

The Met Council intends to change that in its 30-year plan for the seven-county metro area: "Thrive MSP 2040," due out in 2014.

Some of us, of course, prefer to live in a condo above a coffee shop on a transit line. But the rest of us likely won't enjoy lugging rock salt home on the bus, getting the kids to soccer practice on the light rail or pedaling to the dentist on our bikes. Nevertheless, the council has announced that "transit-oriented development" (TOD) will be the guiding principle for development in the metro area for the next 30 years. In its 84-page "TOD Strategic Action Plan," released in June, it held up Portland and San Francisco as enlightened places we should emulate.

TOD will be an "enormous undertaking," the council acknowledged. No kidding. To remake our metro area around transit, the council will do all it can to steer new jobs, homes and economic development in our region to areas within "easy walking distance" (one-half mile) of major transit stops — primarily in the urban core and inner-ring suburbs. In these favored places, tax dollars (mostly from people who live elsewhere) will be lavished on high-density housing, bike and pedestrian amenities, and subsidized retail shops.

The transportation needs of the rest of the metro area will take a back seat. The Met Council (a champion of "equity" in other contexts) declares it will give funding priority to TOD projects in "several key locations," even though this results in "geographic inequity." We can expect money to improve and expand major regional highways and bridges to shrink congestion to grow and traffic safety to suffer.

Many suburbs will also likely pay an economic price, as the Met Council distorts the market with large tax subsidies designed to lure jobs and investment to high-density areas. The council forecasts that, by 2040, the population of Minneapolis and St. Paul will

grow 24 percent and jobs there will grow a whopping 47 percent, while suburban growth on both measures will parallel each other. Such core city growth is strongly counter to historic trends both locally and nationally and seems unlikely to occur, despite TOD policies that attempt to engineer it.

Advocates claim that light rail and TOD will attract impressive new economic investment. But research indicates that TOD generally just redistributes investment that have would occurred elsewhere — usually from suburbs to downtown. It's no surprise that downtown property owners tend to strongly support rail transit projects.

What is TOD's track record in Portland, the nirvana of TOD enthusiasts? Portland has poured huge sums into light rail, streetcars, and developments around transit stations. Now its streets are crumbling, and it can't afford to repave them until at least 2017.

Meanwhile, transit's ridership share for citywide commuting has fallen from 15 percent in 2008 to 10 percent in 2013. Portland has had to cut bus service, used disproportionately by low-income residents, to pay for light rail for well-heeled suburbanites.

In Portland's much-ballyhooed "mixed use" TOD developments, many retail shops — designed with insufficient parking — are vacant. ("Limited, managed parking" is one of the "six principles" of TOD.) Supposedly successful projects like the Pearl District require unsustainable government subsidies.

We can see where transit-oriented development may lead by looking to San Francisco, which recently adopted a TOD-focused regional plan.

Over the next 25 years, "Plan Bay Area" will require almost 80 percent of new residences and 63 percent of new jobs in the nine-county area to be located in about 200 "Priority Development Areas" — small, hyper-dense areas along transit corridors. Together, these PDAs cover just 5 percent of the region's surface area. New suburbs will be barred.

Plan Bay Area mandates that the 30 percent population growth it predicts be funneled into already urbanized areas. As a result, up to 28 percent of neighborhoods and business districts may have to be redeveloped to higher densities, resulting in many more apartments and far fewer single-family homes. Some property owners and savvy developers will reap windfalls, while middle- and lower-income families and young people will lose out.

The libertarian Pacific Legal Foundation has filed suit to halt Plan Bay Area. The foundation has labeled TOD a "sardine strategy for people, housing and jobs" designed to "micromanage people's lifestyle choices."

Speak up now, metro-area residents, or prepare for the "sardine" future of urban planners' dreams.

Katherine Kersten is a senior fellow at the Center of the American Experiment. The views expressed here are her own. She can be reached at kkersten@caexperiment.com

# Sticking it to the suburbs: It's all planned

Crusaders for 'regionalism' want a more concentrated, centrally planned Twin Cities. Those who don't may never know what hit them.

STAR TRIBUNE • SUNDAY, AUGUST 4, 2013

**Katherine Kersten**, contributing writer



The Twin Cities of 2040 will likely be starkly different from the place you live now. People will increasingly live in dense, urban concentrations, even if they'd prefer a house with a yard outside the 494 beltway. Government planners will have power to steer new jobs into central cities and first-ring suburbs, and to set what amounts to quotas for people of different incomes and races in neighborhoods and schools throughout the metro area. Outside the urban core, highway conditions will deteriorate and congestion — encouraged by government — will get worse.

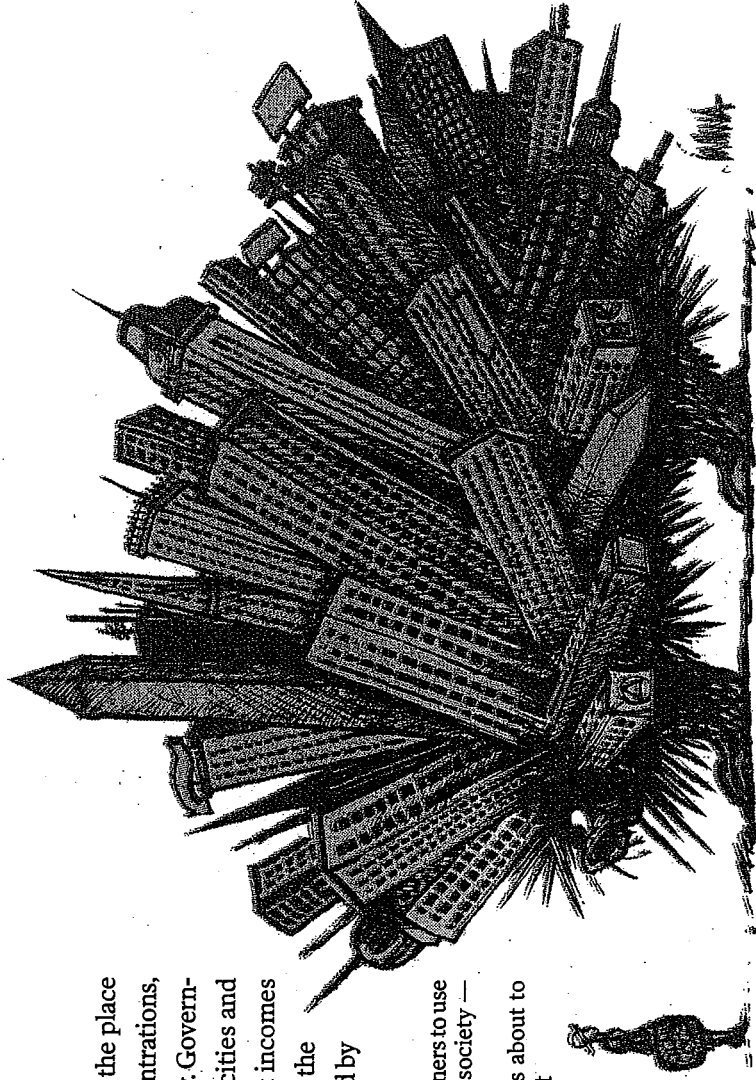
As these changes unfold, you'll never be sure how the freedom and quality of life you once took for granted slipped away. Plenty of elected officials will be as frustrated as you are. But mysteriously, they too will stand powerless as choices constrict.

What will be the engine of this transformation? An out-of-the-limelight agency we generally think of as running the buses and occasionally approving a new runway at the airport: the Metropolitan Council. In coming months, the council will release a draft of "Thrive MSP 2040" — its comprehensive plan to shape development in the seven-county region over the next 30 years. Powerful forces are coalescing to use

the document as a tool for social planners to use to design their vision of the perfect society — and to impose it on the rest of us.

A huge, unchecked power grab is about to take place beneath our noses. But mayors and city councils will find it hard to push back. That's because the Met Council will increasingly wield the power to decide which municipalities thrive and which decline. It will both write the rules for development and hold the purse strings.

**Kersten continues on OP4 ▶**



PEDRO MOLINA • NewsArt



The Met Council was established in the mid-1960s at the behest of Republican-leaning policymakers, who believed regional planning of infrastructure could enhance efficiency. Its reach has grown dramatically, and today it allocates funds (state, federal and regional) among the region's 187 municipalities for projects ranging from highway improvement to bridges to sewer lines. In the process, the council's role has expanded well beyond its original mandate, as government so often does. We can expect MSP-2040 to put this process on steroids, giving the agency a license, over time, to dramatically remake the entire region.

**'Equity,' 'sustainability'**

The forces shaping MSP 2040 — whose final vision the council will approve in 2014 — are part of a growing nationwide movement called "regionalism."

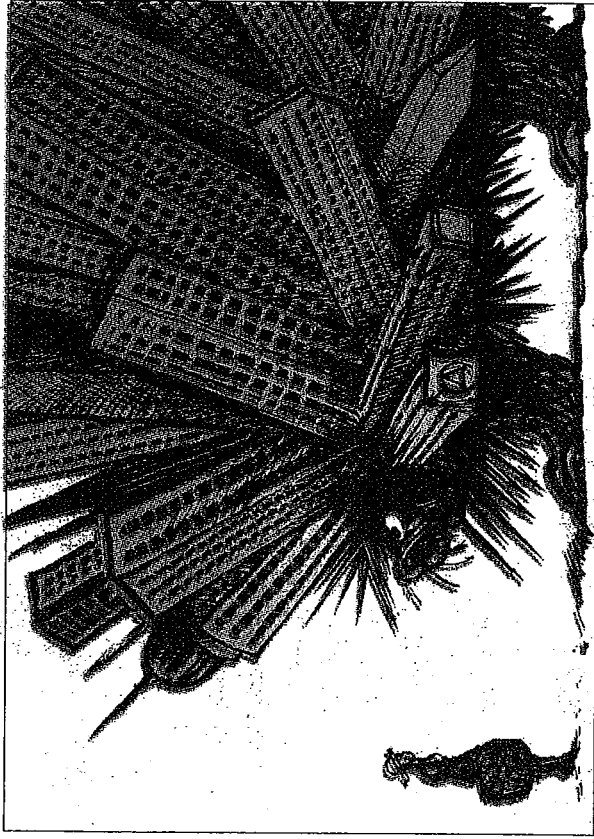
Regional planning of service delivery and infrastructure is important, of course. But "regionalism," as an ideology, is not, as its name suggests, about promoting the good of a region as a whole. It's about metro centers — the urban core and inner-ring suburbs — usurping control over outer-ring communities to advance their own interests and, in the process, effectively replacing local elected officials with a handful of regional governments.

In the case of the Twin Cities, the ramifications for democratic self-rule are profound. The Met Council's 17 members are not elected. Though they come from different parts of the seven-county area, they don't represent the needs and interests of voters there. They are all appointed by Gov. Mark Dayton, and they owe their allegiance to him.

The press for regionalism is coming from the highest power in the land: the Obama White House. The Obama administration's campaign to build the regulatory framework to implement the movement's agenda is documented in political analyst Stanley Kurtz's 2012 book, "Spreading the Wealth: How Obama is Robbing the Suburbs to Pay for the Cities."

The Twin Cities may be a showcase for how far the regionalist crusade can go. Our Met Council is unique, and we already have regional tax-base sharing — one of the movement's most sought-after tools.

An army of academics, environmental organizations, foundations, and transit advocacy and left-wing religious groups is working to ensure that MSP-2040 greatly expands the Met Council's regulatory control. And there's a movement underway to organize politicians from inner-



PEDRO MOLINA • NewsArt

ring suburbs and Minneapolis and St. Paul, with the goal of taking on the outer-ring suburbs and forging a permanent legislative majority for the regionalist agenda.

Regionalism is driven by a core ideological conviction: The cause of the poverty and social dysfunction that bedevil America's cities is the greed and racial bigotry of suburbanites — especially those in prosperous, outer-ring suburbs, which are viewed as unjustly excluding the poor. Regionalists believe that financial aid for the inner ring won't remedy this injustice. A profound change in governance is required.

What sort of change? The title of a book by regionalist guru David Rusk puts it bluntly: "Cities without Suburbs." In regionalists' view, suburbs with their own tax bases are, by definition, a menace to cities, and the distinctions between the two must be wiped out as completely as possible.

Regionalists' strategy to effectively merge cities and suburbs turns on two ideologically freighted buzzwords: "equity" and "sustainability." "Equity" is code for using public policy to redistribute wealth and to engineer economic equality among demographic groups. Regionalists view metrowide "economic integration" as one of government's primary responsibilities. Their plan to accomplish it is twofold: Disperse urban poverty throughout a metro area via low-income housing and make suburban life so inconvenient and expensive that suburbanites are pushed back into the city.

"Sustainability" means policies that would override market forces to ensure that in the future, the great majority of new jobs, economic development and public works projects are funneled into the metro area's urban core and inner ring — where, not coincidentally, regionalists' own political base is concentrated. "Sustainable" policies promote high-density, Manhattan-style living, and attempt to wean us away from our cars and push us to walk, bike or use public transit to get to work.

As one critic — speculating on MSP 2040's likely outcome — lamented: "Do we all have to live in a 1,500-square-foot condo above a coffee shop on a transit line?"

Suburbanites will disproportionately shoulder the costs of this socially engineered transformation, paying more in taxes and getting less back in infrastructure and public services.

**Purse strings**

Regionalists' strategy for imposing their agenda hinges on giving regional bodies like the Met Council the ultimate trump: the power of the checkbook. The Obama administration's "Sustainable Communities Initiative" (SCI) provides a model. SCI channels federal funds for land use, transportation and housing projects through regional bodies. The catch is that, to participate, municipalities must embrace redistributive "equity" goals.

The Met Council already has announced that "equity" and "mitigating economic and social

disparities through regional investments" will be top priorities of MSP 2040. This explicit embrace of social engineering goals appears to signal an intent to initiate what could be a virtually limitless remake of our metro area.

Special-interest groups are lining up to lobby for proposals to embed "equity" and "sustainability" criteria in Met Council plans and/or funding criteria. These proposals include creating one giant seven-county metro school district to facilitate apportionment of students by race and income, and ensuring that "at least 70 percent of projected growth in population and households" in the next 30 years takes place through "infill and redevelopment of already urbanized land."

In the future, if Prior Lake or Anoka want to get a grant to expand a major regional highway, officials there may need to demonstrate that their city meets the council's "equity" criteria on low-income housing, and doesn't allow "exclusionary" zoning, instead of just showing that the project would improve safety or reduce congestion.

Over time, demands could escalate. Eventually, for example, a municipality may have to meet onerous "carbon footprint" or "clean energy" requirements to get approval for a new sewer line. Pressure will mount to make state and federal aid of all kinds contingent on meeting Met Council social planning dictates.

Most likely, the council will continue to operate under the fiction that cities have a choice. Yet a city council or a county board that declines to comply with "regionalist" criteria — citing its citizens' needs and preferences — would ensure that funds and approval for improvement would stop, and so would remain frozen in time.

Advocates insist that the Twin Cities must embrace regionalist policies to remain "economically competitive." In fact, top-down planning by unaccountable bureaucrats that distorts market forces is likely to constrict overall prosperity and stymie development. Ironically, it's also likely to increase "sprawl," as people flee to cities like Delano or Elk River to get beyond the Met Council's iron grip.

Most importantly, the direction the Met Council is heading is inconsistent with our deepest beliefs as a people. The American dream is about striving for a better life through economic growth, not redistribution of wealth. Regionalists' Orwellian appeals to "equity" and "sustainability" are hostile to our cherished traditions of individual liberty, personal responsibility and local self-government.

Katherine Kersten is a senior fellow at the Center of the American Experiment. The views expressed here are her own. She is at kakersten@gmail.com.

# Met Council is mixed up on poverty

- It's going to upend the American dream with its activist housing policies.



**katherine kersten**  
contributing writer

In terms of race and ethnicity, the Twin Cities region is one of the most rapidly diversifying metro areas in the nation. For 15 years, Hispanic, black and Asian residents — now almost a quarter of the population — have been flooding into the suburbs.

This is the American dream in action: people eager for a better life start in the cities, work hard and save, then find a house and yard to call their own. But an elite group of unelected officials — the Metropolitan Council, our regional government — wants to replace this dream with its own top-down vision.

The council was founded in the 1960s to oversee efficient regional use of sewers and roads. But under Gov. Mark Dayton, it is taking on a grandiose social mission. It plans to use “Thrive MSP 2040” — its 30-year development plan for the seven-county region, due out in early 2014 — to remake neighborhoods and impose planners’ vision of the ideal mix of race, ethnicity and income on every municipality.

It laid the foundation with its “Fair Housing and Equity Assessment,” a draft of which was released in June and which analyzed every census tract in the metro area to identify “Racially Concentrated Areas of Poverty” and “Opportunity Clusters.” High-opportunity areas are essentially those with high-performing schools and low crime rates.

Using these data, the council will lay out what the region’s 187 municipalities must do to disperse poverty.

As yet, the council has provided few details. But the federal Department of Housing and Urban Development — the source of the \$5 million planning grant the council used to fund its racial mapping — has made the project’s transformational nature clear. According to HUD, the mapping is intended to identify suburban land use and zoning practices that allegedly deny opportunity and create “barriers” for low-income and minority people. Regional plans, declares HUD, must ensure that suburbs change those practices to meet ratios consistent with racial and income quotas.

A look out east may signal what’s on the horizon. Westchester County is New York’s fourth most racially diverse. Nevertheless, HUD is requiring it to build 750 new units of low-income housing, with thousands more to follow. Most must be in neighborhoods that are less than 3 percent African-American and 7 percent Hispanic.

Repeated reviews of Westchester’s 853 zoning districts have found no evidence of discriminatory zoning or land use. But HUD claims that racial or ethnic clustering in a municipality is, in and of itself, a violation of fair housing. It insists that typical zoning limits on the density, size, height or type of buildings are impermissible “restrictive practices,” and has ordered the county to sue its municipalities.

For HUD, it’s “not about 750 units,” Westchester County Executive Rob Astorino has said, “it’s about changing the world.”

“If HUD can define what constitutes exclusionary practices, then local zoning as it is known today disappears,” he wrote in the *Wall Street Journal*. “Apartments, high rises or whatever else the federal government or a developer wants can be built on any block in America.”

Here in Minnesota, we can expect the Met Council’s housing and transit plans to reinforce its crusade to compel “economic integration.” Its “Transit-Oriented Development Strategic Action Plan,” released in June, strongly suggests that cities that want transportation money will have to meet “social equity” goals, including low-income housing and likely the zoning and other land-use regulation changes required to accommodate it.

Helping low-income and minority residents achieve success should be one of our most important goals. Yet the council’s approach is almost certain to fail.

Why? Its own race-and-income assessment provides a clue. It ranked neighborhoods on the five factors it considers the most important contributors to poverty: access to jobs; safe streets; good schools; social services and basic amenities, and distance from environmental hazards. Yet the analysis revealed that, overall, residents of “racially concentrated areas of poverty” actually have better access to jobs, services and amenities than do residents of “opportunity clusters.” How can we explain this?

The council’s ideology blinds it to a primary cause of entrenched poverty, which it never considers: self-destructive behavior. In Hennepin County, for example, the out-of-wedlock birthrate for U.S.-born blacks is 84 percent, while the white rate is 18 percent. Until we tackle barriers to opportunity like this, we will fail to make the progress against poverty we all desire.

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# Ten Fallacies of the Thrive MSP 2040 Plan

*Faulty Assumptions are Leading to an Unsustainable Long-Term Plan for the Twin Cities Region*



By Randal O'Toole

Center of the American Experiment is a nonpartisan, tax-exempt,  
public policy and educational institution that brings conservative  
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# Ten Fallacies of the Thrive Plan

by Randal O'Toole, Cato Institute

## Introduction

The Twin Cities Metropolitan Council has published a “draft for public review and comment” of the “Thrive MSP 2040” plan, which will serve as the “regional plan for sustainable development” for the seven-county metro area. While the draft uses vague terms and generalities, it is clear that upcoming housing, transportation, and other sub-plans will seek to dramatically alter Minnesota lifestyles. This includes forcing more people to live in multifamily housing and reducing personal mobility, all in the name of “sustainability.”

This plan was partly funded by a \$5 million “sustainable communities” grant from the Department of Housing and Urban Development. Plans funded by similar grants written by other metropolitan planning organizations provide a preview of what the details of the Thrive plan and its sub-plans will look like. The draft Thrive plan also has many hints about planners’ intentions buried within it.

Based on this information, the Thrive plan and its subplans will call for:

- Increasing the cost of single-family homes by limiting the amount of land available for development inside the municipal urban service area and through restrictive zoning within that area;
- Promoting and subsidizing multifamily housing by rezoning neighborhoods to higher densities

and using tax-increment financing and other subsidies to persuade developers to build housing that would otherwise be difficult to market;

- Discouraging driving by increasing traffic congestion in the region;
- Subsidizing expensive alternatives to driving such as rail transit; and
- Diverting gas taxes and other highway funds to projects that actually reduce roadway capacities such as converting general-purpose lanes to dedicated bike lanes.

The draft plan does not spell out all of these features. Instead, it relies on euphemisms that are used throughout the planning profession to mean these things.

The Metropolitan Council argues that the Thrive plan will make the Twin Cities more prosperous and more sustainable. But a careful review of transportation and housing data reveal that the plan will be far from sustainable by any definition of the term. Moreover, the huge subsidies required to implement the plan will reduce the region’s prosperity and its competitiveness with other regions.

The Thrive plan contains numerous implicit or explicit assumptions that are little better than myths and fallacies. This paper will address the most important of these fallacies.

## Fallacy #1: Government action is needed to provide affordable housing.

The Thrive plan's stress on affordable housing is based on an assumption that government programs can make housing more affordable. In fact, the most affordable housing in the nation is in the states and regions that have the least government involvement in land and housing markets.

The nation's least affordable housing is in states like California and Hawaii, which have the nation's most heavily regulated land and housing markets. Housing isn't expensive in these areas due to land shortages: only 6 percent of the state of Hawaii, 36 percent of the island of Oahu, and 17 percent of the nine-county San Francisco Bay Area have been urbanized. But strict urban-growth boundaries have prevented private property owners from using their lands for their highest and best uses.

“ In fact, the most affordable housing in the nation is in the states and regions that have the least government involvement in land and housing markets. ”

At the other extreme, the nation's most affordable housing is in states such as Texas, where counties aren't even allowed to zone, and Indiana, where counties have the option to zone but not all counties exercise that option. Despite lack of regulation, urban “sprawl” is not threatening farms, forests, or open spaces in these states: only 6 percent of Indiana and just 3 percent of Texas have been urbanized.<sup>1</sup>

Midway between California/Hawaii and Texas are Oregon and Washington, which require all or (in Washington's case) most cities to draw urban-growth boundaries. Unlike California and Hawaii, planners in these states are attempting to accommodate population growth by emphasizing multifamily housing. For example, Portland has set

a target of reducing the share of households living in single-family homes from 68 percent in 1995 to 41 percent in 2040.<sup>2</sup>

This range of policies is reflected in the affordability of housing in each state or region. A standard measure of housing affordability is median home value divided by median family income, or *value-to-income ratio*.<sup>3</sup> In 1969, when only Hawaii was engaged in restrictive land-use regulation, the value-to-income ratio was about 2 everywhere in the United States except Hawaii, where it was more than 3. It was 2.2 in the San Francisco Bay Area, 1.8 in Seattle and the Twin Cities, 1.6 in Portland, and 1.4 in Indianapolis.<sup>4</sup>

By 2006, when about fifteen states were practicing some form of statewide land-use regulation, value-to-income ratios in those states ranged from 3 to 9, while they were still around 2 in most states that had no statewide regulation. For example, median home values were more than 8 times median family incomes in the San Francisco Bay Area and Hawaii. The emphasis on multifamily housing had only partially mitigated the effect on housing affordability in Portland and Seattle, where values were around 5 times incomes. Minnesota doesn't have statewide land-use regulation, but regulation by the Metropolitan Council had driven Twin Cities value-to-income ratios to well above 3. In unregulated areas such as Texas and Indiana, value-to-income ratios never rose above 2.2.<sup>5</sup>

Twin Cities value-to-income ratios have fallen to about 2.5 today, but still remain well above those in less-regulated regions.<sup>6</sup> According to Coldwell-Banker, a four-bedroom, two-and-one-half-bath, 2,200-square-foot home in Minneapolis was worth about \$595,000 in 2013. In St. Paul, that same home would have sold for about \$476,000, while in Bloomington it was \$427,000. Meanwhile, that same home in Houston cost only \$191,000, and in Indianapolis it was \$187,000.<sup>7</sup>

A company considering whether to locate new employment centers in the Twin Cities vs. Indianapolis or Houston would have to consider the

extra money it would need to pay its workers so that they could afford the Twin Cities' higher housing costs. Minneapolis-St. Paul home prices and value-to-income ratios are almost certain to rise under the Thrive plan, even if the plan attempts to emphasize multifamily housing over single-family housing, which surveys show most Americans prefer.

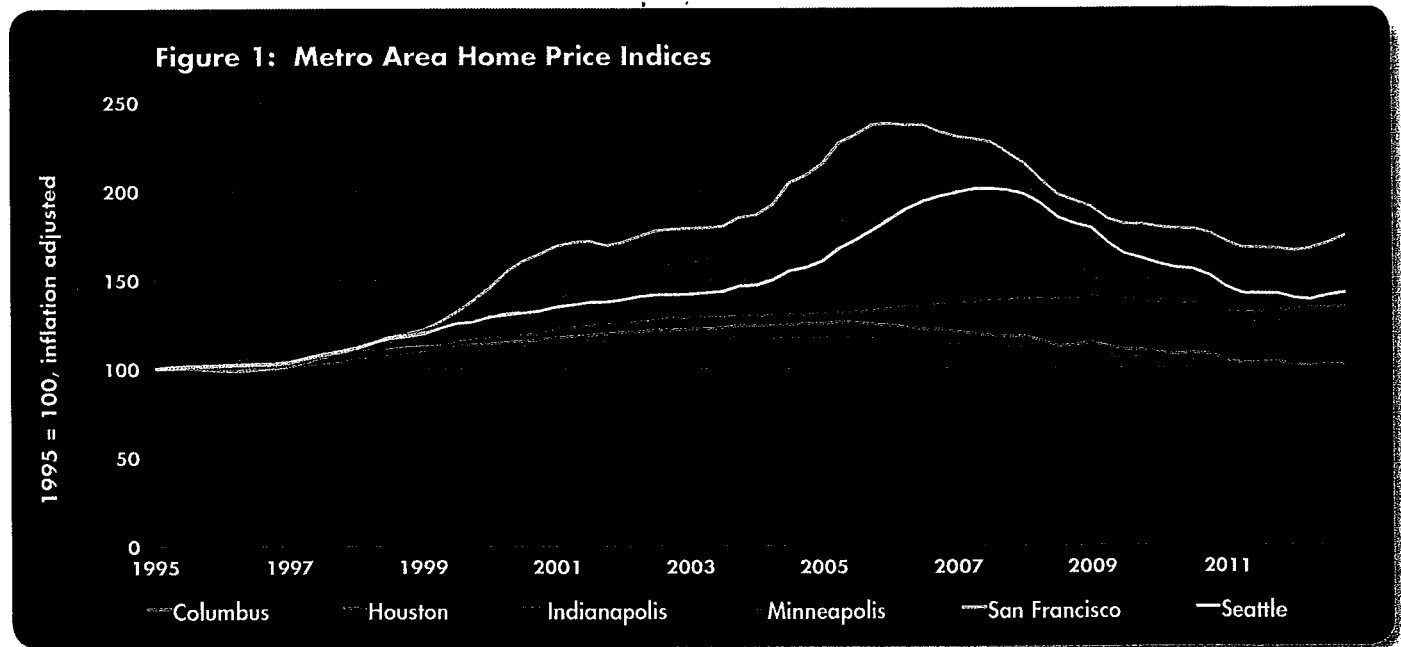
Government regulation not only tends to make housing less affordable, it makes housing prices more volatile, thus increasing the risk that homeowners will lose money on their investments. This is because regulation makes it more difficult for builders to respond to changes in demand. In much of Texas, for example, someone can buy land, get all required permits, build a house, and move in within 120 days of purchasing the land. When demand increases, builders simply build more homes. Regulation can greatly lengthen the time required to get permits and build, so when demand increases, prices increase rather than supply. When demand falls, prices similarly fall rather than being expressed by slower rates of home construction.

Since transportation of labor and construction materials is relatively inexpensive, the only reasons

for housing to be expensive or housing prices to be volatile are shortages of land or land-use regulation that prevents builders from using that land. Minnesota has an abundance of land. The 2010 census found that only 2.1 percent of the state has been urbanized.<sup>8</sup> Even counting all rural roads, railroads, and developments larger than a quarter-acre in size, the U.S. Department of Agriculture's 2007 National Resources Inventory found that less than 4.5 percent of the state has been developed.<sup>9</sup>

Yet Figure 1 shows that Twin Cities housing prices have been excessively volatile over the past decade. This is due to the Metropolitan Council's municipal urban service area that limits the ability of homebuilders to respond to fluctuating demands for housing. When demand goes up, some homebuyers are forced to buy in distant towns and commute many miles to work. But this is expensive, so the increase in demand results in higher prices in the Twin Cities.

After making housing increasingly unaffordable and risky through land-use regulation, planners then propose to provide subsidized, affordable housing for a few low- and moderate-income families. This



**Thanks to the Metropolitan Council's land-use regulation, home prices in the Twin Cities are nearly as volatile as they are in San Francisco and Seattle, and far more than in relatively unregulated regions such as Columbus, Houston, and Indianapolis. Source: "Home Price Indices," Federal Housing Finance Agency.**

is what the Thrive plan proposes. But it would be far more equitable for the Metropolitan Council to reduce its land-use regulation and make housing more affordable for everyone than to provide affordable housing for a few at everyone else's expense.

## Fallacy #2: Multifamily housing is more affordable.

In the Thrive plan, the Council says “the region needs to offer housing options that give people in all life stages and of all economic means viable choices for safe, stable and affordable homes” (p. 22). *Housing options* is a euphemism for multifamily housing and is based on an assumption that multifamily housing is less expensive than single-family homes.

“ In fact, multifamily homes cost more, per square foot, than single-family homes. ”

This assumption is valid only if it is also assumed that multifamily dwellings are significantly smaller than single-family homes. In other words, what saves money is that the dwellings are smaller, not that they are multifamily.

In fact, multifamily homes cost more, per square foot, than single-family homes for several reasons. First, construction costs of multifamily housing are higher if the dwellings are more than two stories tall. A 1997 study in Portland, Oregon, found that two-story multifamily homes cost less, per square foot, than single-family homes, but three- and more-story multifamily homes cost more. On average, multifamily homes cost \$91 per square foot vs. \$74 for single-family.<sup>10</sup> Housing in mixed-use developments costs even more per square foot. If the Metropolitan Council wants to see more mid-rise, mixed-use developments, it is actually advocating for less-affordable housing.

A second issue is that multifamily homes are often built near regional and town centers where there is a lot of competition for land. The higher land costs translate into higher housing costs. If the Thrive plan calls for more multifamily housing in transit corridors and near rail transit stations, it is advocating for less-affordable housing.

Add to this the costs of artificial land shortages created by urban-growth or urban-service boundaries, and multifamily housing in areas with strict land-use regulation can be far less affordable than single-family housing in areas with little regulation. An 800-square-foot condominium in the San Francisco Bay Area can easily cost twice as much as a 2,200-square-foot single-family home in Houston or another Texas urban area.<sup>11</sup>

In short, the way to create more affordable housing is to reduce land-use regulation, not construct more multifamily housing. With reduced regulation, people who want to live in multifamily homes can choose to do so, but most people who want less-expensive homes will choose to buy smaller single-family homes.

The Thrive document goes on to say that the Council will “invest in affordable housing construction and preservation in higher-income areas of the region” (p. 22). This means that relatively wealthy neighborhoods of single-family homes will be deemed to have “unaffordable housing” and to remedy that the Council will mandate the construction of multifamily housing in those neighborhoods.

This pattern follows recent Housing and Urban Development (HUD) proposals and actions requiring other communities in the nation to force construction of multifamily housing in single-family neighborhoods. HUD's “affirmatively furthering fair housing” rules would measure every community's racial and ethnic mix, and if it wasn't mixed enough, would mandate the construction of “affordable” (meaning multifamily) housing in the community.<sup>12</sup> HUD has already successfully sued Garden City, New Jersey, a suburb of New York



City, requiring the city to rezone for multifamily housing because single-family zoning supposedly kept racial minorities out of the community.<sup>13</sup>

The San Francisco Bay Area recently approved a plan that, like the Thrive plan, was funded by a federal sustainable communities grant. Using language that is almost identical to the Thrive plan, the Bay Area plan requires that 80 percent of all new housing in that region be multifamily housing.<sup>14</sup> This will reduce the share of residents living in single-family homes from 56 percent today to less than 48 percent by 2040.

The Thrive plan goes on to require “a mix of housing affordability along the region’s transit corridors” (page 23). This means the Council wants to subsidize the construction of high-density housing along those transit corridors. This was a major focus of the Bay Area plan, which targeted more than 200 neighborhoods along transit corridors for high-density development. But, as noted, high-density, mid-rise housing in regional and town centers will actually be more expensive than single-family homes away from those centers.

What the Thrive plan appears to advocate, then, is that people live in smaller, lower-quality housing than they have in the past, with less privacy and more noise than is found in typical single-family neighborhoods. If the strategy is to make housing more affordable by building smaller housing units, there is no reason why it can’t be achieved with smaller single-family homes. In fact, planners’ real goal is to increase urban densities, and they merely use the affordability issue as a cover for that goal.

### **Fallacy #3: Multi-family housing is more sustainable.**

Another implicit assumption behind the push for multifamily housing is that it uses less energy (and therefore is responsible for less pollution) than single-family housing. Once again, this is only true because multi-family dwellings are much smaller than single-family homes. The Department of

Energy says that, on a per-square-foot basis, single-family homes use 29 percent less energy than multi-family homes.<sup>15</sup> This counts only the energy costs of operation, but the energy costs of constructing mid-rise and high-rise housing are also far greater, per square foot, than for single-family homes.

If the goal is to save energy, then it is far more cost-effective to house more people in single-family

“ The Department of Energy says that, on a per-square-foot basis, single-family homes use 29 percent less energy than multi-family homes. ”

homes and to make those homes more energy efficient than they already are than to house people in energy-inefficient multi-family homes and save energy by making people live in smaller dwellings.

### **Fallacy #4: Racial and ethnic minorities prefer multifamily over single-family housing.**

Though the Thrive plan doesn’t explicitly say so, the assumption that building more multifamily housing will somehow lead to housing equity for racial minorities contains the implicit (and racist) assumption that minorities prefer multifamily housing. This assumption was explicitly stated in the Bay Area plan, which said that Asians and Latinos “have demonstrated an historic preference for multi-family housing,” and that the fact that these ethnic groups are growing faster than non-Hispanic whites “is expected to drive higher demand for multifamily housing.”<sup>16</sup>

The reality, of course, is that the “historic preference for multifamily housing” is income-related, and as incomes rise the majority of all ethnic, racial, and age groups aspire to live in single-family homes.



## Fallacy #5: Transit is an effective alternative to driving.

Transit carries less than 1.5 percent of the motorized passenger miles in the Twin Cities region.<sup>17</sup> Yet the Thrive plan places an undue emphasis on transit as a solution to any urban problem. While automobiles offer door-to-door convenience, transit is slow and inconvenient. Given that research has found a strong positive correlation between commuting speeds and worker productivity, asking people to take transit rather than drive is the same as asking them to accept lower pay.<sup>18</sup>

Transit advocates often point to European cities, which typically spend far more money subsidizing transit than American cities. Europeans drive less than Americans, but they don't make up for it by riding transit. Instead, they simply travel less, which makes them less productive and means that a wide variety of social opportunities are less available and consumer goods are more expensive.

According to the European Union, the average American travels about 15,000 miles per year by car compared with less than 6,000 miles per year for the average European. American travel by urban transit and intercity rail totals less than 700 miles per person per year, compared with 1,300 miles per year for the average European.<sup>19</sup> This extra 600 miles of travel doesn't come close to making up for more than 9,000 miles of lost auto travel.

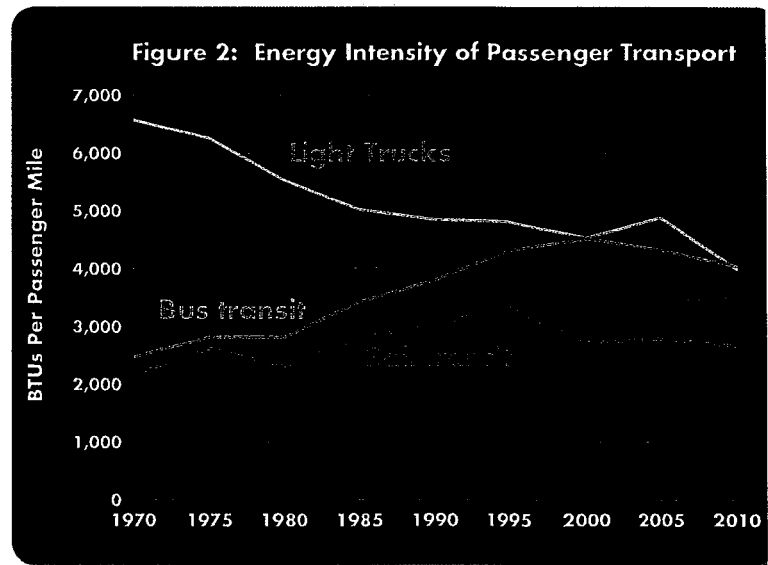
Europeans don't drive less than Americans because European nations are smaller: with open borders, Europe, at 3.9 million square miles, is actually slightly larger than the United States, at 3.7 million square miles. Besides, the nation with the second-highest amount of per capita driving in the world is Iceland, which is less than 40,000 square miles. Differences in auto travel between Europe and the United States are due more to high fuel taxes than to land area, population densities, urban design, or transit systems.

Noting that some low-income households do not own automobiles, the Thrive plan calls for

prioritizing transportation investments "that connect lower-income areas to job opportunities" (page 22). This is a euphemism for spending an even greater share of the region's resources on public transit. Yet "transit is not a reasonable substitute for the private vehicle for most people, poor or not poor," says University of Southern California planning professor Genevieve Giuliano. "In most circumstances, private vehicle access is the key to improved mobility for the poor."<sup>20</sup>

## Fallacy #6: Transit is more sustainable than driving.

An implicit assumption behind the emphasis on transit is that transit uses less energy than driving. That may have been true in 1970, but since then cars have become far more energy efficient, while transit has actually gotten less energy efficient.<sup>21</sup> At average occupancies, the average car on the road uses about 3,364 British Thermal Units (BTUs) per passenger mile.<sup>22</sup> Meanwhile, the Twin Cities Metro transit system uses an average of 3,479 BTUs per passenger mile.<sup>23</sup>



**In 1970, cars were gas guzzlers and transit was energy efficient. Since then, cars have become far more energy efficient while transit has gotten less so. Source: Department of Energy, Transportation Energy Data Book.**

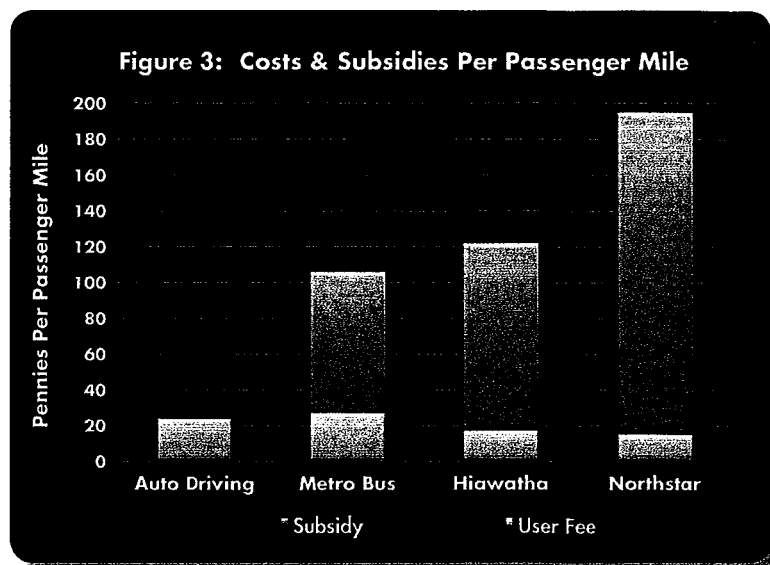
Moreover, as shown in Figure 2, the energy efficiency of cars is growing far faster than that of transit. By 2025, the average car on the road will use only about 2,400 BTUs per passenger mile.<sup>24</sup> Meanwhile, transit technologies, particularly for rail transit, improve only very slowly.<sup>25</sup>

Environmental impact statements (EISs) for both the Central Corridor and Southwest LRT projects reveal neither project should be relied on to reduce energy use in the Twin Cities. In fact, the Central Corridor's Final EIS estimates "[t]he additional energy used by [Central Corridor] LRT is greater than the energy saved by replacing passenger vehicles."<sup>26</sup> Reductions in energy used by passenger vehicles only offset about 25 percent of the additional energy required by LRT.

The proposed Southwest LRT project does better and is estimated to "slightly lower energy consumption."<sup>27</sup> But it is maybe too slight to measure. The Draft EIS admits the "the differences between the alternatives may not be statistically significant."<sup>28</sup> Considering this trivial and possibly statistically insignificant improvement, Southwest LRT does not offer a dependable strategy to increase energy efficiency.

### Fallacy #7: Transit is more affordable than driving.

Partly because transit is inherently inefficient and partly because government operations make it even more inefficient, transit is far more expensive than driving. Americans spend about a trillion dollars a year on purchasing, maintaining, operating, and insuring automobiles, including paying gas taxes, tolls, and other highway user fees.<sup>29</sup> They drive 2.6 trillion vehicle miles per year in cars and light trucks.<sup>30</sup> At average occupancies of 1.67 people per car, they spend about 24 cents per passenger mile on auto travel.<sup>31</sup> In 2011, subsidies to highways, roads, and streets paid out of sales taxes, property taxes, or other general funds, mostly for city and county roads and streets, amounted to about \$38 billion, or less than a penny per passenger mile.<sup>32</sup>



**Transit fares are competitive with auto driving, but only because taxpayer subsidies to transit are huge. On average, subsidies to Twin Cities transit are 88 times more than subsidies to driving. Source: See text.**

Transit fares are competitive with the cost of driving. But subsidies to transit are far greater per passenger mile. In 2011, the average fare paid by Twin Cities transit riders was 25 cents per passenger mile. But transit operations cost 79 cents per passenger mile. Maintenance and capital costs added another 33 cents a passenger mile, for total subsidies of 88 cents per passenger mile, or more than 88 times the subsidies to highways, roads, and streets.<sup>33</sup> Twin Cities residents travel nearly 40 billion passenger miles per year by automobile; shifting that travel to transit would require subsidies of \$35 billion per year.<sup>34</sup>

### Fallacy #8: Improving transit is the best way to provide low-income people with access to jobs.

The Thrive plan notes that many low-income households lack automobiles and strongly implies that improving transit is a good way of helping those households. It specifically states that "households who do not own private automobiles [are] also known as 'transit dependen[t]'" (p. 22).

Census data reveal that less than 2.8 percent of Twin Cities workers live in households that lack automobiles. Moreover, 26 percent of those workers nevertheless drive alone to work, and 11 percent carpool. Since only 36 percent take transit to work, that means they actually rely more on automobiles than transit.<sup>35</sup>

If the goal is to help poor people out of poverty, giving them access to a car is far more likely to succeed than improving public transit. “Car ownership is a significant factor in improving the employment status of welfare recipients,” say UCLA planners Paul Ong and Ellen Blumenberg.<sup>36</sup> One Portland study found that people without a high-school diploma were 80 percent more likely to have a job and earned \$1,100 more per month if they had a car. In fact, the study found that owning a car was more helpful to getting a job than getting a high-school-equivalent degree.<sup>37</sup> Another study by University of California researchers found that closing the black-white auto ownership gap would close nearly half the black-white employment gap.<sup>38</sup>

Auto ownership is so important to helping people out of poverty that welfare agencies in more than 50 urban areas in 25 states started “ways-to-work” programs that help low-income people buy their first cars.<sup>39</sup> These programs offer people low-interest loans of up to \$4,000 to buy a used car or smaller loans to help people repair a non-working car they already own.

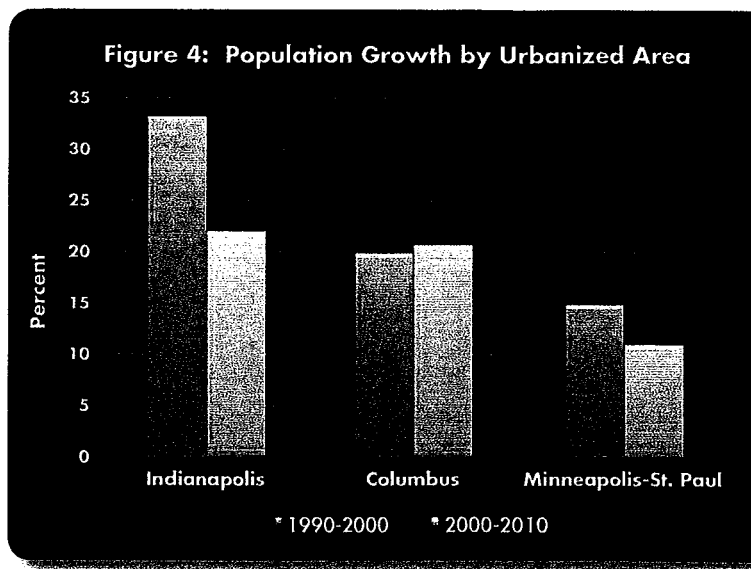
### Fallacy #9: Subsidizing transit and multifamily housing will make the region more competitive.

A major selling point for the Thrive plan is that it will help the Twin Cities region be more competitive with other urban areas. In fact, the reverse appears to be true: those urban areas that spend the least effort meddling with land uses and subsidizing public transit are the ones that are growing the fastest.<sup>40</sup>

On a percentage basis, the fastest-growing urban area in the Midwest, for example, is Indianapolis,

which is growing twice as fast as the Twin Cities. The second-fastest growing area is Columbus (Figure 4). Neither Indianapolis nor Columbus have municipal urban service areas or spend heavily on expensive transit programs. Numerically, the fastest-growing urban area in the country is Houston, which not coincidentally also has the least land-use regulation of any urban area in the United States.

