

April 15, 2015

Metropolitan Council

Attn: ~~Housing Policy Plan~~ Beth Rietz, Interim Community Development Director

390 Robert Street N

St. Paul, MN 55101-1805

RE: Draft Housing Policy Plan (2015 Amendment)

To Whom It May Concern:

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.

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.

Comments on Amended Plan

- 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.
- Ramsey supports the goals of affordable housing identified in the amendment plan so long as it is consistent with the City's current Future Land Use Map. The City has not planned to amend its current Future Land Use Map to increase areas of higher density that what is already currently identified.
- 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 appreciates many of the peer and comparable communities included in the two (2) working groups that helped shape the amendment. Are there documented summaries of these working group meetings?
- 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.
- 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.
- 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.
- 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 is curious of what our Housing Performance Score will be 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.
- Regarding language on page 8 and 13, the City desires to clarify that SAC policies should not result in limitations in future expansion of the MUSA.

Sincerely,

CITY OF RAMSEY

Tim Gladhill
Community Development Director

CC: Edward Reynoso, Metropolitan Council Member, District 9