

April 29, 2015

Metropolitan Council  
Attn: Adam Duininck, Chair  
390 Robert Street N  
St. Paul, MN 55101-1805

RE: Draft Housing Policy Plan (2015 Amendment)

Chair Duininck:

Thank you for the opportunity to review the regional Housing Policy Plan 2015 Amendment. Please include our comments from our September, 2014 submitted comments as well. Some of our broader policy comments are repeated in this response, with our revised comments in the bullet list below. The City supports the Metropolitan Council's goals in promoting its housing goals. However, the City wants to ensure that it does not result in mandates that might be in conflict with our existing land use goals. The following comments are compiled of consensus of our Planning Commission and City Council.

#### General Assumption

- The following comments are based on the assumption that no changes to our Future Land Use Map nor our Housing Assistance Policy will be necessary in order to achieve the standards contained within the proposed amendment to the Housing Policy Plan.

#### Statement of Support

- Ramsey Appreciates the flexibility granted in the Housing Performance Scores that recognizes variation in new construction levels and acknowledges policies that encourage affordable housing even if actual construction not experienced in a given year. Ramsey supports the multiple thresholds, including the threshold of up to 80% AMI, where this was previously 60% AMI. Finally, Ramsey supports points awarded for all local tools provided and acknowledgment of other county, city, non-profit, and state programs that provide tools to the City.
- Ramsey supports the clarification on existing statutory requirements and submittal requirements versus recommended strategies as it relates to the requirement to create a Housing Plan at the local level.

#### Priority Areas of Concern

- Regarding language on page 8 and 13, regarding the utilization of the Sewer Availability Charge (SAC) as a tool to promote affordable housing, the City desires to clarify that SAC policies should not result in limitations in future expansion of the Metropolitan Urban Service Area (MUSA). If this language is to be interpreted in such a way that future MUSA expansions may be limited if the City does not achieve its affordable housing goals, then the City objects to this language. If the language allows only for the utilization of SAC as a financial tool, then the City is fine with the language.

- Ramsey appreciates many of the peer and comparable communities included in the two (2) working groups that helped shape the amendment. That being said, in retrospect, the City of Ramsey would have desired to see that there was additional representation from Anoka County communities on the Working Group. Are there documented summaries of these working group meetings?
- The City of Ramsey feels that the report fails to quantify different socioeconomic factors between individual communities. It appears that the methodology is focused heavily on existing regional and local forecasts.
- The City of Ramsey feels that the report lacks a focus on an increase in aging population, a key housing priority for the City.

#### Questions/Clarification

- Ramsey requests clarification on the definition of Affordable Housing as it relates to land use planning. It is our understanding that the current definition is six (6) units per acre, but the amended plan notes ranges from eight (8) units per acre to twelve (12) units per acre. Ramsey simply desires to better understand how our allocation of affordable housing will be impacted by these thresholds based on our current Future Land Use Map. Our current definition of Medium Density Residential is 3-7 units per acre. Our current definition of High Density Residential is 7-15 units per acre. Our concern is that Ramsey will not receive credit for areas currently shown as High Density Residential which we feel will provide the necessary housing variety and is already currently in our land use plan. Perhaps our areas of High Density Residential will qualify in part two (2) of Option 2 (see page 11 of amended plan). This is important as it relates to how we accomplish our allocations published in the exhibits to the amended plan.
- Please define what you mean by ‘updated housing requirements’ under your implementation plan. Previously, this simply stated review criteria.
- Ramsey acknowledges that our comment desiring to see the methodology of allocating affordable housing need has been incorporated. Ramsey desires a process to help refine these numbers upon output to ensure that these allocations are in line with local experiences. In other words, will there be some process to help refine or amend these numbers at the request of local communities? We believe a process currently does exist, but want to better understand if that process will change with the new methodology.

#### Technical Detail Comments

- Please note that Exhibit Titles are not matching the correct page. Perhaps this is a result of ‘Tracked Changes’
- Based on Exhibit 2 on page 30, Ramsey’s allocation of affordable housing will be adjusted downwards. Ramsey does not object. It appears that according to Metropolitan Council data, 66.4% to 79% of homes constructed in Ramsey are affordable to households at or below 80% AMI.
- Subject to how the Metropolitan Council will calculate areas guided for Medium Density (3-7 units per acre) and High Density (7-15 units per acre) Residential, Ramsey does not object to the overall allocation of 438 affordable units. Ramsey assumes that our current Future Land Use Map will be able to accommodate this allocation. If the Metropolitan Council feels adjustments to our Future Land Use Map are necessary to accomplish this allocation, please inform us. Otherwise, we will move forward on the assumption that no changes to our land use plan are necessary in order to achieve this allocation.
- It appears that our comment regarding ‘normalizing’ our Housing Performance Score has been incorporated to a degree. Acknowledgement of future forecasted growth and history of activities of the past ten (10) years has been added. Ramsey desires to see how our Housing Performance Score will be impacted based on the new methodology.

- Under Housing Programs and Policies, we desire to understand if the programs provided by Anoka County will qualify for our Housing Performance Score. We do not desire to duplicate these already existing services and programs. We will reserve our final comments on this factor until we can see how the broad matrix applies to our local example.

The City of Ramsey continues to express a concern with our published forecasts as it relates to the current system plans. While we acknowledge our Land Use Plan can accommodate these forecasts, we feel the system plans for Transportation and Water Supply lack the necessary investments to accommodate this growth.

Ramsey notes that it will take strong partnerships between the Metropolitan Council and local governments to achieve the allocations by bands in Exhibit 6. Specifically, Ramsey desires a conversation regarding our ability to achieve the allocation of affordable housing at the 30% AMI level. Based on our experience, the surrounding market, and some of the goals of Property Owners with areas guided for the appropriate densities for affordable housing, Ramsey finds it will be difficult to achieve these goals without assistance of programs such as the Livable Communities Program of the Metropolitan Council, the Minnesota Housing Finance Agency, and the Anoka County Housing and Redevelopment Authority.

Sincerely,

CITY OF RAMSEY

Tim Gladhill  
Community Development Director

CC: Edward Reynoso, Metropolitan Council Member, District 9