Overall, transit spending and land-use regulation are both strongly correlated with slower growth. Transit capital spending during the 1990s has a strong negative correlation with population growth in the 2000s. Transit operational spending in the 1990s and 2000s has strong negative correlations with population growth in the same or succeeding decades. These strong correlations hold whether measured by the nation’s 50 largest urbanized areas or the nation’s 160 largest urbanized areas.<sup>41</sup>



**The Indianapolis urbanized area has been growing more than twice as fast, and Columbus nearly twice as fast, as the Twin Cities urbanized area. Source: Census Bureau, 1990, 2000, and 2010 censuses.**

Similarly, growth is also strongly correlated with land-use regulation. The most heavily regulated states and regions, such as California and Hawaii, are growing slowest; the least heavily regulated, such as Texas and North Carolina, are growing fastest; and areas of moderate regulation, such as Minnesota, have moderate growth rates.

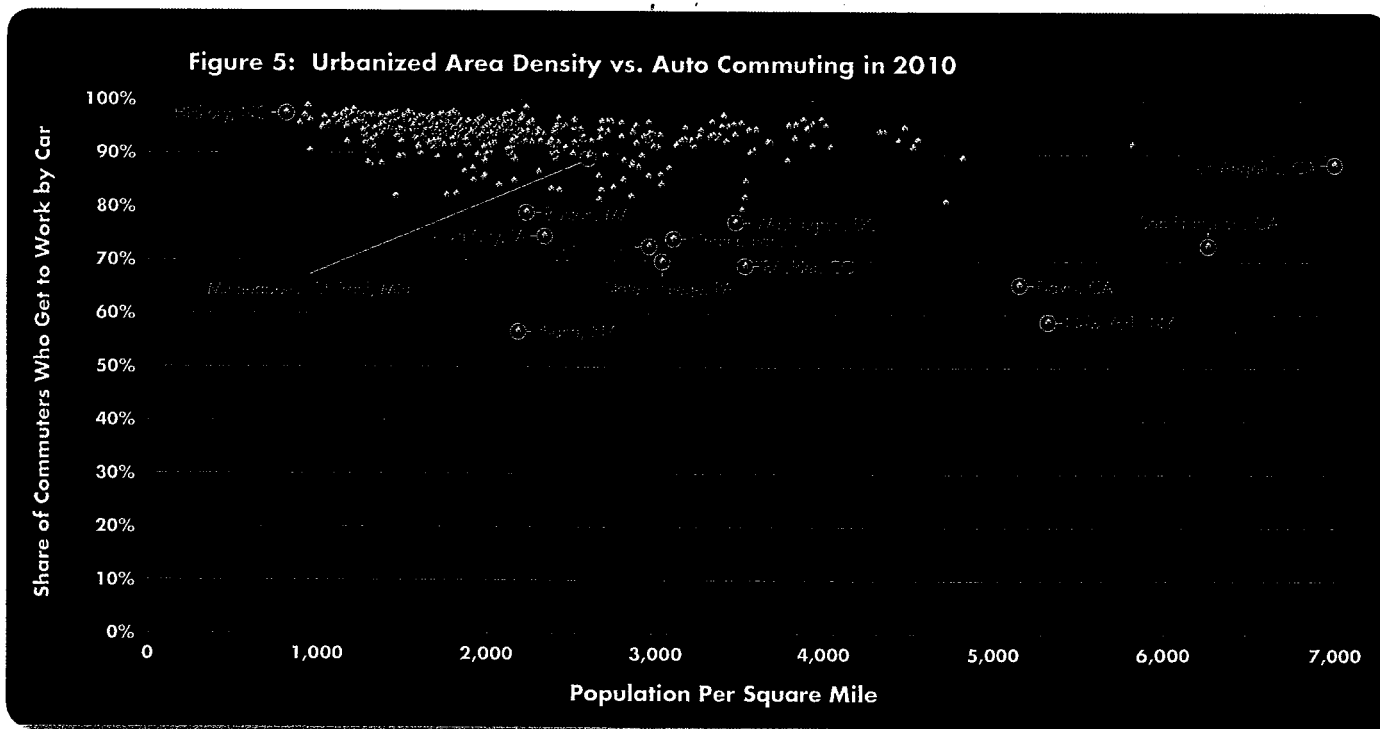
## Fallacy #10: Dense development reduces driving.

The most important fallacy underlying the Thrive plan is the assumption that denser development, especially along transit corridors, can significantly reduce driving and thus (if you believe Fallacy #6) make the region more sustainable. Planners often point to studies showing that households in high-density areas drive less than households in low-density areas. However, these studies almost invariably fail to account for self-selection, that is, that people who want to drive less tend to choose to live in denser neighborhoods where they can be close to transit, shops, and other services. After correcting for self-selection, University of California (Irvine) economist David Brownstone concluded that the effects of density and urban form on driving are “too small to be useful” in saving energy or reducing pollution.<sup>42</sup>

Census data reveal this small but measureable relationship between density and driving. In 2010, the density of the 413 urbanized areas greater than 50,000 people ranged from 811 to 6,999 people

per square mile. The share of commuters driving to work in the densest area was only 9 percent less than the least-dense area (Figure 5). While some urbanized areas do have significantly lower rates of auto commuting, the graph reveals that this is independent of density. In fact, the two most important factors are having a large number of jobs concentrated in one place, such as Manhattan, or having a lot of young people in the work force. Most of the urbanized areas with low rates of auto commuting are college towns, such as Ithaca, Davis, Boulder, and State College, Pennsylvania, or urban areas with large, older downtowns, such as New York, Boston, San Francisco, and Washington, D.C.

Like the Thrive plan, the Bay Area plan counted on increased densities as a way to reduce driving. Yet the plan itself projected that densification, transit improvements, and transit-oriented developments in transit corridors would reduce per capita driving by less than 6 percent.<sup>43</sup> Even that is almost certainly optimistic. Since 1980, the population density of the San Francisco–Oakland and San Jose urbanized areas have each grown by more than 55 percent, and the region has built more than 200 miles of



**The density of an urban area has a measureable but small effect on the share of people who commute to work by car. Source: 2010 census.**

new rail transit lines and scores of transit-oriented developments. Yet per capita transit ridership declined by 36 percent and per capita driving grew by nearly 5 percent.<sup>44</sup>

Urban planners and planning advocates have a decades-long obsession with increasing urban densities. The reasons claimed for needing such densities change: Early reasons involved preserving farmland (when the United States has 1.5 acres of agricultural land that lie more-or-less fallow for every acre actually used to grow crops<sup>45</sup>); preserving open space (when the Census Bureau says that just 3.0 percent of the United States, and only 2.1 percent of Minnesota, have been urbanized<sup>46</sup>); and because low-density suburbs “lack a sense of community” (actual studies have found that suburbanites are more likely to be involved in their communities than city residents<sup>47</sup>).

More recently, density advocates have argued that suburbs cause obesity (in fact, to the slight extent that suburbanites weigh more than city residents, it is due to self-selection: suburbs don’t cause obesity, but obese people are more likely to choose to live in suburbs<sup>48</sup>) or that it is expensive (in fact, the costs of sprawl are far lower than the costs of trying to prevent sprawl<sup>49</sup>). The truth is that as soon as one claim for the advantage of density is debunked, density advocates come up with another.

Whatever the real reasons—and it is likely that many planners themselves aren’t sure why they support urban densification—they are almost certainly based on fallacies such as the ones described here. Instead of writing a plan based on such fallacies, the Metropolitan Council should scrap the Thrive plan and instead investigate what policies actually contribute to urban growth and a healthy environment. Such policies are likely to involve less planning, less land-use regulation, and less subsidy to transit, and more efforts to improve urban mobility and reduce the barriers to residential and commercial development. ■

## References

1 Economic Research Service, United States Department of Agriculture, *Major Land Uses*, “Summary Table 1—Major uses of land, by region and State, United States, 2007,” available at <http://www.ers.usda.gov/data-products/major-land-uses.aspx>.

2 “Region 2040 Recommended Alternative Technical Appendix,” Metro, Portland, Oregon, September 15, 1994, Table 11.

3 For the purposes of this paper, my calculations of value-to-income ratios rely on median family incomes, based on the hypothesis that families are more likely to buy homes than non-family households. Some other researchers use median household incomes, which tend to be a bit lower than median family incomes, resulting in higher value-to-income ratios. This isn’t necessarily wrong but it explains why my numbers might differ from others’.

4 1970 *Census of Housing, Volume 1, Housing Characteristics for States, Cities, and Counties, Part 1, United States Summary*, table 17, “Financial Characteristics for Areas and Places”; 1970 *Census of the Population, Volume 1, Characteristics of the Population, Part 1, United States Summary*, Section 2, table 366, “Median Income in 1969 of Families by Type of Family and Race of Head for Standard Metropolitan Statistical Areas of 250,000 or More.”

5 U.S. Census Bureau, *American Community Survey 2006*, Tables B19113 (median family income) and B25077 (median home value) for states and urbanized areas.

6 U.S. Census Bureau, *American Community Survey 2012*, Tables B19113 (median family income) and B25077 (median home value) for urbanized areas.

7 “2013 Coldwell-Banker Home Listing Report,” Coldwell-Banker, 2013, available at [hlr.coldwellbanker.com](http://hlr.coldwellbanker.com).

8 “Urban and Rural in 2010 by State and County,” Bureau of the Census, 2012, [www2.census.gov/geo/ua/PctUrbanRural\\_County.xls](http://www2.census.gov/geo/ua/PctUrbanRural_County.xls).

9 Natural Resources Conservation Service, U.S. Department of Agriculture, *Summary Report: 2007 National Resources Inventory* (2009), p. 24.

10 William L. White, Robert Bole, and Brett Sheehan, “Affordable Housing Cost Study: An Analysis of Housing Development Costs in Portland, Oregon,” Housing Development Center, Portland, 1997, p. 1, [http://www.hcd.ca.gov/2012\\_affordable\\_housing/portland\\_ah\\_study.pdf](http://www.hcd.ca.gov/2012_affordable_housing/portland_ah_study.pdf).

11 Compare Mark Hogan, ““Why can’t developers build housing in San Francisco for the people who need it most instead of for the rich?” *Markosaurus* blog, October 22, 2013, at <http://markasaurus.com/2013/10/22/why-can%E2%80%99t-developers-build-housing-in-san-francisco-for-the-people-who-need-it-most-instead-of-for-the-rich/> (calculating that an 800-square-foot apartment in

the Bay Area costs \$470,000 to build) with Coldwell Banker, “Home Listing Report,” 2013, at <http://hlc.coldwellbanker.com/FullData.html> (finding that a typical 2,200-square foot single-family home in Dallas, Houston, or San Antonio costs less than \$200,000).

12 “Affirmatively Furthering Fair Housing: Department of Housing and Urban Development Proposed Rule,” *Federal Register*, July 19, 2013, pp. 43710–43743.

13 Will James and Josh Barnabel, “Garden City Loses Housing-Law Case,” *Wall Street Journal*, December 6, 2013, <http://online.wsj.com/news/articles/SB10001424052702304096104579242710500776696>.

14 Metropolitan Transportation Commission, *Draft Plan Bay Area* (2013), p. 26. Draft Plan Bay Area focuses 80 percent of new housing in “Priority Development Areas” (PDAs). According to analysis by John Burns Real Estate Consulting: “Since the PDAs are governed by the PDA types in terms of allowable densities, this effectively means that about 80% of future residential units in the region will be at a minimum of 20 units per acre and at an average of something like 60 to 80 units to the acre.” John Burns Real Estate Consulting, “A Review of the San Francisco Bay Area’s Draft Plan Bay Area/Sustainable Communities Strategy: Market Dynamics and Housing Preferences,” at pg. 5, available at <http://quietandsafesanmarafael.org/wp-content/uploads/2013/05/PBA-Review-by-John-Burns.pdf>.

15 U.S. Department of Energy, *2011 Buildings Energy Data Book* (2012), p. 2–5, [http://buildingsdatabook.eren.doe.gov/docs/DataBooks/2011\\_BEDB.pdf](http://buildingsdatabook.eren.doe.gov/docs/DataBooks/2011_BEDB.pdf).

16 Metropolitan Transportation Commission, *Draft Plan Bay Area*, p. 8.

17 Calculated by comparing vehicle miles in the Minneapolis-St. Paul metropolitan area from U.S. Department of Transportation, *Highway Statistics 2011* (2013), Table HM–71 with passenger miles from U.S. Department of Transportation, *National Transit Database 2011* (2012), “Table 19: Transit Operating Statistics: Service Supplied and Consumed” spreadsheet. To convert vehicle miles to passenger miles, they are multiplied by 1.67, which is the average automobile occupancy rate reported by N. Santos, et al., *Summary of Travel Trends: 2009 National Household Travel Survey* (U.S. Department of Transportation 2011), p. 39.

18 Rémy Prud’homme and Chang-Woon Lee, “Size, Sprawl, Speed and the Efficiency of Cities,” *Urban Studies*, October 1999, 36(11): 1849–1858.

19 Eurostat, *Panorama of Transport: 2009 Edition* (2009), p. 100.

20 Genevieve Giuliano, Hsi-Hwa Hu, and Kyoung Lee, “The Role of Public Transit in the Mobility of Low Income Households,” Metrans Transportation Center, University of Southern California, 2001, p. ii.

21 Stacy C. Davis, Susan W. Diegel, and Robert G. Boundy,

*Transportation Energy Data Book, Edition 32* (Department of Energy 2013), Tables 2–13 and 2–14, available at <http://cta.ornl.gov/data/chapter2.shtml>.

22 Ibid, Table 2–13.

23 Calculated from the U.S. Department of Transportation, *2012 National Transit Database* (2013), “Table 17: Energy Consumption” and “Table 19: Transit Operating Statistics: Service Supplied and Consumed” spreadsheets, at <http://www.ntdprogram.gov/ntdprogram/pubs/dt/2012/excel/DataTables.htm>.

24 Calculated based on federal corporate average fuel economy standards and an assumption that America’s auto fleet will continue to turn over at its historic rate of about 5.6 percent per year. Randall O’Toole, “Obama Undercuts Case for HSR and Rail Transit,” August 4, 2011, at <http://ti.org/antiplanner/?p=5487>.

25 Steven Polzin, “Energy Crisis Solved!” *Urban Transportation Monitor*, July 11, 2008, pp. 8–9.

26 United States Department of Transportation and Metropolitan Council, *Central Corridor Light Rail Transit Project Final Environmental Impact Statement* (June 2009): pp. 4.10-1 to 4.10-2, available at <http://www.metrocouncil.org/Transportation/Projects/Current-Projects/Central-Corridor/Publications-And-Resources/Environmental/CC-FEIS/Published-FEIS/CC-FEIS-Ch4-pdf.aspx>.

27 United States Department of Transportation and Metropolitan Council, *Southwest Transitway Draft Environmental Impact Statement* (October 2012): pp. 4-139 to 4-145, available at [http://www.metrocouncil.org/Transportation/Projects/Current-Projects/Southwest-LRT/Publications-And-Resources/Environmental-Documents/DEIS/Published-DEIS/SW-DEIS-ch4-Environmental\\_Effects.aspx](http://www.metrocouncil.org/Transportation/Projects/Current-Projects/Southwest-LRT/Publications-And-Resources/Environmental-Documents/DEIS/Published-DEIS/SW-DEIS-ch4-Environmental_Effects.aspx).

28 Ibid. Note the DEIS likely overestimates the energy use of passenger vehicles. Based on the energy use and passenger miles listed in Tables 4.11-3 and 4.11-4, the report appears to assume passenger vehicles will use about 3,700 BTUs per passenger mile in 2030 compared to 2,600 BTUs for light rail.

29 Bureau of Economic Analysis, National Income and Product Account Tables: Table 2.5.5. Personal Consumption Expenditures by Function (2012), at <http://www.bea.gov/iTable/iTable.cfm?reqid=9&step=1&acrdn=2#reqid=9&step=3&isuri=1&903=74>

30 U.S. Department of Transportation, *Highway Statistics 2011* (2012), Table VM-1.

31 N. Santos, et al., *Summary of Travel Trends: 2009 National Household Travel Survey* (U.S. Department of Transportation 2011), p. 39.

32 Calculated by subtracting “amounts for non-highway purposes” and “amounts for mass transportation purposes” from “subtotal other taxes and fees” in U.S. Department of Transportation, *Highway Statistics 2011*, Table HF-10.



33 Calculated from the U.S. Department of Transportation, *2012 National Transit Database*, “capital use,” “fare revenue,” “operating expenses,” and “service” spreadsheets. Numbers may not exactly add due to rounding. Capital costs of the Hiawatha and Northstar rail lines amortized over 30 years at 4 percent; capital costs for buses averaged over the past 19 years.

34 U.S. Department of Transportation, *2011 Highway Statistics*, Table HM-71.

35 U.S. Census Bureau, *2012 American Community Survey*, Table B08141, Minneapolis--St. Paul, MN--WI Urbanized Area.

36 Paul Ong and Evelyn Blumenberg, “Job Access, Commute, and Travel Burden among Welfare Recipients,” *Urban Studies* 31(1):77–93.

37 Kerri Sullivan, *Transportation and Work: Exploring Car Usage and Employment Outcomes* (June 2003), available at [http://web.pdx.edu/~jdill/LSAL\\_Sullivan.pdf](http://web.pdx.edu/~jdill/LSAL_Sullivan.pdf).

38 Steven Raphael and Michael Stoll, “Can Boosting Minority Car-Ownership Rates Narrow Inter-Racial Employment Gaps?” (Berkeley Program on Housing and Urban Policy June 2000), p. 2, available at <http://www.uctc.net/papers/685.pdf>.

39 Alliance for Children and Families, “Ways to Work,” at <http://www.alliance1.org/alliance/waystowork>.

40 The Census Bureau reports data for *places*, which includes incorporated cities, and *metropolitan areas*, which includes all counties that are partly urbanized. Since much urban development is outside of incorporated cities while large parts of partly urbanized counties remain rural, neither is appropriate for measuring urban economies. For this, the Census Bureau uses *urbanized areas*, which are agglomerations of 50,000 people or more including one or more central cities (such as Minneapolis and St. Paul), incorporated suburbs (such as Bloomington), and contiguous development in unincorporated areas including residential developments denser than about 1,000 people per square mile (about one or more homes every two acres). Most references to *urban areas* in this report are based on census data for urbanized areas.

41 Calculated from U.S. Department of Transportation, *National Transit Database* (2013), historical data files; and 1990, 2000, and 2010 census populations by urbanized areas. Correlation coefficients for the top 50 urbanized areas are  $-.23$  for transit capital spending in the 1990s vs. population growth in the 2000s;  $-.31$  for transit operating costs in the 1990s vs. population growth in the 2000s;  $-.22$  for transit operating costs in the 1990s vs. population growth in the 1990s; and  $-.26$  for transit operating costs in the 2000s vs. population growth in the 2000s.

42 David Brownstone, “Key Relationships between the Built Environment and VMT,” (Transportation Research Board 2008), p. 7, available at <http://onlinepubs.trb.org/Onlinepubs/sr/sr298brownstone.pdf>.

43 Metropolitan Transportation Commission, *Plan Bay Area Draft Environmental Impact Report* (2013), Table 3.1–12.

44 U.S. Department of Transportation, *Highway Statistics 1989* (1990), Table HM-72; *Highway Statistics 2010* (2011), Table HM-72; U.S. Department of Transportation, *1982 National Transit Database* (1983), Table 417282; U.S. Department of Transportation, *2010 National Transit Database*, “Table 19: Transit Operating Statistics: Service Supplied and Consumed” spreadsheet.

45 Natural Resources Conservation Service, U.S. Department of Agriculture, *Summary Report: 2007 National Resources Inventory* (2009), p. 44.

46 U.S. Census Bureau, “Urban and Rural in 2010 by State and County,” (2012), available at [www2.census.gov/geo/ua/PctUrbanRural\\_County.xls](http://www2.census.gov/geo/ua/PctUrbanRural_County.xls).

47 Jan Brueckner and Ann Largey, *Social Interaction and Urban Sprawl* (Center for Economic Studies 2006), available at [http://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=946914](http://papers.ssrn.com/sol3/papers.cfm?abstract_id=946914).

48 Jean Eid, Henry G. Overman, Diego Puga, and Matthew A. Turner, *Fat City: Questioning the Relationship Between Urban Sprawl and Obesity* (University of Toronto, 2006), p. 1; Andrew J. Plantinga and Stephanie Bernell, “The Association Between Urban Sprawl and Obesity: Is It a Two-Way Street?,” *Journal of Regional Science*, Vol. 47, No.5 (2007) available at [http://www.researchgate.net/publication/4773712\\_THE\\_ASSOCIATION\\_BETWEEN\\_URBAN\\_SPRAWL\\_AND\\_OBESITY\\_IS\\_IT\\_A\\_TWO-WAY\\_STREET/file/e0b495209a33174541.pdf](http://www.researchgate.net/publication/4773712_THE_ASSOCIATION_BETWEEN_URBAN_SPRAWL_AND_OBESITY_IS_IT_A_TWO-WAY_STREET/file/e0b495209a33174541.pdf).

49 Robert Burchell, et al., *The Costs of Sprawl 2000* (2002), p. 13 (finding that homes in low-density areas cost \$11,000 more to service than homes in high-density areas, which is an insignificant sum compared to the hundreds of thousands of dollars added to home prices by urban containment plans).



### *About the Author*

**Randal O'Toole** is a Cato Institute Senior Fellow working on urban growth, public land, and transportation issues. O'Toole's research on national forest management, culminating in his 1988 book, *Reforming the Forest Service*, has had a major influence on Forest Service policy and on-the-ground management. His analysis of urban land-use and transportation issues, brought together in his 2001 book, *The Vanishing Automobile and Other Urban Myths*, has influenced decisions in cities across the country. In his book *The Best-Laid Plans*, O'Toole calls for repealing federal, state, and local planning laws and proposes reforms that can help solve social and environmental problems without heavy-handed government regulation. O'Toole's latest book is *American Nightmare: How Government Undermines The Dream of Homeownership*. An Oregon native, O'Toole was educated in forestry at Oregon State University and in economics at the University of Oregon.

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Minnesotans on the Move to  
Lower Tax States



By Peter J. Nelson

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## FROM FAMILY COLLAPSE TO AMERICA'S DECLINE

THE EDUCATIONAL, ECONOMIC, AND SOCIAL  
COSTS OF FAMILY FRAGMENTATION  
—ABRIDGED—

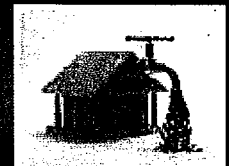


BY  
**MITCH PEARLSTEIN**  
Introduction by Tom Ichniowski

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"Like the 1970s, Minnesota has all the ingredients  
to become a 'second' or 'third' world state. It is  
time to stop the bleeding and start the recovery."  
—Peter J. Nelson, Editor, American Experiment

Minnesota Spending 101  
Smart Budgeting for the Taxpayers



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Fresh Energy

April 28, 2014

Susan Haigh, Chair  
Metropolitan Council  
390 Robert St N,  
Saint Paul, MN 55101

**Re: Comments on the Draft *Thrive MSP 2040* Plan**

Submitted electronically via: [public.info@metc.state.mn.us](mailto:public.info@metc.state.mn.us)

Dear Chair Haigh:

Thank you for the opportunity to submit comments regarding the Metropolitan Council's (Council) draft regional development plan, *Thrive MSP 2040*.

Fresh Energy appreciates that the Council has established a plan that not only provides direction to local communities developing their comprehensive plans but also regional goals that focus on meeting the needs of a growing and changing population and shifting development patterns. We also recognize the importance of the Council having strong partnerships and innovative strategies to address the challenges and opportunities ahead.

Overall, Fresh Energy is very supportive of the direction of the *Thrive MSP 2040* Plan, specifically the five desired outcomes of stewardship, prosperity, equity, livability and sustainability. However, we do have specific comments on the goals and strategies related to transportation investments, climate change and energy efficiency.

**Transportation Investments**

If the region seeks to have a thriving, comprehensive transportation system, the Council and supporting cities must invest in plans, policies and programs that not only maintain our existing infrastructure but also provide options that improve overall quality of life.

▪ ***Connecting Land Use***

- Page 12 and Page 18 – We strongly support leveraging transit infrastructure with higher expectations of land use and encouraging redevelopment and infill development across the region. Land use policies and programs should endorse and incentivize compact development at higher densities. This will lead to cost efficiencies, better access and positive impacts to the environment.
- Density is not welcomed in all communities due to fear of changes in neighborhood fabric, increased traffic and gentrification. The Council must develop strategies to assist communities in supporting density (i.e. zoning, design guidelines and accessibility standards).
- Page 22 - The plan recognizes the “need to meet the housing preferences of today's households” and “expand choices.” However, it does not acknowledge the need for



strategies that take into consideration culture and the make-up of the family of today which is larger and cross-generational.

- Page 28 – More detail is needed on how the Council will “align resources to support transit oriented development and walkable places.”
- Page 47 – The Council must focus transit expansion on connections to existing and emerging high-density job and activity centers. Since there are 42 centers, the plan should prioritize investment by size of center, with the highest priority on major centers. Manufacturing/distribution centers should be labeled separately since it is clear that freight access is most important to these locations and transit is likely less important.
- Fresh Energy strongly supports the Council's recognition that communities should "ensure access to solar energy by addressing it in local comprehensive plans and ordinances, as required by the Metropolitan Land Planning Act [.]” However, the Council must go further by providing local communities with tools and best practices that will assist them in solar resource and land-use planning, zoning, and permitting.

▪ **Equity**

The Council plays a critical role in addressing racial and economic disparities in the region. Fresh Energy strongly supports the intent to invest in and reduce the region's racially concentrated areas of poverty or RCAPs in order to bridge the opportunity gap.

- It is extremely critical that transportation investments connect communities, especially low-income and disadvantaged communities, to opportunities in the form of affordable housing, education, employment, and cultural resources.
- Page 3 – Meeting the demands of the state's “graying and browning” population will present some challenges. The data has shown that the disparities are persistent. However, continuing to view this change through a deficit lens verses an asset-based framework will limit the economic, social and cultural prosperity of the region. We recommend revising the title of the section, “Changes and challenges that lie ahead for the region” to one that not only acknowledges the challenges of the demographic shift but also the opportunities. Diversity is an asset that supports economic vitality.
- Page 21 and Page 47 - The plan should provide more detail about how it will “mitigate” RCAPs. Will the Council support structural changes in policies and programs? How will the Council improve access from RCAPs to job and activity centers? What role will the Council play in truly moving people from poverty to prosperity?
- As the Council considers how to sustain the region's transportation system, it must make decisions concerning rate increases and decreases with an equity framework.

▪ **Active Transportation**

As the state grapples with the rising cost of healthcare insurance and delivery and unhealthy residents, the Council needs to do its part to ensure that land use policies and programs make it easier for people to bike and walk to destinations. Additionally, the Council must commit to securing dedicated funding to build out transit, bicycle, and walking infrastructure.



## Fresh Energy

- Page 25 – We are very supportive of the inclusion of priority language on active lifestyles, and safe access to local, healthy food.
- Page 25 – The plan should acknowledge that limited access to cars and transit prevents many of our residents from enjoying the beautiful regional parks and trails.
- Page 27, Bullet 4 - Replace the word “support” with “require” complete streets approaches to enhance transportation choices” and also add “and improve safety for all users”.
- Page 27 – We are strongly supportive of recognizing the role of the region’s bicycle and pedestrian facilities to promote access, recreation, and health lifestyles.

### **Climate Change Adaptation and Mitigation**

Fresh Energy strongly supports that *Thrive MSP 2040* acknowledges climate change is happening and the need for initiatives (i.e. investing in and connecting transit, biking and walking; building more compact and mix-used development, benchmarking etc.) that reduce greenhouse emissions.

- Page 65 – The plan calls out the Next Generation Energy Act of 2007. We strongly recommend that the Council renew its commitment to reduce greenhouse gas emissions set forth by the law. Specifically, local comprehensive plans should include information on how the city will work to meet the Next Generation Energy Act carbon reduction goals.
- Page 79 – The reduction of vehicle miles traveled (VMT) and carbon per unit of fuel are key drivers of the regions greenhouse gas emissions. The bullet mentioning these two indicators is very vague. Considering that reducing VMT and carbon per unit of fuel advances all of the plan’s five key outcomes – equity, livability, sustainability, stewardship, and prosperity, it is essential that this language is strengthened. Additionally, requiring engagement in city-wide or region-wide benchmarking practices (such as the Regional Indicators Initiative) can help cities first recognize their VMT and greenhouse gas emission baseline, and then demonstrate measureable progress toward reduction goals.
- Page 83 – We are strongly supportive of the language that states, “use the Council’s investments and planning authorities to contribute toward meeting statutory goals for reductions in the generation of regional greenhouse gas emissions, and convene regional discussions about goals for climate change mitigation and adaption.” This language is critical to achieving the goals of the 2007 law.
- Page 83 – Local communities play a critical role in combating climate change. We are strongly supportive of the bullets “Address climate change mitigation and adaptation throughout the local comprehensive plan. Identify local measures that would result in a reduction in water use, energy consumption, and emission of greenhouse gases.”
- More emphasis is needed on alternative fuels and incentives for fleets.

### **ENERGY EFFICIENCY**

Fresh Energy is extremely supportive of the Council’s commitment to “develop, collect and disseminate information about climate change, including energy and climate data, and a regional greenhouse gas emissions inventory.” Public release of information, such as energy consumption data of buildings and



cities, has proven to help drive behavioral change and market transformation, resulting in low to no-cost reductions in energy consumption. Because this section has a lot of repetition, the Council needs to clarify how it will take action and the level of accountability.

- Page 12, 2nd bullet point from bottom of page – Include “clean energy and energy efficiency” into the sentence -”...including expectations for connectivity, clean energy and energy efficiency, density and intensity, etc.”
- Page 23, 1st set of bullet points - Add a new bullet point that states “Promote access to and development of energy efficient projects.”
- Page 32, top of page, first bullet point - Add “publicly” so the information is disclosed and available to the public. The sentence will read “...disseminate information PUBLICLY about climate change...” This change is also needed on page 39, second set of bullet points.
- Page 77, second bullet point - Add energy efficiency to the sentence, “Encourage sustainability in housing, whether new construction or rehab, to promote livability and health, increase ENERGY EFFICIENCY, create longer lasting...”
- Page 77, third bullet point from bottom - Add consideration of energy consumption/utility costs to the sentence, “Identify and analyze local markets, location, energy efficiency, condition and availability...”
- Page 82, last paragraph - Benchmarking through an established program such as Energy Star Portfolio Manager (like the City of Minneapolis is using for their Benchmarking and Disclosure Ordinance) or the state's B3 Program, can help cities in the region determine the best buildings for energy efficiency upgrades and help the region to meet greenhouse gas reduction goals. Add a new sentence "Benchmarking buildings in a city and publicly disclosing their energy and water consumption information can provide starting points, identify feasible outcomes for planning purposes and measure progress toward meeting state greenhouse gas reduction goals."
- Page 83, second bullet point – We are very supportive of the statement “With regional infrastructure, planning, and operations, increase efforts to reduce water use and energy consumption”
- Page 83, sixth bullet - GreenSteps best practices are named here; we recommend including them in all other places where the Council will “develop, collect, and disseminate PUBLICLY information about climate change.” We recommend clarifying whether this is GreenSteps for businesses/planning or “GreenSteps Cities.” We recommend both.
- Page 88 – Add bullet point to last set of bullet points that states, “Benchmark buildings and disclose energy consumption data at a city-wide level.” This could be used in any of the city demographics (i.e. urban, suburban, rural, etc)
- Page 92 – Add bullet point to the first set of bullet points that states “Consider energy efficient improvements or construction as a long-term solution.” This could be used in any of the city demographics (i.e. urban, suburban, rural, etc.).
- We strongly support the goals adopted by the Environmental Services Division and Metro Transit to reduce their energy purchases by 50% by 2020 (compared to a 2006 baseline). We further support the Council's commitment, to "pursue and invest in local generation of renewable energy for



Fresh Energy

operations, including large scale solar facilities." In particular, we have been pleased with the Council's progress towards developing its on-site solar resources at water treatment facilities. We encourage the Council to continue this work, including by proactively identifying additional Council-owned sites suitable for rooftop or ground-mounted solar development.

Again, we appreciate the opportunity to provide comments on this pivotal document. The Council plays a critical role in the region's economic and social prosperity. Understanding that we are operating in an environment with limited resources, the Council must partner with other organizations such as Fresh Energy, to deploy strategies that are sustainable, equitable and innovative. This will not only maximize the full potential of the Council's core policy authorities but also ensure that the region achieve its goals.

Thank you in advance for considering our comments. If you need any assistance regarding this document, I can be reached at [hardy@fresh-energy.org](mailto:hardy@fresh-energy.org).

Sincerely,

**Shawntera M. Hardy**, Director  
Transportation and the Built Environment  
Fresh Energy

**From:** Dane Smith [<mailto:Dane@growthandjustice.org>]

**Sent:** Monday, April 28, 2014 4:58 PM

**To:** PublicInfo

**Cc:** David Van Hattum; [jerkel@mncenter.org](mailto:jerkel@mncenter.org); Chip Halbach ([chalbach@mhponline.org](mailto:chalbach@mhponline.org)); [russ@metrostability.org](mailto:russ@metrostability.org); [jerkel@mncenter.org](mailto:jerkel@mncenter.org); Maureen Ramirez; [barbt@tlcminnesota.org](mailto:barbt@tlcminnesota.org); [Inegstad@isaiahmn.org](mailto:Inegstad@isaiahmn.org)

**Subject:** Growth & Justice Comments on ThriveMSP

To Chair Haigh and Staff of the Metropolitan Council

We at Growth & Justice strongly support the principles and strategic direction of the ThriveMSP 2040 draft plan.

We also have read some of the comments and critiques that have been forwarded to the council by groups with whom we find much in common, such as Transit for Livable Communities, Fresh Energy, Isaiah, Legal Aid, the Trust for Public Land, the Minnesota Housing Partnership, the Housing Preservation Project, the Minnesota Center for Environmental Advocacy, and the Alliance for Metro Stability. We think these critiques are responsible, thoughtful, and worthy of your careful consideration. A common theme in those comments is that this plan could be even stronger and include more “teeth” for racial equity, for environmental sustainability, for transit, for affordable housing and for smarter growth in the metropolitan area.

We were among the first to praise the bold emphasis on racial equity in this plan when it was unveiled and I’m linking you to two recent op-eds that focused on both the racial equity angle and the plan’s proper emphasis on a more holistic view of economic competitiveness for the Twin Cities and Minnesota.

<http://www.startribune.com/opinion/commentaries/251571281.html>

<http://www.growthandjustice.org/news/2014-02/thrive-msp-adds-momentum-to-ending-disparities-in-metro>

We look forward to engaging further and working in concert with you toward a more equitable prosperity in the Twin Cities

Sincerely

**Dane Smith** | President  
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TO : Metropolitan Council

FROM : Housing Preservation Project, Mid-Minnesota Legal Assistance, Minnesota Housing Partnership, Institute on Metropolitan Opportunity

RE : Comments on Thrive public review draft

DATE : April 28, 2014

On behalf of the organizations listed above, we submit the following comments on the Public Review draft of Thrive MSP 2040 :

- 1. Equity.** The commitment in the Thrive plan to Equity as one of five outcomes is a major step forward for regional land use planning, which we applaud. We hope the Council will be equally committed to moving from adoption of this general principle to putting equity into practice in practical ways across the range of its activities; the recent setback in an initial effort to apply this principle to LCDA programs indicates there is much work to be done. The other key in implementing the Equity principle will be in selecting the right indicators of progress in meeting equity goals. We urge the Council to allow for public input in selection of these indicators, as well as benchmarks that may be used.
- 2. Housing is Key.** As demonstrated in the Choice, Place and Opportunity (CPO) assessment and the recent Minnesota Department of Health report on health disparities, the characteristics of the places where people live are key influences on whether families, and especially children, are successful and can contribute to a thriving region. The CPO assessment recognizes that poor people have inadequate choices in where they can raise their families. It commits to increasing the choices for low income people who need decent housing all around the region. It also commits to improving the characteristics of areas where poor people now reside. As a visionary regional development document with an Equity theme, Thrive rightfully emphasizes the Council's role in supporting community development that addresses these two complementary strategies.
- 3. Transit-Affordable Housing Connection.** In at least three places (p. 12, 35, and 64) the report discusses the increased expectations the Council will have with respect to development along transit corridors. Although increased density is part of these new expectations, there is no mention in any of these three places about the role of affordable housing as part of these expectations. Given the fact that the transit/affordable housing connection not only increases opportunities for low income households, but also builds ridership levels for the transit system, there should be explicit mention of affordable housing in each of these sections.

- 4. The Met Council and Schools.** We understand the Council may be wary of getting involved in an area where it believes it lacks legal authority, but several facts are inescapable. One of the most important racial disparities which the Choice, Place and Opportunity report has highlighted is the disparity in school outcomes. Moreover, we also know that schools and housing patterns have a large impact on each other, making it unwise to ignore schools as the Council wields its authority and incentives to guide residential development to meet regional goals. At the very least, Thrive should acknowledge the housing-schools connection, and the Council should initiate cross-sector conversations, in order to clarify where it can play a meaningful role. For more specific suggestions, including references to specific areas of potential influence, please see HPP-IMO-MMLA comments to FHEA (February 2014). In particular, the discussion on expanding housing choices on p.22 should acknowledge the impact of school decisions regarding boundaries and other matters on housing patterns. On p. 36, the Department of Education should be listed as a partner ; see consulting obligation, Minn. Stat. § 124D.892 subd. 1 (c).
- 5. The Disproportionate Need of the Lowest Income Households.** Data the Council has generated for the Housing Policy Plan workgroup confirms what we have known for some time : the greatest gap between affordable housing supply and demand exists for households below 30% AMI. Given that the subsidy gap needed to serve this income group is so great, meeting this need is a huge challenge, but this fact is so directly related to some of the racial disparities which the Thrive report is committed to addressing, it should at the very least be noted in the Thrive document, and the Council should state that finding ways to address this need is on the agenda.
- 6. Section 8 Housing Choice Voucher program.** On p. 22 the Council commits to providing competitive rent limits for Housing Choice voucher holders. This is one of only several actions the Council could take to expand choice for voucher holders. See HPP-IMO-MMLA comments to FHEA, p. 6 (February 2014). In the CPO, Section 8, p.2, the Council has already committed to a broader set of actions to expand choice for voucher-holders, which should also be reflected here.
- 7. Ensuring the availability of sites for affordable housing.** It has been repeatedly noted that the current system under MLUPA, where cities are only required to identify land for potential affordable housing development, frequently does not accomplish the purpose of actual affordable housing development, especially in high-opportunity areas. The discussion of MLPA and LCA obligations on p. 73 and 74 should acknowledge that more work is needed here. The Council could expand its idea articulated on p. 18 of developing a regional inventory of development priorities to include a regional inventory of the best sites for new affordable housing, including coordination with the Twin Cities Community Land Bank. Also, in this regard, the January 2014 draft of the

FHEA contained an important discussion a p. 18 and 19 on barriers to affordable housing development, including both NIMBY and ways in which comp plan requirements to guide land for affordable housing were not working as intended. We have been unable to identify this language in the current CPO document. This is an important factor which should have been addressed in the CPO if it was not, and which also ought to be addressed in Thrive and the Housing Policy Plan.

- 8. Shared Plans and Investment Strategies for RCAPs.** We fully support the Council's commitment to initiating these convenings which will lead to shared plans and investment strategies among stakeholders and the Council. On p. 21, the report indicates the Council may explore funding set asides or special investment resources. The Council should also explore legislative recommendations, including both investments and policy matters.
- 9. Avoiding Displacement.** The report's declaration on p. 23 that we need to ensure that displacement of low income residents along transit corridors should not happen is an important statement we fully support. As successful development will increase land values and housing costs in corridors, identifying specific meaningful actions to avoid displacement should be a major priority of both the Housing Policy Plan and the Transportation Policy Plan. We support both building new affordable housing in areas now lacking that resource and investing in poor communities to better circumstances there.
- 10. Integration of Council activities.** On p. 35 there should be explicit recognition that one way to effectively integrate Council activities is for system and policy plans to contain language connecting to related Council activities; for example, language related to affordable housing could and should be inserted in the Transportation Policy Plan. The Transportation Policy Plan should include an assessment of how it currently affects housing development – and the Housing Plan should trace out its impacts on transit, roads, sewer and park resources. See HPP memo regarding utilization of the Council's legal authorities (3-31-14). Note in particular the value of integrating MLUPA housing requirements into the Housing Policy Plan and other relevant systems and policy plans.
- 11. The Council's roles in connection with Housing.** We fully support the new roles for the Council that appear in the draft, including encouraging increased resources, and supporting fair housing research and testing into real estate steering and lending discrimination. On p. 73 and 74, bullet points delineate the Council's role in promoting affordable housing. The Council should also explicitly commit to creating incentives for local governments to experiment with innovative approaches to creating or preserving affordable housing. This could help to overcome the caution of certain local officials

about embarking on new approaches. In addition, there is a role for the Council in informing the public and promoting the community value and quality of affordable housing development. Finally, when it comes to negotiating affordable housing goals under LCA, this should not be done in a way that undercuts previously established housing goals under MLUPA.

**12. FHEA cluster analysis.** Substantial effort went into the development of a meaningful way to analyze the geography of opportunity in the FHEA, resulting in the cluster analysis. The cluster analysis would appear to have wider value for regional planning but it receives almost no attention in the Thrive document. (One way the cluster analysis could be of greater analytical benefit would be to extend the analysis to smaller geographic areas within the clusters, in order to identify smaller areas which contain high levels of all the opportunity indicators.) At the very least, the community designations in Thrive should be informed more clearly by the FHEA clusters that overlap with the community designations.

**13. Land Planning Act and Livable Communities Act.** While Council and local government obligations under these two important statutes are spelled out, there is virtually no discussion of the impact of these two laws, either here or in the FHEA. Both laws have had a positive impact on affordable housing production throughout the region, but we don't see how a regional plan can fail to recognize that as a region, we fell well short of meeting the collective regional goals under these laws, regardless of the reasons. One fact is particularly compelling with major implications for Thrive and the Housing Policy Plan : During the 1995-2010 period of LCA goals, the two central cities met 111% of their combined goals while the suburbs collectively met only 46% of their goals. This deficit on the suburban side has to have had a significant impact on the disparities so well described by the CPO assessment.

## **Institute on Metropolitan Opportunity Comments on THRIVE MSP: Draft for Public Review and Comment**

Three years ago, the Institute on Metropolitan Opportunity (IMO) published *Region: Planning the Future of the Twin Cities*. This book spoke directly to virtually all of the major planning issues addressed by *THRIVE MSP*. Since this work still represents IMO's opinions on these issues, its policy summary serves as the backbone of our comments on the THRIVE draft for public review and comment.

A lack of cooperation and planning has led to very serious problems in the region, many of which are caused by the Council's unwillingness to use its authority as intended by the legislature.

Racial segregation in schools and housing, once nearly eradicated by the actions of the Council and other state agencies, is now growing as fast here as anywhere in the nation. Segregation destroys lives. It disrupts individuals' education, health and economic security. It destroys the stability of neighborhoods, and saps the strength of the region's work force and economy. It forces the state to spend money on prisons and welfare that could be spent on education and economic growth. Rather than investing in a stronger future, cities must use scarce funding addressing the symptoms of a growing segregation.

In addition, poor planning and wasteful land use creates traffic congestion, stifles the economy, wastes fuel, and worsens the pollution of the air and water. The resulting sprawl puts excessive pressure on aquifers and lakes, while sustainable surface water systems are underutilized.

The Metropolitan Council (and the Land Use Planning Act) was created precisely to address these problems, and for the first two decades of its existence, it did so. However, since the mid-1980s, the Council's willingness to do this work has dwindled, even as the legislature has given it more legal authority and as many of the cities it regulates, the citizens it serves, and the editorial boards evaluating its programs have urged it to do more. For many years the lack of action was attributed to gubernatorial appointees who either misunderstood the council's mission and power or disagreed with the exercise of such authority. Under such leadership, staff initiative to do the Council's legitimate work was suppressed and talented planners and leaders left its employ.

Today, the principal barrier to the Council's addressing these problems is its own timidity and lack of confidence in its ability to meet the region's challenges.

These comments are divided into three sections. The first discusses the Met Council's expansive legal authority and how THRIVE fails to effectively deploy that authority. The second makes specific policy recommendations about regional issues. The third makes suggestions about how the Met Council's governance could be improved. We recognize that the Met Council's existing authority does not enable it to independently pursue all recommendations in the second and third section. However, the Council has significant lobbying powers in the state legislature – powers that we believe the Council should use to aggressively pursue policy objectives outlined here

### **The Legal Authority of the Council**

Debates about governance and policy in metropolitan areas are highly contentious. A major reason for this is that metropolitan growth patterns have made the traditional distribution of governmental powers largely obsolete. American metropolitan areas have evolved from relatively simple city-suburb economies where most jobs were in the center of the region into extremely complex mosaics where jobs and housing are scattered across large areas governed (in most metros) by large numbers of local governments. Very few metropolitan residents now live, work, shop and play in a single municipality. As a result, policy decisions in individual municipalities have consequences well beyond their borders with impacts on many people with no power to affect those decisions.

Resolving the resulting mismatches is no simple matter. Governments guard their powers closely and proposals to increase the scale of existing entities (through consolidation or annexation) threaten existing prerogatives. Similarly, proposals to create alternative units that are properly scaled (regional governments) are criticized as “big government” or for adding to public sector complexity by “creating a new layer of government.”

The Council was created to address these problems and given immense legal authority to do so. The legislature gave the Council the broad authority:

To prepare and adopt, after appropriate study and such public hearings as may be necessary, *a comprehensive development guide for the metropolitan area*. It shall consist of a compilation of policy statements, goals, standards, program, and maps prescribing guides for *the orderly and economic development, public and private, of the metropolitan area*. The comprehensive development guide *shall recognize and encompass physical, social and economic needs of the metropolitan area and those future developments which will have an impact on the entire area* including but not limited to such matters *as land use, parks and open space land needs, the necessity for and location of airports, highways, transit facilities, public hospitals, libraries, schools and other public buildings*.<sup>1</sup>

The plan must recognize and “encompass” the “physical, social and economic needs of the region.” To do this, the council must make a determination of the “physical,

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<sup>1</sup> Minn. Stat. § 473.145

social and economic needs” of the region. Once determined, the council must create a plan that responds to these needs to ensure the orderly and economic development of the region, both in the public and private sphere.<sup>2</sup> It is hard to find a planning topic not included under such a broad grant of authority.

The statute notes that the master plan will recognize and encompass those future developments which will have an impact on the entire region, including but not limited to:

- 1) Land use
- 2) Parks and open space,
- 3) Necessity for and location of airports,
- 4) Highways
- 5) Transit facilities,
- 6) Public hospitals,
- 7) Libraries,
- 8) Schools, and
- 9) Other public building.

If this list of specifically enumerated powers were not sufficiently impressive, the Council has discretionary authority to decide that any other additional developments could have “a regional impact.” It has broad legal authority to define what amounts to a “regional impact.” MLUPA also gives the Met Council the open-ended authority to “exercise *all powers which may be necessary or convenient* to enable it to perform and carry out the duties and responsibilities now existing or which may hereafter be imposed upon it by law.”<sup>3</sup> Minnesota courts have repeatedly noted that this is extremely broad grant of power.<sup>4</sup>

The legislature granted the Metropolitan Council broad authority to require local governments to conform to the Metropolitan Development Guide. The Metropolitan Land Use Planning Act mandates that all local governments within the seven county metropolitan area prepare comprehensive plans. Under the Act, the Council’s policies provide the basic framework within which local governments should prepare their comprehensive plans.<sup>5</sup> “While certain policies in the development guide have an elevated status under the act, *all Council policies provide the general plans for Metropolitan area development.*”<sup>6</sup>

Minn. Stat. § 473.175 provides the Council with the authority to ensure that the contents of the local comprehensive plan do not dramatically depart from the Council’s plan for the region. It provides that:

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<sup>2</sup> Id.

<sup>3</sup> Minn. Stat. §473.129 subd. 1 (emphasis added).

<sup>4</sup> Arrowhead Regional Corrections Board v. Aitkin County, 534 N.W.2d 557 (Minn. App. 1995); City of Brooklyn Center v. Metropolitan Council, 243 N.W.2d 102 (Minn. 1975).

<sup>5</sup> Minn. Stat. § 473.858; Ohm at 376.

<sup>6</sup> Brian Ohm, Growth Management in Minnesota, The Metropolitan Land Planning Act, 16 Ham.L.Rev. 359, 376 (1993).

The Council shall review the comprehensive plans of local governmental units and the capital improvement programs of school districts... to determine their compatibility with each other and conformity with Metropolitan systems plans. The Council shall review and comment on the apparent consistency of the comprehensive plans and capital improvement plans with the head of it with the other adopted chapters of the Metropolitan development guide. The Council may require a local government unit to modify any comprehensive plan or part thereof which may have a substantial impact on or contain a substantial departure from a Metropolitan system plan.<sup>7</sup>

The Metropolitan Land Use Planning Act defines “metropolitan system plans” to mean “the transportation portion of the development guide and the policy plans and capital budgets for metropolitan wastewater service, transportation, and regional recreation and open space.”<sup>8</sup> The systems plans, however, like all the Council’s policy plans, “must substantially conform to all the policy statements, purposes, goals, standards, and maps in the Metropolitan development guide.”<sup>9</sup> A comprehensive review of the Council’s powers by Brian Ohm notes the “definition of metropolitan system plans does not explicitly limit the scope of the plans to the transportation and wastewater activities of the council and the regional operating agencies. On the contrary, “[i]n addition to the Metropolitan Development Investment Framework policies, Council policies which are not a “metropolitan system,” must be incorporated in the metropolitan systems policy to the extent there is a rational relationship between the policies in the Metropolitan systems.”<sup>10</sup>

The Council can use its authority to modify a comprehensive plan if it contains “a substantial departure” from, and “may have a substantial impact on,” a Metropolitan systems plan. The Council has broad discretionary power to make these determinations. It is required only to find that the comprehensive plan “may” have a substantial impact on a metropolitan system plan and the “exact definition as to what constitutes a substantial impact or a substantial departure is left to the discretion of the Council, as a legislative body, to either formally define and administratively codify or to determine a case-by-case basis as comprehensive plans or comprehensive plan amendments are reviewed by the Council.”<sup>11</sup>

In *Lake Elmo v. Metropolitan Council*, the Minnesota Supreme Court affirmed an expansive construction of the Council’s powers under MLUPA. In that case, the City of Lake Elmo submitted a comprehensive plan to the Council that proposed accommodating the population and household growth forecasted for it by the Council through 2020 in mostly low-density development that would leave no reserve for growth the Council forecasted for the City between 2020 and 2040. The Council found that the plan contradicted the Metropolitan Development Guide and its metropolitan systems plans. In particular, the Council found that the City’s comprehensive plan would require it to shift

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<sup>7</sup> Minn. Stat. § 473.175 subd. 1

<sup>8</sup> Minn. Stat. § 473.852 subd.8.

<sup>9</sup> Minn. Stat. 473.146, subd. 1

<sup>10</sup> See Ohm at 380.

<sup>11</sup> Olm 16 Ham.L.Rev at 381; Minn. Stat. §473.175.



its investments in wastewater treatment and transportation in order to accommodate growth in other communities that it had forecast for the City. The Court held that the City's comprehensive plan substantially departed from the metropolitan systems plans because it "ignore[d] the Council's desired density levels and fail[ed] to preserve land for future development." In addition, the Supreme Court agreed with the Council's determination that Lake Elmo's comprehensive plan would have a substantial impact on the Council's plans for the metropolitan systems by causing inefficient utilization of existing and planned metropolitan systems and requiring the Council to make changes at considerable cost to accommodate the City's forecasted growth in other communities of the region.<sup>12</sup>

***In sum, MLUPA and the Courts have given the Council broad powers and discretion. Despite this, the Council has been much less aggressive in the use of its planning powers in recent years.***

The evolution of how the Council defines and enforces the Metropolitan Urban Services Area (MUSA) clearly illustrate the Council's reluctance to use its own authority. First, the way the Council defines the MUSA shifted from a clearly delineated line to "MUSA Cities." Originally, the MUSA was a distinct line, beyond which metropolitan services (transportation, waste water collection and treatment) were not provided, even if the line split a jurisdiction.

In recent years, the Council changed the way the MUSA is defined to allow municipalities that are split by the MUSA to receive metropolitan services in new developments on non-contiguous tracts within the jurisdiction as long as they stay within an overall limit for urbanized land. Not only is this more expensive for regional taxpayers, but it also makes it much more difficult for the Council to limit the total amount of land added to the MUSA in the future. If a municipality later wishes to develop the land between the current, continuous MUSA and non-contiguous development added to the MUSA under the new guidelines, the Council would find it politically very difficult to resist pressure to provide services to the new development. In effect, individual municipalities can increase the total amount of their land receiving metropolitan services by staging development in strategic ways, weakening the Council's ability to regulate the total amount (and location) of urbanized land in the region.

Although THRIVE spells out several community types with separate analyses of the policy priorities in each type, it has little to say about the MUSA. (The MUSA is mentioned only twice in the entire document – on pages 50 and 65 – and then only in a very general way.) The new community designations embody the priorities of the MUSA, but only to a limited extent. This failing is illustrated by THRIVE's flimsy efforts to discourage the growth of the "rural residential" community designation. THRIVE in effect accepts existing 1-2.5 acre lot development in these areas, despite the fact that they are outside the MUSA, and entirely inappropriate from a regional point of view. Although THRIVE limits this recognition to areas where this development pattern already exists (Table 1 on p. 64), the document does little to make one believe that the Council will truly eliminate this type of land use in these areas in the future. In the

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<sup>12</sup> City of Lake Elmo v. Metropolitan Council, 685 N.W.2d 1 (Minn. 2004).

subsequent policy discussion about rural residential areas, the described Council role is to “encourage rural development patterns that will protect natural resources” and “discourage future development of rural residential patterns (unsewered lots 2.5 acres or less).”

Given the very strong incentives local officials in these areas have to zone for high-end resident development, “encouraging” one type of behavior and “discouraging” another can hardly be expected to be the determining factors in how these areas develop. The Council should commit to do all that it can to eliminate this type of development in these areas – including using its full powers to reject local plans.

The policy discussions in THRIVE are replete with this type of passive language – language that can only be interpreted to reflect a continuing timidity on the Council’s part when it comes to enforcing regional priorities in the face of local resistance.

The long-term actual pattern of urbanization in the region shows the effects of the Council’s weakening resolve. In 1986, just 22 percent of urbanized land in the Metropolitan Council’s seven counties was outside the MUSA as it then was defined. During the next 16 years, however, 47 percent of newly urbanized land occurred outside the MUSA as it was defined in 2002. During this time, the Council was clearly exercising less control over development patterns outside the MUSA and the spread of urbanized land in the region became much more “scatter-shot.” Although there are some recent indications of strong growth in the core of the region, a variety of short-term factors – spiking gas prices, the housing crisis and the recession – almost certainly contributed as much to this as longer term, more sustainable factors like a permanent re-structuring of living preferences.

***If the Council truly wants to meet the more ambitious objectives of THRIVE (few as they are), it must first and foremost strengthen its resolve and become much more aggressive about exercising the powers that it has.***

## **Policy Areas**

### ***Land-use Planning***

A region’s land use planning system affects all of the policy areas covered in previous chapters and more. Local decisions about where to put development, how much of it to allow, and what types to pursue affect how much the region sprawls, social and racial diversity in regional housing markets and schools, the location of and access to job centers, and the region’s ability to conserve sensitive natural resources. Obviously, planning policies alone cannot fully address all of these needs, but the planning system should and can be designed to complement direct initiatives in each of these areas.

To meet needs in all of these areas, the Met Council should use its power to require development practices that:

- Cluster development on a regional scale. This conserves land at the fringes of the region, relieving pressures (in most metropolitan areas) on environmentally sensitive areas and farm land. It also concentrates demand for transportation

infrastructure, takes advantage of economies of scale, and facilitates transit and other non-automobile modes of transportation. In particular, the council should return to the practice of supporting the intensification of existing job centers and actively discourage the fragmented growth of unclustered employment.

- Require that new development on previously undeveloped land occurs at reasonable densities on land adjacent to already developed land. This conserves land and resources while lowering the costs of providing regional services.
- Regulate land-use outside of the developed area to maintain densities low enough to allow higher density in-fill when these lands are required for future growth. Moderate density development (such as one housing unit per two acres) in areas just beyond the developed core of the region can make it very difficult to increase densities later as the urbanized core expands.

In the Twin Cities, these general guidelines imply a set of policies, including:

- Refocus on growing within the limits of the MUSA. Recent trends include dramatic increases in the amount of scattered-site development outside the MUSA.
- Enforcement of density limits outside the MUSA. The Metropolitan Council currently takes its planning responsibilities outside the MUSA much less seriously than inside the MUSA.
- Serious review of local plans for consistency with regional objectives.
- Greater interactions between the Council and the four collar counties. This should be pursued within the context of a reinvigorated state planning system that manages how the metropolitan area (and other urbanized areas in the state) interact with nearby rural areas. This interface is more important now than ever, as the region's influence spreads beyond the official 11-county metropolitan area.

### ***Schools and Housing***

Schools and housing policy are closely related. On the one hand, housing patterns determine the make-up of neighborhood schools. On the other, school characteristics are an important determinate of location decisions for many households. This two way causation exacerbates vicious cycles in housing markets that result in segregation and rapid transition in neighborhoods and schools. If poverty rates increase in a neighborhood's schools, nearby housing becomes less and less attractive to middle income families. At some point, middle class households will exclude the neighborhood from consideration. Even, without active flight by middle class families, normal turnover in the housing market will lower average incomes in nearby neighborhoods, which, in turn, increases poverty rates in schools, beginning the cycle again. ***This means that maintaining economic diversity in schools cannot be achieved in the absence of a housing strategy that emphasizes distributing affordable housing evenly across the region, rather than concentrating it in a few places.***

As in most metropolitan areas, the problem in the Twin Cities is not simply one of passively maintaining diversity in schools and neighborhoods. Many neighborhoods and schools in the central cities and inner suburbs have *already* made the transition to concentrated poverty and grossly disproportionate shares of the region's non-white population attend schools and live in these areas. More proactive policies are needed to overcome vicious cycles in local housing markets and the incentives facing local officials in growing areas to limit housing development to housing that "pays its way."

All of these factors imply that coordinated housing and school policies are needed to achieve integrated schools and neighborhoods. ***Council policies should be focused on affordable housing strategies that require that all parts of the region provide their fair share of affordable housing and that ensure that current residents in neighborhoods of concentrated poverty have schooling options beyond all-poor, all-minority schools in their neighborhoods.***

School Policy. The starting point for the Council on school policy is the recognition that ***the council is required by state and federal law to help local schools stay racially integrated.***

In *Swann v. Charlotte-Mecklenburg*, the Supreme Court held that once a school district, as an agent of the state, was found to have committed an act of de jure segregation, federal courts must enjoin school construction policies that would foster further segregation.<sup>13</sup> At the time of the drafting of MLUPA, Minneapolis, as an agent of the state, was declared a de jure segregated, which it remains to this day.

Professor Robert Freilich, who drafted the Land Use Planning Act, was also an expert on school desegregation law. He stated that one of the most important reasons that he insisted that schools be included in the Act, and that school construction specifically be under the supervision of the Met Council, was in order to help the state avoid a possible constitutional violation that would result in a metro-wide school desegregation order. According to statute, the Met Council "shall adopt a development guide" that "will encompass the physical, social and economic needs of the metropolitan area and those future developments which will have an impact on the entire area" including "the location of *schools*."<sup>14</sup> The law further mandates that the Council "construct an inventory" of all schools in the metropolitan area and the unused space within each school.<sup>15</sup> The council may submit its comments to the commissioner of education on any school district facility that is proposed in the metropolitan area. MLUPA requires that a local government unit's comprehensive plans shall contain a statement on "the effect of the plan on affected school districts"<sup>16</sup> and these comprehensive plans must be submitted to the affected school district for review and comment six months prior to their submission to the Council.<sup>17</sup> Finally, it suggests that these comprehensive plans contain an intergovernmental coordination process for cooperation with school districts generally

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<sup>13</sup> *Swann v. Charlotte-Mecklenburg Bd. of Educ.*, 401 U.S. 1 (1971).

<sup>14</sup> MINN. STAT. § 473.145 (2013) (emphasis added).

<sup>15</sup> *Id.* § 473.23(1).

<sup>16</sup> *Id.* § 473.859(1).

<sup>17</sup> *Id.* § 473.858(2).

and the siting of public schools in particular.<sup>18</sup> There are six additional references to schools in MLUPA.<sup>19</sup>

When the legislature authorized a metropolitan school desegregation rule, it required the Department of Education to “consult with the Metropolitan Council to coordinate school desegregation efforts with the housing, social, economic, and infrastructure needs of the metropolitan area.”<sup>20</sup> The Minnesota Legislature has also facilitated the creation of three large city-suburban integration school districts to facilitate and coordinate, in consultation with the Metropolitan Council, more integrated schools on a metropolitan basis.<sup>21</sup>

The Fair Housing Act requires HUD and its grantees like the Met Council to consider the racial balance of schools attended by government-supported housing recipients. This legal requirement is grounded in the insight that stably racially integrated schools are a central component of fair housing policy.

School data for the Twin Cities shows a dramatic increase in racial isolation. In 1995, there were only fifteen elementary schools and twenty middle/high schools with more than seventy-five percent of their students nonwhite. By 2011, the number had increased six times for elementary schools (to ninety percent) and by more than three times for middle/high schools (to seventy-one percent). The Council has contributed to this trend by essentially ignoring its obligations to school planning.

Housing Policy. The starting point for housing policy is the Council’s own analysis of equity in the region – *Choice, Place and Opportunity* (CPO). The CPO concluded that “[l]iving in areas of concentrated poverty hurts people in many ways” and that “households of color are more likely to live in areas of concentrated poverty than white households at rates beyond those explained by income alone.”<sup>22</sup> It also concluded that people of color and low income residents face barriers to housing choice. A clear contributing factor to this pattern is that fact that subsidized housing is currently disproportionately located in high-poverty areas that are also often predominantly non-white.<sup>23</sup> Fifty-one percent of the region’s subsidized housing – but only 15 percent of overall housing – is located in the opportunity cluster characterized by high poverty rates, high non-white shares and the region’s poorest performing. In contrast, the opportunity

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<sup>18</sup> *Id.*

<sup>19</sup> MINN. STAT. § 473.3875 prioritizes transit for livable communities grants to evaluate projects coordinating school and public transportation. Minn. Stat. §473.625 discusses the process of detaching airport land from school districts, MINN. STAT. §473.629 addresses proper valuation of property for bond issues by school districts and MINN. STAT. §473.661 covers airport noise mitigation resources for school districts.

<sup>20</sup> MINN. R. 3535; *See also* 1994 Minn. Laws, Ch. 647, Art. 8(2)(1)(c).

<sup>21</sup> For information on the three integration school districts, *see* West Metro Education Program (WMEP) at <http://sites.google.com/a/wmep.k12.mn.us/wmep-k12-mn-us/>; East Metro Integration District (EMID) at <http://www.emid6067.net/>; and Northwest Suburban Integration District (NWSID) at [http://www.nws.k12.mn.us/About\\_NWSISD.html](http://www.nws.k12.mn.us/About_NWSISD.html).

<sup>22</sup> Metropolitan Council, *Choice, Place and Opportunity: An Equity Assessment of the Twin Cities Region*, p. ii.

<sup>23</sup> CPO, Section 7, p. 7.

cluster with the highest performing schools had 50 percent of all housing units, but only 22 percent of subsidized units.

These findings make it clear that the Council needs to focus much more aggressively on ensuring that all parts of the region provide their fair shares of affordable housing. Policy priorities should include:

- Creating *and enforcing* serious affordable housing goals, especially in growing areas with good schools, should be a priority in the Council's housing policies. In addition to traditional criteria, like access to jobs, housing targets should be used to promote integration by income and race in neighborhoods and schools.
- Performance on these goals should be among the most important criteria used by the Met Council when reviewing of local comprehensive plans and plan approval should be linked to spending in other policy areas to give the review process teeth.
- Funding under existing affordable housing programs--the Low Income Housing Tax Credit and HUD's Section 8 programs--should be distributed based on overall population proportions, the distribution of school age population, and integration goals, deemphasizing the current focus on the core of the region.

The Metropolitan Council has a distinguished history of using its powers over federal funding to steer affordable housing funds toward the parts of the region where affordable housing is most needed. The Council's Policy 13/39 did this very effectively during the 1970s and early 1980s. Compared to other parts of the country, the Council has also done reasonably well steering LIHTC and HUD Section 8 funding toward suburban areas. However, simulations described in Chapter 4 of *Region* make it clear that more could be done. Indeed, existing funding streams could be used to significantly reduce segregation by race and income in the region's schools.

The incentives facing local officials in these policy areas make it very unlikely that local areas will pursue these goals on their own. The vicious cycles associated with income and racial transition in neighborhoods and schools are well known and local officials are very wary of them. This means that the Council must be vigilant in enforcing fair housing goals, and treat non-compliance with fair housing targets as grounds for rejecting local comprehensive plans. In addition, the Council needs to be aware of the potential for individual schools and neighborhoods to reach "tipping points" and undergo rapid economic and racial transitions. This means that existing, "naturally occurring" market rate affordable housing should be included in decisions regarding future affordable housing targets and the location of new subsidized housing.

### ***Economic Development and Transportation***

Economic development and transportation policy are also closely related. On the one hand, location decisions by businesses and residents are strongly affected by the existing (and planned) transportation system. People and firms want easy access to other parts of the region and the rest of the world. On the other hand, decisions about where to locate transportation infrastructure and what type of infrastructure to emphasize are

affected by where jobs and residents are currently located. For instance, congestion relief is unquestionably the dominant factor raised in public discussions of transportation issues in most metropolitan areas.

As with schools and housing, policy should recognize this two-way relationship. Economic development planning should reflect both the current transportation system and objectives about how we want the transportation system to work in the future. Transportation decisions should be conditioned both by current settlement and job patterns and by objectives about how we want future growth to occur.

The overall objectives of development and transportation policies follow directly from the planning, housing and schools goals described above. Planning priorities mean that ***economic development policy should encourage growth parts of the region that are already developed, and immediately adjacent areas, to conserve land and infrastructure.*** Housing and school objectives imply that development policy should foster access to jobs across the income spectrum by promoting growth in areas with the greatest access by transit and the existing road system. Finally, there is widespread agreement that devoting local government resources to attract firms and high income households to one part of the region from another is inefficient from the point of view of the region as a whole. Reducing incentives for this wasteful competition is therefore another legitimate concern on the regional scale.

Taken together, these objectives imply regional economic development policies that emphasize:

- Clustered development to conserve land and infrastructure. The implied strategy is to focus development efforts along existing transportation corridors or at the intersection of current major highways.
- Infill and new development near the core of the region to enhance access to opportunity for the disadvantaged populations disproportionately residing there.
- Reduced incentives for inter-local competition for commercial and high-end residential development.

In the Twin Cities, the first two objectives correspond to long-standing goals of the Met Council. However, both the urbanized land data and the job growth data<sup>24</sup> show that regional growth is happening more and more on scattered sites beyond the urbanized core and away from major transportation infrastructure. The Council clearly could do more. One way would be to put greater emphasis on transportation improvements that complement these goals.

The final objective – incentives to reduce inter-local competition – is one of the primary motivations for the Twin Cities unique tax-base sharing system, the Fiscal Disparities Program. This program both reduces the incentives for inter-local competition, by reducing the fiscal windfalls for municipalities that accompany many types of commercial-industrial development, and promotes regional cooperation, by sharing the fiscal benefits among all participating communities. However, the program covers only the seven core counties of the region, leaving out the rapidly growing collar

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<sup>24</sup> See Chapters 1 and 5 of *Region*.

counties (Chisago, Isanti, Sherburne and Wright). The program also excludes another portion of the tax base that can provide equally enticing fiscal windfalls--high-end residential development.

### ***Environment***

Much of the region's sensitive natural are threatened by growth.<sup>25</sup> We must find new ways to grow—ways that consume less land and allow us to both grow and conserve the region's valuable natural assets. New development on undeveloped land must be at greater densities than in the past and we must find ways to channel more growth to already developed areas. This will require actions at the state, regional and local levels. However, because of the fiscal and development incentives they face, local governments are not particularly well-suited to regulate or protect sensitive natural areas in many cases. This means that state and regional decision-makers must take the lead. This logic also applies to climate change mitigation and adaptation, and natural resource protection.

The Council could use its authority to adopt an action plan for climate change mitigation and adaptation, and establish regional goals for reducing greenhouse gas emissions. If the climate action plan assumed that certain forms of land use and transportation would be needed to meet the regional goals, the Council could include the assumptions in its plans for the metropolitan systems, which would translate into local requirements through the metropolitan systems statements under Minn. Stat. §473.856. Similarly, the Council could adopt a plan to protect the region's remaining natural areas and areas where aquifers are recharged. The Council could create protections for these areas in its plans for transportation and wastewater. Communities would have to respond or confront an order for modification. In the absence of this kind of intentional use of integration and alignment, the Council will not meaningfully move forward on its goals for prosperity, livability, and sustainability as presently set out in draft form for Thrive MSP 2040.

First steps should include:

- Increasing state-level leadership and guidelines for growth in the metropolitan area and in the exurbs just beyond the region's official boundaries. Reconstituting the state planning agency would be a good first step. Council lobbying efforts in the state legislature should emphasize these objectives.
- Integrating environmental issues into local plan reviews and elevating environment to a "system" in the Met Council review process. This would effectively integrate environmental issues into Met Council planning for transportation, economic development, and housing.
- Lobbying to expand the Met Council's planning powers and services into the four collar counties, which contain nearly half of the metropolitan area's sensitive natural areas. In the interim, the Council should work more closely with these counties to coordinate policies.

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<sup>25</sup> See Chapter 5 of *Region* and "Growth Pressures on Sensitive Natural Areas in DNR's Central Region," Ameregis, 2006.



- Using the potential expansion of the Fiscal Disparities Tax Base Sharing into the four collar counties as a bargaining chip in negotiations with the collar counties to expand the Council's authority.
- Strategic use of Met Council infrastructure decisions – waste water collection and treatment, transportation planning and MUSA expansions – to support environmental goals.

## **Governance**

The preceding sections describe a wide variety of proposals across several policy areas. Many metropolitan areas are ill-equipped to deal with these recommendations. The most glaring shortcoming in most cases is the lack of region-wide institutions with the needed powers. The Twin Cities is one of the few regions where this is not an issue--the Metropolitan Council has the statutory powers needed to fill this void. However, the Council operates above highly fragmented local governments, where many local authorities resist regional approaches to many of the problems described above. As a result, the Council's actions often fall short of its powers.

THRIVE promises to continue this trend by consistently underplaying the Council's legal authority to pursue and influence policymaking in the Twin Cities. The policy recommendations in THRIVE regarding Council interactions with local governments are particularly timid. In light of the fact that the incentives facing local authorities in many of the policy areas under discussion in THRIVE – affordable housing, equity, transportation, the environment, economic development – push them toward actions that are clearly not optimal from the point of view of the entire region, the Council's power to review and require changes to local plans is an extremely important function. Indeed, it was this function that the Met Council was created to perform. The Council should embrace its planning powers, rather than running from them, as it does in much of THRIVE.

The rest of this section addresses the question: What sort of governance structure could best address all of the issues raised by our earlier comments. Put another way, what distribution of responsibilities to the various levels of government provides the best way to meet these objectives at the lowest possible cost while remaining responsive to voters?

### ***Regional Government***

There several areas where the Met Council should work to expand its powers and a few others where the Council should use its current powers more aggressively.

Boundaries. The Council's current boundaries include only the seven core counties of the metropolitan. In 1972 this area represented the full metropolitan economy. Since then, the four collar counties--Chisago, Isanti, Sherburne and Wright--have become fully integrated into the region's housing and labor markets. Housing and labor markets are the major engines that spread the costs and benefits of local actions across the

metropolitan landscape and effective regional policy making implies that the collar counties should be added to the Council's territory.

Such an expansion would likely meet resistance in the collar counties. From their point of view, they would be taking on costs (in the form of potential limitations on how they could grow) without receiving commensurate benefits (which would be spread across the region over the long term). One way to reduce the opposition would be to couple expansion of the Metropolitan Council's planning powers with expansion of the Fiscal Disparities Program--the region's tax base sharing system. Such an expansion would clearly provide financial benefits in the collar counties. Simulations by the Minnesota House of Representatives Research Office show that the collar counties would receive substantial financial benefits from the program if they were now in the program. This is because of they have relatively small amounts of commercial-industrial tax base (the source of contributions to the regional pool of tax base) and relatively low total tax base per capita (the primary determinant of distributions from the pool). According to the simulation, the overwhelming majority of municipalities in the collar counties – 77 out of 88, representing 80 percent of population would benefit. In many cases the benefits would be substantial.<sup>26</sup>

Representation. Although the sixteen members that sit on the Metropolitan Council ostensibly represent specific districts, they are not currently elected by voters in those districts--they are instead appointed by the Governor. Since 1994 the Council has produced four separate long run plans, each with significant differences from its predecessor. In large measure this reflects the fact that the Council's make-up can change very dramatically from one gubernatorial election to the next. Indeed, since Governors normally appoint members of their own party to the Council, it could change from 16 Republicans and no Democrats to 16 Democrats and no Republicans and back again in just four years. The reality has been almost this bad. The Council has shifted from 100 percent Republican during most of the 1990s (largely moderate Republicans appointed by Governor Carlson) to eight Democrats, four Independents and four Republicans (during Governor Ventura's single four-year term), to 100 percent Republican (more conservative Republicans, for the most part, appointed by Governor Pawlenty) from 2002 to 2010 and to 100 percent Democrats since Governor Dayton's election.

These dramatic partisan shifts lead to significant philosophical shifts, which make long run planning more difficult and expensive. Most of the Council's service responsibilities involve capital intensive activities where current decisions can have very long run consequences--transportation, transit, waste water collection and treatment. If the planning philosophy underlying decisions in these areas frequently changes from one extreme to another, long run planning will clearly suffer. Further, in a region that has been split fairly evenly on partisan lines during the last two decades, these shifts are fundamentally undemocratic. Virtually every critique of the Council these days (from either end of the political spectrum) begins with the accusation that because it is unelected, its powers should be curtailed.

Simulations from *Region* show that, if the Council were elected, it would almost certainly have been much more stable during the last 20 years. They show that if it had

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<sup>26</sup> See Map 6.1 and the accompanying discussion in *Region*, pp. 266-267.

been elected, control of the Council would almost certainly be tightly contested during the entire period. Democrats would have controlled the Council in five elections and Republicans would have won control in three.<sup>27</sup> More importantly, each part of the region would have had a voice representing its interests during the entire period.

#### Regional land-use planning and the Metropolitan Urban Services Area (MUSA).

As discussed in the introduction to these comments, the Council has been much less aggressive in the use of its planning powers in recent years, particularly with regard to land use planning and the MUSA. This issue is most apparent in the chapter entitled “Strategies for Community Designations” where THRIVE discusses how to address issues specific to different types of communities. The bullets listed under the “Council Role” for each of the community groups are replete with passive verbs like “encourage,” “coordinate,” and “identify” or non-threatening actions like “provide technical assistance,” and “partner with” rather than the kinds of assertive actions that will be needed to overcome strong incentives for local actors to discount the regional consequences of local development policies (like lot-size regulations). Similar concerns arise with respect to virtually all policies associated with equity issues such as the regional distribution of affordable housing. If the Council is truly concerned about equity and (regionally) efficient development patterns, then it must show a greater willingness to enforce regional objectives, especially when reviewing local comprehensive plans and making regional infrastructure investments.

#### ***Cities and Townships***

Regardless of how aggressively a region pursues a regional governance strategy, cities and townships will still fill important functions--building and maintaining local infrastructure like streets and sewers; providing local police and fire protection; regulating new development. Ideally, municipalities should be large enough to provide these services at efficient scales. In sparsely settled areas, this may be impractical and in these areas county governments often provide local services. However, very small municipalities are not uncommon even in relatively densely settled or developing areas. For instance, in 2005 roughly half of the cities and townships in the 11-county Twin Cities metropolitan area (129 out of 270) had fewer than 2,500 residents. Even in the mostly developed seven core counties, there were 78 such places--more than 40 percent of cities and townships. There were another 53 municipalities with between 2,500 and 5,000 residents – 33 in the seven core counties and 20 in the collar counties.

There are no hard and fast estimates of the optimum size for local governments but it is difficult to defend a system in a large metropolitan area where two-thirds (182 of 270) of the cities and townships have fewer than 5,000 residents. The extreme degree of fragmentation clearly implies that policies should be designed to encourage localities to take advantage of any opportunities to reduce fragmentation through consolidation or annexation. In the Twin Cities, the most likely opportunities for this involve cases where cities border on townships. The State’s Office of Administrative Hearings handles a steady stream of annexation cases but they are disproportionately outside of the

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<sup>27</sup> See Figure 6.1 and the accompanying discussion in *Region*, pp. 267-268.

metropolitan area and rarely involve large tracts of land. For instance, in September 2007 there were 144 pending boundary change cases and just 28 of them were in the Twin Cities metropolitan area. (This represents 20 percent of cases, while the metro houses 60 percent of the state's population.) Of these 28 cases, only four involved annexations of more than 100 acres of land.

Although the Council has few direct powers in this area, it could do much to encourage local areas to pursue cooperative strategies or consolidations by incenting this behavior when it makes its own funding and infrastructure decisions.



**ISIAAH Comments on the draft comprehensive development guide for the Twin Cities metropolitan area, *Thrive MSP 2040*.**

**Submitted April 28, 2014**

**By Doran Schrantz, Executive Director**

ISIAAH is an organization of clergy, congregations and people of faith in Minnesota working collectively towards racial and economic justice. ISIAAH and its predecessor organizations have worked on issues of regional concern for over two decades. We appreciate this opportunity to comment on *Thrive MSP 2040 – Public Review Draft*.

We applaud the efforts of the Metropolitan in drafting this important document, which sets the vision for our region's growth over the next 30 years. In particular, we are encouraged to see the inclusion of equity as one of the five desired outcomes. We also applaud the Council's language around "pivoting from expanding to maintaining our region's wastewater and highway infrastructure;" encouraging redevelopment and infill; and recognizing the ways in which regional planning and investments can contribute to promoting healthy communities.

We also affirm the principles of integration, collaboration and accountability which will govern how the Metropolitan Council will implement the vision. Finally, we would like to acknowledge all the hard work of the Metropolitan Council Chair, members and staff that has gone into this effort.

In November 2011, ISIAAH sent a memo to Metropolitan Council Chair Susan Haigh, which we incorporate by reference in these comments (attached below). Our comments on the Thrive MSP 2040 Draft are guided by that memo, which lifted up the need for racial equity to be a regional priority, and called for the Council to exert bold leadership. In particular, we would urge you to consider the following:

1. **Equity must be a priority, not simply one of five "desired outcomes."** For both moral and practical reasons, we believe that none of the other desired outcomes (stewardship, prosperity, livability and sustainability) can be meaningfully achieved unless equity is achieved.
  - To achieve equity, we must acknowledge the past, and prepare for real change. The document names disparities, but gives a snapshot of a problem rather than exploring the historical context for the problem.

- Achieving equity means recognizing that power and resources have not been equitably distributed, and taking affirmative steps to shift these patterns of distribution, even in the face of resistance and opposition.
  - We would specifically lift up the discussion of structural racism contained in the Minnesota Department of Health’s report to the Legislature, “Advancing Health Equity in Minnesota” (February 1, 2014). We hereby incorporate that report by reference and encourage each Metropolitan Council member to closely study it: [http://www.health.state.mn.us/divs/chs/healthequity/ahe\\_leg\\_report\\_020414.pdf](http://www.health.state.mn.us/divs/chs/healthequity/ahe_leg_report_020414.pdf)
2. **Reinvest in the core.** We feel the development pattern projected in Thrive MSP 2040 does not meaningfully depart from the status quo – where urban and inner-ring residents end up subsidizing sprawl.
- We are alarmed to note that the Thrive MSP 2040 plan calls for nearly  $\frac{3}{4}$  of the total metro growth (601,000 new residents) to be in suburban and rural areas (and  $\frac{3}{4}$  of that growth – 449,000 new residents to be at the suburban edge and rural areas), while only  $\frac{1}{4}$  will be added to the urban core and inner ring suburbs (220,000 new residents)
  - Further, 37% of expected job growth – 394,000 new jobs – are slated for outer suburban areas, while only 27% of job growth – 37% of new jobs – will be in the urban core and inner ring suburbs.
  - We feel the growth pattern should be flipped, and question whether any of the desired outcomes –equity, stewardship, prosperity, livability and sustainability – could be achieved without doing so.
3. **Go further in recognizing the ways in which the Met Council’s decisions impact educational outcomes.**
- We take issue with the characterization that “the Council does not play a role in education,” (p. 4) and we think that runs counter to the principles of integration across silos and collaboration across sectors and levels of government in order to achieve the Council’s vision for the region.
  - We feel that housing, transportation, land use policy all have meaningful impacts on educational outcomes. The development of these policies should be pro-actively mindful of these impacts.
  - For particular policy solutions we would urge the Council to consider the comments made on the Fair Housing & Equity Assessment in February 2014 by

Housing Preservation Project, the Institute on Metropolitan Opportunity and Mid-Minnesota Legal Aid.

**4. Prioritize Transit Equity.**

We feel the the implications of the growth projections contained in the *Thrive MSP* draft run counter to the Metropolitan Council's responsibility to provide effective transit for those who depend on it most. In addition to the recommendations we made in November 2011 memo (below), we urge you to include plans for improved bus service, shelters and signage, as well as fare equity. In addition, we support the recommendations made by Transit for Livable Communities in their comments.

5. **Be bolder.** Bold leadership requires the courage to name the impediments, and advocate for reform even if it is beyond the technical purview of the Council. A thirty year vision – if the word “vision” is to retain any meaning -- should not be constrained by the narrowest interpretation of the Council's role and authorities.
- a. We would like to see the Metropolitan Council more clearly embrace its mission to serve primarily the *residents* of the region, not the various agencies and governments of the region.
  - b. In the interests of bold leadership for the region, we believe it behooves the Council to name at least some of the impediments to achieving its stated goals, including issues that may be technically beyond the scope of the Metropolitan Council's current authority. For example,
    - i. Are the members of the Metropolitan Council truly representative of, and accountable to, residents of the region on a proportional basis?
    - ii. Can the Metropolitan Council be effectively led by part-time, largely uncompensated Chair and Members?
    - iii. Shouldn't the geographic reach of the Metropolitan Council, set nearly 50 years ago, be expanded to reflect current realities to include the four additional counties which are part of the MSA?

In summary, we are concerned that the document falls short in boldness of vision necessary in order to affect real change in our region. Thrive MSP 2040 is a key opportunity by which the Met Council can further align its investments and integrate its authorities in service of a regional vision. We urge the Metropolitan Council to be bold, and to be strategic, in leveraging all of its resources to sharpen its 30-year vision and lead the region.

## MEMORANDUM

To: Susan Haigh, Chair, Metropolitan Council

From: Pastor Grant Stevensen, President; Pastor Paul Slack, Co-Chair Clergy Caucus; Doran Schrantz, Executive Director, ISAIAH

Re: Vision for Regional Leadership

Date: November 28, 2011

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In preparation for our meeting on Wednesday, November 30, we thought it would be helpful to outline the discussion we would like to have. As you may know, ISAIAH is a coalition of 100 congregations throughout the Twin Cities metropolitan area, St. Cloud and Rochester. We are thousands of people committed to working together to make our communities healthy, racially and economically equitable places to live, work, play and worship. ISAIAH and its predecessor organizations have worked on issues of metropolitan equity for almost 20 years. We are pleased you were appointed Chair of the Metropolitan Council, and we look forward to working with you.

### OVERVIEW

#### *Context*

The Twin Cities region is being torn apart by growing racial and economic disparities. There are huge gaps in employment, income, health and education. Over 22% of African Americans are unemployed in Minnesota, more than three times the unemployment rate for whites. In the seven-county metro area, median income for whites is \$83,000, while it is only \$34,000 for African Americans. Mortality rates are 3.5 times higher for American Indians and 3 times higher for U.S.-born African Americans than whites in the region.

Our future hangs in the balance. As our state rapidly diversifies, our students suffer the second worst racial disparities in the nation. From 1992 to 2008, our region went from 9 to 108 racially segregated elementary schools, with 40,000 children. If current trends continue, in 20-30 years greater than 30% of **all** teenagers will not graduate from high school.

As people of faith, we respect the inherent dignity of each person. The consequence of these disparities is the potential loss of talent and contributions from thousands. Our region cannot be economically viable with a large portion of our population struggling to find decent jobs or suffering from poor health. The time has come for bold leadership and a new direction for our region.

Without the Met Council, given the extreme governmental fragmentation of the Twin Cities region, we have no doubt these disparities would be even worse. The Met Council can serve (and has served) a crucial function in promoting regional policies that help all communities, rather than pitting one municipality against another. Almost by nature, the work of the Met



Council is complex, technical and inaccessible to most people. We believe the Council's obscurity is a threat to a future of shared regional prosperity.

#### *Our Thesis*

**We believe the Metropolitan Council has an enormously important role to play in leading our state to a more prosperous and more equitable future.**

Regional governance matters. In conjunction with other key state agencies, the Met Council can be a powerful force for creating racial equity outcomes. For example, decisions by municipalities, counties, schools, and hospitals are interconnected with transportation infrastructure and affordable housing. People live and work in a metropolitan region of many cities that share a common fate. People from neighborhood communities in core cities and suburbs desire to see a strong region with access to opportunity for all residents, without disparities by race.

Shared values and vision can be the foundation for a partnership of the community with the regional governance body to shape our future. We believe this will require a re-imagining of the Met Council's role. The Met Council should envision itself as an agency that primarily serves the people of the region, not municipalities and developers. The Met Council can provide bold leadership in coordination with state agencies, including the Departments of Education, Health, Human Services, Human Rights, and the Minnesota Housing Finance Agency, to create a more prosperous, racially equitable future.

#### *Proposition*

ISIAAH is built from faith communities across the Metro region. The ISIAAH community reflects a shared vision for Minnesota's future that is grounded in racial equity and economic vitality for all. ISIAAH presents an opportunity to build support for regional governance.

We have put community voices to good use in stakeholder tables that focus on concrete strategies to produce racial equity outcomes. For example, we have developed strong partnerships with many state agencies, including MnDOT, the Departments of Education, Health, and Human Services in order to make government more effective in serving the people of Minnesota on racial equity goals. We would like to partner with the Met Council to strengthen its position to lead in creating a more prosperous, competitive, and racially equitable metropolitan region.

To this end, we are using our experiences at other state agencies to propose a set of broad principles that are essential elements to co-creating this vision. We offer some examples to guide discussion on tangible strategies that could shape racial equity in our region. We understand the tension between the urgency of addressing the real problems that face our communities immediately, and the importance of setting long-term structures into place. Some of these examples could be implemented quickly, while others will take years. Our ultimate goal is to look at what regional governance can do to address racial disparities, and

the consequences of those decisions on all persons living in the Twin Cities over the next several decades.

We look forward to hearing your ideas and reactions.

## **PRINCIPLES**

**Principle 1: Met Council must proclaim the advancement of racial and economic equity as a key priority and essential element of building and sustaining our region's economic prosperity.**

### Examples

- Set real, measurable and enforceable regional goals for reducing segregation and racial disparities, and regularly report data that would allow for transparency and accountability.
- Revise the Met Council's mission statement and goals to reflect these priorities.

**Principle 2: Met Council must prioritize re-investment in communities that have been harmed most by policies and practices that have resulted in isolation and segregation.** It must promote health through true community development, including activities for youth, parks and athletic facilities, childcare centers, and health clinics.

### Examples

- Correct for the imbalance in policy over the past few decades, wherein residents of central cities and inner suburbs effectively subsidized the outer-reaches of the metro area through inequitable spending on roads, sewers, transit and parks.
- Engage in Health Impact Assessments (HIAs) around significant development projects to measure meaningful impacts on the health of the community members. Dedicate resources for HIAs of policies and projects that organized groups of residents deem important.

**Principle 3: Met Council must set educational excellence for all, particularly children of color, as a regional priority.**

### Examples

- Use the Council's existing authorities to work with Housing and Educational agencies to affirmatively further fair housing and support schools that are racially integrated on a regional basis.
- Support the creation of high-quality, racially- and economically-integrated magnet schools in historically underserved communities.

**Principle 4: Transportation projects executed by the Met Council must connect all residents with access to opportunity, including those unable to drive.** Sprawl and car dependence exacerbate racial inequities. In the last decade, good investments in light rail transit have begun. However, bus operations face frequent threats of reduced service and increased fares.

Examples

- Measure access to destinations, not overall ridership numbers, as the primary goal of Metro Transit operation. Analyze performance and service improvement plans with equity metrics to understand the impact of current and proposed operations by racial and economic demographics.
- Prioritize bus operations to maintain stable, adequate funding with the “flexing” of transportation funds to transit (e.g. change MVST ratio or use of flexible federal dollars).

**Principle 5: The Met Council must commit itself to deep, authentic and powerful partnership with community stakeholders.** This means tapping into the generative possibilities of the people in our region by supporting community stakeholders in developing real power and decision-making opportunities, rather than simply creating advisory entities. Priority should be given to people of color and immigrants who have historically been disenfranchised.

Examples

- Work with the Departments of Education, Health, Human Rights, Human Services and MN Housing Finance Agency to create a special working group on regional integration.
- Look to the stakeholder table created at MnDOT in partnership with ISIAAH as a model. Examine best practices both locally and from other regions to design the optimum model for true stakeholder engagement.

**ISIAAH’S COMMITMENT**

In the past several months, groups of ISIAAH leaders have met individually with most Met Council members. In addition, ISIAAH leaders have met with county commissioners, state department commissioners, school superintendents, mayors, hospital and business leaders and legislators. We have also begun a series of regional briefings of clusters of these leaders, to have a conversation about the role the Met Council can and should play in creating a strong, competitive, racially and economically just Twin Cities region.

ISIAAH has demonstrated an ability to build political will to address difficult issues through bridging regional, racial, class and political divides by grounding a constituency in a set of shared values. ISIAAH has trained thousands of leaders, many of whom have assumed substantial roles in the public and private sectors.

Through our base of 100 congregations, and the developing “Prophetic Voices” network of 350 clergy statewide, ISIAAH has the potential to reach 400,000 Minnesotans. With a broad geographic reach including strong representation in many suburbs, ISIAAH is a vehicle for civic participation by residents of diverse political persuasions, as well as those not previously civically engaged. In 2012, we will continue to reach out to this base to spur conversation and engagement of the public in creating a healthier and more equitable future.

## **AN INVITATION**

On **Sunday, February 12, 2012** ISIAAH will convene a leadership summit, “Shaping the Future with Hope.” The meeting will take place **from 3:00pm to 5:00pm at Progressive Baptist Church** in St. Paul. We intend to gather 600-800 leaders, including 150 clergy, from around the region, to lift up the work of the Governor’s administration and the Met Council. We are also inviting the Governor, the Commissioners of Education, Health, Human Services, Housing, Human Rights and Transportation, select School Superintendents, Mayors, Legislators and members of the Metropolitan Council. We view your participation in this event as crucial, and look forward to your response.



April 28, 2014

Ms. Susan Haigh, Chair and Members, Metropolitan Council  
Metropolitan Council  
390 North Robert Street  
Saint Paul, MN 55101

Dear Chair Haigh and Members:

Thank you for the opportunity to comment on the draft *Thrive MSP 2040* document. Metro Cities represents 90 member cities in the metropolitan area that are home to over 90% of the region's population. We have closely monitored the development of *Thrive*, and convened an advisory group of city officials who provided local perspectives that contributed to our response. Metro Cities appreciates the work by Metropolitan Council members and staff on the draft, and the outreach performed by the Council over the last two years as the document was being developed. Metro Cities offers the following comments for your consideration.

#### **GENERAL COMMENTS**

Metro Cities is encouraged by the underpinning in *Thrive* to strengthen collaboration with local governments, the acknowledgement of the Council's role as a 'convener' and enhancing assistance to local communities. *Thrive* characterizes the numerous assets of the region and its singular importance to the state's economy as well as the challenges and opportunities ahead including infrastructure needs, the influence of population changes on shaping growth, and the need for the region to position itself as economically competitive, nationally and globally.

*Thrive MSP 2040* is broad in scope, and includes areas not historically under the Council's purview, namely around climate change, equity, and economic competitiveness.

Although the draft identifies a range of outcomes and goals, Metro Cities notes that the document does not identify the resources needed to meet them. It also contains few specifics as to how the outcomes will translate into policies, statements, and accountability measures.

The approach under *Thrive* is that of a shared vision for the region. While Metro Cities commends the Metropolitan Council for this approach, how the document translates into policies and actions will serve as ultimate measures in determining whether the vision is ultimately a shared one. The goals are certain to lead to potentially competing priorities as policies are developed to achieve them. To implement a guide that is successful will require consistent efforts by the Council that aim for balance, transparency, adherence to the Council's core mission, and engagement with partners at every step of its implementation.

## **REGIONAL/LOCAL COLLABORATION**

Metro Cities appreciates the tone of collaboration throughout the document. This is consistent with the tone of the current development guide, our overall experience with the Council and its staff, and with statutory directives that assign key but specific roles for the Metropolitan Council for regional planning and the operation of regional-level infrastructure.

Metro Cities is encouraged by *Thrive* statements that speak to balancing regional issues and concerns with local goals and circumstances. It is imperative that the Council work closely in collaboration with local governments that manage the region's growth through comprehensive planning, and that the Council balance its attention and resources on all areas of the region. We trust that the role of metropolitan cities as key implementers of the development guide will continue to be recognized as *Thrive* moves from draft to implementation, and that the Council will continue to bring communities together to tackle issues that are key to our region's success and which transcend local boundaries.

## **FUNDING/RESOURCES**

The draft encompasses a broad range of goals and areas in which the Council will endeavor to employ leverage, authority, incentives, and/or assistance. However, the document is notably lacking an analysis of fiscal costs that will be required for identified goals to take actual shape. Significant resources will be necessary to meet stated outcomes. Such an analysis would place the vision and goals outlined in *Thrive* in the context of the resources needed for their fulfillment, and would assist the Council in defining top *Thrive* priorities.

Absent such an analysis, Metro Cities is concerned that broadly defined goals may translate to unfunded mandates, or uses of resources that potentially compromise their integrity around statutory requirements, stability of the source, and proportionality to the goods and services they provide. The Council must be cautious around using existing fund/fee structures to advance particular *Thrive* goals that would do so at the expense of equity and effectiveness in the use of the resource.

As an example, a recent Met Council appointed work group of local elected officials and Metropolitan Council members that looked at the sewer availability charge (SAC), included in its recommended principles that any advancement of specific *Thrive* goals by the Council that would involve SAC must be weighed with respect to program impacts around its equity, transparency and simplicity.

## **OUTCOMES AND PRINCIPLES**

The proposed draft identifies five outcomes that offer a guide for the effective and innovative use of the region's resources. However, the document lacks clarity about how outcomes will translate into regional/local responsibilities for advancing them. While the outcomes represent solid values and ideals, the absence of identified strategies and measurements call into question how the Council will know when or if they have been achieved. Specific comments are below.

### ***Stewardship***

The document notes that the Council's priority is to pivot from expansion to maintenance of transportation infrastructure. Resources for transportation infrastructure to meet future regional needs are vastly underfunded, and *Thrive* would be well served by more directly delineating the consequences associated with the lack of resources for meeting these regional goals and priorities. Without this information, this and other outcomes may be challenged at the outset.

### ***Equity***

Metro Cities supports the goal of ensuring all residents have access to choices and opportunities as outlined in this outcome. To be effective, this outcome and expectations for achieving it must be more clearly defined by the Council. Metro Cities suggests that the statement under this outcome that calls for "engaging a full cross section of the community" should be primary, to allow the Council to fully understand and account for the diversity of constituencies, and community needs and goals across the region before proceeding with specific policy goals.

Metro Cities opposes questions on Livable Communities grant forms that require applicants to define how local projects would advance equity, particularly without linked measurable goals. Generally, Metro Cities would submit that the LCA program, as it is currently structured, serves as a shining star and workhorse in advancing equity and other outcomes identified in *Thrive*.

### ***Sustainability (Water and Climate Change)***

Metro Cities supports efforts to advance natural resource and environmental protection and to protect water supply and quality, and adequate funding and incentives for local governments to comply with state and regional efforts around protections and policies.

While Metro Cities supports the Council's role in regional water planning and community assistance, there are many agencies with jurisdiction over water, and our policies oppose a regulatory role for the Council around this locally provided utility, and that would likely overlap with existing regulatory roles by other agencies. Metro Cities encourages the Council to continue enhancing awareness and collaboration with local governments and other partners. Further, the Council must more fully utilize the Water Supply Advisory Committee in this work, and continue to address statutorily identified goals for the committee. Please note the document should be clarified in that the Legislature directed the Council to undertake regional planning activities, but does not stipulate a specific "management" role for the Council around water supply as the document currently states.

Metro Cities' supports the Council's goals for continuing to reduce inflow-infiltration, and has secured state resources to assist communities with this goal.

With respect to climate change, Metro Cities does recognize the 'soft' approach that the document takes, but notes the lack of specifics on what this approach looks like. This is a new area of scope for the Council, and one for which a set of commonly understood definitions is essential. Metro Cities supports public and private efforts around environmental protection and sustainability. We envision this as an issue for which the Council would do best to lead by example, to be focused in promoting best practices, and to collaboratively engage with

communities, and organizations such as Green Steps Cities, that can provide examples around practices and results.

### ***Integration***

While breaking down organizational 'silos' has much merit in theory, how this principle translates into policy integration is not well defined. Metro Cities recognizes that most Council functions are tied to resource streams with clear statutory and/or policy requirements. As the Council seeks to potentially align goals, it must take care to carefully navigate goals with funding constraints and requirements. It must also ensure that local land use authority is not usurped in alignments of regional goals and functions. On-going, in-depth analysis and active engagement with local government partners will be required as the Council's work is guided by this principle.

### ***Accountability***

This principle states the Council will use specific indicators, as well as its authorities, to achieve outcomes in *Thrive*, but lacks specific details. Metro Cities believes that indicators and measures should be to the extent possible identified, transparent and understandable to local governments and others that will be instrumental in implementing the goals outlined in *Thrive*.

## **LAND USE/ECONOMIC COMPETITIVENESS**

*Thrive MSP 2040* states that the Council will set higher expectations for land use, particularly around transit areas. There are also varying expectations for density in the community designations. While Metro Cities appreciates the more layered approach the designations provide, some cities have expressed concerns about required density levels as they intersect with a lack of existing tools for redevelopment, market-based realities, natural resource considerations, and fiscal constraints. Some communities have also noted that the designations need to better acknowledge a community's growth and development and that an understatement of these factors could delay needed future infrastructure investments.

Metro Cities commends the Council for recognizing the importance of regional economic competitiveness and the need to ensure that investments are aimed at growth and economic prosperity. Metro Cities believes that the most important and appropriate role for the Council is the performance of its core functions of regional level planning and infrastructure in a cost effective, strategic, and appropriately scaled manner that will promote economic growth in the region. It should also maximally operate programs that enhance regional tax base, spur private investment, and increase community livability, which foster additional prosperity and growth that benefits the entire region. Further, the Council should work in concert with local partners to help secure state and federal tools and resources for economic development and redevelopment.

The Council's interests along these lines should be more general than specific, and vigilance must be exercised at the intersection of regional expectations and community priorities. Economic development is largely a local issue, and one that cities approach differently, depending on the needs, goals and resources of the community.



## **TRANSPORTATION**

The metropolitan area will require a significant influx of resources for transportation to meet future growth, changing demographics and regional goals around economic competitiveness. The need for resources is a compelling concern for our state and region that should be more clearly identified in *Thrive*. The region and its communities would also be well served through a stronger leadership role by the Council to help secure state and federal level resources for transportation so that the needs of the region with respect to these important goals can be achieved.

The document also does not sufficiently address the need for regional transportation plans and investments to be tailored at a sub-regional and community level. Some of our members have expressed concern that the document focuses more on communities that are better positioned for transit. While the document predicts more concentrated growth, it is difficult to assess what will occur in the next decades as the region's demographics continue to shift. While Metro Cities recognizes that there are limited existing resources and that the Council's focus is around preservation, there are many areas of the region whose transportation infrastructure leaves them simply, unserved, or at best, underserved. These communities must be included in the regional strategy for enhancing our transportation/transit and other infrastructure and investments.

## **HOUSING**

Metro Cities supports the tone and content of *Thrive* with respect to identified Council and local roles to ensure adequate housing affordability and choice for citizens throughout the region.

The issue of affordable housing, and the allocation of affordable housing need, is a key concern for cities. Metro Cities appreciates the work of the Council with its local government partners to address issues associated with the allocation and planning for future need. We also support the inclusion of local government partners and other stakeholders to assist the development of a regional housing policy. Generally, we support a housing policy that has as its underpinning collaboration, guidance, and best practices for local communities to meet wide ranging housing needs that account for various local demographics, circumstances and market conditions.

## **COMPREHENSIVE PLANNING**

There are several areas of the document that suggest additional voluntary elements to local comprehensive plans. While we support local comprehensive planning, the comp plan process is expensive and labor intensive. Metro Cities' policies support a review and potential streamlining of these processes, and we urge the Council to consider specifically how this can be achieved, particularly in the context of the document's goals. We also support resources in assisting cities with the preparation of comprehensive plans.

## **CONCLUSION**

The proposed *Thrive MSP 2040* is a forward-looking document, and the work by the Met Council and its staff are apparent. Metro Cities is pleased to see the emphasis on working

collaboratively with local governments, and the unique role of the Council as a “convener.” Metro Cities has also appreciated the transparent process under which *Thrive* has been developed, and the outreach by the Council and its staff.

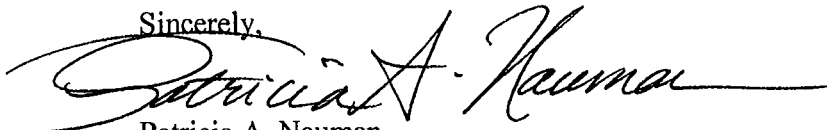
There are areas in *Thrive* that Metro Cities considers are in need of further work, definition, and detail. The document also appears to be moving the Council toward a new and expanded purview in certain policy areas as well as potentially adding new requirements for local governments.

Metro Cities supports the role of the Council in setting broad regional goals, managing the overall growth of the region, and providing services that cannot be provided as efficiently or cost effectively at the local level. To this end, we believe that the region will be best served with a consistent focus and priority by the Council on advancing its core mission and functions.

Metro Cities supports a strong and vibrant metropolitan region that promotes the success of all communities. As the Council works to incorporate the goals of *Thrive MSP 2040*, it will be imperative that the Council work collaboratively with its local government partners to ensure a regional development guide that encompasses the needs and goals of all the region’s communities. Metro Cities stands ready to work with the Council as it incorporates the new development guide into its mission, planning and operations.

Thank you for the opportunity to comment on the draft *Thrive MSP 2040*.

Sincerely,

A handwritten signature in black ink, reading "Patricia A. Nauman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Patricia A. Nauman  
Executive Director

Cc: Patrick Born, Regional Administrator

**From:** Sue Watlov Phillips [<mailto:suewatlovp@aol.com>]  
**Sent:** Monday, April 28, 2014 4:02 PM  
**To:** PublicInfo  
**Subject:** MICAH-THRIVE 2040 Comments

Please find attached our comments on the THRIVE 2040 Plan.  
Thank you,  
Sue Watlov Phillips, M.A.  
Interim Executive Director

### **THRIVE 2040 Comments**

**MICAH supports eliminating disparities and providing equitable opportunities for everyone, in the Metropolitan Region, to obtain decent, safe, accessible and affordable housing, livable incomes, affordable and accessible health, human services and transit, excellent education, environmentally safe and where everyone's civil rights are respected and protected.**

- 1. Please include the Implementation Plan and the Engagement Plan of how all members of the community will be involved in all decisions in the final THRIVE Document.**
- 2. Please describe the accountabilities that will be in place to ensure that disparities are eliminated and equitable opportunities are in provided throughout the region for decent, safe, accessible and affordable rental and homeownership.**
- 3. Corridors of Opportunities: Please describe how Jobs and Contracts will be awarded and provided to that community's businesses and residents. The percentage of minority/women owned businesses receiving contracts and people of Color obtaining jobs through THRIVE initiatives should be at least equal to the percentage of people of color in the region or in community impacted (whichever is higher). Corridor stops should designed by the local community residents to meet their needs**
- 4. Please describe how you will insure Full Accessibility for people with disabilities, poor credit and/or rental histories and/ or criminal histories to obtaining decent, safe, accessible and affordable housing, livable incomes, affordable and accessible health, human services and transit, excellent education, environmentally safe and where their civil rights are respected and protected throughout the region.**
- 5. Please describe how you will use Rule 39 stop school districts from drawing their school boundaries around low income housing developments.**
- 6. Please describe how you will use Rule 39 to ensure communities are developing affordable housing for everyone in the community especially in communities creating or expanding business opportunities/jobs.**

**Thank you for the opportunity to comment. MICAH looks forward to working together with you to Bring Our Metro Area HOME!**

**Sincerely,**  
**Sue Watlov Phillips, M.A.**  
**Interim Executive Director, MICAH**



**MID-MINNESOTA LEGAL AID  
MINNEAPOLIS OFFICE**

**James E. Wilkinson ▪ (612) 746-3784 ▪ jewilkinson@mylegalaid.org**

April 22, 2014

Susan Haigh, Chair  
Metropolitan Council  
390 Robert St. N.  
St. Paul, MN 55101-1805

Dear Chair Haigh:

We have been heartened by the commitment you have voiced for promoting equitable outcomes throughout the region. In particular, your statement to the PRO meeting on March 17 that equity will be featured in Thrive, in all the systems plans and in the Council's housing work, was very welcome. This was an excellent articulation of a policy that will serve the region's residents well and is in line with the commitment made by the Council to HUD in submitting its Choice, Place and Opportunity (CPO) assessment.

It was therefore disappointing that a staff proposal before the Community Development Committee, also on March 17, which incorporated equity considerations into the draft 2014 LCA fund distribution plan was met with some push-back from Metro Cities and by some members of the Committee. We agree that there is more to be done to specify measurements, incentives and consequences. To keep the equity proposal under consideration for LCA inclusion, Chair Cunningham suggested that Metro Cities and Council staff should set up a working group to address the details.

May we make two suggestions? One, keep promoting the equity agenda through all aspects of the Council's reach, but most especially in the housing and community development field where, as the CPO Assessment shows, there is so much room for improvement. Two, please make sure that the inclusive approach to addressing equity and reducing RCAPs that you have championed filters down to work-groups like the one proposed for specifying how equity outcomes will be measured and achieved in the LCA plan. While Metro Cities is an essential partner in working through these issues, they are not the only one.

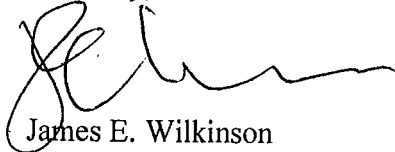
I am writing on behalf of my colleagues at the Minnesota Housing Partnership, the Housing Preservation Project, and the Minnesota Center for Environmental Advocacy as well as for Legal

April 22, 2014

Page 2

Aid. As always, we will contribute as much as we can to the success of these efforts and will respond to any questions or suggestions that this letter may elicit.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Wilkinson', with a large, stylized initial 'J'.

James E. Wilkinson  
Supervising Attorney

JEW: nlb

cc: Gary Cunningham

Guy Peterson

Beth Reetz

Paul Burns

Chip Halbach

Tim Thompson

James Erkel

1010-0303693--1257193



Minnesota Center for  
Environmental Advocacy

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MEMORANDUM

To: Metropolitan Council

From: James L. Erkel, Attorney & Director  
Land Use & transportation Program

Date: April 28, 2014

Subject: Public Comment Draft of Thrive MSP 2040

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This memorandum sets forth the comments of the Minnesota Center for Environmental Advocacy (MCEA) in regard to the Metropolitan Council's public comment draft of Thrive MSP 2040 (Thrive). I have been engaged on Thrive from the start of the Council's planning process and I have appreciated the opportunities I have had to make one of the stakeholder presentations, attend the meetings of the Committee of the Whole and listen to the Council's deliberations, and engage with a number of the members of the Council. In this memorandum, I provide general comments about the authority of the Council and its role in the region as discussed in Thrive. I also support the more specific comments about Thrive submitted by Transit for Livable Communities and the Housing Preservation Project.

The Council is to be commended for its efforts to reach out beyond the usual suspects and listen to all elements of the region. I applaud the Council for considering and taking to heart information it heard about major shifts in some of the most basic assumptions about the region. This approach is much different than that undertaken for the existing Regional Development Framework which simply extrapolated the low-density development patterns of the 1990s out to 2030 at a time when the region was about to fall into the economic abyss because those trends could no longer be sustained. Rather than driving down the road using only the rearview mirror for navigation like it did in the Framework, the Council is to be commended for shifting its gaze and looking out the front windshield in Thrive.

The Council has identified the major challenges and trends that confront the region. MCEA supports the Council's specific direction on regional equity, the affordability of housing, water sustainability, natural resource protection, and climate change. The Council is right that these issues will decide how well the Twin Cities will compete with other regions. The Council is also right that it should make use of all of its authorities and investments in a coordinated fashion to deal with these challenges. Some may call this social engineering by the Council but in doing so they reveal how much they do not know about the Council's special role in the region, show their own distrust of the market when it conflicts with their cultural norms, and reflect a willingness to impose command and control on others when it suits their politics.

In my stakeholder presentation, I noted that the Council has been identified as a model for regional governance. Indeed, the Council's special set of authorities and investments includes some of the best tools that exist for regional growth management. However, I also noted that the Council's record has not matched its reputation. For some time, the Twin Cities has grown less densely than other regions including Houston which, ironically, has no regional or local land use planning and regulation as generally understood. The reason for the mismatch is that, being constantly whipsawed and second-guessed, the Council has for some time pulled its punches. Rather than act as the region's advocate, the Council has taken unnecessarily narrow interpretations of its authorities and has been content to simply provide regional services to the region's communities.

The Council acknowledges, at least impliedly, that it has broad authority to guide the orderly and economical development of the region. The Council repeatedly states it will use all of its authorities and investments in new coordinated ways to achieve the outcomes it seeks on the critical issues it has identified. It almost immediately retreats from these statements by relying substantially on the Council's collaboration, coordination, and convening functions. In laying out the major actions that established the architecture of regional governance, the Council remarkably fails to include the 1976 Metropolitan Land Planning Act which requires all communities to prepare comprehensive plans and grants the Council authority to review and either approve or deny them. Except for some passing references, Thrive does not set out an explanation of the Council's authority to review comprehensive plans until almost its very end. The significance of the review authority is that there is something hard that backs up the Council's regional interests at the end of all of its collaboration and coordination with the region's communities. It loses meaning, though, if it is not even on the table for discussion.



I will provide an example of how the Council can and should, in fact, make use of all of its authorities in regard to the critical issues of water sustainability and natural resource protection. The Council's discussion of the issues in Thrive more than adequately demonstrates that the protection of groundwater recharge areas and regionally significant natural areas is critical to the orderly and economical development of the region. The Council has the authority to deny a comprehensive plan if it substantially impacts on or a substantially departs from the Council's metropolitan system plans. In the past, the Council has narrowly construed this authority to mean impact on the system rather than the system plan. The Minnesota Supreme Court held in the Lake Elmo case that the Council's authority broadly relates to the system plan, not simply the system itself.

The distinction between the system and its plan is important because the system plans must, in turn, be consistent with all of the plans, policies, and programs the Council adopts. The groundwater recharge areas can be properly considered an integral part of the Council's water resources plan. The regionally significant natural areas could be included as well because, as the Council explains in Thrive, many of them also serve as recharge areas for groundwater. Even if not, the Council's policy direction on regionally significant natural resources means their protection can be included in the Council's system plans. If the Council is serious about using all of its authorities, it should state in the water resources and transportation plans that it does not support growth in groundwater recharge areas and regionally significant natural areas. Then, the Council should include specific statements in the system plans that growth will be treated by the Council as a substantial impact on or substantial departure from the system plans. As the Lake Elmo decision states, the Council may attach density or performance standards to the levels of its protection it intends.

My greatest disappointment in regard to the Council pulling its punches relates to the treatment of climate change in Thrive. The draft admits that climate change 'threatens our continued orderly and economical development' and the region is 'already seeing rising temperatures and increased severe weather events.' The draft states that the Council will 'use climate impacts as a lens through which to examine all of its work' and 'use both its operational and planning authorities to plan for and respond to the effects of climate change.' Having set this solid direction, though, the Council then pulls its punch by proposing to rely only on its carrots and not consider any of its sticks 'unless and until the lack of action poses a threat to orderly and economical development or portends a significant collective financial cost.'

To start with, this approach completely fails the basics of regional planning. On one hand, Thrive admits the predicate for action -- climate change exists and is already changing the region. On the other, the Council sticks its head in the sand and hopes that what is already happening around it in terms of direct effects such as droughts, floods, and other catastrophic events and indirect effects such as loss of biological diversity, worsening air and water pollution, and increasing infrastructure costs from 'business as usual' growth patterns will somehow miss the region. Instead, the Council states that it will wait until an undefined cost-benefit assessment or a regulatory requirement pushes it into action.

Evidently, we have to wait for the climate equivalent of the 35W Bridge falling into the Mississippi before the Council will take meaningful action. At that point, though, the kinds of action that will be needed and the cost of undertaking them will be much worse than if the Council mixed in some sticks into the approach it sets out in Thrive. The Council's climate discussion in Thrive more than adequately lays the base for taking action under the Metropolitan Land Planning Act. The Council could adopt a climate action plan to deal with mitigation and adaptation and establish regional goals for reducing greenhouse gas emissions at the levels specified in the Next Generation Energy Act.

If the climate action plan assumes that certain forms of land use and transportation are needed to meet the regional goals, the Council could include the assumptions in its plans for the metropolitan systems. Communities would have to plan for them or run the risk that the Council would order modifications because their comprehensive plans would substantially impact or depart from the plans for the metropolitan systems. The Council could withhold its approval of comprehensive plans based on the elements and assumptions of the climate plan that are integrated or embedded in the systems plans. Last, the climate plan would provide the context for the regional collaboration the Council seeks and would set expectations and identify resources for communities to make use of in their own planning. In the absence of this kind of intentional use of integration and alignment, the Council will not timely or meaningfully deal with the effects that climate will have on its goals of prosperity, livability, and sustainability for the region. In fact, the Council's approach will make them worse.



**SCALE**  
Scott County Association For Leadership And Equality

April 11, 2014

Metropolitan Council  
390 N. Robert Street  
St. Paul, MN 55101

RE: Comments on *Thrive MSP 2040 Comprehensive Development Guide*

Dear Council Members,

I am writing on behalf of SCALE to thank you for the opportunity to review and comment on the *Thrive MSP 2040* plan. Many of our communities will provide direct written comments on the draft plan, and SCALE encourages the Council to review and follow-up, as appropriate, to each community's input and ideas. We all share a vested interest in ensuring the Twin Cities metropolitan area remains a thriving place to live, work, raise a family and do business. In this letter I would like to share some common themes that have been expressed by our communities in reviewing the draft *Thrive MSP 2040* plan.

- **Jobs and Employment Growth:** SCALE has established a goal of creating enough jobs in Scott County to accommodate 50% of our resident labor force by 2030. Under current labor force projections provided by the state, this means by 2030 we want to have 78,270 jobs. Scott County has undergone a recent surge in economic development and job growth in the past few years, and we are on track to reach our target goal by 2030. SCALE is confident we can reach this goal given our community's available land for economic development, great access to regional transportation system, quality workforce, excellent schools and neighborhoods, and unmatched customer service in the delivery of local government services. SCALE does not see this job growth potential appropriately reflected in the *Thrive* plan, particularly in two specific sections: 1.) the preliminary employment forecast for Scott County in 2040 is 62,680 – well below the target goal set for 2030, and 2.) excluding Scott County altogether on the map of Job and Activity Centers in the region. ***SCALE encourages the Council to respond to those communities that will demonstrate in more detail their potential for job center concentrations and overall employment growth.***
- **One Size Does Not Fit All:** SCALE agrees with a statement in *Thrive* that it's time to move beyond the "one size fits all" mentality in the region. *Thrive* correctly states that within our region, communities are growing, developing and redeveloping in different ways. But it then seems *Thrive* advances a contradicting policy stating that the Council is pivoting from expanding to maintaining the region's wastewater and highway infrastructure. Halting wastewater and highways infrastructure expansion in growing areas of the region could harm public health and safety. Under-investing in these areas could lead to inappropriate development patterns. SCALE firmly believes parts of the Twin Cities metropolitan area will continue to need these types of regional investments. ***SCALE encourages the Council to respond to those communities that will demonstrate in more detail their need for continued expansion, not just maintenance, of these important regional infrastructure investments.***



**SCALE**  
Scott County Association for Leadership & Efficiency

- **Growth and Investment Should Be Focused on All Transportation Corridors, Not Just Transitways.** *Thrive's* geographic focus on growth and investment seem to follow existing and future transitways, but ignores actual places in the region where there are existing homes, jobs and businesses. The TH 169 corridor from Shakopee to Maple Grove is an example. This stretch of highway corridor contains some of the highest concentration of employment in the state. Yet, some of the large communities along this corridor (Plymouth, Maple Grove, Shakopee) are designated Suburban Edge, where growth and investment is not as strongly promoted as in Suburban communities with transitways. SCALE believes the Met Council should be promoting growth and investment equally in all of these communities along this existing corridor and other important corridors in the Twin Cities, regardless of whether or not the corridor is targeted for new regional transit investments. ***SCALE encourages the Council to respond to those communities that will demonstrate in more detail their vision for growth and development along key transportation corridors.***
- **New Community Designations:** The 2030 regional framework plan had two urban planning categories: Developing Area and Developed Area. It was easy to understand the distinctions between these two categories, the differences in density expectations and development patterns, and the variation in the level of regional investments. Communities understood the path to move from one category to the next over the 30-year planning horizon. *Thrive* has five urban planning categories: Urban Center, Urban, Suburban, Suburban Edge, and Emerging Suburban Edge. It is difficult to understand the distinctions between these planning areas and to understand how some community designations were established. It appears that regional infrastructure investments will depend on which category communities fall into. It also appears that important policies in the draft Transportation Policy Plan (TPP) are directly tied to these community categories. Community categories should reflect the desired region in 2040, not today. If a community is ultimately envisioned to be Suburban – that should be the designation today so it starts developing to those densities, appropriate transportation spacing, appropriate transit system and ultimate water/sewer. To come back and retrofit is very difficult and leads to health and safety issues along the way. SCALE also notes that the Council's role in economic competitiveness for Suburban communities is different than the other categories. Only in the Suburban communities does it clearly state that it's the Council's role to "invest in regional amenities and services, including transit, regional parks and trails and bikeways to support the Suburban area as an attractive place to locate and do business." ***To best position our growing communities for continued regional infrastructure investments and to keep our communities economically competitive in the region, SCALE encourages the Council to respond to those communities requesting a different community designation.***

We look forward to continuing our dialogue on these important policy directions in the draft *Thrive MSP 2040* plan and again appreciate the opportunity to share SCALE's ideas and input into this important planning process.

Sincerely,

Jay Whiting, Chair  
Scott County Association for Leadership & Efficiency

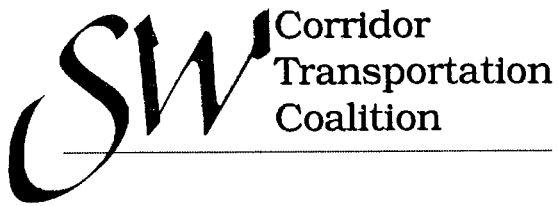
**From:** Joshua Houdek [<mailto:joshua.houdek@sierraclub.org>]  
**Sent:** Monday, April 28, 2014 5:02 PM  
**To:** PublicInfo  
**Subject:** Comments on Thrive MSP 2040 Draft

The Sierra Club North Star Chapter appreciates the opportunity to comment on the Thrive MSP 2040 – Public Review Draft. This important guiding plan for our metropolitan region is instrumental in moving the dial forward on issues of environmental sustainability, smart growth and equity. In general, we appreciate the Council’s regional land use planning focus on building healthy, more equitable communities with an emphasis on infill, rather than sprawling development. We see room for improvement however, to make this vision more bold, and achievable.

Our greatest concern is how climate change is addressed. The Sierra Club strongly supports the acknowledgment of this threat and the need for regional resiliency. However, much stronger tools need to be identified and implemented - instead of the passive initiatives to reduce greenhouse gas emissions. A principal example:

Greater emphasis is needed on Vehicle Miles travelled (VMT) reduction. Prioritizing this goal is critical to directing more sustainable transportation and land use investments, while advancing the Council’s key outcomes of equity, livability, sustainability, stewardship, and prosperity. We urge the plan to include an even stronger focus on road repair and complete streets rather than greater investment in highway expansion. VMT can also be reduced by increasing the density targets especially for suburban, urban, and urban center areas and setting higher density expectations for transit station areas. The Council needs to do its part to ensure that land use policies and programs make it easier for people to bike and walk to destinations. Additionally, the Council must commit to securing dedicated funding to build out transit, bicycle, and walking infrastructure.

Joshua Houdek  
Land Use and Transportation Program Manager  
Sierra Club North Star Chapter  
2327 E Franklin Ave, Minneapolis, MN 55406  
Main: 612-659-9124, Direct: 612-259-2447, Cell: 612-207-2295



April 2, 2014

Chair Susan Haigh  
Metropolitan Council  
390 N. Robert St.  
St. Paul, 55101

Dear Chair Haigh:

Thank you for this opportunity to comment on the Thrive 2040 plan. The members of the Southwest Corridor Transportation Coalition appreciate the work that has gone into developing a vision for the future of the region and developing new outcomes for measuring the work of the Metropolitan Council.

The members of the Southwest Corridor Transportation Coalition are extremely concerned about future plans for the transportation system and land use in the region. Communities along US Highway 212 and TH5 have a clear vested interest in future transportation investments that will shape the quality of life and economic development in this area.

The goals of improving stewardship, prosperity, equity, livability and sustainability speak to the aspirations of people and communities in our region. Defining progress in these areas may look very different in some communities than in others. The indicators that are developed for measuring progress will be important.

We understand that the state will have limited resources for transportation investments in the future and those resources need to be directed to provide a high return on investment. Therefore, previous investments in major corridors should be maximized by making needed improvements to close gaps and target dollars to areas with clear safety problems and high growth rates.

As demonstrated by the increase in business growth along the new Highway 212, the Southwest Corridor Transportation Coalition feels strongly that completing this major corridor to a four-lane facility from Chaska to Norwood Young America will improve economic development and prosperity in the region while leveraging previous investments to maximize their impact on the region. The remaining two-lane gaps need to be addressed to handle increasing population growth, increasing employment levels and increasing freight movement.

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Robert J. Lindall, President

470 US Bank Plaza, 200 South Sixth Street Minneapolis, MN 55402 • Phone: (612) 337-9300 • FAX: (612) 337-9310

According to information in the Thrive 2040 draft plan, the bulk of future growth in population, households and employment will occur in the outer suburbs. Carver County is projected to experience a population growth from 91,042 people in 2010 to 151,720 people in 2040 with a corresponding increase in households from 32,891 in 2010 to 60,550 in 2040. The additional 60,678 residents are expected to generate an additional 212,373 trips per day in the region. We need to plan now for highway and transit expansion that will maintain mobility, safety and a high quality of life in this part of the metro area. In the coming twenty years, traffic volumes in year 2030 are forecast to increase on Highway 212 to between 21,000 and 28,000 vehicles per day, or two to three times the existing traffic volumes, exceeding the capacity of the existing two-lane facility.

While the draft plan discusses the importance of freight movement to the prosperity of region, there are no specific plans mentioned for highway expansion despite the acknowledgement that 75% of freight movement occurs by truck. In the section discussing freight movement, the plan notes:

“To make the regional highway system more efficient, the Council and the Minnesota Department of Transportation are building managed lanes—MnPass lanes—which provide a congestion-free alternative for transit users, carpools, and those willing to pay. This market-based solution allows auto drivers and small trucks to price the value of their time spent in congestion and pay for a faster alternative. These managed lanes also create more capacity for larger trucks in the general highway lanes during peak traffic periods. Employers locate worksites to maximize their accessibility and proximity to the workforce.”

Unfortunately, there are no MnPASS lanes planned on US Highway 212, a high-priority interregional corridor with a high volume of truck traffic, currently estimated at 1,850 heavy trucks per day. It's unclear how the Council plans to improve freight movement on US Highway 212 or other interregional corridors.

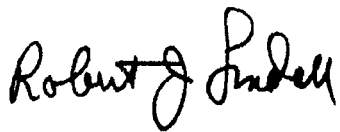
The value of connections to the rest of the state for the movement of both people and products is not highlighted in this plan. Clearly, the region needs to focus on major connectors to regional centers and to improvements in freight corridors. The fact that the legislature passed a Corridors of Commerce plan in 2013 highlights the fact that these corridors are not receiving the attention and the investments they need. The Thrive 2040 plan does not mention the Corridors of Commerce program and the need to make these important corridors a priority. Long-range plans like Thrive 2040 need to recognize the role of the legislature in guiding development policies so that legislative directives are not in conflict with the principles and plans developed by the agency.

Safety on our roadways is another area that should receive more attention in this plan. High crash rates on Trunk Highway 5 and other major corridors continue to leave too many fatalities and injuries. Improving livability in the region will require investments that reduce crashes and improve safety on our roadways. Clearly, safety is a critical component of livability but the plan is short on specifics regarding strategies and plans to reduce crashes.

Page 3

On behalf of the Southwest Corridor Transportation Coalition, I would like to urge the Council to include the value of needed improvements to interregional corridors like US Highway 212 and TH5 in meeting the goal of improving stewardship of the system that has been developed with previous investments, improving prosperity with investments that attract new businesses and living wage jobs, equity for people of all income levels to live throughout the region, livability with critical safety improvements and sustainability by making investments that will meet the region's transportation needs for many years to come.

Sincerely,

A handwritten signature in black ink that reads "Robert J. Lindall". The signature is written in a cursive style with a large, prominent initial "R".

Robert J. Lindall

President

cc: Lyndon Robjent, Division Director/County Engineer, Carver County  
Randy Maluchnik, Carver County Commissioner  
Southwest Corridor Transportation Coalition Members



## TRANSIT for



Livable Communities

Transit for Livable Communities  
2356 University Avenue W, Suite 403  
Saint Paul, MN 55114  
651-767-0298  
tlc@tlcminnesota.org  
www.tlcminnesota.org

**DATE:** April 22, 2014  
**TO:** Metropolitan Council  
**FROM:** Barb Thoman, Executive Director, Transit for Livable Communities  
**SUBJECT:** Draft Comments on *Thrive MSP 2040 – Public Review Draft*

Thank you for this opportunity to comment on this important document. Thrive MSP 2040 and the accompanying system plans are foundational to achieving the overarching goals of equity, sustainability, prosperity, stewardship, and livability. To meet those goals, we encourage you to strengthen the plan by:

- Targeting new growth in jobs and housing to activity centers identified in the draft, and prioritizing those centers and the racially concentrated areas of poverty as locations of investment, reinvestment, and new transit service.
- Stating a focus on road repair and complete streets rather than greater investment in highway expansion.
- Increasing the density targets especially for Suburban, Urban, and Urban Center areas and setting higher density expectations for transit station areas.
- Setting measureable goals and measuring progress on an annual basis toward meeting those goals.

Our letter is organized into three sections, A) general comments on key areas/ideas that we strongly support, B) general comments on key areas where we disagree or would strengthen the language, and C) specific comments with a narrower scope, including suggested changes in wording or format.

### **A. General comments**

#### **Ideas and areas of emphasis we strongly support and many we would strengthen**

1. A Council role in comprehensive regional planning for water management. (page 46, others)
2. Prioritizing preservation of the remaining agricultural land in the region for local food production, economic benefits, and environmental reasons. (pages 14, 31, others)
3. Focusing transit expansion on connections to existing and emerging high-density job and activity centers. Since there are 42 centers (page 47), the document should prioritize investment by size of center, with the highest priority on major centers. We believe that manufacturing/distribution centers should be identified separately since freight access is so important to these locations and transit is likely less important.
4. Identification/implementation of specific strategies to reduce the region's racially concentrated areas of poverty (RCAPs), including A) using "transit dependency" as one of the three criteria to identify transit market areas and levels of service, B) expansion of affordable

- housing in transit station areas, and C) use of criteria to prioritize investment at the Council/TAB's disposal in the RCAPs. (pages 19-23, 38, 44, others)
5. The plan should provide more detail about how to improve access from RCAPs (page 47) to the job and activity centers noted above.
  6. Requiring zoning in transit corridors, especially in LRT/BRT station areas, to be commensurate with the level of transit investment if communities want to be eligible for greater transit investment.
  7. We ask for greater detail and specificity on strategies to encourage active lifestyles and the importance of the built environment to improved health outcomes (page 25). We also ask the Council to prioritize funding construction of a regional bicycle system and planning and construction of a regional pedestrian system that connects to high-frequency transit.
  8. How will the Council support the important goal of access to safe and healthy food? Could the Council's Livable Communities assistance help eliminate food deserts and bring healthy food to communities with limited access to healthy food? (page 25)
  9. Aligning resources to support transit-oriented development and walkable places as explained on page 28; more detail on what resources are being aligned would be helpful.
  10. Expanding the amount of technical assistance (page 37) provided by the Met. Council and playing a greater role as regional convener (pages 38-39).
  11. Creating a set of indicators (page 41). While we might not have agreed that the Annual Benchmarks used by the previous Council were the right set of benchmarks, it was valuable to mark outcomes compared to specific goals.
  12. Defining transitway to include streetcar and arterial rapid bus as well as LRT, highway BRT, and commuter rail, and using Transit Market Areas to prioritize investments (page 79, others).
  13. Establishment of overall density expectations, except that we recommend much higher density expectations than those listed in the plan for Suburban, Urban, and Urban Center areas. Density expectations should also be established for LRT and BRT station areas and for Rapid Bus corridors. Investment should not be made in LRT corridors/station areas in communities that do not rezone for density levels commensurate with the level of transit service planned (page 67-69). Please explain more clearly what these density expectations mean.
  14. Council role in increasing the variety and type of housing choices and development/ preservation of affordable housing (page 77).

#### **B. What we would change**

15. We have major frustrations with the way in which this document talks about highways and transit.
  - In many places this document calls out the "lack of money for highway expansion" but does not lament the lack of money to build out the transit system (pages 2, 4, 45, 78).
  - Thrive MSP should not cite "having **only** \$59 million annually for highway expansion," or talk about "meeting one-fourth the need," ... for highway expansion (page 2, 11). The Twin Cities metro area has one of the nation's largest regional highway systems (which should be mentioned and footnoted in the document). With projected population growth over the next 25 years composed in large percentage of senior citizens, we strongly disagree that the region needs to spend more money on highway expansion and bottlenecks (page

79). Increasing funding for highway expansion by \$200 million each year for 25 years is an additional \$5 billion by 2040 and will create a greater future maintenance liability for the state's residents and incentivize (subsidize) longer trips and trips at peak period. This appears to conflict with messaging in the draft Transportation Policy Plan (TPP).

- The document should mention that this region's large highway system has contributed to the low-density development patterns and to the long commute length in our region.
  - The entire highway system does not need to be fully rebuilt; much of it needs to be better maintained. Page 11 creates a false impression that state and federal revenues for transportation are declining (page 11, paragraph 3). Congress has supplemented the highway fund with general revenues to fill the gap caused by declining fuel tax revenues. Minnesota is continuing to see increases in revenues for transportation (5 percent annually over the past two years with license tab fees and MVST being relatively strong. See MnDOT revenue information for 2011-2013 on the MnDOT web site.
16. Make a commitment to prioritizing planning for and investment in pedestrian infrastructure and street connectivity within and adjacent to the region's light-rail station areas, along high-frequency bus corridors, and connecting to park-and-rides within denser areas (page 27). This is an important use of federal flexible dollars in other regions.
  17. The plan should use MPCA and national data about the impact on health of air pollution along high traffic corridors. See study by MPCA's Dr. Greg Pratt in *Journal of Exposure Science and Environmental Epidemiology*. Advance online publication 18 September 2013; doi: 10.1038/jes.2013.51. Referenced at this link: <http://www.nature.com/jes/journal/vaop/ncurrent/abs/jes201351a.html>. Also: [http://www.saferoutespartnership.org/sites/default/files/pdf/Air\\_Source\\_Guide\\_web.pdf](http://www.saferoutespartnership.org/sites/default/files/pdf/Air_Source_Guide_web.pdf).
  18. We strongly support the emphasis on outcomes on page 7, but ask the Council to identify what of the 215 things identified as the Council role are different from past Council priorities. We understand the Council intends to develop more specific outcomes as part of the policy plans, but Thrive should go further in setting the overall direction.
    - Buried on page 79 and only referenced here, is the outcome of vehicle miles travelled (VMT) reduction. This outcome, when coupled with increased transit access, would advance all of the plan's five key outcomes—equity, livability, sustainability, stewardship, and prosperity. But what the Council will do to achieve this outcome is very vague, especially in terms of prioritizing and aligning investments. As noted above, there is not a commitment to securing increased funding to build out transit, bicycle, and walking systems. In the land use realm, Thrive talks a lot about compact development, but seems to leave the decision wholly to local government. For example, page 82 states, "Encouraging land use policies that create a more compact land use pattern can ultimately reduce energy consumption..." This is a nice descriptive statement but makes no investment or policy commitment by the Council to this outcome.
    - The "Implementing Thrive" section (page 121, near the very end of the plan) should be moved to the introduction. These two pages provide the most clarity on how Thrive relates to other planning documents and what investment and regulatory options the Council has to achieve the outcomes described. Similarly, the Council commitment to "create a set of indicators, parallel to Thrive..." (page 41) should be moved to the introduction.
  19. The document should note that nearly 60 percent of the growth in population—474,000 of the additional 824,000 people by 2040—will be people over age 65. Since the Travel Behavior Inventory (TBI) shows that seniors make fewer trips each day and fewer trips

during peak periods, this will mean less demand for peak-period travel than historical population growth trends would indicate.

20. More of the region's population growth should be targeted to communities that have infrastructure in place today—including water, roads, and schools. (We assume these are areas classified as Urban and Suburban.) The addition of nearly 300,000 people in Suburban Edge communities and Rural Residential is too many. At densities of less than 5 units per acre, these communities are very costly from an infrastructure and environmental standpoint and increases traffic and environmental impacts. People without access to a car have a very hard time getting to jobs located in these communities. The Met. Council should not provide incentive funding to accommodate growth at densities this low.
21. Growth should be targeted more specifically within the nine types of communities identified in this plan (Urban, Agricultural, etc.) to centers and to main street corridors when transit or walking could be viable modes of transportation.
22. The document should specifically identify the acres of land that are currently farm land, open space, or large lot development and that would be converted to residential and employment uses if this plan is approved as currently written.
23. Land use policies (page 66) should specifically endorse compact development at higher densities and incentivize this type of development in nearly all of the nine development types. The language under Building in Resilience is so vague as to be meaningless.
24. If the Council is serious about “providing leadership to support climate change mitigation, adaptation and resilience” (page 30) and “is committed to building a resilient region that minimizes its adverse contributions to climate and air quality” (page 31), Thrive needs to provide more specificity on how “the Council’s investments and planning authorities” can “contribute toward meeting statutory goals for reductions in the generation of greenhouse gas emissions” (page 83). The Council’s approach to climate change should not just include “softer approaches” but should include using Council-administered regional and federal funding to support strategies that reduce climate change emissions and withholding funding for projects that increase greenhouse gas emissions, such as new interchanges and road widening not associated with job centers (page 32).

**Comments page by page with suggested changes to language or format**

25. Page 1, paragraph 3. This statement should be modified: “The region has efficient transportation systems that move people and goods...” This statement is only true if one has access to a car. The system is very inefficient if one is traveling to work in an off-peak period or on the weekend or in the many areas of the region with limited transit.
26. Page 2, bullet 2. “...maintain our highway system.” “Highway” should be replaced with “roadway.” Highway has a specific definition. Roadway is broader and it’s our region’s local roads that are in the worst condition. The word roadway is used on page 10.
27. Page 2, bullet 3. This section is about preservation and this bullet is about expansion. This language should be deleted or language about the poor state of repair on state, county, and especially local roads should be noted.
28. Page 5. It is positive to note that “Thrive addresses issues greater than any one neighborhood, city or single county can tackle alone to build and maintain a thriving metropolitan region.” We recommend supporting that statement by noting that 38 percent of metro commuters leave their county to go to work, and that a majority leave their county to go to work in 5 of the 7 metro counties (i.e. all but Hennepin and Ramsey).

29. Page 9. Replace “costly” with “impossible” in this sentence: “National resources would be costly to replace.”
30. Pages 44-73. The maps on pages 44-73 are too small and have too few labels and identifiers to have much value. Please make them full page maps unless they are only illustrative.
31. Page 10, paragraph 10. Please add a statement, as other regions do in their plans, that low-density development contributes to degradation of the region’s surface water.
32. Page 25. Thrive should note that people without access to a car can’t get to many of our beautiful regional parks and then list the number that have no transit service.
33. Page 25, active living section. The plan should say more specifically what land use decisions will make it easier for people to walk to destinations: more compact development and higher densities.
34. Page 27, bullet 4, top of page. Replace the word “support” with “require” in this sentence: “Support complete streets approaches to enhance transportation choices.” Also add “and improve safety for all users.”
35. Page 27, last bullet on page. Revise sentence to read, “Work with partners to plan, construct ... to regional systems (such as transit stations and high frequency bus corridors, major, regional and sub-regional job/activity centers, and regional parks).”
36. Pages 53, 79. The statement on pages 53, 79 about interconnected streets and the existence of sidewalks in the urban core is correct for Minneapolis, but not Saint Paul. A large portion of the City of Saint Paul does not have sidewalks.
37. Pages 53-64. Please identify the number of acres in each of the nine development types (Urban Center, Suburban, etc.).
38. Page 68, first paragraph. Council mission should ensure cost efficient growth, not just orderly growth.
39. Page 68, bullet 2 under Community Role and page 78, paragraph 3. Street patterns should be well-connected, not just interconnected. You could say that any street is interconnected if it connects to another street.
40. Page 80. Much of the plan emphasizes growth in the 42 centers. However, on page 80 (Economic Competitiveness section) the Council’s role is defined as being to: “prioritize regional investments in places that are drivers of economic innovation and growth for the region.” Thrive should either define where these “places” are, or stick to the 42 centers.

Finally, we found the organization of the document difficult. It is hard to get a clear sense of the Council’s priorities regarding a specific topic—say preservation of agricultural land or development of a regional bicycle plan—when information is located in so many places and not identified in an index.



April 28, 2014



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Dear Chair Haigh:

The Trust for Public Land – Minnesota is pleased to provide comment in three areas – natural resources and regional parks & trails, climate change mitigation and adaptation, and water supply sustainability -- contained in the *Thrive MSP 2040 – Public Review Draft*.

**1) Natural Resources and Regional Parks and Trails**

Our region benefits from abundant natural resources and a nationally leading regional park system that puts our metro area high on many rankings for livability, bike-friendliness, park access and more. Given the projected increase in residents, more can and should be done to develop and maintain our incredible natural resources and park systems; therefore **we strongly support the Council's actions described on page 10 to protect the region's natural resources.**

We **applaud and wholeheartedly support the commitment in Thrive MSP 2040 to include equity** as one of five desired outcomes; this is a major step forward for regional land use planning, specifically as it relates to **equitable access to parks and trails**. We hope Met Council will be equally committed to moving from adoption of this principle to putting equity into practice across the range of its' regional park and trails activities, and to codify the principle through policies to be adopted into the *Regional Parks & Trails Policy Plan*.

We support, and would **strengthen**, the commitment to increase livability through *increasing access to nature and outdoor recreation through regional parks and trails* (page 25). We also agree with the four actions to achieve this (pages 25-26), and especially agree with the aspects we've highlighted in bold:

1. **Expand the regional park system to conserve, maintain, and connect natural resources identified as being of high quality or of regional significance;**
2. **Provide a comprehensive regional park and trail system that preserves high-quality natural resources, increases climate resiliency, fosters healthy communities, and enhances quality of life in the region;**
3. **Promote expanded multimodal access to regional parks, regional trails and the transit network;**
4. **Strengthen equitable usage of regional parks and trails by all our region's residents, such as across race, ethnicity, class, age, ability and immigrant status.**

Of course, action #3 alone would not be sufficient to meet the equity goal, so action #4 is critical. Met Council will promote equitable multi-modal access by encouraging the region's residents,

including low income and people of color who live in the region's urban center communities, **to travel to regional parks and trails**. As a critical complement to multi-modal access, Met Council should also focus on ensuring there are culturally specific regional park opportunities **located nearby where residents live**. As our demographically diversifying residents increasingly embrace life in high-density communities, as projected in the population forecasts that underpin Thrive MSP 2040, it is clear that there will be **concurrent growing demand for regional parks in high-density communities**. This very concept is described on page 49:

*Integrating natural resources into our development patterns helps to create livable neighborhoods and desirable places to visit. Incorporating natural areas and trees into neighborhoods adds to a community's sense of place, as well as providing opportunities to interact with the natural environment on a daily basis. Some natural areas can also increase opportunities for outdoor recreation and exercise, especially when integrated into the neighborhood.*

Today, the most visited regional parks are located in Urban Center communities, including the Minneapolis Chain of Lakes and Como Regional Park. And, these are the areas that are home to many of the region's racially concentrated areas of poverty. The demand for regional parks located in Urban Center communities will only increase, yet this Thrive MSP 2040 does not give direction to meet this demand.

Again, Action #4 (page 26) is extremely important and should include development, redevelopment and expansion of culturally specific regional park and trail opportunities **located nearby where low income and people of color reside**. We are aware of policies being considered by the Metropolitan Parks and Open Space Commission (MPOSC) that are aimed at strengthening equitable usage of the regional parks system. The 13 policies proposed to MPOSC on April 22<sup>nd</sup> include funding and investment policies, planning policies, and convening and information policies that the Met Council could adopt into the Regional Parks Policy Plan. These 13 policy ideas are bold and should move forward with input from the Park Implementing Agencies as well as input from stakeholders and advocacy voices.

## **2) Climate change mitigation and adaptation**

We believe that Thrive MSP 2040, and the Transportation Policy Plan that will be developed in the coming months, can and should support the overall goals of the Next Generation Energy Act of 2007 and its intent to implement emissions reductions (p. 65).

We have specific areas of feedback:

- In "Access, Mobility and Transportation Choice" section of Land Use Plan, it is essential that Met Council **preserve or, ideally, strengthen** the following language on page 79:
  - *Use Council investments and policies to reduce vehicle miles traveled (VMT) and carbon per unit of fuel, which are key drivers of the region's generation of greenhouse gas emissions.*
- In "Building in Resilience" section of Land Use Plan, it is important that this section be **retained and strengthened**. In particular, we support the Council roles spelled out on page 83, especially:
  - *Use the Council's investments and planning authorities to contribute toward meeting statutory goals for reductions in the generation of regional greenhouse gas emissions, and convene regional discussions about goals for climate change mitigation and adaptation.*
  - *Develop, collect, and disseminate information about climate change, including energy and climate data, GreenSteps best practices, the next generation of the Regional Indicators data, and potentially a regional greenhouse gas inventory.*



- It is also important to **retain** Community Roles (page 83), including:
  - *Address climate change mitigation and adaptation throughout the local comprehensive plan.*
  - *Identify local measures that would result in reductions in water use, energy consumption, and emission of greenhouse gases.*

### 3) Water Supply Sustainability

We support a strong Met Council role in comprehensive regional planning for water management. (page 46, and other pages), and especially encourage the Met Council work to *incorporate water sustainability considerations in all areas of Council policy and actions, including overall development patterns, water management, transportation, and housing and regional parks.* (p. 15)

What is not described in this draft of the Thrive MSP 2040 plan, and language should be included, is the interrelationship of groundwater and surface water supplies with land use decisions. It is widely understood that protecting land, and restoring native vegetation, in key watersheds can improve groundwater supply by maintaining or increasing groundwater recharge rates. Conversely, loss of farmland and natural habitats to urban and suburban growth will increase impervious surfaces and reduce the ability of soils and plants to naturally filter the water. One means of protecting water supply is to acquire land, or controlling interests in the land, in strategic source water areas. Regional parks and trails and protection of natural assets can play a key role in protecting water supply.

In addition to our specific comments on the three topics above, we also want to indicate our **support of these Met Council roles:**

- *Leveraging transit infrastructure investments with higher expectations of land use (p. 12)*
- *Encouraging redevelopment and infill development across the region (p. 18)*
- *Supporting the region's bicycle and pedestrian facilities to promote bicycling for transportation, recreation and healthy lifestyles (pp. 27-28)*

We appreciate the opportunity to provide comment and input on the *Thrive MSP 2040 – Public Review Draft*. If you have questions, we would be pleased to address them.

Regards,



Susan Schmidt  
Minnesota State Director  
The Trust for Public Land



Dear Metropolitan Council,

We write as a group of committed metro area food access practitioners, community leaders, and allies, with a combined experience of decades working towards a healthy, sustainable, and equitable food system that provides economic benefits to our local communities. We are excited that the outcomes of the Thrive process coincide so closely with the goals of such a food system: Stewardship, Prosperity, Equity, Livability, and Sustainability. As the nexus of environment, social, economic and particularly equity issues, we believe the food system plays an integral role in achieving Thrive's mission. In turn, the time is long overdue for a region-level overview of our food system. We have been stymied in our goals by a patchwork of inconsistent policies and priorities from municipality to municipality, a lack of a coordinated high-level view of our local food system by decision-makers, and institutional barriers from deeply interconnected systems such as housing, transportation, land use planning, and the like.

Though we support the goals and draft of Thrive, we believe that in order to have the greatest impact we must work closely to address and prioritize important dimensions of the food system that are currently missing. Given our region's dire need to work towards racial and economic equity and climate resilience, we believe that there is a shining, synergistic opportunity for the Metropolitan Council to begin to use its convening powers and the ThriveMSP process to include equitable healthy food access in regional planning, and we urge you to do so.

Thrive places a great importance on climate resilience, and examines the stormwater system and regional development with a climate lens. However, given the massive impacts of drought and flooding on our food system, we are surprised that a mention of ensuring community food security is not part of the ThriveMSP's consideration of climate resilience. Localizing our food system with a network of hundreds of food-producing individuals, businesses, and organizations, both rural and urban, would go a long way towards ensuring that our region continues to thrive. Particularly helpful would be a focus on urban agriculture, where most of the FHEA-identified RCAPs are located. Place a food desert map over the RCAP map, and you will see many parallels. The food system and, in particular, urban agriculture, plays a crucial role in ensuring that all of our communities are equitably prepared to thrive as our climate changes.

We commend the Met Council for prioritizing the preservation of agriculturally productive land in the rural edges of the region. However, we are surprised that stewarding similarly available soil in our urban regions was not touched upon. There are vacant lots strewn throughout our urban and suburban metro region which would add value and complementarity to our current development by advancing the opportunity for people to grow their own food. Moreover, growing one's own food is an easy opportunity for those in wealthy, home-owning areas of the metro, while easily accessible gardening or urban agriculture plots are extremely difficult to come by for residents of the region's RCAPs. Often, the

opportunity to grow your own food is much more significant to these residents, particularly by recent immigrant communities, as a cultural practice for physical, mental, spiritual, economic, and social health. The option to garden or practice urban agriculture at one's home or within close walking distance should be available to anyone who wants it.

When prioritizing transit investments, we urge the Council to explicitly connect equitable transit-oriented development with equitable food access, which includes healthy and culturally appropriate food. Additionally, emphasis must be placed on safety for pedestrians and transit-dependent members of the community to access to these food centers.

These examples highlight both the challenges and opportunities presented in our region as well as the important role that the food system plays within this.

In order to address these concerns and maximize the benefits of this process, we request that you work with the undersigned to convene an equitable food system advisory group for the FHEA and ThriveMSP 2040 planning and implementation process. The Metropolitan Council holds an influential role as a convener of regional priorities. Given our region's racial disparities in as it relates to economics and health and the continuing reality of climate change, the time is long overdue for a region-level overview of our food system. Implementing such a view now will enhance health equity and climate resilience efforts for our region's future. This advisory group should deliberately prioritize inclusion of and leadership from community of color stakeholders from the FHEA-identified Racially Concentrated Areas of Poverty.

We believe that the ThriveMSP 2040 process as a whole, will shape opportunity and equity in our region in all aspects of people's lives. Recognizing the cross-sectoral importance of food will enhance the current work of the FHEA and ThriveMSP 2040. We look forward to engaging in the ongoing work of creating equity and opportunity in our region; equity that extends to where we live, work, and play, and what we breathe, drink, and eat.

We look forward to your response, which can be directed to [Christine@wsco.org](mailto:Christine@wsco.org)

Gardening Matters  
Growing West Side  
Healthy Food Action  
Land Stewardship Project  
Ramsey County-Saint Paul Food and Nutrition Commission  
Stone's Throw Urban Farm.  
West Side Community Organization



May 5, 2014

Comments on Thrive MSP 2040 were received from the following residents:

Angela Anderson  
Ann Mongoven  
Art Serotoff  
Benita Warns  
Brian Ross  
Candace Dow  
Christine Popowski  
Craig Brown  
Donald Jackson  
Donna Draves  
Eric Saathoff  
Erik Baxstrom  
Erik Petzel  
Erik Roth  
Fred Tyler  
Gloria Honda  
Greg King  
Helen Carlson  
Hilary Reeves  
Jackie Grissom  
James Gagne  
Jason Bennett  
Jennifer Harmening Thiede  
Jonathan Ahn  
Julia Singer  
Julie Nelson  
Kathleen Murphy

Kennedy Willis  
Kevin Thompson  
Laurel Yarrow  
Lisa Daniels  
Margaret Beegle  
Mark Synder  
Mary Bjornjeld  
Meghan Grossman  
Michael North  
Michael Tracy  
Pam Brushaber  
Paul Douglas  
PJ MacGillis  
Raymond Bissonnette  
Rich Nymoen  
Rick Harrison  
Rod Wolff  
Scott Halstead  
Sean Gosiewski  
Stefan Pomrenke  
Steve DeLapp  
Susanna Patterson  
Thomas Kottke  
Tim O'Connor  
Tom Spitznagle  
Val Escher

From: pulverfass1946@yahoo.com  
Sent: Friday, April 25, 2014 11:06 AM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Sincerely,

Angela Anderson  
1121 4TH ST N  
Stillwater, MN 55082-4358

**O'Connell, Pat**

---

**From:** Ann Mongoven [akmongoven@gmail.com]  
**Sent:** Sunday, April 27, 2014 8:49 PM  
**To:** PublicInfo  
**Cc:** Commers, Jon  
**Subject:** Thrive MSP input

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Met Council.

As a resident of Highland Park in Saint Paul and an active ISAIAM leader at Saint Joan of Arc Catholic Church, I am writing you to be bold in your support of racial and economic equity in the core cities and suburbs of our metro area. I grew up in Detroit and have experienced firsthand the devastation of a city this is driven by redlining, white flight and no public transportation system that supports strong schools and job growth. I hope and pray that we can learn from our experiences and build a better, safer, healthier communities in our core metro area for my children and yours.

Ann Mongoven  
2104 Edgcumbe Road  
St. Paul, MN 55116

651-292-1952

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## Thrive MSP 2040 comments – submitted through Your Ideas site

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I strongly support the use of an "Equity Lens" through which the Met Council will view and analyse its policies and practices regarding Thrive MSP 2040. For me, both the Thrive plan and the Places, Opportunities and Choices analysis make the case for an Equity Lens well. Also, I believe that if the Met Council takes its own pronouncements seriously, it will implement the Accountability value in a particular way. This means that the residents who are most affected by a policy, practice or project have a voice in determining the particulars of the strategy or policy and then sit on the evaluation group as the project unfolds and is completed. I think the people most affected are the people to whom the Met Council must be accountable. They should be involved from the onset including shaping the project, implementing it and evaluating it. Who better to assess the success or failure of a project than the intended beneficiaries? In addition, who better to provide formative information and direct adjustments to improve the project than the intended beneficiaries?.

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Art Serotoff

**From:** Mike and Benita [<mailto:warns@pclink.com>]  
**Sent:** Monday, April 28, 2014 2:49 PM  
**To:** PublicInfo  
**Subject:** Thrive 2040 Plan Comments

Please enter this e-mail message into the official public record of comments on the Thrive 2040 Plan.

Overall the plan makes sense. However, I am concerned about the specific recommendations for the Urban Core areas of the plan relating to the density of housing, concentrations of poverty, and transportation/transit.

First, density. There are locations within the urban core where adding density makes sense. However, it is not appropriate to add high-rise residential developments immediately adjacent to neighborhoods that are single-family in character. While many of the current population of young adults in their 20s and 30s want to live in dense urban areas, this generation has yet to form a large number of households with children. Once this generation begins to reproduce, they will no longer want to live in those hipster apartments, but will want to buy houses with yards for their kids to play, green space to garden, and yet have convenient nearby shopping and transit. The single-family neighborhoods located in the urban core will provide this opportunity. We must be careful not to overbuild multi-unit residential developments. Likewise, many seniors want to move into places with less maintenance, BUT many still want a patch of green land to call their own. Also, many seniors have worked a lifetime to buy their homes, and want to stay in them. We need to provide resources for those seniors who want to age in their own homes – funds to help them convert homes to handicap access. Just about every plan I read concludes that seniors will move out of their single-family homes into multi-unit buildings. Most seniors do not want to move to senior “ghettos.” They want to be around younger people to continue to feel connected. We need multi-generational developments. Your plan addresses improving racial and economic diversity, but still concentrates families with children in certain areas, young hipsters in other areas, and old people in their senior buildings. We need generational diversity in housing opportunities, and the chance for everyone who wants to garden to have access to that opportunity.

Second, concentrations of poverty. Quit building so much “affordable” housing in the urban core, or at least spread it out into the wealthier neighborhoods. Just because there is transit shouldn’t mean that the area will be primarily targeted for people with low incomes. I am very concerned about the high concentration of land in the urban core that is owned by non-profits that don’t pay taxes. We should not allow large concentrations of non-profit property ownership – whether institutional, religious, or residential. There should be a percentage cap of such properties and new non-profit ownership limited to areas that have less than their fair share. The goal should be that no more than 20% of a community’s land be owned by non-profits. This will improve the tax base of communities and provide more opportunities for private ownership. We also should analyze the current maps to see where there are concentrated areas where there are no households with children and create housing opportunities that better integrate the generations as well as mixed incomes. Most of the new housing in the urban core is being built for adult-only households – and we are not building homes suited for young families. We should do something creative – provide tax incentives to retrofit duplexes into one unit handicap accessible and one unit for a larger family, or allow clusters of extra-small single-family houses mixed into single-family neighborhoods. We need less high-rises that separate people from the land and more creative integration. People in high-rises can’t grow their own food – unless they do so in a community garden – so let’s keep people in single-family homes and encourage them to grow food. Also provide incentives for affordable housing to be placed in wealthier neighborhoods, and don’t allow new developers to build any more in areas that already have concentrated poverty.

Third, transportation/transit. It is nice to have walkable neighborhoods in our urban core, but it doesn’t work for those with limited mobility if we can’t even keep the sidewalks and streets clean enough for them to navigate in winter. The reality is that we live in a northern climate with harsh winter conditions. People with limited mobility cannot walk over snowbanks to get to transit. They will choose to use a car in inclement weather. We must recognize this fact and not keep building medians and diverters that make it

difficult to drive to preferred destinations. When all the Baby Boomers die off, these young hipsters who think we all should use transit, walk, or ride bicycles all the time will be starting to move into middle age and their golden years. They will suddenly want to use cars a lot more due to changes in their health and mobility. They also will need cars to haul around their Baby Boomer parents, especially in winter. What about when these young adults start having children? How are they going to haul around their babies? Will they want to carry a baby or push a stroller through the snow when it is 20 below? Can they use transit to get their young kids to sports practices and games? I'm not saying that we shouldn't invest in transit, better bicycling infrastructure, or make it easier to walk to nearby places, but we need to face the reality of our winter conditions and not limit car capacity so much to make it impossible for people to use them when their health or circumstances won't let them use anything else. Multi-unit developments should provide parking sufficient for the residents, not assume that they all will use transit.

One last note concerning transportation – the BNSF Midway Hub has increased capacity substantially over the last 20 years, and the noise level from that facility is unacceptable. This noise is interrupting sleep for several thousand households located within a mile of this facility. People who want to open their windows on pleasant nights cannot do so due to the noise that keeps them awake, so these people end up using energy to run air conditioners that otherwise wouldn't have been needed. Night operations need to be limited at this facility. This facility should immediately hire people to act as spotters for vehicles moving in the yard so the backup beepers could be turned off at night. Also, the operators of the loading machines need better training so they don't drop the containers. Just those two actions would improve things considerably. We also should require the railroad to add noise reduction mitigation as a condition for any future increase in use of the facility.

Thanks for reading my comments.

Respectfully,

Benita Warns  
1440 Lafond Avenue  
St. Paul, MN 55104  
651-641-1037  
[warns@pclink.com](mailto:warns@pclink.com)



**From:** Brian Ross [<mailto:brross@crplanning.com>]  
**Sent:** Monday, April 28, 2014 4:35 PM  
**To:** PublicInfo  
**Subject:** Comments on the draft Thrive 2040 Plan

Thank you for the opportunity to submit comments on the draft Thrive 2040 Plan. I believe the Plan makes substantial progress in recognizing the forward-looking issues that will affect our region, and in setting the course for local government comprehensive plans. My comments address two related issues: 1) the Plan's recommendations for helping local governments address climate change mitigation, and; 2) the Plan's recommendations for addressing the statutorily-required element for address solar energy resources.

### **Incorporating Climate Change Mitigation in Regional and Local Plans**

The Council's recognition of the need for climate mitigation within local and regional government planning efforts is laudable and is an important step forward from previous regional plans. The draft Thrive 2040 Plan successfully integrates climate change mitigation discussion and explicit recognition of State policy (Next Generation Energy Act) into multiple sections of the Plan. I believe the draft Thrive 2040 Plan moves the regional planning effort substantially forward in regard to transforming regional and local actions, to capture cost effective and "no-regrets" opportunities that are the highest priority for climate change mitigation.

In regard to specific strategies, the Council's preference for "softer approaches" (p. 32) to elicit action by local governments is understandable in recognition of the cultural and ideological barriers to addressing GHG emissions in our region. While I am pleased to see the Council's commitment to take stronger approaches in the event of a "lack of action" by local governments, the apparent assumption behind the "softer approach," is inconsistent with the recognition of substantial cultural and ideological barriers to addressing our region's contribution to climate change.

The "softer approach" seems to be rooted in an assumption that the primary barrier to local government action consistent with Minnesota's GHG reduction goals is lack of information or technical capability. Information and technical assistance is a vital and necessary component to addressing our region's contribution to climate change and for capturing the myriad economically beneficial opportunities for GHG reductions. But lack of meaningful action over the last decade has put our region into a more precarious position regarding achieving the necessary GHG reductions to mitigate extreme risk. Information and technical assistance are the foundation for action, but are insufficient without also preparing now to take additional steps.

Moreover, the criteria stated in the Regional Plan for taking stronger actions ("a threat to orderly and economical development or portend(ing) a significant collective financial cost") has already been reached. The draft plan acknowledges this on page 3: Emerging environmental challenges threaten the continued livability of our region. The adaptation strategies that our region is already taking as a result

of changing storm patterns, increased risk of both extreme heat and cold, and weakening of natural systems that enable and sustain ongoing development is sufficient demonstration of “significant collective financial cost.”

In the development of system statements (to guide plans) and local capital improvement plans (to guide investments), the Council should identify the key pieces of infrastructure that must begin a transition today in order to achieve an 80% GHG reduction by 2050. Local and regional governments make transportation, housing, and utility infrastructure investments every year that will still be with us in 2050. We cannot continue to expand these infrastructural systems without explicit consideration of whether today’s investments will enable or prevent substantial GHG reductions by 2050. Houses built today will be part of the solution or part of the problem in 2050. Streets and transit systems built next year are part of the solution to reduce GHG emissions by 80%, or they are obstacles that will need to be rebuilt at greater expense in the future.

Moreover, information and technical assistance provided to local governments needs to guide actions that are designed to achieving Next Generation Energy Act goals. Some of the Thrive 2040 language acknowledges the standard noted above, such as “Use the Council’s investments and planning authorities to contribute toward meeting statutory goals for reductions in the generation of regional greenhouse gas emissions . . .” (p. 83). However, even this policy should more clearly use the statutory goals as a performance standard, as in “Ensure the Council’s investments and actions by planning authorities are consistent with achieving statutory goals for reductions in the generation of regional greenhouse gas emission. . .”

The draft Thrive 2040 Plan is a general policy document. Specific programs and strategies will be the real test of whether the Plan can direct the transformative changes necessary to mitigate GHG emissions, improve resiliency, and sustain our communities. We cannot wait another ten years to see if the “softer approach” will work. In fact, we can, based on substantial historic evidence, presume that the “softer approach” will be insufficient to create the infrastructural change necessary to achieve Next Generation Energy Act goals. The Thrive 2040 plan should describe the steps that will follow the informational and technical assistance, in order to allow cities and counties to plan for necessary changes within this planning cycle.

### **Planning for the Protection and Development of Solar Energy Resources**

I support the Council's recognition of that development of our region’s solar energy resources is both an important component of meeting the region’s climate and environmental protection goals (e.g. p. 31, 5<sup>th</sup> bullet) and a land use with economic benefits to land owners and communities (e.g. p. 83). As the Thrive 2040 Plan notes (p. 83), the Metropolitan Land Planning Act requires communities to address solar resources:

472.859 subd 2.b. - A land use plan shall contain . . . an element for protection and development of access to direct sunlight for solar energy systems.

In addressing solar resources in the Thrive 2040 Plan, however, the Council should take care to appropriately describe the statutory requirements in the context of current opportunities and best practices for resource protection and development. Historic treatment of solar resources in the Council's regional plans and in most local comprehensive plans has, unfortunately, focused on the word "access," assuming that the primary planning and ordinance tools for enabling solar development was mitigating conflicts between adjoining property owners regarding solar resources. However, recognizing the primary local government role in planning and development regulation for local resources should require focus on the words "protection and development."

The Council should make clear to communities that comprehensive plans and ordinance must provide for "protection and development" of solar resources. The third bullet point under Community Role on p. 83, for instance, should read;

"Ensure that local comprehensive plans and ordinances protect and enable the development of solar resources, as required by the Metropolitan Land Planning Act, and address the use of other alternative energy sources within the planning process."

The Council can then provide local communities with tools that will assist them in solar land-use planning and more meaningfully allow for development of this critical local resource. The Council can utilize a large variety of existing tools, models, and documented best practices to assist communities in meeting statutory planning and implementation requirements. Moreover, the Council can facilitate mapping of solar resources by local governments as new public GIS data sets are (or will soon be) available that show site-level detail and allow accurate assessment of solar potential by community.

I also endorse the Council's recommendation on community solar gardens (several locations, e.g., p.88); "Consider subscribing to community solar gardens for municipal electric load, or providing sites for gardens." However, this language circumscribes the valuable role that local governments can play in community solar garden development, and I recommend the following language to better clarify local government's potential role:

"Promote the development or use of community solar gardens by public and private entities to enable fuller and more economic use of the community's solar resource, including participating as subscribers, assisting in marketing CSG opportunities for economic development, and providing sites for gardens to be developed."

Finally, I fully endorse adoption of the goals of the Environmental Services Division and Metro Transit to incorporate renewable energy into divisional operations. Reducing energy purchases by 50% by 2020 (p. 33) through energy efficiency and use of renewable resources such as large scale solar facilities, while maintaining or improving the quality service, demonstrates the potential for local government operations to follow suit. In particular, I am been pleased with the Council's progress towards developing its on-site solar resources at water treatment facilities. The Council should continue this

work, including proactively identifying additional Council-owned sites suitable for rooftop or ground-mounted solar development.

Thank you,

Brian Ross

501 Main Street SE #711

Minneapolis, MN 55414

**From:** Candace Dow [<mailto:candace.dow@gmail.com>]  
**Sent:** Monday, April 28, 2014 4:53 PM  
**To:** PublicInfo  
**Subject:** Thrive MSP 2040 Comments

Greetings,

Thank you for the opportunity to comment on the document. I appreciate all the work that went into the draft. My comments appear below:

Regards,  
Candace Dow  
Minneapolis, MN  
612.374.4952  
[candace.dow@gmail.com](mailto:candace.dow@gmail.com)

### **Thrive MSP 2040 Comments**

General Questions (to address in the introduction)

1. Who is the audience? Current residents? Persons familiar with the Twin Cities? Persons wondering about moving to the Twin Cities or locating a business in the Twin Cities? (Might the latter group want a map of the seven-county area as part of the larger region?) Representatives of organizations that will submit plans to the Metropolitan Council?
2. What do you want the audience to do differently after reading Thrive MSP 2040?
3. Why is the Metropolitan Council writing this document now? (Need explanation about census, population updates, planning, etc.)
4. Is growth inevitable or necessary?
5. Thrive discusses community health. Might you also add how education, employment, healthy food access, housing, transit, and other factors, collectively termed "social determinants of health" relate to Metropolitan Council charges and policies?

Questions and Comments (Page number from page printed in document.)

1. General observation: If you want comments, number each line on each page for ease of comments.
2. Check colors or shading so person who prints document in black and white can still differentiate maps.

3. Use consistent spacing after period. Some places have one space, other places have two spaces.
4. Page 1: A diverse mix of high-tech and high-value-added industries call (should be calls).
5. Page 2: Clarify "metropolitan region" to differentiate between seven-county region and other organizations that include more counties in the metropolitan area. Unsure if metropolitan growth refers only to seven-county area or larger metropolitan area.
6. Page 2: Cite source(s) for statistics.
7. Page 4: Do readers need to look elsewhere to learn about GREATER MSP?
8. Page 6 and all other blank pages: Perhaps add, "This page intentionally left blank." Or, delete blank pages so document does not appear so long.
9. Page 7: Clarify if stewardship, prosperity, equity, livability, and sustainability are new or ongoing Metropolitan Council desired outcomes.
10. Page 21: Give location for Penn Avenue Community Works, such as "Hennepin County's Penn Avenue Community Works in North Minneapolis..."
11. Page 22: State more strongly that housing affordability includes both housing and transportation cost and that housing should be near amenities, including grocery stores.
12. Page 26: What about seniors who never married and had no children? This group of seniors may have different care needs.
13. Page 26: Millennial generation: "Different lifestyle choices..." compared to seniors, within the generation?
14. Page 27: Will all readers know what "complete streets" means? (Capitalized at bottom of page, not at top of page.)
15. Page 41: Appreciate the rationale for a data-driven approach.
16. Page 43: Appreciate clarifying opening paragraph.
17. Page 45: Provide key for map.
18. Page 45, 46ff: Provide correct page references to other parts of Thrive.
19. Page 48: Provide key for map.
20. Page 49: Reader may not know the location of the Carlos Avery Wildlife Management Area, so may be helpful to include county or other locator, as on page 61.
21. Page 49: Does the map exclude parks?

22. Page 64 or later: Would it be helpful to list all communities alphabetically in a column and have a column for each type of land use so that a reader can note communities with more than one land use type?

23. Page 66: As with suggestion for page 22: State more strongly that housing affordability includes both housing and transportation cost and that housing should be near amenities, including grocery stores.

24. Page 68ff: Appreciate Council and Community role sections.

From: [cpopowski2009@gmail.com](mailto:cpopowski2009@gmail.com) [mailto:[cpopowski2009@gmail.com](mailto:cpopowski2009@gmail.com)]

Sent: Friday, April 25, 2014 7:21 PM

To: PublicInfo

Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

Sincerely,

Christine Popowski  
2630 PLEASANT AVE APT 101  
Minneapolis, MN 55408-1448



From: [cbrown@monkeybridge.com](mailto:cbrown@monkeybridge.com) [mailto:[cbrown@monkeybridge.com](mailto:cbrown@monkeybridge.com)]  
Sent: Friday, April 25, 2014 5:26 AM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Thank you for making equity a key priority, but please set stronger goals so that planning and investment for transportation and housing do reduce poverty in our region.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Sincerely,

Craig Brown  
2908 SOUTHBROOK DR  
Minneapolis, MN 55431-2447

**From:** Donald Jackson [mailto:poornomoreinc@gmail.com]  
**Sent:** Wednesday, April 30, 2014 12:00 PM  
**To:** PublicInfo  
**Subject:** Thrive MSP input

I very concerned about the issue of Racial equity as an African American male the we continue to be looked as a priority in our community I deserve the right to have opportunities to thrive and provide for my family.

As a child of God, I cannot to hoping to have livable, sustainable and prosperous life style.

We must reinvest in our cities and inner ring suburbs as a top priority. We are people too and expected to be treated as such.

I'm apposed to the evening time show Family Guy being aired at 5PM. This show is disrespectful and degrading to youth and young girls, teenage boys with an undertone that killing the child's mother is funny, it must stop.

<iframe width="560" height="315" src="//www.youtube-nocookie.com/embed/VmnXaywJeLM?rel=0" frameborder="0" allowfullscreen></iframe>

Would appreciate feedback.

Thank you

--

Thank you for contacting Poor No More Inc. in our efforts to better serve you we now have virtual offices Worldwide. Our new office headquarters is located at the

Donald Jackson  
Fifth Street Towers Building  
100 Fifth Street  
Suite 1900  
Minneapolis, MN. 55402.  
(612) 306-5894  
www.impoornomore.com

We now have over 1,100 offices worldwide to better serve you, Where do you want to meet...

**From:** Donna Draves [mailto:[donnakandr@q.com](mailto:donnakandr@q.com)]  
**Sent:** Saturday, April 26, 2014 10:23 PM  
**To:** PublicInfo  
**Subject:** My comments on Thrive MSP

Dear Metropolitan Council.

I just finished looking over the document for public review called Thrive MSP One vision one metropolitan region and I'm sending a few comments.

I think probably of lot of work went into it.

Have four other things to add.

(1) is **air quality** addressable? It would be great if it could be.

(2) your use of the word "resources" makes it sound like we are to "use" the land and "use" the water-- are resource for our consumption. I have a difference take on it. I view creation as our brother and sister. We co exist and I believe to really THRIVE we need to respect our water land and air like **one of us**. Now and the next generations need to create a relationship with these not just keep eating them up.

(3) On the various maps of the metro I realize there are city and country boundaries and it's convenient with statistics to divide them this way. However they also could be divided by their natural landscapes( rivers and valleys) like the water shed page. Not dividing down a river, but realizing the ecosystem that river holds (on both banks).

(4) As much as I believe in integration and collaboration I would like you to consider in the benefits of **silos**. Upholding the dignity of one's individual way of doing things can be a valuable thing.

Thanks for the opportunity to share my comments.  
I'm glad I live in the Twin Cities.

My childhood home was near Randolph, MN in the Cannon River Valley.  
Now I live near the Mississippi River in NE Minneapolis.

Thanks for all you do.

Sincerely,

Donna Draves  
[donnakandr@q.com](mailto:donnakandr@q.com)

From: ericsaathoff@gmail.com  
Sent: Thursday, April 24, 2014 8:11 PM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Thank you for making equity a key priority, but please set stronger goals so that planning and investment for transportation and housing do reduce poverty in our region.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Sincerely,

Eric Saathoff  
884 Ivy Ave E  
Saint Paul, MN 55106-2045

From: [ebaxstrom@gmail.com](mailto:ebaxstrom@gmail.com) [mailto:[ebaxstrom@gmail.com](mailto:ebaxstrom@gmail.com)]  
Sent: Monday, April 28, 2014 10:01 AM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

Please increase density especially for urban areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Furthermore, please do more to target or concentrate new growth in infill areas near the urban core so that these destinations can be served affordably by transit, walking, and bicycling.

Sincerely,

Erik Baxstrom  
3725 29th Ave S  
Minneapolis, MN 55406

From: erik.petzel@heart.org  
Sent: Friday, April 25, 2014 9:06 AM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

It's important to me how the Twin Cities metro region grows. We need a stronger regional plan and better transportation policy plan because there are limited resources that must be used to provide access to opportunity for everyone while also protecting the natural environment.

I also ask that you please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Sincerely,

Erik Petzel  
5121 Upton Ave S  
Minneapolis, MN 55410-2246

**From:** Erik Roth [mailto:[erik.roth@earthlink.net](mailto:erik.roth@earthlink.net)]  
**Sent:** Monday, April 28, 2014 5:02 PM  
**To:** PublicInfo  
**Subject:** comment on Thrive MSP 2040

To whom it should concern:

Unfortunately, I just received this hefty document, which is exceedingly short notice to allow the proper attention deserved.

When did this get publicized and how was it presumably made available?

I demand more time for more people to participate, or insist that the whole matter is worse than worthless.

But given that the Met Council is unelected, and thus not accountable to the public, this devious process is not surprising.

At a rapid scroll through and quick scan, one thing, on page 41, popped out screaming for comment.

### ***Accountability***

***Results matter. Milton Friedman remarked, "One of the great mistakes is to judge policies and programs by their intentions rather than their results."***

Incredibly, irresponsibly, the Met Council must not be aware of the horrific irony in quoting that remark by Milton Friedman.

The results of Milton Friedman's economic policy advice have been so insidiously disastrous as to be contemptibly criminal.

Read "The Shock Doctrine" by Naomi Klein about that.

By quoting this remark, the clue thus provided to the Met Council's cluelessness, at best, or callous disregard, at worst, portends grave consequences, all antithetical to so-called thriving for our commonwealth.

Consequently, I must vehemently oppose the entire document and everyone associated with it. This is a disgusting travesty, and a shameful tragedy for our region.

Erik Roth  
Minneapolis

From: [frogofthetrees@yahoo.com](mailto:frogofthetrees@yahoo.com) [mailto:[frogofthetrees@yahoo.com](mailto:frogofthetrees@yahoo.com)]  
Sent: Friday, April 25, 2014 12:51 AM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Sincerely,

Fred Tyler  
951 IGLEHART AVE  
Saint Paul, MN 55104-5427



**From:** Glo on Ipad [<mailto:honda.glo@gmail.com>]  
**Sent:** Friday, April 25, 2014 11:44 PM  
**To:** PublicInfo  
**Subject:** Thrive MSP input

Racial equity must be a top priority, for both moral and practical reasons. Every single one of us is a child of God, and deserves to thrive. With 43% of the region expected to be people of color by 2040, we cannot hope to achieve livability, sustainability or prosperity without equity being at the center.

Reinvesting in core cities and inner ring suburbs must be a top priority. The current draft plan does not represent a significant departure from the status quo. We cannot continue to subsidize sprawl and the expense of our urban core.

We must grow our transit system, and it must effectively serve those who depend on it.

We are all in this together, but we are not all starting from the same point. We must recognize how people are situated, and prioritize investment in those communities that have been systematically cut off from opportunity. Achieving this vision of a strong, equitable region requires bold leadership from the Met Council.

Please, now.

Sincerely,  
Gloria Honda

From: Greg King gmail [<mailto:greg.king.family@gmail.com>]  
Sent: Monday, April 28, 2014 12:49 AM  
To: PublicInfo  
Subject: Input on Thrive MSP 2040

Greetings members of the Met Council!

As a lifelong Minnesotan, a sixteen-year resident of Minneapolis, and a father of three, it is great to know that you are developing a plan to keep our region thriving for decades to come. However, as a person of faith who has been involved in numerous charitable and nonprofit efforts over the years, I am very aware that our metro area has a severe racial divide that has grown into a chasm over the course of the most recent economic crisis. The reality is that life as a Minnesotan of color does not have the same rich opportunities to share in the abundance of our state as the life of someone in the white majority. Statistically, we can see that educational, employment, health, and law enforcement systems are all highly unequal. As a Christian, I believe that this denial of a person's right to fully participate in our public life on the basis of their race is a sin that must be confronted and addressed.

As such, I ask that you ensure that the Thrive MSP 2040 Plan acknowledges and addresses this reality honestly and aggressively.

Racial equity must be a top priority for both moral and practical reasons. With 43% of the region expected to be people of color by 2040, we cannot hope to achieve livability, sustainability or prosperity without equity being at the center. Furthermore, reinvesting in core cities and inner ring suburbs must be a top priority, rather than continuing to subsidize suburban sprawl. This is critical both for sustainability and for addressing the racial divide, as we have become increasingly segregated with many inner-city, minority neighborhoods becoming zones of limited employment opportunity. Finally, we must continue to grow our transit system to connect those who are most in need of employment with the opportunities in the outer suburbs in a sustainable way.

Please recognize that the success of our region depends on the success of all communities, but we must be realistic about the fact that we are not all starting from the same point. We must prioritize investment in those communities that have been systematically cut off from opportunity. Achieving this vision of a strong, equitable region requires bold leadership from the Met Council.

Greg King  
Member of ISALAH ([www.isaiah-mn.org](http://www.isaiah-mn.org))  
5116 17th Ave S  
Minneapolis, MN 55417  
(612) 722-8665

From: Helen Carlson [<mailto:hcarlson@d.umn.edu>]  
Sent: Saturday, April 26, 2014 6:51 AM  
To: PublicInfo  
Subject: Thrive MSP input

Regarding Thrive MSP 2040, please consider the following items:

Racial and economic equity must be a top priority, for both moral and practical reasons. With 43% of the region expected to be people of color by 2040, we cannot hope to achieve livability, sustainability or prosperity without equity being at the center. Equity means that the horrific gaps in educational achievement, housing, and income must be closed.

Reinvesting in core cities and inner ring suburbs must be a top priority. The current draft plan does not represent a significant departure from the status quo. We cannot continue to subsidize sprawl and the expense of our urban core. The Met Council must work to maximize cooperation among the first ring suburbs and to offer incentives to share in addressing the serious inequalities that exist.

We must grow our transit system, and it must effectively serve those who depend on it.

We are all in this together, but we are not all starting from the same point. We must recognize how people are situated, and prioritize investment in those communities that have been systematically cut off from opportunity. Achieving this vision of a strong, equitable region requires bold leadership from the Met Council.

This is the time when the Met Council can make a difference for the futures of its citizens.

Respectfully,

Helen L. Carlson  
6615 Lake Shore Drive S. #917  
Richfield, MN 55423

From: hareeves@yahoo.com  
Sent: Thursday, April 24, 2014 4:31 PM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because this is all about using our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Thank you for making equity a key priority, but please set clearer goals so planning and investment for transportation and housing do reduce poverty in our region.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling (no more auto-only communities!).

I strongly urge the Met. Council to focus on road repair and complete streets rather than more investment in highway expansion. (We already can't repair what we have!)

Please increase density targets (especially for suburban, urban, and urban center areas) and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Thank you for some of the visionary language in Thrive regarding equity and climate change. This is good, but it's still not clear that anyone is going to be held accountable. Please set strong enough goals and measures so that you can reject municipal comp plans that don't increase density or fail to put jobs & housing along existing infrastructure and along transit.

Thank you!

Sincerely,

Hilary Reeves  
210 N 2nd St., #205  
Minneapolis, MN 55401

**From:** Jackie Grissom [jackiegrissombam@gmail.com]  
**Sent:** Friday, April 25, 2014 3:09 PM  
**To:** PublicInfo  
**Subject:** Thrive MSP input

Those of us who possess the ability, the intelligence and the power for change must make the decisions to help others less fortunate. Make the moral calls, vote for a true change I'm the system. We need affordable housing, better paying jobs and transportation for all citizens. We can no longer say " its someone's else responsibility" the tome is now for true empathy, support and actions.

Thank you for reading this Jackie Grissom

**From:** James Gagne [<mailto:jgagne61@gmail.com>]  
**Sent:** Monday, April 14, 2014 4:10 PM  
**To:** PublicInfo  
**Subject:** 2040 plan

To whom it may concern,

From what I have read so far I am opposed to the direction for the Met Council's Thrive 2040 plan. Below are my comments.

- Why according to the Minnesota State Highway Investment Plan are we only going to have \$52 million available annually for Highway mobility improvements for a total of \$416 million? Yet the Met Council is going to spend \$1.8 billion on the SWLRT alone, and I do realize that a great majority of that money is from the Federal government. It seems to me that there is an effort to starve highway funding in order to push more transit development?
- Where did the population numbers come from, it appears there were developed by someone at the Met Council? Have those numbers been confirmed by any third party outside consultants? Sorry to be skeptical but you are basing all of your plan on these numbers and I have a very hard time believing the numbers.
- I am greatly concerned with the Met Council's drift towards "Racial Disparities" issue. The Met Council is a planning board and should do everything in its power to provide public transportation that allows people access to jobs. But it seems like we are having a lot of mission creep going down the road that you are.
- Your mention of the Duluth flood as an example of changes to our environment is LUDICROUS and should be removed. There is NO proof that it was caused by anything other than a freak storm and you belittle this whole plan with that in.
- Page 4's assertion that "transit" has lead to new development just hasn't been the case So far. This is from a credible study done over the last 10 years on the Hiawatha line.
- Please define "Equity" on Page 7? Again why and how are you going to bring Equity into your planning equation?
- Bottom of Page 11 makes mention of using more "managed lanes to provide congestion free option" This is one of the most ridiculous things that you continue to push. Please show me a Independent source of data that is not connected to the managed lane industry that can prove that these lanes make any sense? Everyone of the studies that I have seen is done by an engineering or consulting firm that has there hand in providing goods or services to these lanes. Bottom line on these lanes is why should a wealthy person be able to enjoy a "congestion free option" when a person of lesser means can't, and how does that fit into your "Equity" equation?
- Although I reluctantly believe we need some rail transit to stay competitive with other cities the most recent studies show that only NYC has had an increased use of transit overall. So the obsession with building more LRT seems way over blown, what seems to make more sense to more and better bus service.

- Your contention on Page 17 that MnPass lanes provide more capacity "for larger trucks in the general highway lanes" is NOT TRUE. On 394 which I use daily I see that if the MnPass lane was open to all the overall capacity would increase greatly and that would allow more movement of traffic in ALL of the lanes.
- I agree with encouraging redevelopment of infill sites.
- Page 19 "Equity" you need to remove this is not your job and you are not equipped to and or is your mission to focus on this.
- Page 26 you are making a lot of assumptions about the Millennial generation. First off they may be delaying having kids but I can assure you that they are and once they do they are not going to want to live in the same way and places that they currently do. You cannot assume they are going to want to live in a transit corridor in multi family housing and are going to take transit to do all of their shopping school drop offs and everything else that comes with having kids.
- I love the idea of more Park and Ride lots they really get used from what I see around the metro area and THEY will actually reduce congestion by having convenient and flexible transit options.
- As a person that bikes 2,000 to 3,000 miles per year I for one don't see the need to take away traffic lanes to make room for more bike lanes. This is some new urbanists utopian idea that 99.9% of the people in the metro will never use and the continued push for it is counterproductive.
- Now the council is going to have a Water Supply Master Plan, when was the council told to address this issue?
- Same thing with Climate Change??? It seems like the Council is going to solve all the worlds issue's.
- Your example's of Climate Change are really really laughable and completely not proven.
- Thrive: Principles = Integration, collaboration and accountability, really who makes this up and how much of our money are you spending thinking this up????

In my opinion the Met Council is trying to creep into every aspect of our lives and its mission, budget and the 2040 plan is really outrageous in its scope and complexity.

James R. Gagne  
 2615 West Lafayette Road  
 Excelsior, MN 55331  
[jgagne61@gmail.com](mailto:jgagne61@gmail.com)  
 612-709-5158

**From:** Jason Bennett [<mailto:flyingbennett@yahoo.com>]  
**Sent:** Sunday, April 27, 2014 2:33 PM  
**To:** PublicInfo  
**Subject:** Thrive MSP 2040

Most of the "vision" proposed in the 130 page pdf is quite reflective of grander global zoning policies as outlined by the United Nations and organizations like the "International Council on Local Environmental Initiatives". Certainly the Light Rail project is a part of this "sustainability" that keeps popping up throughout the "vision". The same Light Rail project which on the south side of the metro is already \$400 million over early projected costs and rising! Beginning estimates were around \$1.2 billion and currently the cost is \$1.6 billion. But apparently the Metro Council cares not the amount of federal grants and tax payer money that will be thrown into such a financial black hole of which the ridership will never end up paying for its maintenance costs and general funds needed to keep it going...just like the Max Line in Oregon! And just recently Brooklyn Park had a city council meeting pertaining to private property being grabbed through "eminent domain" for the north side's light rail project, which no doubt will be just as much of a financial mess and waste of tax payer funds.

Under the section "Responsibly managing finite natural resources", I see that one of the points is "Fund ongoing acquisition of priority natural resources and the last best places into the Regional Parks and Open Space System"...The eminent domain land grab up in Dakota County along the Mississippi river for more park area and bike paths infringing upon people's private property rights for pennies on the dollar no doubt fit into the Metro Council's "vision" of the future! The Metro Council's cronyism makes me sick!

Denials of applications to build single family homes in favor of other insider developers who will build condos and apartment buildings will also be a part of this crony vision of yours. Increasing stress on families that will want nothing to do with "stack and pack" living standards forced onto them by the Metro Council. The lack of living choices for individuals and families that will come out of this "vision" will become apparent as more of this is implemented. Those in charge within the Metro Council's department and their rising personal wealth due to kick-backs received through the implementation of this vision will also become very apparent and those like myself will be sure to show it to the public with painstaking detail! As the insider deals continue to happen and consolidation of wealth and unequal living standards between those on the inside of this "Thrive MSP" future and the rest of us become quite noticeable, the names of those responsible will be made public and justice will be served!

What you want is the silent, obedient consent of the public on this "vision" ....well you don't have it!



## O'Connell, Pat

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**From:** jlharmening@gmail.com  
**Sent:** Tuesday, April 22, 2014 5:21 PM  
**To:** PublicInfo  
**Subject:** We Need a Stronger Regional Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows and believe we need a stronger regional plan as well as a strong transportation policy plan--because this is all about using our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Thank you for making equity a key priority, but please set clearer goals in Thrive MSP to guide planning and investment for transportation and housing to reduce poverty in our region.

Please do more to target or concentrate new jobs and housing into areas with a high concentration of jobs and/or housing, so that these destinations can be served affordably by transit, walking, and bicycling.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Sincerely,

Jennifer Harmening Thiede  
4717 5th Ave S  
Minneapolis, MN 55419-5640

From: [hello@jonathanahn.com](mailto:hello@jonathanahn.com) [mailto:[hello@jonathanahn.com](mailto:hello@jonathanahn.com)]

Sent: Monday, April 28, 2014 10:26 AM

To: PublicInfo

Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Sincerely,

Jonathan Ahn  
2537 Emerson Ave S  
Minneapolis, MN 55405

From: julia@writeworks.net  
Sent: Friday, April 25, 2014 9:06 AM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

& please do more with mass transit, to get it moving. We need a strong voice and commitment to LRT, especially SWLRT, and we need to include everyone in this. Kenwood will be under-served if the 21st Station is not built. I realize that some of my neighbors are doing everything they can to keep this train from running at all, (LRT Done Right is really LRT not done at all) but we have to look at the bigger picture, the future of Minneapolis, and this neighborhood, and come up with ways to make it work. Ie a high-line styled bikeway. Trains are the priority, or should be, in this corridor. it is and has been a train corridor for at least a hundred years.

And seriously, how cool would a high-line be in the tree-tops?

We need to start listening to the people who want to make things work, not the ones who don't.

Thank you for supporting transit and Minneapolis.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Sincerely,  
Julia Klatt Singer

Sincerely,

Julia Singer  
1946 Sheridan Ave So  
Minneapolis, MN 55405

Thrive MSP 2040 comments – submitted through Your Ideas site

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**Julie  
Nelson**

**With all of the national and global focus on the need to address food security in the coming years, I was surprised to see such little emphasis on urban agriculture and zero emphasis on food systems and policy. The need for food is something we all have in common, yet the dialogue around transportation systems, policies, land use, economic development are not discussed in the context of food. For example, do we have transportation systems that allow people equitable access to fresh, healthy food? Do city ordinances do the best they can to support the growth of urban agriculture, food systems/supply chains, local businesses in the food industry? Are there roadblocks that could be removed to incorporate food forests on public park land and encourage gardens in vacant urban lots and housing developments?**

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From: [murphyk314@aol.com](mailto:murphyk314@aol.com) [mailto:[murphyk314@aol.com](mailto:murphyk314@aol.com)]  
Sent: Friday, April 25, 2014 4:46 PM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Thank you for making equity a key priority, but please set stronger goals so that planning and investment for transportation and housing do reduce poverty in our region.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

We need our legislature to come forward and realize that a Transit plan that works for all of Minnesota and transit riders, needs to be a 2-way street. A plan that gives transit riders flexibility just as road projects do for those who drive cars. For getting people to work who rely on public transit just as we have a Taxi service that works for the needs of getting people where they need to go.

It is time to step up and make our governor understand that it takes federal funding to run a good transit system. That our Transit riders are worth every penny it takes to have a good transit system as well as giving money to road projects each and every year. There are people that are riding our LRT system and our buses and will continue to ride.

Handicapped people have no other alternatives as well as low income people who can not afford to have a car or choose not to have a car and for those who can not drive like myself. It is time to send out a message that fixing potholes etc. each and every year along with all the plowing in the winter and roads that are dangerous to drive in our winter storms leaving sidewalks with snow and ice because MNDOT is too concerned about clearing roads, becomes costly year after year to clear. Transit riders have a right to better options when it comes to our winter weather. Better heated shelters, bus stops that are clear of the snow and ice, streets in communities that are plowed for bus routes to get around and that are accessible for transit riders to walk on the side walks and not falling on the ice or having to walk in the streets.

I urge the Met Council to put a message out there in their long range plan that these things are important to all transit riders.

Sincerely,

Kathleen Murphy  
6601 5th Avenue So.  
Minneapolis, MN 55423-2480

From: kennedyawillis@gmail.com  
Sent: Thursday, April 24, 2014 6:36 PM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I am most interested that the development aimed at improving racial and class equity is intentionally and carefully planned so that the historically underserved and marginalized are not pushed out of the city because of costs and/or discriminatory employment and housing practices in the city. There need to be policies and other initiatives to ensure that everyone can make the choice to stay and/or move into the neighborhoods and TC regions that they would like to live in. High concentrations of poverty or wealth are not just and should be broken up with mixed-income communities and mixed-use spaces. People from different backgrounds and different economic standings should be able to interact with each other in mixed communities so that both can learn valuable lessons and understandings from each other.

Please prioritize intentionality and careful considerations for creating accessibility and mobility within and between communities, classes, races, and ethnicity when making development and city planning decisions.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Sincerely,

Kennedy Willis  
2850 Cedar Ave S 304  
Minneapolis, MN 55407

From: kevrthom@msn.com  
Sent: Friday, April 25, 2014 9:46 AM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

Particularly in the Bassett Creek Valley, which is wide open for development along the SWLRT alignment! Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Again, the Bassett Creek Valley area!

Sincerely,

Kevin Thompson  
469 Newton Ave. S.  
Minneapolis, MN 55405



Thrive MSP 2040 comments – submitted through Your Ideas site

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**Laurel Yarrow**      **Lots of park space where both dogs and humans can play freely together - with lots of trees! Park space for dogs increases human interaction. These spaces become community gathering places where people actually talk to each other. We need this! We also need urban reforestation. Parks create space for large trees underneath it.**

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Thrive MSP 2040 comments – submitted through Your Ideas site

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Lisa  
Daniels

The draft of Thrive is commendable. The 5 areas of focused outcomes is spot on.

Stewardship, Prosperity, Equity, Livability, Sustainability.

I specifically wanted to comment in regard to specific strategies and the Council's preference for "softer approaches" (p. 32) to produce action by local governments is understandable in recognition of the cultural and ideological barriers to addressing GHG emissions in our region. I believe the time for "softer approaches" has passed and would merely reinforce a complacent attitude and result in too little too late. We must actively pursue approaches that engage local communities and provide education, information and technical assistance today. Especially in the areas of energy consumption, water and energy efficiency and clean energy production. For example the Blue Lake Waste Water Facility is going to be installing a large solar project to power it. The field case of this project should be shared widely and openly and all other facilities should be encouraged to engage in similar projects.

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From: beegle@louberts.com  
Sent: Thursday, April 24, 2014 6:56 PM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Climate instability must be factored into the equation. Supporting renewable energies is critical. We must get perennials into the ground and cars off the road.

Personal Rapid Transit must be tested and implemented immediately. It has the versatility to marginalize automobile traffic.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

Thank you for making equity a key priority, but please set stronger goals so that planning and investment for transportation and housing to reduce poverty in our region.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Please be courageous and explore the potential of Personal Rapid Transit.

Sincerely,

Margaret Beegle  
550 Varner Circle North  
Golden Valley, MN 55427

From: [snyde043@gmail.com](mailto:snyde043@gmail.com) [mailto:[snyde043@gmail.com](mailto:snyde043@gmail.com)]

Sent: Friday, April 25, 2014 4:36 PM

To: PublicInfo

Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Thank you for making equity a key priority, but please set stronger goals so that planning and investment for transportation and housing do reduce poverty in our region.

Sincerely,

Mark Snyder  
2302 Johnson St NE  
Minneapolis, MN 55418-3938

**From:** Mary Bjorngjeld [<mailto:mbjorngjeld@gmail.com>]  
**Sent:** Friday, April 25, 2014 3:56 PM  
**To:** PublicInfo  
**Subject:** Thrive MSP input

Hi,

I am a resident of Brooklyn Park where we have the largest percentage of population diversity along with Brooklyn Center.

I would like to agree with Isaiah on:

first priority--racial equity  
reinvest in our core cities and inner ring suburbs  
recognize impact of housing and transportation policy affects our

schools

build and operate transit system focused on equity

I also would like to make sure that our city and regional parks are funded, and green space is on the increase. Community gardens are important and so are community schools.

Thank-you.

Respectfully,  
Mary B.

**From:** Meghan [<mailto:meghanmgrossman@yahoo.com>]  
**Sent:** Saturday, April 26, 2014 10:17 AM  
**To:** PublicInfo  
**Subject:** Thrive MSP input

Racial equity must be a top priority, for both moral and practical reasons. Every single one of us is a child of God, and deserves to thrive. With 43% of the region expected to be people of color by 2040, we cannot hope to achieve livability, sustainability or prosperity without equity being at the center.

Reinvesting in core cities and inner ring suburbs must be a top priority. The current draft plan does not represent a significant departure from the status quo. We cannot continue to subsidize sprawl and the expense of our urban core.

We must grow our transit system, and it must effectively serve those who depend on it.

We are all in this together, but we are not all starting from the same point. We must recognize how people are situated, and prioritize investment in those communities that have been systematically cut off from opportunity. Achieving this vision of a strong, equitable region requires bold leadership from the Met Council.

Meghan Grossman

Resident and homeowner

Longfellow, Minneapolis

Sent from my iPod

**From:** Mike and Sue North [<mailto:tjnorth@brainerd.net>]  
**Sent:** Monday, April 28, 2014 3:04 PM  
**To:** PublicInfo  
**Cc:** Bill Faber  
**Subject:** Thrive MSP 2040 Comments

To Whom It May Concern:

Attached is a draft manuscript that I and my co-author will be submitting to *The Loon* (the journal of the Minnesota Ornithologists' Union) next week for possible publication. We believe the content has useful information for your planning effort that identifies guilds of avian species that have already been affected by urbanization, and makes recommendations for a few species that merit special attention.

Sincerely,  
Michael R. North

# Impacts of Twin Cities Metropolitan Area Development on Regional Breeding Bird Distributions

By

Michael R. North, Minnesota Department of Natural Resources, 1601 Minnesota Drive, Brainerd,  
Minnesota 56401

and

William E. Faber, Natural Resources Department, Central Lakes College, 501 West College Drive,  
Brainerd, Minnesota 56401

Urban development is known to impact avian distribution and abundance, although there are surprisingly few studies, especially experimental studies, on such effects (Marzluff et al. 2001a). The majority of studies that have been conducted have focused on changes in relative abundance in forested ecosystems according to Marzluff et al. (2001b), who found only nine studies that examined changes in presence—absence (i.e., distribution). For some species, the impacts are positive, or at least initially they appear to be positive. For example, wetland modifications in Anchorage, AK, facilitated the range expansion of breeding Canvasbacks (*Aythya valisineria*), Lesser Scaup (*Aythya affinis*), and Gadwalls (*Anas strepera*) into new areas of Alaska (North 2001), but also allowed populations of Canada Geese (*Branta canadensis*) to grow beyond normal carrying capacity (or range of natural variation; M. North, personal observation), which ultimately is likely not positive for humans or geese. In Tucson, AZ, Cooper's Hawks (*Accipiter cooperii*) nested at higher densities than exurban conspecifics, but had higher mortality rates and nest failure rates (Boal and Mannan 1998, 1999). Examples of adverse impacts to avian species due to urbanization are more difficult to document than are benefits, although the case for adverse impacts is theoretically simple and intuitively easy to accept. For example, Boal and Mannan (1999) hypothesized that predatory birds should be especially sensitive to urbanization because they require large areas of undeveloped land in which to hunt and are easily disturbed by human activities. Marzluff (2001b) found that both raptors and ground—nesting species associated with urbanized forests were more likely to decrease than raptors or ground—nesting species associated with urbanized grasslands. Likewise, species in the interior forest species guild, such as Ruffed Grouse (*Bonasa umbellus*), Barred Owls (*Strix varia*), Pileated Woodpeckers (*Dryocopus pileatus*), Ovenbirds (*Seiurus aurocapilla*), and Red-eyed Vireos (*Vireo olivaceus*) should be adversely affected by forest fragmentation associated with urban development (Wilcove 1985, Marzluff et al. 2001b, Porter et al. 2001). Valiela and Martinetto (2007), however, conducted a meta—analysis of Breeding Bird Survey data from eastern and central North America and concluded open—nesting, edge, and wetland—dwelling species appeared to be adversely affected by urbanization, whereas forest—dwelling species appeared to be increasing (although their linkage with species population trends to actual urbanization was more theoretical and not actually measured).

There are multiple mechanisms by which urbanization could affect birds. These include modifications in habitat types and abundance, alterations in predator populations, changes in mortality rates due to



collisions or other causes such as hunting pressure or toxins, food supplementation, changes in water quality and quantity, climate amelioration, and increases in exotic plant and animal species' populations (see Marzluff 2001, Marzluff et al. 2001b; also Wilcove 1985 and Boal and Mannan 1999). Haskell et al. (2001) found that predator populations of Blue Jays (*Cyanocitta cristata*), domestic cats (*Felis catus*), raccoons (*Procyon lotor*) and opossums (*Didelphis marsupialis*) increased with increasing housing density. The major adverse impact to birds, however, likely comes from habitat loss and fragmentation. Porter et al. (2001) established a gradient in Oxford, OH (approximate population 20,000) that ran from an exurban area through a suburban area to the town's central commercial district. They found that tree and shrub cover, basal area, vegetation density, canopy cover and patch size all decreased along the gradient from the exurban area to the core commercial district. Conversely, percent cover by buildings and other impervious cover increased along the gradient, while percent grass cover and tree diameter varied non-linearly.

Within Minnesota, some species landscape—level responses to urbanization have already been documented. For Chestnut—sided Warbler (*Setophaga pensylvanica*), Green and Janssen (1975) write, "In the early twentieth century the species was fairly well represented ... in the area around the Twin Cities, but as forests were cut and urbanization progressed, it began to disappear." For Ruffed Grouse they report, "... in the Twin Cities area the species has been extirpated by development; there have been no reports from Hennepin County in twenty-five years" (or since about 1950). Conversely, for Ring-Necked Pheasants they report, "... 'clean farming' practices in recent years have resulted in a reduction of the population. Most numerous in the Twin Cities suburban area where there is sufficient cover and artificial feeding by the local residents."

The impetus for this study was to evaluate the impacts of a proposed commercial development in the suburban fringe of the Twin Cities metropolitan area (hereafter Metro area) that would fragment one of the largest remaining tracts of Big Woods forest in that part of the Metro area. We hypothesized that interior forest species would be adversely affected by urban development and that this would be reflected in their distribution. In this paper, we examine the impacts of urban development on the regional distribution of birds. Distribution information was obtained from the recently completed data entry phase of the Minnesota Breeding Bird Atlas Project. We do not address abundance, although the two metrics are related (i.e., an abundant species should be widespread, but an uncommon species may or may not be widespread; also, the number of atlas blocks or density in which a species is present should be somewhat proportional to its abundance).

An underlying assumption of our paper is that as the amount of survey effort increases, the likelihood of a species being detected increases. We visually reviewed data on block effort (i.e., hours) and number of species detected per block available on the Breeding Bird Atlas website, and both metrics confirmed that both block effort and number of species detected in the Metro area were among the highest in the state. Thus, we are confident that if the Atlas is indicating a species is absent, it likely is absent. The converse is problematic, however; if a species appears to be more common in the Metro area, it could be due to increased search effort and not necessarily greater local distribution or abundance. Another assumption we made was that a large—scale metro area would be required for impacts to be noticeable and measurable.

Key terminology follows that proposed by Marzluff et al. (2001b): *urban* refers to highly developed city centers where humans tend to live in multi-residential housing; *suburban* refers to less densely developed parts of cities where humans tend to live in single-family residences; and *exurban* and *rural* refer to outlying areas where human density is less than a suburban setting. A *rural* setting is dominated by agriculture, whereas an *exurban* setting has greater amounts of natural vegetation. Because the Twin Cities Metro area has both rural and exurban areas bordering suburban areas, we refer to the rural and exurban areas collectively as the *wildland interface*. Collectively, urban, suburban, and rural/exurban areas are referred to as the *urban gradient*.

### Study Area

The Twin Cities metropolitan area covers seven counties in eastern Minnesota and is home to 2.85 million people (Metropolitan Council 2011a). At the core of the Metro area are the twin cities of Minneapolis and St. Paul. Land use in the seven county Metro area includes agriculture (30%), undeveloped land (23%), residential areas (22%), park and recreation areas (10%), intensively developed areas (9%), and open water (6%; Metropolitan Council 2011b). Tree canopy cover in urban areas in Minnesota (predominantly the Twin Cities, but also Rochester, St. Cloud, Duluth, etc.) averages 18.4%, whereas it averages 27.1% in urban and suburban areas combined, and 30.9% statewide (Nowak and Greenfield 2010). Lakes >25 acres average more than 11 per township in the most urbanized parts of the Metro area, which places the urbanized area among the higher lake—density areas in Minnesota (Minnesota Department of Conservation 1968). Lake density is lower in some of the suburban and exurban areas of the Twin Cities, including northern Hennepin, southwestern Anoka, and Dakota counties.

Although residential development accounts for about 70% of urban area growth, housing density has increased slightly since 2005, thus decreasing the rate of sprawl. Also, the amount of mixed—use development has increased, which also has the effect of reducing sprawl relative to traditional development patterns. From 2005—2010, parkland set-asides amounted to 18,000 acres, or an average of 3,600 acres/year (Metropolitan Council 2011b). From 2000—2010, population in the urban core and in some peripheral agricultural areas has decreased, while population gains have occurred in the suburbs and northern agricultural areas.

The Metro area is in the Eastern Deciduous Forest ecological province and its core area encompasses parts of three ecological subsections: the Anoka Sand Plain, Big Woods, and St. Paul—Baldwin Plains and Moraines (Minnesota DNR 2005, 2006). The margins of the Metro area also include small amounts of the Mille Lacs Uplands, Blufflands, and Oak Savannah ecological subsections.

The Anoka Sand Plain on the north side of the Metro area is a broad, flat, sandy lake plain that was dominated by oak savannah, wetlands, and upland prairies in the 1890s. Today, primary land uses are cropland (36%), grassland (including sod farms, 18%) and upland deciduous hardwood forest (13%; Minnesota DNR 2006).

The St. Paul—Baldwin Plains and Moraines on the east and southeast side of the Metro area was originally characterized by oak savannah (50%), upland deciduous forest (25%) and prairie (9%). Today,

primary land uses are developed (32%), cropland (30%), pasture (13%), and forest (10%). Topography ranges from steep hills, to rolling hills, to flat plains.

The Big Woods ecological subsection on the west and southwest side of the Metro area was originally characterized by upland deciduous hardwood forest (57% in the 1890s), which now amounts to 3% of the landscape. Today, cropland (60%) and pasture (14%) are the dominant land uses. Topography is flat to gently rolling. The original Big Woods forest was dominated by basswood (*Tilia americana*), red oak (*Quercus rubra*), and sugar maple (*Acer saccharum*; Minnesota DNR 2005).

Thus, the Metro area gradient tends to go more from *urban* to *exurban* on the north and east, and from *urban* to *rural* on the west and south. Percent of original wetland areas remaining in the heart of the Twin Cities Metro area are estimated at 31% for Hennepin County and 33% for Ramsey County; at 12-17% in Carver, Scott, and Dakota counties that grade into the *rural* areas to the south and west; and 71% for Anoka County and 43% for Washington County that grade into *exurban* areas to the north and east.

## Methods

We reviewed distribution maps on the Minnesota Breeding Bird Atlas website ([www.mnbba.org](http://www.mnbba.org)) for presence—absence of all species expected to occur in the Twin Cities metropolitan area and identified 40 species for which it appeared there was evidence that urban development adversely affected their local distribution. For each species, we gave them a subjective grade of A+ to D- for strength of evidence, and compiled data on their habitat affinities/guilds, nesting habits, and foraging guilds. The Ring-necked Pheasant (*Phasianus colchicus*; graded A+; Figure 1) became the species by which all other species were graded against. Distribution maps were downloaded from the Breeding Bird Atlas website in October 2013 (after the close of the data entry deadline) and presented to a small panel of bird experts for their critique of our selected species. Based on panel input we re-graded the species and placed them into two categories: strong evidence (A or B grade) or weaker evidence (C or D grade). Two species (Sharp-shinned Hawk [*Accipiter striatus*] and Pine Warbler [*Setophaga pinus*]) were dropped from consideration because we deemed their absence from the Metro area to be due to their reaching the natural limit of their range, rather than effects of urbanization. We consulted Birds of North America (Poole and Gill 1992—2002) to assign species to habitat and nest site affinities. We also identified nine species that seemed to show positive benefits from urbanization, but they were not further assessed statistically.

We identified a rectangular inner urban core area based on Minnesota Land Cover Classification System land cover data, and two concentric rings around the core area to represent a gradient from the wildlands interface through suburbia to the urban core. The urban core area occupied 1,755 mi<sup>2</sup> and contained 50 priority Breeding Bird Atlas survey blocks. The next ring occupied about 2,005 mi<sup>2</sup> and contained 54 priority blocks. These two areas together covered the entire seven—county Metro area except for three townships in western Carver County. The outer ring occupied about 1,980 mi<sup>2</sup> in the “collar” counties (Chisago, Isanti, Sherburne, Wright, Sibley, Le Sueur, Rice, Goodhue) and western

Carver County and contained 70 priority blocks. Areas in Wisconsin that would have fallen within the two rings are not included in this study due to lack of comparable data.

We randomly selected 25 priority blocks for each of the three areas on the urban gradient and recorded presence or absence for 37 species (including Eastern Meadowlark [*Sturnella magna*]) and for meadowlarks combined. We did not test for Western Meadowlarks (*Sturnella neglecta*) because of concerns about accuracy of identification. Presence—absence data was placed in a 2x3 contingency table and analyzed statistically with a chi—square test of independence (Steel and Torrie 1960).

## Results and Discussion

We identified 22 species (Table 1) for which there is strong visual evidence for urbanization adversely affecting their regional distribution in Minnesota, and another 16 species (Table 2) for which we deemed the evidence “weaker.” The majority of species showing strong visual evidence for adverse impacts also had statistically significant chi—square test results, while the majority of species showing weaker visual evidence for adverse impacts had non—significant chi—square test results. Species maps are available at [www.mnbba.org](http://www.mnbba.org).

Table 3 shows the frequency of occurrence of each species in 25 randomly—selected priority blocks in each area along the urban gradient arranged according to results of chi—square tests of independence. We expected the number of blocks with a species present to generally increase from the urban core to the wildland interface. Seventeen species followed this pattern (including species that did not change between two consecutive classes along the gradient but did have a rise between urban—suburban areas or suburban—wildland interface areas). Ospreys (*Pandion halietus*) decreased in frequency of occurrence from urban to exurban areas, which was opposite of what we expected, which shows the importance of relying on statistical tests over visual interpretations. Osprey distribution in the Metro area is highly influenced by the placement of nest platforms, which are used by Metro—area ospreys to a greater extent there than elsewhere in the state (K. Woizeschke, Minnesota DNR Nongame Program, unpublished data). Four species had their lowest frequency of occurrence in suburban areas, while seven had their highest frequencies there. It is not unusual for avian density to peak in the suburban areas of the urban gradient (Marzluff 2001). Two species, Common Loon (*Gavia immer*) and Veery (*Catharus fuscescens*), showed no trend. It is important to note that we calculated frequencies of occurrence at only one overall landscape scale, whereas the species we statistically evaluated probably responded at 38 different landscape scales.

The greatest numbers of species on these lists are affiliated with grassland or savannah habitats (45%, Table 4) and are ground or low—shrub nesters (65%, Table 5). Species associated with forests (24%) or tree nesting (16%) were surprisingly under—represented, suggesting that forest fragmentation is not a major factor altering avian distribution in developed areas. However, this does not indicate that their abundance is not greatly affected by forest loss and fragmentation.

The nine species that seemed to show strong visual evidence for positive effects on their distribution and/or abundance are Cooper's Hawk, Red—shouldered Hawk (*Buteo lineatus*), Broad—winged Hawk (*Buteo platypterus*), Great Horned Owl (*Bubo virginianus*), Chimney Swift (*Chaetura pelagica*), Peregrine Falcon (*Falco peregrinus*), Merlin (*Falco columbarius*), Northern Cardinal (*Cardinalis cardinalis*), and House Finch (*Haemorhous mexicanus*). It is significant that most of these species are larger raptors.

### *Forest Birds*

Ultimately, we intuitively rejected our hypothesis that the distribution of forest interior species was adversely impacted by urban development. While the distributions of Ruffed Grouse, Ovenbird, Veery, and Wood Thrush (*Hylocichla mustelina*) visually suggested adverse effects, species such as Cooper's Hawk, Red—shouldered Hawk, and Broad—winged Hawk visually appeared to have benefitted, and other forest species showed no discernible effects. Statistically, only Ovenbird and Wood Thrush had significantly different rates of occurrence across the urban—wildland interface gradient, and the pattern of Wood Thrush occurrence (Table 3) did not demonstrate either adverse or positive effects from urbanization. Marzluff et al. (2001b) reviewed other studies that found raptor populations, including Red—shouldered Hawks, often increased with development, and Valiela and Martinetto (2007) found forest—dwelling species' populations generally increased in northeastern North America due to reforestation following early logging.

Ruffed Grouse may not have shown a statistically—significant adverse impact because the impact may have occurred at a greater geographical scale than we explored. In particular, Ruffed Grouse may be adversely affected by increased Great Horned Owl and hawk populations resulting from urbanization. Other factors associated with urbanization that likely adversely affect Ruffed Grouse include increased mammalian nest predators, loss of early—successional forest, habitat fragmentation, and increased collisions with windows and other objects. Increased regional hunting pressure likely crosses an unknown threshold leading to hunting becoming an additive cause of mortality rather than a compensatory cause of mortality, or what Gullion (1984) refers to as “accumulative depletion” (see also Small et al. 1991). An urban barrier could have important consequences for gene flow and population recruitment in southeastern Minnesota as the Metro area appears to form a bottleneck for dispersion from northern breeding areas to southern breeding areas, leaving only a narrow corridor of suitable dispersal habitat in Washington County along the St. Croix River. This concern is premised on a gradual decline in Ruffed Grouse populations in southeastern Minnesota from the early 1970s—early 1990s without a subsequent rebound (Minnesota DNR 2012, p. 54), on Ruffed Grouse being considered poor dispersers (Gullion 1984; as is a closely related species, Hazel Grouse [*Bonasa bonasia*], in Eurasia [Swenson 1991, Aberg et al. 1995]), and questions as to how much of a barrier the Mississippi River may be to gene flow and dispersal from Wisconsin. In Sweden, Hazel Grouse are averse to dispersing across as little as 100 m of non-forested habitat, and even 2 km (1.2 miles) of unpreferred forest cover types are barriers to dispersal (Aberg et al. 1995). Comparable data are not available for Ruffed Grouse, but it would appear that the Mississippi River would be a barrier to Ruffed Grouse dispersal except where numerous forested islands are close to each other.

## Grassland Birds

The primary suite of species that appear to be adversely affected by urbanization are grassland birds and ground—nesters, with many species in Tables 1 and 2 included in both guilds. Grassland birds also had the seven highest chi—square values, indicating greatest evidence of adverse impacts (Table 3). Vesper Sparrow (*Pooecetes gramineus*; Figure 2) had the highest chi—square value. Some grassland birds tend to be more area—sensitive than other guilds, including Lark Sparrows (*Chondestes grammacus*), Grasshopper Sparrows (*Ammodramus savannarum*), and Western Meadowlarks that require 100—200 ha of habitat in California (Bolger 2001). Such large native grasslands are attractive for development in urban growth areas due to less land clearing effort required and perhaps to perceived lesser ecological value. Ground—nesting species and low—shrub nesting species are more susceptible to predation from cats and other small predators (e.g., raccoons, Blue Jays) whose populations typically increase with urbanization (Haskell et al. 2001). Also, adverse impacts to ground—nesting species are not limited to urban areas but are well—documented in undeveloped forested areas as well (e.g., Hanowski et al. 2000). It is likely that loss of habitat and increased predation pressure have an additive or compounding impact on grassland birds in urban settings. The large number of ground—nesting grassland species in Table 1 strengthens the case for including Grasshopper Sparrows, Lark Sparrows, and Bobolinks (*Dolichonyx oryzivorus*; Figure 3) in Table 2 as species being affected by urbanization, and inclusion of the latter two are also supported by results of chi—square tests of independence. These data support other findings about the widespread declines of grassland birds (e.g., Valiela and Martinetto 2007, Sauer et al. 2008).

Historically, most of the grassland species assessed here were fairly common to abundant and widespread in the 1970s (Faanes 1981); the Savannah Sparrow (*Passerculus sandwichensis*) was one of the three most common nesting species in the St. Croix River valley, and the Vesper Sparrow was the second most common nesting sparrow. Three species, however, were less widespread than today: Eastern Meadowlark, Eastern Towhee, and Lark Sparrow. Faanes (1981) indicated Eastern Meadowlarks were far less abundant than Western Meadowlarks, and that there was a marked increase in abundance going eastward.

One area where grassland species tend to persist as a guild in the Metro area is along the Ramsey—Anoka County line, and especially in the Arden Hills area. This area still supports area—sensitive species such as Grasshopper Sparrow, Lark Sparrow, Eastern Meadowlark, Bobolink, and Northern Harrier (*Circus cyaneus*), and merits special attention when new developments are proposed. We recommend that permitting and environmental review of proposed development projects in this area be carefully reviewed for impacts to grassland birds. We also recommend that public education about programs such as Cats Indoors should be continued and expanded. An interesting study would be to evaluate whether species that nest both on the ground or in low shrubs (e.g., Lark Sparrow) shift their frequency of nest placement (i.e., a greater frequency towards low shrubs) in response to urbanization.

### *Aquatic Species*

Species associated with shallow lakes, shallow wetlands, and marshes that appear to be affected by urbanization include Blue-winged Teal (*Anas discors*), Black Tern (*Chlidonias niger*), and Yellow-headed Blackbird (*Xanthocephalus xanthocephalus*). Blue-winged Teal are also a grassland ground-nesting species, so they may be more influenced by loss of grassland habitat and an increased predator base, as is the case with the suite of other birds of the grassland guild. The proximate mechanisms affecting Black Terns and Yellow-headed Blackbirds are not evident but may involve water quality, toxins/pollutants, reduced prey base, or altered internal wetland dynamics that affect marsh cycling through the hemi-marsh stage. Yellow-headed Blackbirds breed only in high-productivity lakes and marshes where they rely extensively on emerging aquatic insects (Orians 1980). Concerns about the loss of Yellow-headed Blackbirds in the Metro area date back to 1993 (Jenness 2000). Jenness documented the decline from five known or suspected breeding sites in Ramsey County in 1993 to one viable colony and one or two marginal sites in 1999, and he attributed the decline at one site (Black Tern Pond) to changes in hydrology (i.e., too much bounce, or additional runoff from development affecting cattail conditions). Jenness also documented the decline of a colony of 40–50 Yellow-headed Blackbirds in the mid-1990s to only a few by 1999 on the Anoka County side of Laddie Lake on the Anoka–Ramsey county line, which he attributed to degradation of cattail stands due to increased water levels. Black Tern Pond also hosted breeding Black Terns in the 1990s. The Breeding Bird Atlas surveys from 2009–2013 did not find any breeding Black Terns or Yellow-headed Blackbirds in Ramsey County, and only a minor (i.e., insufficient to suggest breeding) sighting of Yellow-headed Blackbirds on the Ramsey County side of Laddie Lake.

### *Shrubland Species*

Several species of shrubland nesting birds rely on forest disturbance for creation of their preferred habitats. These include Chestnut-sided, Yellow (*Setophaga petechia*), Blue-winged (*Vermivora cyanoptera*), and Golden-winged Warbler (*Vermivora chrysoptera*), Eastern Towhee (*Pipilo erythrophthalmus*), Clay-colored (*Spizella pallida*), Chipping (*Spizella passerina*) and Song Sparrow (*Melospiza melodia*), and Indigo Bunting (*Passerina cyanea*); see Webb et al. (1977) and Faanes (1981). At latter stages of regrowth, shrublands succeed into secondary forests preferred by Ruffed Grouse and Rose-breasted Grosbeaks (*Pheucticus ludovicianus*). Urbanization results in the loss of forest disturbance (i.e., the loss of younger forest) due to changes in logging activities and fire suppression. Some of these species are adaptable and can convert to wetland shrub habitats, including Golden-winged and Yellow Warbler, and Song Sparrow. Sedge meadows succeed into shrub swamps in the absence of natural fires, which are typically suppressed in urban landscapes. An interesting study would be to determine the extent to which these latter species shift from upland to wetland habitats in urban settings versus exurban settings as a response mechanism to urbanization. The succession of sedge meadows to shrub swamps may also explain the apparent adverse impacts to Sedge Wren (*Cistothorus platensis*), Sandhill Crane (*Grus canadensis*), Northern Harrier, and perhaps Virginia Rail (*Rallus limicola*).

Among the species assessed in this paper, Chestnut—sided Warbler and Clay—colored Sparrow had formerly been widespread, while Blue—winged Warbler and Eastern Towhee were rare or uncommon and appeared to be spreading (Green and Janssen 1975, Faanes 1981).

### *Other Impacts*

There are numerous lakes in the Metro area that are of a suitable size to support breeding Common Loons but do not. Ramsey County has 50 lakes over 25 acres in size, and Hennepin county has 130, not including reservoirs on the river systems (Minnesota Conservation Department 1968). There are probably multiple human—induced impacts affecting Common Loons including reduced water clarity due to turbidity and algal blooms, loss of naturally vegetated shorelines for nesting due to residential lot development, increased egg—predator populations, and excessive recreational activity (e.g., Lake Minnetonka on holiday weekends). Of the lakes >25 acres, 16 (32%) in Ramsey County and 38 (29%) in Hennepin County are adversely affected by drainage (Minnesota Conservation Department 1968). However, Common Loon frequency of occurrence did not vary along the urban gradient (Table 3).

Belted Kingfishers (*Megaceryle alcyon*) and Bank Swallows (*Riparia riparia*) typically nest in cut banks associated with rivers and gravel pits, or sometimes stockpiled borrow materials or vertical faces resulting from road cuts. In the Metro area, 140 mi<sup>2</sup> of aggregate resources have been developed on, paved over, or otherwise excluded from use due to difficulty in getting permits and approvals for new mines due to zoning restrictions. In the last 160 years, 70% of the local aggregate resource has been consumed or rendered unavailable (Southwick et al. 2000). In active gravel pits in the Metro area, we assume that the demand for aggregate resources keeps active mine wall faces in constant change, rendering them largely unavailable for nesting sites. These factors probably explain the apparent adverse impact of urbanization on the distribution of nesting Belted Kingfishers and Bank Swallows in the Metro area. However, variation in the frequency of occurrence along the urban gradient was not statistically significant for these species.

Red—headed Woodpeckers (*Melanerpes erythrocephalus*) have an affinity for sparsely (open) wooded areas such as oak savannahs and golf courses, so in theory they should be prevalent in urban areas, and in fact in the past they were associated with urban areas. Also, Faanes (1981) indicated they were common and uniformly distributed in the physiographic regions of the St. Croix River valley that included the Twin Cities metro area. However, they are noted for being particularly susceptible to being hit by moving vehicles (Poole and Gill 1992—2002; Pam Perry, personal communication), which possibly accounts for their sparse distribution in the Metro area today. The common practice of removing dead branches and trees in urban areas has also been implicated in their decline (Poole and Gill 1992—2002).

### *Species with Non—significant Chi—square Test Results*

There are several possible reasons why some species did not show significant test results for frequency of distribution along the urban—wildland interface gradient. For some species their densities may be too low to detect actual differences. These include Ruffed Grouse, Virginia Rail, Wilson’s Snipe (*Gallinago delicata*), and Grasshopper Sparrow. For Ruffed Grouse, the geographic scale we selected may also have been too small. For example, hunting pressure in the exurban zone from urban—based



hunters may have an additive effect to habitat alteration and predator population increases occurring mainly in the urban and suburban zones.

For some species, the impacts of urbanization may be expressed in one ecological subsection but not another. An example may be the Brown Thrasher (*Toxostoma rufum*), which seems to be missing from the Big Woods ecological subsection of the Metro area, but not the other subsections. Another example may be the Rose-breasted Grosbeak which also seemed to be absent from the Big Woods subsection (although that species had a significant chi—square value). Also, the vagaries of random block selection may mask actual differences. This may be the situation for Blue—winged Teal and Grasshopper Sparrow.

Lastly, there may be no actual differences in distribution. This may be the case for Trumpeter Swan (*Cygnus buccinator*), Common Loon, Belted Kingfisher, Bank Swallow, Veery, and Grasshopper Sparrow. These latter species, except for Veery, were on the list of species with “weaker” visual evidence. We note that in the Metro area, both Common Loon and Veery are near the edge of their natural ranges.

It is important to note that lack of a statistically significant value does not mean there is no impact from urbanization. It may mean that the impact is occurring at a different geographic scale than we measured, or for other reasons listed above.

#### *Species with Significant Chi—square Test Results but Non-linear Distributions*

Twelve species with significant chi—square values had their highest or lowest frequency of occurrence in the suburban zone. For three species (Northern Harrier, Blue—winged Warbler, and Savannah Sparrow), these dips or rises may simply represent variation due to random selection of priority blocks for analysis. For some species, such as Dickcissel (*Spiza americana*), Bobolink, Field Sparrow (*Spizella pusilla*), and Clay-colored Sparrow, these rises may represent a combination of both adverse impacts from intense urbanization and benefits from suburbanization. For Eastern Meadowlark it appears there are benefits specifically from suburbanization, and for Eastern Towhee it appears there are adverse impacts from suburbanization. It is also possible that minor dips in frequency of occurrence in the wildland interface could be due to different species—specific responses to differing vegetation conditions in rural versus exurban areas (e.g., for Ring—necked Pheasant, Bobolink). Future research could elucidate the factors that these species are responding to and within which zone(s) of the urban gradient the responses are occurring in.

For two species with marginally significant chi—square values there is no linear trend along the urban gradient: Yellow—bellied Sapsucker (*Sphyrapicus varius*) and Wood Thrush, thus they cannot be readily classified as benefitting from or being adversely affected by urbanization. Both Faanes (1981) and Green and Janssen (1975) indicated the Wood Thrush was fairly widely distributed, but Faanes had their area of abundance north of the Metro area, while Green and Janssen had their area of abundance from Hennepin County on south and east, thus there may be an undetected Metro area affect embedded within in ecological subsection effects.

### *Species at Edge of Range*

We noted four species whose ranges extend to the edge of the Metro area and then stop. Sharp-shinned Hawks are associated with dense deciduous, coniferous, and mixed forests and should be able to find suitable habitat in the Metro area. However, the direct and indirect competition between multiple *Accipiter* species has been implicated as playing a role in individual *Accipiter* species' distribution patterns (Poole and Gill 1992—2002). The positive benefits of urbanization realized by Cooper's Hawks may therefore translate into adverse impacts to Sharp-shinned Hawks through interspecific competition.

Red-breasted Nuthatches (*Sitta canadensis*) are affiliated with coniferous and mixed forests, typically in the Laurentian Mixed Forest ecological province or biome, but their range extends into the Eastern Deciduous Forest also. Their distribution in the Metro area appears to be more affiliated with the Anoka Sand Plain and St. Paul—Baldwin Plains and Moraines ecological subsection boundaries (which contain more conifer forest components than the Big Woods ecological subsection) than with patterns of urban development.

Black—and—white Warblers (*Mniotilta varia*) are affiliated with mature and second-growth mixed and deciduous forests, typically in the Laurentian Mixed Forest biome, but their range extends into the Eastern Deciduous Forest also. They also show a “possible preference for swampy forests” (Poole and Gill 1992—2002) which may explain why they exhibit a cluster pattern around the Carlos Avery Wildlife Management Area in northeast Anoka County in the Breeding Bird Atlas. In Maryland, Black—and—white Warblers in one study were not found in forests smaller than 208 ha (514 acres; Robbins et al. 1989). Conversely, in the Adirondack Mountains of New York this species' numbers increased with logging (Webb et al. 1977). Green and Janssen (1975) indicated this species was historically quite scarce south of Mille Lacs Lake, but Breeding Bird Atlas results suggest they are expanding to the southeast. It appears urbanization may be limiting their expansion in the Metro area.

Pine Warblers are associated with coniferous forests, with a particular affinity for the Laurentian Mixed Forest biome, and their distribution in Minnesota rarely encroaches into the Eastern Deciduous Forest biome. Faanes (1981) and Breeding Bird Atlas results both suggest, historically and currently, that the Pine Warbler is at the southern edge of its range at the north end of the Metro area. However, comparisons between maps in Green and Janssen (1975) and the Breeding Bird Atlas hint that Pine Warbler distribution is expanding, thus urbanization could become a barrier to further spread into the Metro area where mature conifers have become established.

For Red-breasted Nuthatch and Black—and—white Warbler, we cannot adequately determine whether urbanization impacts the margins of their ranges, or whether other factors limit their ranges. Black—and—white warblers are ground nesting species, so it may be that cats or other predators that benefit from urbanization are affecting their local distribution. For Pine Warbler and Sharp-shinned Hawk, we believe factors other than urbanization determined their distribution patterns around the Metro area. We are also reluctant to draw any conclusions for Sharp-shinned Hawks because we are wary of the accuracy of the local sight records in the Breeding Bird Atlas.

### *Comparison with Historical Data*

There are two sources of historical data that lend themselves to comparison with our current results. One is Faanes (1981, *Birds of the St. Croix River Valley: Minnesota and Wisconsin*) which we have incorporated into the discussion, above. The other is Henderson (undated), who compiled a preliminary atlas of breeding birds in Minnesota from Breeding Bird Survey data from 1967–1979. Henderson used DNR Regional boundaries and subregions as his areas, which at the time included the seven-county Twin Cities Metro area as a distinct DNR region. Henderson presented the results as number of birds/100 miles. The Metro area had 106 species (range 87–147 in rest of state) and 4,550 birds/100 miles (range 2,148–4,008 in rest of state). Among the species that attained their highest statewide densities in the Metro area were Blue-winged Teal, Ring-necked Pheasant (133/100 miles, compared to 81/100 miles in southwest Minnesota), Belted Kingfisher (but numbers low), and Sedge Wren. Other species that attained relatively high densities in the Metro area were Black Tern, Brown Thrasher, Vesper Sparrow (56/100 miles), Bobolink (78/100 miles), and Western Meadowlark (255/100 miles). Among the species that attained relatively moderate densities in the Metro area were Red-headed Woodpecker, Horned Lark (*Eremophila alpestris*), Bank Swallow, Dickcissel, Clay-colored Sparrow, Savannah Sparrow, Grasshopper Sparrow, and Yellow-headed Blackbird. These all appear to be impacted by urbanization now. For Western Meadowlark, it appears their decline began about 1978 (see Table 1 in Janssen 2000).

Species with relatively low densities in the Metro area were Common Loon, Wilson's Snipe (*Gallinago delicata*), Yellow-bellied Sapsucker, Veery, Wood Thrush, Ovenbird, Black-and-white Warbler, Chestnut-sided Warbler, Rose-breasted Grosbeak, Eastern Towhee, and Eastern Meadowlark. Blue Jays, implicated as a predator that benefits from urbanization, attained densities in the Metro area that were relatively low on a statewide basis. This suggests the impacts of urbanization on some of these species (except Black-and-white Warbler, Eastern Towhee and Eastern Meadowlark) may have occurred earlier than for the other species with high or moderate densities listed above. Other species we assessed were absent from the Metro area at the time of Henderson's compilation (Trumpeter Swan, Red-breasted Nuthatch, Pine Warbler), or Henderson considered them as not effectively counted by BBS surveys (Ruffed Grouse, Sharp-shinned Hawk, Osprey, Virginia Rail). For the first three species, it suggests that urbanization may be limiting their range expansions.

### *Conclusions*

Grassland, wetland, and ground-nesting species appear to be the birds most adversely affected due to urbanization. Grassland species that are ground-nesting species appear to be doubly-affected by loss of habitat and increases in predators (e.g., cats). The distribution of forest-dwelling species does not appear to be affected by urbanization, and forest-dwelling raptors appear to benefit from urbanization. These results are not contrary to other studies examining the effects of urbanization on birds. Further research is recommended to elucidate the mechanisms by which individual species respond to urbanization, and at which threshold (i.e., intensity of development) these impacts occur. Specifically, individual Breeding Bird Atlas priority blocks could be ranked according to degree of urbanization and correlated with species presence-absence. Abundance data may also be forthcoming

through the Breeding Bird Atlas project which would further lend itself to studying the impacts of urbanization on avian communities. Visual characterizations of data can be misleading and therefore need to be supported with statistically analyzed quantitative data. Lack of statistical significance does not mean a particular species is not affected by urbanization, but that it may be occurring at a different geographical scale than we tested for.

Species that we assessed that could be characterized as “common species becoming rarer” supported statistically include: Ring-necked Pheasant, Northern Harrier, Black Tern, Red-headed Woodpecker, Horned Lark, Sedge Wren, Ovenbird, Chestnut-sided Warbler, Savannah Sparrow, Clay-colored Sparrow, Field Sparrow, Vesper Sparrow, Dickcissel, Rose-breasted Grosbeak, Eastern Meadowlark, Yellow-headed Blackbird, and Bobolink. Western Meadowlark should be added to this list based on changes noted from Henderson (undated), Faanes (1991), and Janssen (2000). The Grasshopper Sparrow and Ruffed Grouse probably also fit into this category, but they had statistically non-significant chi-square test results, perhaps because their distributions were too sparse. Several of the species listed above are also either on the Audubon Minnesota Action Plan as “target species” or are being proposed for the DNR’s 2015 list of Species in Greatest Conservation Need (SGCN) due to declining populations statewide or declining habitat. These include Northern Harrier, Black Tern, Red-headed Woodpecker, Field Sparrow, Dickcissel, Bobolink, Western Meadowlark, and Yellow-headed Blackbird, suggesting that urbanization is exacerbating their decline locally, but the decline is due to multiple causes. Species not on either list (due to declining populations or habitat) include Ruffed Grouse, Ring-necked Pheasant, Horned Lark, Sedge Wren, Ovenbird, Chestnut-sided Warbler, Vesper Sparrow, Savannah Sparrow, Clay-colored Sparrow, and Rose-breasted Grosbeak, suggesting their local declines are due primarily to urbanization.

Species that we assessed that could be characterized as “advancing species constrained in their ability to spread into urbanized areas” include: Sandhill Crane, Black-and-white Warbler, Blue-winged Warbler, Eastern Meadowlark, Eastern Towhee, and Lark Sparrow. Red-breasted Nuthatch, Pine Warbler, and Trumpeter Swan may also fit into this category. An interesting ecological study would be to explore whether Eastern Meadowlarks exploited a void created by a decline in Western Meadowlarks, or whether advancing Eastern Meadowlarks displaced Western Meadowlarks, and what role changing habitat conditions may have played in this “tension zone” between the two species.

Species that we assessed for which the data did not statistically support visual evidence of adverse impacts include: Trumpeter Swan, Blue-winged Teal, Osprey, Common Loon, Virginia Rail, Wilson’s Snipe, Belted Kingfisher, Yellow-bellied Sapsucker, Bank Swallow, Wood Thrush, Veery, and Brown Thrasher. All of these except Osprey, Wilson’s Snipe, Yellow-bellied Sapsucker and Bank Swallow are also listed as either Audubon Minnesota Action Plan as “target species” or are being proposed as SGCNs.

Table 1. Species showing strong evidence of Metro area urbanization adversely affecting their regional distribution in Minnesota. "Savannahs" include regenerating forest cutover areas.

| <u>Species</u>          | <u>Natural Habitat Affinity</u> | <u>Nest Site</u>     | <u>Significant?<sup>1</sup></u> |
|-------------------------|---------------------------------|----------------------|---------------------------------|
| Blue—winged Teal        | shallow lake                    | ground (upland)      | no                              |
| Ring—necked Pheasant    | grassland                       | ground               | yes                             |
| Ruffed Grouse           | forest (deciduous, mixed)       | ground               | no                              |
| Northern Harrier        | grassland, sedge meadow         | ground               | yes                             |
| Sandhill Crane          | grassland, sedge meadow         | ground, wetland      | yes                             |
| Black Tern              | shallow lake                    | over water           | yes                             |
| Red—headed Woodpecker   | oak savannah                    | tree cavity          | marginally                      |
| Horned Lark             | grassland                       | ground               | yes                             |
| Veery                   | forest (deciduous, mixed)       | shrub, stump, ground | no                              |
| Brown Thrasher          | savannah                        | shrub                | no                              |
| Ovenbird                | forest (deciduous, mixed)       | ground               | yes                             |
| Blue—winged Warbler     | shrub savannah/wetland          | on or near ground    | yes                             |
| Chestnut—sided Warbler  | shrub savannah                  | shrub                | yes                             |
| Eastern Towhee          | shrub savannah, forest          | shrub, ground        | marginally                      |
| Savannah Sparrow        | grassland                       | ground               | yes                             |
| Clay—colored Sparrow    | grassland, savannah             | shrub                | yes                             |
| Field Sparrow           | savannah                        | shrub, ground        | yes                             |
| Vesper Sparrow          | grassland                       | ground               | yes                             |
| Dickcissel              | grassland                       | shrub, low forb      | yes                             |
| Rose—breasted Grosbeak  | forest, shrub savannah          | shrub, tree          | yes                             |
| Eastern Meadowlark      | grassland                       | ground               | yes                             |
| Yellow—headed Blackbird | marsh                           | over water           | yes                             |

<sup>1</sup>See Table 3 for results of chi—square test of independence.

Table 2. Species showing weaker evidence of Metro area urbanization adversely affecting their regional distribution in Minnesota, arranged by significance.

| <u>Species</u>           | <u>Natural Habitat Affinity</u>       | <u>Nest Site</u>             | <u>Weakness</u>                                     | <u>Significant?<sup>1</sup></u> |
|--------------------------|---------------------------------------|------------------------------|---|---------------------------------|
| Red—breasted Nuthatch    | forest (coniferous, mixed)            | tree cavity                  | near natural edge of range                          | yes                             |
| Sedge Wren               | sedge meadow                          | ground, low                  | gaps elsewhere                                      | yes                             |
| Bobolink                 | grassland                             | ground, low                  | sparse to north                                     | yes                             |
| Black—and—white Warbler  | forest (deciduous, mixed, coniferous) | ground                       | near natural edge of range                          | marginally                      |
| Lark Sparrow             | grassland, savannah                   | ground, shrub                | no sightings to west                                | marginally                      |
| Yellow—bellied Sapsucker | forest (deciduous, mixed)             | tree cavity                  | gaps elsewhere                                      | yes <sup>2</sup>                |
| Wood Thrush              | forest (deciduous, mixed)             | low in tree or in high shrub | sparse across state                                 | yes <sup>2</sup>                |
| Trumpeter Swan           | shallow lake                          | over water                   | sparse to east, south                               | no                              |
| Common Loon              | lake                                  | shoreline                    | near natural edge of range                          | no                              |
| Virginia Rail            | marsh                                 | over water                   | sparse across state                                 | no                              |
| Wilson’s Snipe           | wetland                               | ground                       | sparse in southern MN                               | no                              |
| Belted Kingfisher        | riparian                              | ground cavity                | large gaps elsewhere                                | no                              |
| Bank Swallow             | riparian                              | ground cavity                | gaps elsewhere                                      | no                              |
| Grasshopper Sparrow      | grassland                             | ground                       | sparse across state                                 | no                              |
| Osprey                   | lake and forest                       | dead tree or pole            | influenced by location of artificial nest platforms | yes <sup>3</sup>                |
| Western Meadowlark       | grassland                             | ground                       | identification vs Eastern Meadowlark                | n/a                             |

<sup>1</sup>See Table 3 for results of chi—square test of independence.

<sup>2</sup>Trend non-linear (parabolic), so cannot be interpreted as either positive or adverse effect.

<sup>3</sup>Significant in the opposite direction than predicted; suggests positive impact from urbanization.

Table 3. Frequency of occurrence of birds in 25 randomly—selected priority blocks in each zone along the urban gradient, arranged by value of chi—square test of independence results.

| Species                 | Observed   |                |                         | Exp <sup>1</sup> | Chi—Square | Prob—ability | Habitat Affinity |
|-------------------------|------------|----------------|-------------------------|------------------|------------|--------------|------------------|
|                         | Urban Core | Sub—urban Ring | Wildland Interface Ring |                  |            |              |                  |
| Vesper Sparrow          | 6          | 19             | 22                      | 15.7             | 144.7      | <.005        | grassland        |
| Savannah Sparrow        | 10         | 21             | 19                      | 16.7             | 68.7       | <.005        | grassland        |
| Horned Lark             | 9          | 18             | 20                      | 15.7             | 68.7       | <.005        | grassland        |
| Dickcissel              | 6          | 17             | 13                      | 12               | 62         | <.005        | grassland        |
| Bobolink                | 2          | 12             | 9                       | 7.7              | 52.7       | <.005        | grassland        |
| Any meadowlark spp.     | 6          | 15             | 8                       | 9.7              | 44.7       | <.005        | grassland        |
| Ring—necked Pheasant    | 16         | 25             | 21                      | 20.7             | 40.7       | <.005        | grassland        |
| Eastern Meadowlark      | 6          | 14             | 7                       | 9                | 38         | <.005        | grassland        |
| Yellow—headed Blackbird | 2          | 4              | 10                      | 5.3              | 34.7       | <.005        | marsh            |
| Field Sparrow           | 10         | 18             | 13                      | 13.7             | 32.7       | <.005        | grassland        |
| Black Tern              | 0          | 6              | 7                       | 4.3              | 28.7       | <.005        | marsh            |
| Chestnut—sided Warbler  | 0          | 1              | 6                       | 2.3              | 20.7       | <.005        | shrub savannah   |
| Sandhill Crane          | 7          | 9              | 13                      | 9.7              | 18.7       | <.005        | grassland        |
| Blue—winged Warbler     | 1          | 7              | 5                       | 4.3              | 18.7       | <.005        | shrub savannah   |
| Clay—colored Sparrow    | 11         | 17             | 13                      | 13.7             | 18.7       | <.005        | grassland        |
| Rose—breasted Grosbeak  | 14         | 18             | 19                      | 17               | 14         | <.005        | forest           |
| Northern Harrier        | 3          | 1              | 6                       | 3.3              | 12.7       | <.005        | grassland        |
| Eastern Towhee          | 6          | 3              | 8                       | 5.7              | 12.7       | <.005        | shrub savannah   |
| Ovenbird                | 6          | 7              | 10                      | 7.7              | 8.7        | <.05         | forest           |

Table 3. Continued.

| Species                  | Observed      |                       |                               | Exp <sup>1</sup> | Chi—<br>Square | Prob—<br>ability   | Habitat<br>Affinity |
|--------------------------|---------------|-----------------------|-------------------------------|------------------|----------------|--------------------|---------------------|
|                          | Urban<br>Core | Sub—<br>urban<br>Ring | Wildland<br>Interface<br>Ring |                  |                |                    |                     |
| Sedge Wren               | 11            | 13                    | 15                            | 13               | 8              | <.05               | grassland           |
| Red—breasted Nuthatch    | 2             | 2                     | 5                             | 3                | 6              | .05                | forest              |
| Yellow—bellied Sapsucker | 8             | 11                    | 8                             | 9                | 6              | .05 <sup>2</sup>   | forest              |
| Wood Thrush              | 8             | 5                     | 8                             | 7                | 6              | .05 <sup>2</sup>   | forest              |
| Red—headed Woodpecker    | 1             | 3                     | 4                             | 2.7              | 4.7            | <.10               | oak savannah        |
| Black—and—white Warbler  | 0             | 2                     | 3                             | 1.7              | 4.7            | <.10               | forest              |
| Lark Sparrow             | 4             | 5                     | 7                             | 5.3              | 4.7            | <.10               | grassland           |
| Ruffed Grouse            | 1             | 1                     | 3                             | 1.7              | 2.7            | n.s.               | forest              |
| Belted Kingfisher        | 11            | 9                     | 11                            | 10.3             | 2.7            | n.s.               | riparian            |
| Bank Swallow             | 5             | 7                     | 5                             | 5.7              | 2.7            | n.s.               | riparian            |
| Grasshopper Sparrow      | 5             | 7                     | 7                             | 6.3              | 2.7            | n.s.               | grassland           |
| Trumpeter Swan           | 4             | 5                     | 6                             | 5                | 2              | n.s.               | marsh               |
| Blue—winged Teal         | 8             | 7                     | 9                             | 8                | 2              | n.s.               | marsh               |
| Brown Thrasher           | 19            | 21                    | 20                            | 20               | 2              | n.s.               | shrub savannah      |
| Virginia Rail            | 3             | 2                     | 3                             | 2.7              | 0.7            | n.s.               | marsh               |
| Wilson’s Snipe           | 1             | 1                     | 2                             | 1.3              | 0.7            | n.s.               | wetland             |
| Common Loon              | 6             | 6                     | 6                             | 6                | 0              | n.s.               | lake                |
| Veery                    | 6             | 6                     | 6                             | 6                | 0              | n.s.               | forest              |
| Osprey                   | 8             | 5                     | 1                             | 4.7              | 24.7           | <.005 <sup>3</sup> | lake/forest         |

<sup>1</sup>Expected value for chi—square test of independence. <sup>2</sup>Trend parabolic, so neither positive nor adverse impact. <sup>3</sup>Significant in the opposite sense than predicted; suggests positive impact from urbanization.



Table 4. Habitat affinity of species whose distribution appears to be adversely affected by urbanization.

| <u>Habitat Affinity</u>     | <u>Strong Evidence of Impact</u> | <u>Weaker Evidence of Impact</u> | <u>Total</u> | <u>Percent</u> | <u>Percent with Significant Chi—square<sup>1</sup></u> |
|-----------------------------|----------------------------------|----------------------------------|--------------|----------------|--|
| Grassland/savannah          | 12                               | 5                                | 17           | 45             | 88 <sup>2</sup>  |
| Forest                      | 4                                | 5                                | 9            | 24             | 67 <sup>3</sup>  |
| Marshes/lakes/wetlands      | 3                                | 4                                | 7            | 18             | 29   |
| Shrubs/regenerating forests | 3                                | 0                                | 3            | 8              | 100  |
| Riparian (cut banks)        | 0                                | 2                                | 2            | 5              | 0  |

<sup>1</sup>p≤.10

<sup>2</sup>Western Meadowlarks not included in calculations due to questions on identifications in Breeding Bird Atlas.

<sup>3</sup>Osprey included in group as non—significant adverse impact.

Table 5. Nesting habits of species whose distribution appears to be adversely affected by urbanization.

| <u>Nest site (primary)</u> | <u>Strong Evidence of Impact</u> | <u>Weaker Evidence of Impact</u> | <u>Total</u> | <u>Percent</u> | <u>Percent with Significant Chi—square<sup>1</sup></u> |
|----------------------------|----------------------------------|----------------------------------|--------------|----------------|--|
| On/near ground             | 11                               | 7 <sup>2</sup>                   | 18           | 47             | 72 <sup>3</sup>  |
| Low shrub/forb             | 7                                | 0                                | 7            | 18             | 71   |
| Tree/high shrub            | 2                                | 4                                | 6            | 16             | 83 <sup>4</sup>  |
| Overwater                  | 2                                | 3 <sup>5</sup>                   | 5            | 13             | 40   |
| Burrow                     | 0                                | 2                                | 2            | 5              | 0  |

<sup>1</sup>p≤.10

<sup>2</sup>Includes Lark Sparrow, which has a slightly greater affinity for nesting on ground than in low shrubs (Birds of North America [Poole and Gill 1992—2002]).

<sup>3</sup>Western Meadowlarks not included in calculations due to questions on identifications in Breeding Bird Atlas.

<sup>4</sup>Osprey included in group as non—significant adverse impact.

<sup>5</sup>Includes Common Loon.

## Acknowledgments

We thank Pam and Ken Perry and Kevin Woizeschke for providing feedback on our initial visual assessment of species impacted by urban development, and Central Lakes College Natural Resources students Jakob Graber, Bobbi Gunderson, and Adam Maleski for assisting in extracting data from random blocks in the Breeding Bird Atlas.

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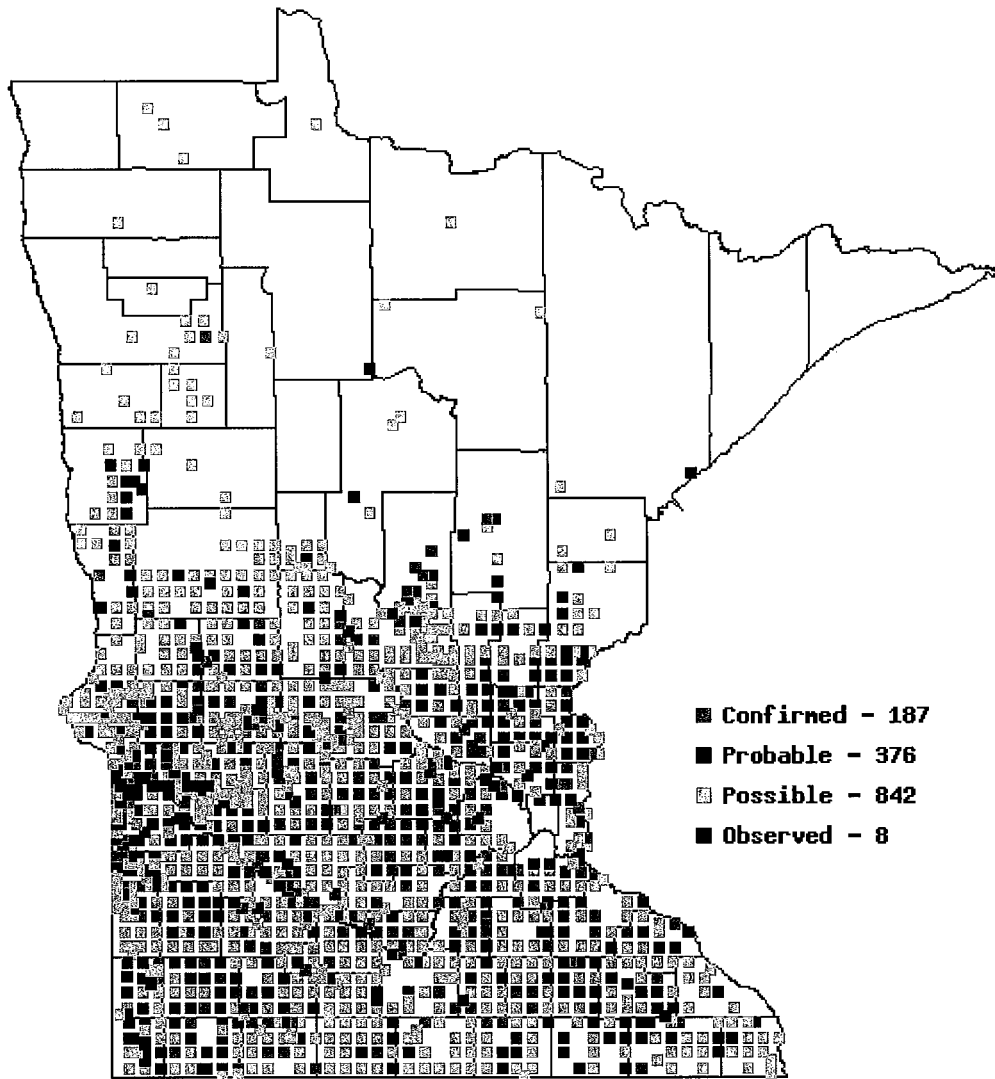


Figure 1. Distribution of Ring-necked Pheasants in Minnesota. Source: Minnesota Breeding Bird Atlas, [www.mnbba.org](http://www.mnbba.org) accessed 3 October 2013. This species visually shows the clearest impact of urbanization on a species distribution. Note: in our evaluation of presence—absence, we treated “observed” records as “absence,” since the observer did not consider the sighting to be evidence of breeding.

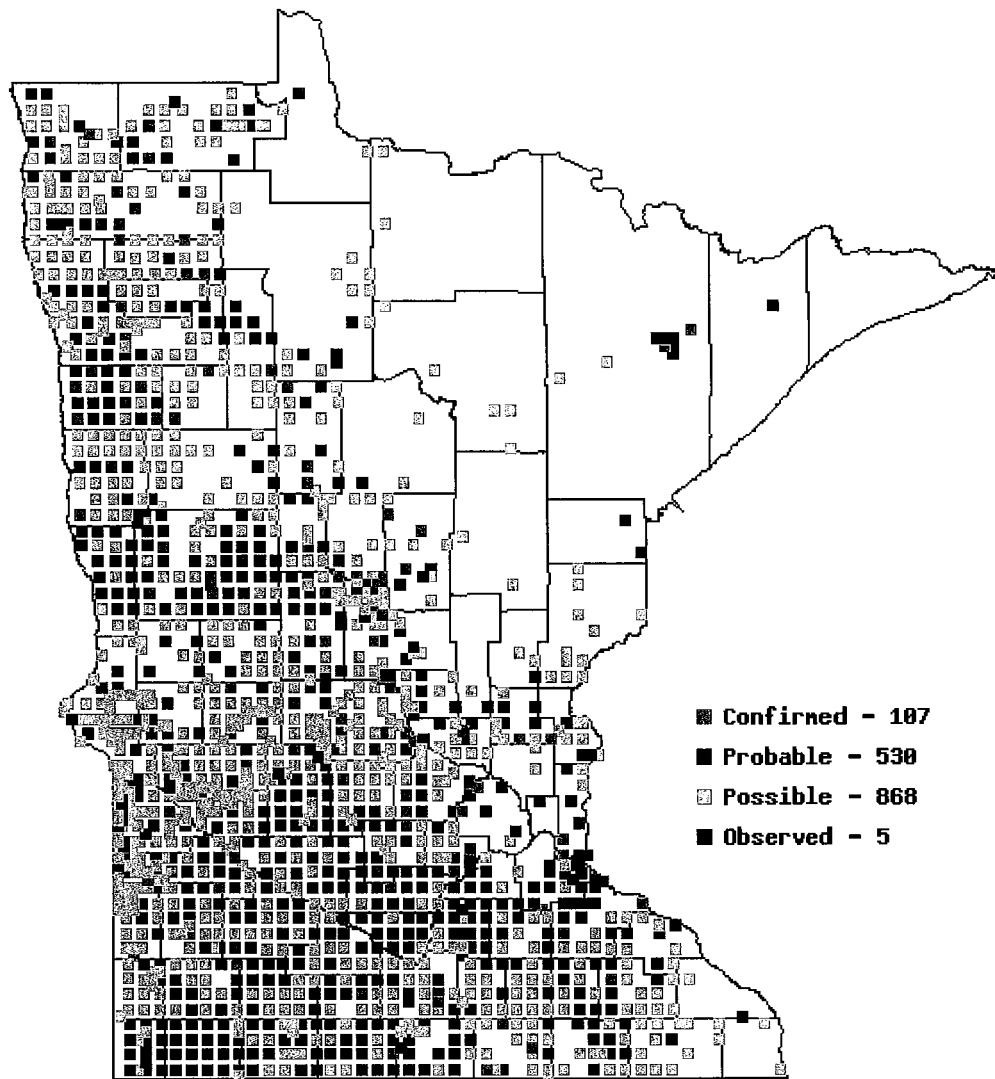


Figure 2. Distribution of Vesper Sparrows in Minnesota. Source: Minnesota Breeding Bird Atlas, [www.mnbba.org](http://www.mnbba.org) accessed 3 October 2013. This species had the highest chi-square test value among species whose distribution is impacted by urbanization. Note: in our evaluation of presence-absence, we treated “observed” records as “absence,” since the observer did not consider the sighting to be evidence of breeding.

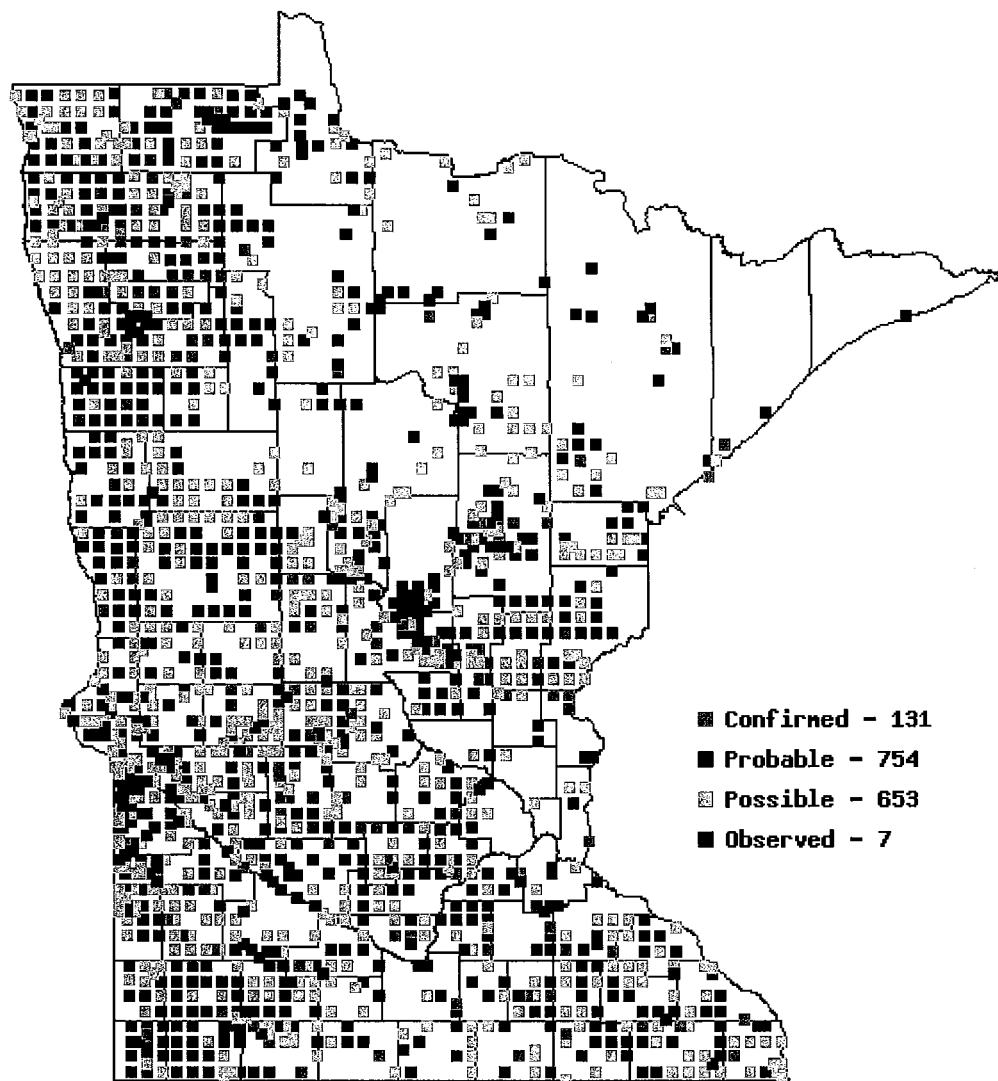


Figure 3. Distribution of Bobolinks in Minnesota. Source: Minnesota Breeding Bird Atlas, [www.mnbba.org](http://www.mnbba.org) accessed 3 October 2013. This is an example of a species with weaker visual evidence of impacts from urbanization, but one with a significant chi—square test value. Visual evidence was considered weak due to gaps in distribution in Sherburne, Isanti, and Chisago counties. Note: in our evaluation of presence—absence, we treated “observed” records as “absence,” since the observer did not consider the sighting to be evidence of breeding.



From: michaeljohntracy@gmail.com  
Sent: Friday, April 25, 2014 10:26 AM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Thank you for making equity a key priority, but please set stronger goals so that planning and investment for transportation and housing do reduce poverty in our region.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Sincerely,

Michael Tracy  
1528 4th St NE  
Minneapolis, MN 55413-1236

From: [pbrushaber@gmail.com](mailto:pbrushaber@gmail.com) [mailto:[pbrushaber@gmail.com](mailto:pbrushaber@gmail.com)]  
Sent: Monday, April 28, 2014 12:46 PM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Thank you for making equity a key priority, but please set stronger goals so that planning and investment for transportation and housing do reduce poverty in our region.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Sincerely,

Pam Brushaber  
5953 Penn Ave S  
Minneapolis, MN 55419-2030

May 6, 2014

Susan Haigh

Metropolitan Council

St. Paul, Minnesota

Dear Chair Haigh,

For 15 years I've been tracking a rapidly changing and evolving climate in Minnesota, and reporting to the public about the trends. We are, in fact, entering a new normal, and climate volatility has gone from theory to reality. We're seeing the impacts in a myriad of ways, from higher summer dew points to erratic winters and a longer freeze-thaw cycle in the spring. Summer rains are falling with greater intensity. The Minnesota State Climate Office reports four separate Thousand Year flash floods in Minnesota, just since 2004. In addition to an increase in the frequency of jaw-dropping weather, we're seeing more swings from drought to flood, what many have dubbed "weather whiplash". The latest National Climate Assessment released May 6 confirms what scientists have been telling us for some time: this isn't your grandfather's weather anymore.

Although there is certainly reason for concern, there are steps Minnesota can and must take to increase the resilience of our infrastructure, to make our communities as weather-resistant as possible. Data from the University of Minnesota shows our state has already warmed 3 degrees F. since the early 1800s; more warming is in the pipeline, and the visible manifestations of that warming will be even more extremes; more numerous and frequent swings in temperature and moisture. We need to be ready. Smart growth and economic success will require new strategies that factor a more volatile climate. What worked in 1940 certainly won't work in 2040.

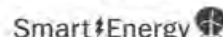
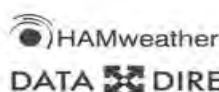
The Thrive MSP 2040 plan does, in fact, call for "building in resilience" to land use and regional developing, with the goal of promoting "sensitive land use and development patterns to achieve Minnesota's adopted greenhouse gas emissions goals at a regional scale." The time for promotion has passed. It's time for action. I would suggest the Council's role might be one of coordinating the region's achievement of greenhouse gas emission goals adopted by the State in 2007. Specifically, the role described for the Metropolitan Council and the communities in the region, as outlined on pages 83-84, require further strengthening if we are to successfully address this fundamental shift and tackle one of the most complex, all-encompassing issues of our time.

Minnesota has a long, rich history of being progressive, enlightened, and on the cutting edge of change. Climate change touches all aspects of our communities, from public health and transportation to infrastructure, storm readiness, building codes and insurance. Future generations will judge us on our willingness to acknowledge the science, respect the trends we're seeing in the data, and rise to the occasion with thoughtful, effective policy.

Thank you for the opportunity to comment on the Thrive 2014 plan.

Paul Douglas

Senior Meteorologist, Media Logic Group



**From:** PIERRE [pmacgillis@hotmail.com]  
**Sent:** Wednesday, April 23, 2014 11:26 AM  
**To:** PublicInfo  
**Subject:** Please forward Public Comment regarding Growth Forecast

I believe that the Met Council's 30-year growth forecast is not taking enough consideration into the role of oil and gas prices over the next 30 years. Oil and gas prices are not going down. Demand for oil worldwide is only increasing and very few new substantial sources of oil are being discovered. The idea of expansion into the exurbs is predicated on the availability of relatively cheap gasoline. This is not a likely outcome for the next 10, much less the next 30 years.

I believe that more resources should be devoted to the urban cores of St. Paul and Minneapolis rather than places utterly dependent on cheap oil.

Thank you,

PJ MacGillis

From: Raymondtb@q.com  
Sent: Thursday, April 24, 2014 9:31 PM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Sincerely,

Raymond Bissonnette  
143 DAHLIA ST  
Saint Paul, MN 55115-1612

**From:** Rnymoen [<mailto:rnymoen@aol.com>]  
**Sent:** Friday, April 25, 2014 3:31 PM  
**To:** PublicInfo; Rummel, Sandy  
**Cc:** [lnegstad@isaiahmn.org](mailto:lnegstad@isaiahmn.org)  
**Subject:** MSP 2040

Councilmember Rummel and Met Council staff,

For MSP 2040, racial equity is paramount because with 43% of the region expected to be people of color by 2040, we cannot hope to achieve livability, sustainability or prosperity without equity being prioritized. Reinvesting in core cities and inner ring suburbs must also be a top priority but the current draft plan does not represent a significant departure from the status quo. We cannot continue to subsidize sprawl and the expense of our urban core. We also must grow our transit system, and it must effectively serve those who depend on it. We are all in this together, but we are not all starting from the same point. We must recognize how people are situated, and prioritize investment in those communities that have been systematically cut off from opportunity. Achieving this vision of a strong, equitable region requires bold leadership from the Met Council. Thanks for your consideration.

Rich Nymoen  
768 Eldridge Avenue E.  
Maplewood, MN 55117

**From:** Rick Harrison [<mailto:rharrison@rhsdplanning.com>]

**Sent:** Monday, April 21, 2014 7:08 AM

**To:** Thamman, Freya; Torres, Angela; Larson, Michael; Barajas, Lisa; Boylan, Patrick; Haigh, Susan; Rodriguez, Katie; Schreiber, Lona; Munt, Jennifer; Vaneyll, Gary; Elkins, Steve; Brimeyer, James; Cunningham, Gary; Duininck, Adam; Reynoso, Edward; McCarthy, Marie; Rummel, Sandy; Melander, Harry; Kramer, Richard; Commers, Jon; Chavez, Steven; Wulff, Wendy

**Subject:** Comments and warnings on the 2040 Plan

Dear Met Council representatives:

Tomorrow morning I've been invited to a round table on the 2040 plan. In reading this plan I feel there is being made a number of terrible decisions, and of course, a number of good decisions too.

First – who am I to comment? I own the world's only land planning firm that has brought entirely new methods (models of development and home design) and technologies to the land development field - for the past ¼ century. Your 2040 plan seems to assume more of the same patterns of the past for 2040, whereas that is simply not true. With Short Elliott & Hendrickson's (the largest consulting firm in Minnesota) commitment to invest in new technology and training in new design models, and our growth plans we have in the next two years as we build national partnerships with the leading consulting firms, to blanket this nation with a new era of sustainable growth. We hope the innovations in become standards, not just in design but also in regulations. Working alone, and with no political ties or outside investment, our small firm has planned 900 developments in 46 States and 18 countries – this is considerably larger than the number of developments claimed by the Congress of New Urbanism.

The following video link (best opened using quick-time, or Chrome) will give you an insight as why the regulations of the past century, and technology developed the past four decades, have fostered unsustainable growth, and what is being done to overcome these roadblocks:

[www.rhsdplanning.com/Prefurbia2014.mp4](http://www.rhsdplanning.com/Prefurbia2014.mp4)

The density goals of the MET Council 2040 plan are both unrealistic and in my opinion as someone who has designed much of the past growth of this region, disturbing. The past efforts to fix this area in projects like Clover Ridge, the Ramsey Town Center, and in urban examples like the Excelsior & Grand or even the new West End failed to reach objectives. The commercial in Clover Ridge is not the restaurants and coffee shops promised, but instead either empty or used clothing... so residents must still get in their cars. The alley-laden section of that project is still half vacant, and the newest housing is at best terrible vinyl sided abstractions of what should have been, but nothing like the quality of Liberty on the Lake construction, landscaping and architecture which was likely the 'vision' of those approving the development. The Ramsey Town Center is mostly vacant with commercial that has little exposure and far too little parking should the business be successful someday. The residential is hangar-row design with people overlooking insignificant green-space or worse, seas of

asphalt. Again, not quite the picture of the artists renderings. The urban gentrified promise of Excelsior and Grand? All the restaurants are gone except McCoys! Even Panera Bread could not survive! West End retail mostly remains vacant after almost 5 years, and those that have leased have demonstrated quite a bit of turn-over. Yes, the restaurants are wildly successful, but so much so that just last Friday evening when we went to a movie, the only parking space was on the roof of a ramp of the building next door to the main center! None of these are successful, none sustainable, yet seem to be the model for the 2040 plan.

There are far better solutions... please take a few minutes of your time to discover just a few pioneering innovations **that came from this area** that are now benefitting families worldwide.

I'm far too busy creating new sustainable developments worldwide and growing the technology side of my business to be heavily involved in the 2040 plan, but will make time both today and tomorrow to educate Wendell Cox before he speaks tomorrow, and be involved in the Round Table. If after reviewing the video link, see some interest and want some counter-points and suggestions, I can try to make the time.

Rick Harrison

Rick Harrison Site Design  
Studio



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**From:** rod wolff [<mailto:rodwolff@mchsi.com>]  
**Sent:** Monday, April 28, 2014 3:40 PM  
**To:** PublicInfo  
**Subject:** ThriveMSP2040 Comments & Feedback

After reviewing the ThriveMSP2040 Draft, there is:

1. Too much emphasis on LRT and other forced mass transit options which most people don't want (and which always cost too much, are never used by a large number of people, never built on time, always over budget, never have enough ridership, never meet initial rider projections, always need subsidies, never pay for themselves even though they are frequently projected to be self-funding after a few years, are NEVER used by most metro people, always take funds away from more worthy transportation projects).
2. Not enough emphasis on more traditional transportation projects which are both desired and used by the vast majority of metro population (accommodate more cars and buses, improve existing roads and bridges by adding more lanes).
3. Too much emphasis on increasing housing density in the suburbs, which no one except the MET Council wants.
4. Too much emphasis on guaranteeing equal outcomes for all, rather than guaranteeing equal opportunity for all. There's a big difference between these 2 guarantees.
5. Too much emphasis on "fairness" and redistribution of income (see #4.).
6. Too much emphasis on the narrow concerns of extreme environmentalists.

Scott Halstead  
3271 Woodbridge Street  
Shoreview, MN 55126-3067  
651/486-9861  
snhalstead@gmail.com

Governor Mark Dayton  
130 State Capitol  
75 Rev. Martin Luther King Jr. Blvd.  
St. Paul, MN 55155

Honorable Governor Mark Dayton;

Katherine Kersten had an interesting article in the Sunday (April 13<sup>th</sup>) Opinion Page titled "The Met. Council will burden you now". She stated her opinion on the top-down controls approach the unelected Met Council planned to apply upon us with high density housing and mass transit plan as stated in their new 30 year comprehensive plan "Thrive MSP 2040". According to the Metropolitan Council website; the first phase of outreach involved four different components:

- Grass-roots community-based conversations to engage under-represented communities
- Organization-sponsored events
- Council member-sponsored listening sessions
- Council online idea-gathering site

Through these efforts, more than 1,100 people have participated, attending one or more of about 50 community meetings or submitting an idea online. I was not able to find any information where the conventional media was utilized to publicize participation in the planning phase or that businesses were sought out. In comparison, the city of Vancouver, Canada engaged more than 19,000 citizens in their truly comprehensive plan.

The Metropolitan Council developed the "Thrive MSP 2040" comprehensive plan without seeking extensive input of the citizens of the Metro area. There are 2.9 million residents, thousands of businesses employing more than 1.5 million people and many governments. Where were the public announcements in the traditional media? Did they utilize a widespread survey to obtain input? Upon reading the Metropolitan Council Website documents, and checking with my city Council, there appears to be a lack opportunities for input by the vast majority and the draft report reflects the lack of broad participation.

Minnesota State Statute 2013 473.446 Transit Tax Levy is levied on all taxable property in the Metro transit-taxing district without the citizens of the metro area having a vote for a representative. The entire regions needs are not being considered and a small area is receiving the majority of LRT projects without considering highway congestion, total financial resources and extension and connection to transit. The Metropolitan Council has not set and maintained transit project priorities. The Metropolitan Council has a record of ineffective, high cost LRT (\$1.784 billion for 21 miles) of slow service that functions as a bus replacement, rather than rapid transit that would benefit a much larger segment of the metro area. Compare our LRT to the Vancouver, B.C. SkyTrain, automated light rapid transit system, which provides fast, (average 28 mph) efficient service between downtown Vancouver and the suburbs and provide nearly 400,000 rides daily on 42 miles of grade separated line. A Green Line ride from Target field to Union Station would take 23 minutes instead of 45 at 28 mph. Slow, high cost and increased congestion doesn't seem like a very good transit strategy.

It is time to stop the Thrive 2040 MSP planning process, dismiss the Metropolitan Council and elect a representative council that reflects the total population, business and government including a few by the Governor and Legislature based upon qualifications to perform the functions. There must be frequent conventional media and broad participation in surveys and planning throughout the region. It is past time to have a vision that is followed without regard to changes in Minnesota political leadership. Refer to the Legislative Auditor's comments/recommendations including the lack of an agreed-upon vision and priorities for transit in the regions report dated Jan. 2011 at [www.auditor.leg.state.mn.us/ped/pedrep/transit](http://www.auditor.leg.state.mn.us/ped/pedrep/transit) on Governance of Transit in the Twin Cities.

Sincerely.

Scott W. Halstead

CC: Metropolitan Council

CC: State Senator Bev Scalze

CC: State Representative Jason Issacson

1 Attachment

**Attachment - Thrive 2040 MSP**

From Scott Halstead

3271 Woodbridge Street

Shoreview, Minnesota 55126

snalstead@gmail.com

**Rail Transit**

The focus of the Blue Line and Green Line LRT projects has been on providing bus replacement service in the corridors with very high initial costs, high and increasing operating and maintenance costs, high ridership and transit oriented development (housing) with minimal congestion relief on the highway system and nominal new riders/revenue. The North Star Line Commuter Rail has been financial disaster with very high initial costs, operational costs, very low ridership and undependable service on the busiest rail line in Minnesota. As stated later by the Minnesota Legislative Auditor, "the governance structure for transit in the region is far from ideal." More than 25 organizations are involved with transit planning, development, or operations in the Twin Cities region and, in some cases, their relationships are strained by overlapping responsibilities and distrust. Additionally, the lack of an agreed-upon vision and priorities for transit in the region has contributed to the transit governance challenge. The current situation has resulted in large part from the Metropolitan Council's lack of credibility among elected officials and other regional stakeholders". Unfortunately, in regards to transit, the burden has been in the past, is now and extends far into the future.

The Twin Cities has changed greatly since World War 11. Since 1950, the Twin Cities metro area population has grown from 1,151,053 to approximately 2.9 million. In 1950, around 75% of the residents lived in Minneapolis and St. Paul. Now, 67% live in the suburbs and 28% in the central cities. The suburbs have 76.6% of the jobs and the central cities have 23,4%.

The Twin Cities metro area is very difficult place to

operate a cost effective widespread transit system.

- Two large rivers (one with a wide expanse of unbuildable land, many lakes and many parks
- Suburbs with large residential lots, low population density, road systems not conducive to transit, automobile dependent, uncontrolled residential and business development, plentiful and lower cost land big box retailing and small shopping centers
- Communities and counties not focused on regionalism, increasing highway congestion
- Inadequate and undependable financing.
- Employment with a single employer is a thing of the past. Most families are dual income.
- The central cities population and employment have declined. Land availability is limited and very expensive.

The Metropolitan Council annually publishes transit ridership. Metropolitan Transit ridership has grown from 65,956,000 in 2003 to 81.4 million in 2013 with the addition of the Blue Line (Hiawatha) LRT. Wow, isn't that great!! Well, think again! The Minnesota Streetcar Museum website reports that transit ridership peaked at 238 million in 1920. It declined in the depression and World War 11 and rebounded to 201 million in 1946. In 1949, 36% of all trips in the metro area were made on transit, compared to less than 5% today. Following World War 11, there was tremendous expansion of the Twin Cities metro area. The streetcar system ceased to exist. The private bus system became dysfunctional. The automobile became the transportation method of choice, and transit ridership fell off the cliff. Perhaps instead of the term "grown", "slowly recovering" is more accurate.

The private bus system was sold to Metropolitan Transit System, an operational arm of the unelected Metropolitan Council. Several large suburbs went to the Minnesota Legislature, which allowed them to "OPT-OUT" from Met. Transit and they established their own bus systems. Managing Transit has proven to be very difficult with so many players, changing rules, changing leadership, inadequate financing, nobody in charge, failure to establish and adopt transit policies based upon sound

transit strategy, current and future transit needs of the region not adequately taken into account, inadequate funds for operations and maintenance, inflated performance projections new jobs. The U.S. Department of Transportation changes grant evaluation criteria often when a different President is elected. Different Governors have policies, which change the support for transit and Metropolitan Government. Lack of consistency at the National and State level is a major problem for Metropolitan Government.

The Metropolitan Council established the following vision for transit; "To fuel economic growth, meet the demands of a growing and changing population, and compete successfully in the global economy. The Council's goal was to double transit ridership from 2003 levels by 2030". We have both financial and management issues at the State, Metropolitan, County and local level that need to be promptly resolved. The legislative auditor certainly has provided some guidance. However, a more thorough analysis of the roles, responsibilities and authority of the various levels should be made to include and coincide with other very successful systems. We have a lot of experienced public policy proponents that should be able to provide guidance.

We certainly don't have a 21<sup>st</sup> century bus and rail system; Large portions of the metro area totally lack transit service and many others have very limited service that can't be depended upon by commuters. Many central cities residents lack the qualifications for the professional and technical jobs in the central cities, but the transit system does not extend to the suburbs where they can earn an income based upon their knowledge, skills and abilities. The LRT and Commuter rail system serves a very small portion of the metro area, and the bus system is not wide-ranging.

How does the Blue Line (Hiawatha LRT) meet the 21<sup>st</sup> Century standard?

Good:

- Good route connecting downtown Minneapolis, Veterans Administration Hospital, Ft. Snelling, airport and the Mall of America.
- Effective use of tunneling, bridging, park and rides,

bus and LRT coordination.

- Transit oriented development; high density housing has been constructed throughout the corridor to replace the housing that was in the corridor prior to the project.

How **doesn't** the Blue Line (Hiawatha LRT) meet the 21<sup>st</sup> Century standard?

- New Jobs - From 2000 - 2012, Minneapolis lost 21,000 jobs and Bloomington 17,000 jobs.
- Operates as a bus replacement transit system
- Slow (41 minutes to travel 12 miles (approximately 18MPH)
- Rider time savings: Express buses from the suburbs south of the Minnesota River are faster than Blue Line service from the Mall of America. Limited stop buses from south Minneapolis are a little slower than the Blue Line LRT.
- Excessive number of stations, (19) slows operation; 46<sup>th</sup> street station and 50<sup>th</sup> street station are only 4 blocks apart
- High excessive construction costs; \$827.1 million for 11.8 miles
- Creates congestion and safety problems; Traffic signal mismanagement on Hiawatha Avenue unnecessarily delays vehicle traffic on HWY 55 wasting time and fuel and reducing air quality.
- High congestion with pedestrians and vehicles in downtown Minneapolis with rail operating in center of the street in downtown business district.
- Missed opportunity to connect at the skyway level. An elevated LRT line which would have reduced total travel time by approximately 5 minutes for both the Blue Line and the Green Line, allowed for increasing the frequency of trains without expensive extension of stations and acquisition of light rail vehicles. Safety and air quality would be improved as well as traffic flow and reduced consumption of fuel.
- Fare system/revenue that doesn't account for any of the \$827 million dollar investment including park and ride ramps and lots, premium service and high

operating and maintenance costs.

- High construction, operation and maintenance costs. Slow speed results in additional light rail vehicles (LRV's) and larger maintenance facilities. High ridership necessitated almost immediate modification to lengthen each rail station because the initial design did not have any flexibility for increases in capacity. Because of the slow speed, more operators, maintenance personnel and support staff are needed as well as increasing the frequency and quantity of buses feeding the LRT system. Transit riders and vehicles in the corridor are losing time every day because of the slow speed, numerous crossings, traveling in the center of a busy downtown street. Financially, Met Transit was not able to charge Express Fare, because they are not providing express level service.
- Extension of the Blue Line and connection to other transit is less attractive; lengthy travel times will reduce ridership as the system expands. Potential riders are more likely to continue driving, increasing congestion on the overloaded road system.

The Green Line (Central Corridor) has the same attributes as the Blue Line

Professional services were very high; (primarily various phases of study and design totaled \$190.9 million. It was very costly to inspect and design supporting the Washington Avenue bridge over the Mississippi River which needed additional support, traveling on Washington Avenue in the midst of high tech precision instruments at the University of Minnesota and going down the center of University Avenue necessitating upgrading of underground infrastructure, controlling traffic signals and then going adjacent to public radio's operation.

- Slow speed (approximately 45 minutes to travel 11 miles (less than 15 miles per hour substantially increases the number of light rail vehicles at \$3.3 million each, \$10 million per 3 LRV per train and more operators and larger maintenance facilities. With time for changing directions 30 - 36 LRV will be needed per hour. Using
- Duplicate transit services; some of the I-94 express



buses will continue as they save riders 10 -15 minutes each way. Also, Route 16 buses will continue on University Avenue picking up and dropping off customers between stations.

- Estimated ridership is 40,000 per day by 2030. The existing bus service provides around 25,000 rides per day. The addition and extension of connecting routes will increase ridership, but may also adversely affect ridership on other routes. New housing development will provide new riders. If increased ridership projections have been.
- Extension of the line to the east or other locations may not be very successful because of the lengthy commute through St. Paul unless riders destination is downtown St. Paul.
- Congestion relief on I-94 will be zero.
- Elimination of lanes on University Avenue will increase congestion.
- Prioritization of LRT through control of traffic signals will increase congestion, waste time and fuel and worsen air quality.
- Honking the horn and the dinging the bell at every intersection is going a major nuisance to nearby residents especially if it operates all night.

The North Star commuter rail line is and has always been a financial and operational disaster. \$347.8 million to construct stations and parking facilities and acquire used trains. Only approx. 700,000 riders per year, with discounted fares, operating costs of \$18.7 million and fares totaling \$2.5 million. It utilizes the busiest rail lines in the State of Minnesota. Freight trains are in hold several hours each morning and afternoon increasing the freight costs to everyone. Freight trains caused delays and cancellation of North Star operations numerous times during the severe weather this winter. The delays caused by the North Star train are in all likelihood contributing to the delays of agriculture crops from North

Dakota to destinations and fertilizers getting to the growers, The benefits are few and the costs very high. The North Star Line removes very few vehicles from the highways. It is the height of inefficiency in transit. Now is the time to close down the North Star line and replace it with buses. It is my understanding that the Minnesota Department of Transportation was the lead organization for the North Star Line.

Based upon the Blue Line and Green Line not providing effective transit to the metro area and the Minnesota Department of Transportation establishing the North Star Line, it is very apparent that both the Minnesota Department of Transportation and the Metropolitan Council lack talent, skills and ability to effectively manage rail transit

Transportation 2040 for the City of Vancouver, B.C. set the following criteria for their comprehensive plan.

Great transit is: **Fast** – competing favorably with driving over long distances, **Frequent** – with minimal wait times and long service hours, providing the freedom to travel at any time, **Reliable** – with predictable travel times that people can trust, **Accessible** – usable by everyone, including people with mobility, visual, hearing, and cognitive impairments, **Comfortable** – with the capacity to meet demand and allow travel with dignity and **Complete** – linking key destinations throughout the region, with convenient and attractive connections between lines.

The suburbs are the economic engine powering and steering the economy of the metro area and Minnesota. While we each live in one community, many of us work and conduct activities throughout the metro area. The most thriving communities invest in economic development with various financial tools. Controls have been established for fairness throughout the metro area. Those investments are instrumental in businesses creating new jobs to boost the community, region and states economy. We should not establish unnecessary regulations that harm the economic vitality of the region. The Metropolitan Councils data reflects from 2000 - 2012 the leading job gainers include Maple Grove, 13,000 jobs; Eagan, 6,300; Richfield, 5,800; Shakopee, 5,200; Woodbury, 4,400; Golden Valley, 3,600;

Lakeville, 3,500; and Blaine, 3,000. The major job losers over the same period: Minneapolis, 21,000 jobs; Bloomington, 17,000, and St. Paul, 13,000. How are central cities downtowns going to make large increases in employment with very high cost land, slow LRT transit which increases congestion? How are the central cities going to attract families with school systems and infrastructure in dire needs?

Private enterprises need **access to the global economy through** highway interchanges, railroads, intermodal freight terminals (train to truck), airports, and river ports to connect our region to regional, national and global markets. 70 percent of the region's jobs are within 1 2 mile of a major highway; 28 percent are within 1 2 mile of existing or under construction transit-ways. Unless \$ start flying out of the sky without strings, we can't afford to invest large sums of transit funds in housing unless we get very effective fast transit that connect employees to employers throughout the metro area.

#### **Citizens League report to the legislature to establish the Metropolitan Council**

The following is a brief summary of a Citizen League Report provided recommending that the 1967 legislature, establish a Metropolitan Council for solving metro-wide problems by a coordinated approach.

The metro-wide problems that needed a coordinated for solving included establishment of area-wide parks and open space system, a metropolitan zoo, adequate refuse disposal facilities, control of Dutch elm disease and similar types of blight, and air pollution control, and would have coordinating responsibility over airports, highway construction and watershed districts. In addition, the Metropolitan Council would take over the functions of the Metropolitan Planning Commission, Mosquito Control District, Metropolitan Transit Commission and Minneapolis-St. Paul Sanitary District.

The Citizen's League recommended that the 1967 Legislature create a Metropolitan Council, directly elected by popular vote of the people, to solve the pressing area wide

governmental problems of the Twin Cities area in a coordinated manner. The Council would be responsible only for those area wide functions and services which cannot be handled adequately by municipalities and counties and which are specifically assigned to the Council by the Legislature. The Council would not have any broad "home rule" type grant of authority.

One member of the Metropolitan Council would be elected from each state senatorial district in the seven-county area, making a total membership of 29 to 31 members to serve a four-year term. The Council chairman would be appointed by a majority vote of Council members. They would be fulltime and be the Council's chief executive officer and spokesman. They would preside at Council meetings, but not have the right to vote or veto Council actions.

The Council would be empowered to impose fees, fares and other charges, which would be its primary sources of revenue, until a new source of general taxation is found, the Council would be allowed a small property tax levy to finance the balance of its operations. The elected officials didn't establish the Metropolitan Council as recommended and that has been a significant problem.

According to Wikipedia, The **Metropolitan Council** is the regional governmental agency and metropolitan planning organization in Minnesota serving the Twin Cities seven-county metropolitan area. The Metropolitan Council is granted regional authority powers in state statutes by the Minnesota Legislature. These powers can supersede decisions and actions of local governments. The legislature entrusts the Council to maintain public services and oversee growth of the state's largest metro area.

The Council's role in the Twin Cities metro area is defined by the necessary regional services it provides and manages. These include public transportation, wastewater treatment, regional planning, urban planning for municipalities, forecasting population growth, ensuring adequate affordable housing, maintaining a regional park and trails system, and "provides a framework for regional systems including aviation, transportation, parks and open space, water quality and water management.

The Met Council currently has 17 members, 16 of which represent a geographic district in the seven-county area with one chair who serves "at large." All members are appointed by the Governor of Minnesota and are reappointed with each new governor in office. The Minnesota Senate may confirm or reject each appointment. The Council delivers regional services to communities and the public through these divisions and operating areas:

- Regional Administration/Chair's Office - Generally sets the goals, direction, financial management, budgeting, shared funding and grant programs.
- Community Development - The majority of land use, regional, urban, and long range vision plans.
- Transportation - This division is known as Metro Transit to the public and administers all bus and light rail lines, analyzes and develops future transportation options. Local roads and street planning is left to county and city governments. Highways are planned and managed by the Minnesota Department of Transportation
- Environmental Services - MCES is mandated to address water quality, water supply, and sewage treatment. It also has full jurisdiction of the wastewater treatment system (within the MUSA boundary). Treatment of drinking water and storm run-off water management are left to municipalities.
- Municipal Urban Service Area (MUSA) - While not a division, the MUSA is an urban growth boundary. They limit the services and infrastructure needed for development. Growth is controlled because state law prohibits disastrous septic tank systems and most cities require development to be connected to a system.

**THE LEGISLATIVE AUDIT Commission 2011 report of transit in the metro area.**

**State Auditor James Noble's cover letter states " the governance structure for transit in the region is far from ideal." More than 25 organizations are involved with transit planning, development, or operations in the Twin Cities region and, in some cases, their relationships are strained by overlapping responsibilities and distrust.**

Additionally, the lack of an agreed-upon vision and priorities for transit in the region has contributed to the transit governance challenges.

The current situation has resulted in large part from the Metropolitan Council's lack of credibility among elected officials and other regional stakeholders. Therefore, the first step toward reform should be to address the composition of the Metropolitan Council. While several approaches are possible, they recommend a Council with a mix of gubernatorial appointees and elected officials from the region.

The Legislative Audit Commission made the following recommendations to the legislature. The recommendations and references to the applicable report pages:

- ▪ The Legislature should restructure the governance of the Metropolitan Council. (Pp. 41-49)
- ▪ Although several governance structures have merit, we recommend the Legislature follow Option 2, which calls for a mix of appointed and elected Council members serving staggered terms. (pp. 41-49)
- ▪ Separating Metro Transit and the Metropolitan Council would provide some benefits but would also likely present drawbacks. Given the current structure, Metro Transit and the Council should not be separated. (p. 50)
- ▪ Given the current structure of the Metropolitan Council and the taxing authority of the Counties Transit Improvement Board (CTIB), CTIB should not be eliminated. (p. 51)
- ▪ Given federal requirements and the current structure of the Metropolitan Council, the Transportation Advisory Board should not be eliminated. (pp. 51-52)
- ▪ The suburban transit providers should not be eliminated, although there are opportunities for consolidation. (p. 52)
- ▪ The Legislature should amend *Minnesota Statutes* 279B.09 to explicitly give the Metropolitan Council authority to allocate the supplemental Motor Vehicle Sales Tax revenue in the Twin Cities region. (p. 73)

- ▪   The Metropolitan Council should allocate supplemental Motor Vehicle Sales Tax revenue based on the needs of the region. (pp. 73-74)
- ▪   The Legislature should amend *Minnesota Statutes* 473.446. 2, to extend the transit taxing district so that all communities under the Metropolitan Council's jurisdiction are included in the transit-taxing district. (p. 74)
- ▪   Smaller city-run suburban transit providers should consider consolidating. Those suburban providers that remain should work collaboratively with the Metropolitan Council to improve bus transit service in the region. (pp. 74 75)
- .   (pp. 91-92)
- ▪   The Metropolitan Council should only incorporate into the region's Transportation Policy Plan those transit-ways that are at or near the top of the region's transit priority list. (pp. 92-93)
- Minnesota Legislature should repeal *Laws of Minnesota* 2002, chapter 393, sec. 85, and allow consideration of the Dan Patch corridor. (p. 93)

The Legislature should designate in law the Metropolitan Council as the federal grantee and constructor of New Starts transit-way projects in the region. (pp. 93-94)

The Legislature should not commit capital funds to a transit-way development project without ensuring that operating revenues for the first five to ten years have been identified. (p. 94)

The Legislature should clarify the goals and priorities of transit in the Twin Cities region. (p. 122)

The Metropolitan Council should work with stakeholders to adopt a set of measures that examine the performance of the transit system as a whole, according to the goals outlined in statute. (p. 123)

The transit providers in the region should work with the Metropolitan Council to identify such measures and ensure that data are comparable across the providers in the region. (p. 123)

## EVALUATION REPORT

### Governance of Transit in the Twin Cities Region

JANUARY 2011

The Minnesota State Auditor report

The region depends on local initiatives to move transit projects forward, in part because there are no agreed-upon region-wide criteria for prioritizing potential transit-ways.

#### Transit way Planning Challenges

As discussed above, several entities are involved in planning transit-ways in the region, including local communities, counties, the Met Council, and the FTA. As a result, we found that:

- The process for planning transit ways in the Twin Cities region is fragmented.

Counties and local stakeholders, through the alternatives analysis process, develop transit ways. Many stakeholders with whom we met, including Met Council staff, Metro Transit staff, and county commissioners, said the region depends on local initiatives to move transit projects forward. There is broad acknowledgement that these local efforts are important for gaining support for transit projects in the region. However, the local efforts are based on local, and not necessarily regional, priorities. As noted earlier, the Met Council, which is the only transit agency with region-wide responsibilities in the Twin Cities, officially becomes involved in the development of a transit-way only once the local stakeholders have recommended the locally preferred alternative to the Met Council and the Council, into the Transportation Policy Plan, adopts the transit-way.

Other metropolitan areas have set priorities for transit-way development.



Beginning in 2001, the Met Council conducted an analysis of 29 proposed transit-way corridors and identified which corridors could support LRT or BRT. In 2004, the Council grouped the corridors into "Tier 1" and "Tier 2" projects, based on readiness and geographic distribution. Most of the Tier 1 corridors have been developed or are under development, including Hiawatha LRT, North Star commuter rail, Central Corridor LRT, and BRT on I-35W South and Cedar Avenue. However, the Council did not prioritize one transit-way before another, nor did the Council identify what criteria should be used to prioritize the transit-ways. In fact, Bottineau Boulevard, identified in 2004 as a Tier 1 corridor, is further behind in the development process than Southwest Corridor, which was identified as a Tier 2 transit-way. **The region depends on local initiatives to move transit projects forward, in part because there are no agreed-upon region-wide criteria for prioritizing potential transit-ways.**

In 2008, the Met Council published the 2030 Transit Master Study, an updated study of potential transit-ways that evaluated potential corridors on the basis of ridership and cost. In this study, the Council recommended some transit-way corridors for additional development or study, including Bottineau Boulevard, Southwest Corridor, I-35W North, I-94 East (Gateway Corridor), and Rush Line Corridor. However, the Council did not recommend which transit-way should be developed next. Several transit-ways, including Bottineau Boulevard and the Gateway, Red Rock, Robert Street, and Rush Line corridors, are moving forward with the alternatives analysis process. There is widespread belief among people we interviewed that the next transit-way developed will be the one that is next to complete the alternatives analysis process, not necessarily the one that will most benefit the region. This is in part based on how the development of transit in the region has occurred in the past, and in part because there are no agreed-upon region-wide criteria for prioritizing potential transit-ways.

In contrast to the Twin Cities region's approach, other metropolitan areas have taken a broader view towards developing transit systems. The Regional Transportation District of Denver prioritized a set of transit-way corridors to build a comprehensive regional transit system.

Through its process, Denver's Regional Transportation District identified an order for building the transit-ways through 2018. Similarly, the Utah Transit Authority, with the aid of a voter-approved sales tax, accelerated the construction of five additional rail projects in the region to develop a comprehensive regional transit system. Originally planned to be completed by 2030, these five rail transit-ways are now scheduled to be completed by 2015.

**Whether funding is available to build a transit-way may not relate to whether funding is available to operate the transit way.**

For example, the FTA typically provides funding for 50 percent of the capital costs of a transit way, but it does not provide funding for the transit way's ongoing operations. Similarly, county regional railroad authorities may, by law, provide up to 10 percent of the capital costs of a light rail or commuter rail transit way in the region, but Minnesota law prohibits them from contributing "any funds to pay the operating and maintenance costs for a light rail transit or commuter rail project.

Given the region's scarce transit operating resources and unpredictable revenue sources (as discussed in Chapter 1), the Met Council and other regional transit providers will need to prioritize services. Transit way projects may or may not be a priority for the region. If the transit ways are constructed, however, there will be increased pressure on the Met Council to fund their operations even though there may be other regional transit priorities, such as improving bus service throughout the region.

The strategy of the Metropolitan Area Transit planners is questionable. The express bus service between Minneapolis and St. Paul is much faster than the Central Corridor LRT and is comparable to the limited stop service. We are providing LRT rail transit to central cities residents that already have much more convenient bus service. With very high land prices in the downtowns, there is minimal new job development and many of the corridor residents lack the education for the jobs in the downtowns. Constructing higher cost housing will further harm the existing residents. The LRT lines don't get these residents to jobs where they can earn a living wage. Relatively few

commuters have changed from driving to transit and the slow LRT transit times isn't going to be attractive suburban commuters in the future. Highway congestion and travel times will increase. The very high construction costs and operating and maintenance costs consume vast amounts of the financial resources which leaves nothing for further transit expansion without increasing the financial burden substantially.

Fixed Rail Transit - Minnesota Legislature needs to establish regulations with performance requirements that ensure effective use of mass transit funds.

Some suggested performance factors:

- Transit system is designed to function very well 50+ years into the future
- Speed - average speed 25+ mph end to end
- Easily extendable
- Increased capacity with minimal cost
- Connectivity to other transit
- Reliable
- Provides better transit service than currently available - total time
- High quality service that supports increased prices
- Safe for riders and others in the corridor
- Minimal conflicts with pedestrians and vehicles
- Enforceable contracts when sharing tracks
- Quiet
- Congestion is reduced
- Substantial increase in transit ridership
- Coordinated support system including transit, park and ride facilities, fares and collection, safety, maintenance
- Efficient use of equipment and personnel
- Two way traffic
- Utilizes existing right-of-ways to the maximum practicable extent
- Fares are structured for peak time and distance to keep subsidies minimal. Denver has fares from \$2.25 - \$5.00. When you provide high quality fast service

many people will be attracted to rapid transit and revenue will increase.

- Accessibility to jobs for those that live in the corridor and a viable plan to increase in employment
- Destinations that the public wants and needs
- Transit is a good neighbor
- Duplicative transit in the same or adjacent corridors is minimal.
- Road, Transit and Business development are planned, designed and constructed in a cohesive manner.
- Transit fares are 45%+ of the Total Operating and maintenance costs of the fixed rail/duplicative bus and short route feeder buses.

When the primary funding source is transit, all other factors are secondary.

My analysis of the environmental impact statements and supplements for the Central Corridor disclosed that positive impacts of the project were overstated and negatives issues generally understated. The Hiawatha LRT projected large increases in employment for Minneapolis, Ft. Snelling and Bloomington. According to the most recent Met. Council statistics, employment actually declined approximately 8% in those locations from 2000 to 2010. The Hiawatha and Central Corridor LRT emphasize new housing and employment of minimum wage jobs. Met. Transit reports total transit times less than schedules for Hiawatha LRT. There will be significant congestion with four light rail trains will be in downtown Minneapolis at the same time along with countless buses, vehicles and pedestrians during peak periods.

We have spent more than \$2 billion on our existing rail transit lines. In my personal analysis, we have made poor fixed rail investments, which will not serve us well in the future and will require extremely large subsidies.

Personally, I support fixed rail and other transit in the metro area. I have a business administration degree, was a Transportation Officer in the service and worked in logistics for 34 years. I actively participated in the Central Corridor Project including attending and commenting

at many open houses, testifying at Metropolitan Council meetings on the subject, analyzing bus transit schedules, ridership, proposed performance, problems, meeting directly transit staff, analyzing the environmental impact statement and supplements. I can assure you that the Central Corridor LRT will not come close to matching the performance factors I have listed. The big question is, how are metro area taxpayers going to be convinced to provide increased funding for transit?

Compare our metropolitan rail transit systems to Denver, Vancouver B.C. and Calgary. Denver has a totally different strategy that results in much lower construction costs, more new job development, getting people out of their vehicles and a fare system that is based upon zones. Calgary has a very basic low cost approach that is effective. Vancouver utilizes tunnel and elevated platforms/rail throughout the corridor to achieve vary fast and frequent service and gets a premium fare. Transit systems need to meet the needs, geography and communities desires.

We need leadership at the State level to enact performance requirements that change the Minnesota strategy for transit development in the Twin Cities.

The metropolitan area is and was very fragmented; Counties, cities, townships, school districts, airport commissions, watershed districts and Metropolitan Council to name some. Efficiency, equity and responsibilities that fall outside individual community boundaries need support and management for the benefit of all, became the responsibility of the Metropolitan Council when it was established in 1967.

February 12, 2014

Rail, enhanced bus options recommended for Midtown Corridor

Feb. 12, 2014

MINNEAPOLIS - A study of transit alternatives in the Midtown Corridor recommends a combination of rail in the Midtown Greenway and enhanced bus service on Lake Street as the best long-term transit solution for the

corridor.

The recommendation, known as a Locally Preferred Alternative, was approved Wednesday by the Policy Advisory Committee (PAC) for the Midtown Corridor Alternatives Analysis. The group includes community and business representatives as well as elected and appointed officials from the Metropolitan Council, Hennepin County and City of Minneapolis

The alternatives analysis considered the benefits, costs and impacts of creating a 4.4-mile transit way between the METRO Blue Line's Lake Street/Midtown Station and the proposed West Lake Station on the METRO Green Line Extension (Southwest LRT).

"As the Lake Street area becomes more popular as a tourist destination, as well as a great place to live, work, eat, bike and shop, it is vital that we provide faster and more efficient transportation," said Ron Lezama, a PAC member and former chairman of the Latino Economic Development Center, located on Lake Street

The recommended transit improvements will be advanced as funding is available.

With enhanced bus (also known as arterial bus rapid transit), improved stations would be built every half-mile on Lake Street. Buses would continue operating in mixed traffic but travel times would be improved by making fewer stops, the use of off-board fare payment and transit signal priority. The improvements would extend into St. Paul on Marshall Avenue, connecting with the METRO Green Line's Snelling Avenue Station on University Avenue.

Rail would run immediately south of the Midtown Greenway bike trail. The LPA calls for trips to be operated with single-car trains. Future analysis will identify the vehicle type and double/single-track segments.

Bus and rail are recommended because enhanced bus would better serve those traveling shorter distances in the corridor while rail would better serve as a crosstown connection linking light-rail lines and other potential bus rapid transit lines.

"We're very excited about the idea of improving transportation in the Midtown Corridor," said Joyce Wisdom, a PAC member and executive director of the Lake Street Council. "People really want to be able to move along Lake Street without parking and un-parking."

#### **Midtown Greenway LPA at a Glance**

- > **Travel Times:** A local bus trip from West Lake Street to the METRO Blue Line's Lake Street Station would take an average of 42 minutes. An enhanced bus trip is estimated to take 30 minutes and a rail trip is estimated to take 13 minutes.
- 
- > **Ridership:** Around 14,600 customers currently use local bus service in the Midtown Corridor each weekday. With enhanced bus and rail, ridership is projected to grow to 32,000 riders a day by 2030.
- 
- > **Cost:** Depending on track design, enhanced bus and rail are estimated to cost between \$235 million and \$270 million to build and \$15 million a year to operate.

From: sean@afors.org  
Sent: Thursday, April 24, 2014 11:06 PM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Sincerely,

Sean Gosiewski  
2801 21st Ave S. Suite 100  
Minneapolis, MN 55407-1226



## O'Connell, Pat

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**From:** Stefan Pomrenke [stefanpomrenke@gmail.com]  
**Sent:** Thursday, April 17, 2014 9:19 PM  
**To:** PublicInfo  
**Subject:** Fwd: Public Comment - NeoThrive - More Bike, Density, Solar

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Apologies I sent the earlier e-mail too soon.

I am a family physican interested in public health. Metro planning can be a vehicle to increased levels of activity and overall wellness. I would advocate for even greater interdisciplinary work than what you have described. I would involve the MN Department of Health and the Ramsey and Hennepin Health Departments in the formation of the Thrive 2040 plan.

I advocate for denser urban planning, to achieve greater connectedness within neighborhoods. This can be effected by placing bike travel as the primary mode of transportation, trains as secondary, buses as third, and cars as the fourth. This role reversal will increase the economic strength of local neighborhoods and decrease the sprawl that is causing an unsustainable blight on our metro area. This will overall improve the wellness of our population. Your facebook advert about the public comment period is a picture of St Paul from the view of Dayton's Bluff my neighborhood. Depressed economic areas like ours need greater density and improved access to local foods to improve our overall wellness.

I would also advocate for more metro wide solar plans to create neighborhood solar co-ops to further enable energy independence and cleaner air quality.

The power of the met council is needed to create these dramatic and needed changes to keep young people like myself living in these great Twin Cities!

Stefan Pomrenke, MD, MPH, MATS age 32.

Steve DeLapp • 8468 Lake Jane Trail • Lake Elmo, MN 55042  
• April 28, 2014

## **Comments to Thrive 2040 Final Draft**

Here are my personal comments on the Final Draft of Thrive 2040, based on 9 years as a commissioner and chair of the Washington County Planning Commission, 7 years as a commissioner and chair of the Lake Elmo Planning Commission, 8 years as commissioner and chair of the Minnesota-Wisconsin Boundary Area Commission, and 16 years as a member of the Lake Elmo City Council. I write as a licensed architect, and as someone who has long recognized the importance of implementing sustainable development and design practices, which include the protection and enhancement of natural open space and the importance of closely connecting people's lives with both their chosen built communities and close by open space.

Based on the mandated implementation of the **2020 Development Framework** in Lake Elmo and a handful of other resident driven semi-rural cities, former Governor Pawlenty was primarily concerned with accommodating the interests of land speculators, commercial development companies, and tract home builders. Based on the Final Draft of **Thrive 2040**, Dayton has been especially concerned with accommodating the interests of informed urban planners in parallel with goals of the two central city mayors, affordable housing and mass transit advocates, and to a lesser degree would like to see all suburban cities more homogeneously developed. Both long term plans come at the expense of the environmental sustainability and the quality of life for many of the Region's residents.

Here are my comments on the need to revise the Final Draft of **Thrive 2040**. I am fully aware that none of them will be adopted at this late date, but that all, if not most would make the Twin Cities and Minnesota a better place to live for a majority of are residents:

### **Summary:**

1. Prepare regional documents by first determining the interests of the localities.
2. Put the sustainability of the environment of the 7 County Metropolitan Area as the first priority.
3. Put the well-being of existing residents, (voters,) ahead of the accommodation of new residents.

4. Continue to make multi-year forecasts with associated local accommodation, but make mid-course corrections on an annual basis.
5. Encourage population growth and development in other parts of Minnesota.
6. Encourage "bottom's up" government, instead of the "top down" government prevalent in Minnesota, that is inaccessible to most citizens.
7. Stop forcing the highest density of housing in Lake Elmo and other cities on the least healthy and least desirable land.
8. What the Met Council can do to make Lake Elmo a better city and partner.

1. The Thrive 2040 document should have been premised on the formally expressed interests of each city and township in the Metro Area with special input by Counties on the development of very large open space projects, health services, and transportation issues. The Met Council should be trying to accommodate the wishes of each jurisdiction in the most efficient, most cooperative manner and in a way that accepts the historically different characteristics and interests of each city. However, the Council should continue to put a brake on interests of each city that directly harm the competing interests of other cities. Instead the Met Council is dictating to cities what each city must expect for households and jobs and use its zoning and taxation to accommodate based on a formula of uniformity.

At its creation 40 years ago, the Metropolitan Council was responsive to the interests of each city and provided many planning tools needed to best accommodate those interests. Many cities then, and a few today, lack competent planning capabilities, as evidenced by a flyover of the Twin Cities. Easily apparent poor zoning and poorly located transportation corridors have contributed to the destabilization of traditional community life, rapidly expanded government, reduced residents' quality of life, caused the elimination of many prime farmlands, special natural habitats, and wildlife corridors. In the early days of the Met Council members were selected for their planning and leadership skills, not for political reasons and not for participation in the development industry.

The Regional plans should revert to addressing the stated interests and concerns of the residents of each city and township in the Metropolitan Area. Each has different priorities, different assets, and different liabilities and presumably their residents chose to make them their hometowns for different reasons. While we share common assets and common liabilities, sometimes what is considered an asset in one city is considered a liability in another.

The costs to operate each city and township vary substantially, depending on the interests of their residents and the special needs caused of each city. The residents of many cities have chosen to live in cities with a large government presence to provide treed boulevards, manicured parks, community centers for recreation, seniors, and the arts, libraries, imposing city halls, and to put an emphasis on local economic development, public safety, and nearby shopping malls and retail strips. The residents of

other cities, such as those in Lake Elmo, want a small town feeling and continue to work in St. Paul and Minneapolis and do primary shopping in regional malls and big box stores in 5 surrounding cities wanting outside shoppers. Some people chose to live in large cities where the government is determined at a distance and others prefer to live in small cities where direct citizen input is welcome and needed. **The Met Council should be sorting out the interests of each city and township, and helping them meet their objectives, while providing the planning assistance that is badly lacking in most.**

2. I can't do better at discussing No. 1 priority for Regional planning in Thrive 2040, than by copying the Letter to the Editor by David L. Trauger of Marine on Saint Croix, printed in the April 28, 2014 edition of the Star Tribune:

*"Why plan for growth? **The Metropolitan Council should be planning for sustainability** ("Growth forecast brings conflict as cities vie for development dollars," April 23). The emerging reality is that our seven-county metropolitan region will face unprecedented challenges in the not-too-distant future. These social, economic and ecological realities, driven by limits imposed by changes in water and energy, will necessitate transformative changes. We must become a different kind of country. We should be planning transitions required over the next five years, not projecting growth over the next 30.*

*Face facts: Uncontrolled economic growth is unsustainable on a finite planet. Signs of stress are becoming apparent everywhere as a consequence of climate disruption and peaking of vital natural resources, particularly water and oil. If anyone has doubts, visit local grocery markets and compare rising prices for fruit, vegetables, meat and fish due to prolonged droughts and transportation costs from producing regions. It doesn't make sense to pave over productive land in proximity to where people live. City dwellers need to be aware that the average distance our food travels from field to fork exceeds 1,500 miles and consumes 100 calories of energy to produce 10 calories of nourishment.*

*We need to be mindful that the future is not what it used to be. One of Earth Day's messages was "business as usual" must come to an end soon if we hope to ensure a habitable planet."*

3. Why is the well-being of non-existent residents put behind that of people who might be interested in moving into the Region? Except for immigrants without citizenship, the residents living in the Region are voters. The interests of voters come first in a country where elections and citizen participation determine outcomes. The Council needs to be very cognizant that it was not elected by any voters, but rather appointed by a governor who was elected by voters from throughout the State of Minnesota, with very little concern for the impact on the Metro Area. I find it frightening that 25 years ago, the mayor of Woodbury told me during a council meeting I was attending, "**We don't care**

**about our existing residents, they are already here. We are about planning for new residents."** I could never forget such a statement.

4. All Fortune 500 companies and all responsible governments have 5 year plans that are updated on an annual basis. No document should ever more than one year out of date. The 2020 Development Framework was badly out of date by 2008, yet cities such as Lake Elmo, Minnetrista, Medina, Dayton and others were forced to pretend there was no recession, no lack of resources for transit, highways, schools, ground water, and landfills, and no change to the internal and outside demand for growth in the Metro Area. Three years after completion of the 2010 Census, the Met. Council has partially acknowledged what all cities have observed at their front desks and in the foreclosure notices in the newspapers. Meanwhile millions have been spent pursuing the implementation of unrealistic and/or unwanted land use map mandates to help expand the Metropolitan Council's sewer system and local water systems, often at the expense of ground water depletion. The Met Council should immediately start updating its 30 year planning documents on an annual basis to avoid the cost and embarrassment associated with projections that have never been accurate.

5. Compare Ohio to Minnesota. Ohio has twice the population and half the area. Both are Great Lakes states, with the border rivers, and both are primarily agricultural states. In all probability, Minnesota will have the population density of Ohio in 100 years. But should most of the increased people live in the Metro Area? When will it be time for new growth in Minnesota to go to different parts of the State, such as Mankato, Rochester, Duluth, Worthington, Alexandria, and Albert Lea/Austin? Why have one, unsustainable, overbuilt metropolitan area in the State, when there could be 4 or 5 sustainable metropolitan areas? Unfortunately, the Metropolitan Council does not look beyond the 7 County Metropolitan Area and adjacent counties are repulsed at the thought of joining it. Perhaps there are reasons and perhaps there are better reasons why there should be 4 or 5 elected Metropolitan Councils that both serve the interests of their regions, but coordinate their planning to benefit the entire state.

6. Should every part of the Metro Area outside the core cities look the same? Should the standard be the lowest common denominator? Should the Metro Area be indistinguishable from the sprawl surrounding Atlanta, Omaha, Chicago, Kansas City, etc.? To date, the Metropolitan Council has not used its claimed authority to make the bird's eye view of the Twin Cities reflect the different, climate, topography, or unique interests of the hardy people of Minnesota compared with anywhere else and has not allowed different parts of the Twin Cities to develop differently, even for cities governed by more enlightened councils with more competent staffs. Perhaps the intent is

Minneapolis and St. Paul have substantially underutilized regional and local assets, including empty schools and excessive water and sewer utilities. They have effective governments. They rightfully ought to be the location for much of the new housing that will increase their livability and efficiency. Every job that Lake Elmo attracts that is not intended to provide goods and services for Lake Elmo residents, is a job that is taken away from the job centers in Minneapolis and St. Paul, or taken away from welcoming

suburban cities with the large government infrastructure needed to properly serve regional business.

The primary driver for where new population lives in the Metro Area has not been these cities, and inner ring cities with similar underutilized assets, but national tract house builders. These builders need at least 50-100 acres, or more to carry out their assembly line, cookie cutter, high impact construction, and they are succeeding because of political influence, not the desires of existing residents who are forced to pay for new schools, fire halls, police headquarters, city halls, etc. as each new plateau of government is reached. At least in California, there are substantial impact fee requirements. In Minnesota, the existing residents must heavily subsidize national builders.

And similarly, national big box chains want and expect to receive undivided access and attention from highway drivers, and expect large surface parking areas for Black Friday shoppers. Buildable land is hard to find in fully platted cities without massive infusions of TIF funding.

7. The Met Council has ordered Lake Elmo to plan for growth primarily adjacent to the overcrowded I-94 corridor, where proposed bus rapid transit will probably accommodate 5% of the additional traffic. The new residents will be subject to high noise levels from the constant drone of truck traffic. I know, I live a mile from I-694 and have no quiet time. They will be subject to the poorly understood impacts of an overhead Xcel Energy high line, and to the noise from one of the very rare outdoor gun ranges in the Metro Area. I live 3 miles from the gun range and the noise is common, especially in early Fall. In Lake Elmo, all deeds to new houses within about 1/2 mile of the gun range are required to include language acknowledging the prior presence of the gun range and the expectations to homeowners of significant disturbance. In addition, the soot and pollution from I-94 will have an impact of people living less than 1/2 mile away. Few if any of the new house buyers in Lennar's and other subdivisions will be likely to be aware of any of these serious environmental and quality of life concerns as they pick out the color of granite for their kitchen counters and are otherwise not exposed to any outside conditions.
8. Here is what I think the Met Council could do to make Lake Elmo a better and more sustainable place to live:
  - Lobby the Legislature to put all of each city in the same school district. Lake Elmo is in three, Woodbury is in three and Hugo is in 4.
  - Stop forcing Lake Elmo to transport its limited water resources from the residents on one end of the city to serve potential residents on the other end of the city.
  - Plant trees on Highway 36 and I-94 to improve the scenic view of Minnesota for the tourists we are trying to attract and the commuters and to block the view of overwhelming advertising aimed at distracting drivers.

- Provide Lake Elmo access to 60<sup>th</sup> Street, which is effectively detached from the City by the closure of most access to Highway 36 in order to accommodate current rapid growth in Stillwater's annexation land and another 30,000 cars per day from Wisconsin. That the Metropolitan Council authorized the construction of the Oak Park Heights river crossing is a cross the Council must bear, but the Council should not exacerbate this serious violation of its own principles by making life worse for the residents of Minnesota as a consequence.
- Transfer Hwy. 5 from the State to the County as approved by the Met Council almost 20 years ago and still not implemented. Have the County reduce the baseless, mile long 4 lane component to two lanes.
- Encourage Lake Elmo to continue to develop with the sustainable Open Space developments that have attracted national attention and won the top national housing award. Help Lake Elmo with its plan to create a downtown that functions as a viable community gathering place that can serve as an example for other cities in the Metro area, as compared with fake "Lifestyle Malls" that should embarrass anyone who has traveled outside the Metro Area or learned anything about developing viable communities, as opposed to creating money pumps for commercial interests.
- Force the proper construction of the entrance "parkway" from I-94 to the Lake Elmo Regional Park. It is a vast treeless expanse of a 4 lane divided highway that serves less than 5,000 cars per day and maybe 10 bicycles per day. It cut into a lake in order to have 4 lanes with a 50 foot or wider median that is ugly to anyone born outside of a wide open farm field. Now it even has tall banners for Lennar lining one section, an insult to both the Regional Park and the residents of Lake Elmo. As development picks up, the route will probably be lined with dozens of illegal real estate signs mirroring the illegal signs in Woodbury. Can the Met Council demand that these signs, which assault every visitor to the Regional Park be removed? In addition, the TAB should insist that the road be reverted to a 45 mph, two lane road or a quiet 4 lane divided road with a design comparable to the City's new 5<sup>th</sup> Street, which will be seen as an immediate asset rather than a serious and costly transportation mistake that has not been corrected since it's construction with I-94 when some people were still expecting the construction of "Elmodale."

From: susanna.patterson1969@gmail.com  
Sent: Thursday, April 24, 2014 6:51 PM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Thank you for making equity a key priority, but please set stronger goals so that planning and investment for transportation and housing do reduce poverty in our region.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling.

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

.

Sincerely,

Susanna Patterson  
1018 Olive St W  
Stillwater, MN 55082-5635



From: Thomas.E.Kottke@HealthPartners.com  
Sent: Friday, April 25, 2014 1:56 PM  
To: PublicInfo  
Subject: We Need a Stronger Regional Plan

Dear Metropolitan Council:

I care about how the Twin Cities metro region grows. We need a stronger regional plan, as well as a strong transportation policy plan, because we need to use our limited resources in ways that best provide access to opportunity for all and protect our air, water, and land.

Thank you for making equity a key priority, but please set stronger goals so that planning and investment for transportation and housing do reduce poverty in our region.

Please do more to target or concentrate new growth in jobs and housing, so that these destinations can be served affordably by transit, walking, and bicycling. These are all important promoters of health

I urge the Met. Council to embrace a focus on road repair and complete streets rather than greater investment in highway expansion. I ride my bicycle to work, and I can say that the road surfaces are terrible.

Please increase density targets especially for suburban, urban, and urban center areas and set higher density expectations for transit station areas. Densities greater than 10-20 units per acre are needed for pedestrian and transit-friendly communities.

Thank you very much for your attention to these requests.

Sincerely,

Thomas Kottke  
8170 33rd Avenue South  
Minneapolis, MN 55425-4516

## Thrive MSP 2040 comments – submitted through Your Ideas site

Tim OConnor

What should happen is you are all thrown in prison for the rest of your lives.  
You are criminals representing the UN whether you realize it or not.  
I said this to you, despite being scared out of my mind.  
I wish I would have recorded your scowls and frowns.  
I also wish I would have recorded the knowing grin on the face of the Council's head.... because she KNOWS every word of this is true:

Hello - thank you for allowing me to speak.  
Thrive 2040 means we cannot build our homes where and how we wish.  
It means we cannot operate our motor vehicles at a reasonable cost, or possibly at all.  
It means rising costs for energy, gasoline, housing, food, water, and taxes which will be exacerbated by a decrease in the quality of life as underemployment, joblessness, and infrastructure deteriorate along with the tax base as people flee our inflicted area.  
They will not come in droves as predicted.  
The jist of Thrive 2040 is summed up at the bottom of page 43: ""This section discusses four special features to emphasize the strong roles they play shaping how THE COUNCIL wants the region to grow and develop."  
Personally, I take this as a threat and a reversal of the notion of by the People for the People. Thrive 2040 violates what America stands for - it cedes control of our personal prosperity and autonomy and gives it to a body of central planners.  
Similar plans have failed in Portland, Seattle, and San Jose.  
Thrive 2040 is a socialist plan, developed by the UN, in 1992, and called Agenda 21.  
The goals of Agenda 21 and Thrive 2040 are the same: create regions in the United States of low mobility, high density, welfare-based social control centers, with the intent of destroying all sovereignty from the local level to the national level and calling it stewardship, prosperity, equity, livability, and sustainability.  
The council has a legitimate role in coordinating public works when they operate for the People. Thrive 2040 has nothing to do with the People, it has to do with what the COUNCIL wants.  
It has been pounded into our heads for years - "global warming is real, it is man-made, and we have to stop consuming everything, failure will kill us all."  
We need a rational evidence-based discussion about global warming, and climate change in general because global warming is certainly not caused by man, as the evidence from any real scientific endeavor regarding it shows.  
So the cause for the creation for Thrive 2040 is a lie.  
The goal is compliance through fear to get us to accept regulations for efficiency and lose our freedoms at the same time.  
Restrict your travel, shorten your showers, allow PACE inspectors into your home, buy solar panels and wind turbines, sell your cars, only buy local food. We can tell you the truth the next time you tell us these things - go put out the sun if you want to stop climate change.  
Finally, back to more important matters - our families.  
We don't want our future generations to be born into bondage for the reckless spending practices you social idealists are proposing in Thrive 2040.  
We don't need 90 million dollar a mile trains.

We don't need subsidized housing.

We don't need this MET council dictating where, how, and when we can do what we want to do.

We don't need this Thrive 2040 plan. In order to thrive we need LIBERTY and FREEDOM.

**From:** Tom Spitznagle [<mailto:tspitznagle@comcast.net>]  
**Sent:** Monday, April 14, 2014 5:51 PM  
**To:** PublicInfo  
**Subject:** Thrive MSP 2040 Draft Observations

Dear Met Council Members,

After scanning the Thrive MSP 2040 draft, I would like to offer the following observations, some of which may have already been considered during the draft plan's development:

1) Central cities have been an assumed feature of civilization for thousands of years. However, more recent advancements in communications technology have dramatically diminished the need for people to be physically co-located in order to conduct business, participate in social events, etc. So, plans for the future should be cautious not to assume the same level of significance that central cities have had in the past without considering the dramatic impacts of rapidly-evolving new technologies on lifestyle preferences.

2) Large central cities generally also have significant disadvantages in the form of much greater congestion, higher crime and ever higher costs of living – reasons why so many people do not want to live in them and prefer to live and work in suburban (and beyond) communities. Another reason why care should be exercised in how much importance central cities should command in the planning process.

3) Another planning consideration pertaining to central cities is the increased level of national security risk associated with concentrating too many key assets (such as people, business and public infrastructure) together in close proximity to each other. We have been fortunate to never have had any major attack on our homeland but the reality is that nothing stays the same forever. Better to anticipate and plan for such possibilities.

4) Climate change is referenced throughout the draft and, therefore, appears to be a major consideration. According to friends who are environmental scientists, the climate changes, that's what the climate does. The notion of what climate change is going to cause in terms of future weather impacts still seems open to debate at this point. Caution should be exercised not to attribute too much importance to recent weather events until longer term trends can be scientifically verified. Prior to the shift in emphasis to climate change, global warming was supposed to be settled science but the theories and their environmental impacts proposed some 15 or more years ago do not appear to be holding true according to many scientific authorities.

Sincerely,

Tom Spitznagle  
Bloomington, MN

**From:** Val Escher [<mailto:vescher@freestylempls.com>]  
**Sent:** Monday, April 28, 2014 4:41 PM  
**To:** PublicInfo  
**Subject:** Thrive 2040

Dear Met Council:

Thank you for giving the public the opportunity to comment on the Minneapolis-Saint Paul Thrive 2040 plan. I have several comments about the plan, most of which may be rightly perceived as begging and pleading for the Met Council to amend the plan to give greater priority to transit:

(1) According to Thrive 2040, people age 65+ will more than double by 2040 in the Twin Cities. Please increase our transit projects to allow the elderly, the disabled and the poor greater access and independence. I still want to get to work, the doctor's office and the store, even if I can't drive. I am disabled, but I still pay taxes; right or wrong, I feel the city owes it to me to have a decent transit system as much as a transportation system.

(2) We live in a market economy. Please need to make transit attractive so everyone uses transit and keeps transit financially feasible. Support trains because they are cheaper over the long term, and more popular. People who don't ride the bus will ride the train, which increases our ridership base.

(3) Bike and walking paths are critical, not an extra. Exercise is at the very core of the human experience. Bike paths and sidewalks are cheaper to build than roads, and offer so many popular outcomes. Surly, Handsome, Peacock Groove and QBP are MN bike part manufacturers; and we have over 30 bike shops in town. Bike tourism and recreation is a huge part of our local economy.

(4) You are doing a great thing for business in the southwest suburbs and alleviating the twice daily traffic jams on 35W by putting the SW-LRT in place. Thank you for voting that in. Residents need to stop quibbling about exactly how the route goes. Personally, I'd like to see a rail route from Uptown to Downtown Minneapolis, but people forget we are building a street car line on Nicollet. 46th Street is a huge intersection; I wish the proposed street car line ran that far so it would intersect with the BRT and the freeway exit, if you want my two cents' worth.

(5) The Thrive 2040 plan itself would be a lot more understandable if you would publish its maps in a larger and/or interactive web format. People will be ready to pay for Thrive 2040 only if they can see what they are paying for. Please publish the maps so they are readable and meaningful, and make them web-accessible at all times.

Thank you for all the work you've done to push transit measures forward in the Twin Cities.  
Now, onward and forward!

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