

December 26, 2018

Honorable Councilmembers and Planning Commissioners,

The District 1 Land Use Committee has had the opportunity to meet with City planners and review the various drafts of the Comprehensive Plan over the past year. We appreciate the engagement efforts that have accompanied this process and feel that we have been able to review the plan in an informed way. We submit the following comments on the November 2, 2018 Draft on behalf of the District 1 Community Council and urge you to consider them as you proceed with adopting the final draft of the plan.

We first want to acknowledge the gravity of a document like the Comprehensive Plan. We inherit a legacy of zoning and land use policies that were used to advance the interests of white homeowners and protect white privilege by directly and indirectly designating where different racial groups were allowed to live in our city. We believe that housing is a fundamental human right and that housing policy carries tremendous moral implications. Additionally, Saint Paul residents' access to jobs, fresh food, educational opportunities, and healthcare directly impact their physical and economic wellbeing. Finally, we understand that we are facing an historic existential crisis caused by climate change. These are profound issues that cannot be addressed solely at the local level. However, policies enacted at the City-level, including those codified in the Comprehensive Plan, are a critical piece in addressing these issues.

We support the overall scope and content of the draft plan. We do have comments about some general topics. First, we feel there should be a consistent definition and measurement of equity so that all policies are headed in the same direction concurrently. ACP50 is an imprecise tool at the city- and neighborhood-level as it is a yes/no designation that changes year-to-year and can miss pockets of significant poverty within an otherwise affluent area due to the census subdivision it is measured at. The plan should also acknowledge the problems associated with racially concentrated wealth in addition to its discussion of the challenges from concentrated poverty.

We feel it is also important to acknowledge the role zoning plays in housing costs. It has been well-documented that overly restrictive zoning ordinances create artificial scarcity and thus drive up the value of land. This is particularly insidious because land value is a significant fixed cost in the new construction of housing. The construction of multi-family buildings with fewer units can result in exorbitantly expensive housing when land values are high. It also adds to the difficulty of efficiently funding the construction of new affordable housing. The policies contained in this plan can help ease escalating land values if corresponding zoning amendments are made that realize those policies.

We overall support the policies regarding housing density and the need for additional housing options. We support changes to the zoning and building codes that allow the flexibility to develop “missing middle” housing types in areas that are currently zoned single-family. The ability to accommodate the needs of different family types, stages of life, and levels of ability is important to maintaining strong neighborhoods. An expanded range of housing types, such as bungalow courts and townhouses/rowhouses, complement single-family homes in a neighborhood.

We have also strongly supported, as an organization, the rebalancing of transportation modes and making our streets safer. We believe that residents should not be obligated to own a motor vehicle to meet daily needs. We believe that more transportation options need to be developed in our district and on the East Side, including continuing to add bicycle infrastructure and increasing the frequency and availability of transit. Part of this development requires a commitment to all-season maintenance so that these modes are always available regardless of season. We encourage all efforts to help neighborhoods across the city transition from auto-centric to people-centric.

We finally would like the impacts of, and responses to, climate change better articulated in the plan. Climate change will impact the city in ways not seen before. Significant rain events in warmer months and a continuous freeze-thaw cycle in cooler months could devastate and overwhelm city infrastructure. The region could see a significant arrival of climate refugees, both domestic and foreign, following natural disasters and as international cities become uninhabitable in the summer, these new residents not accounted for in population estimates. An increase in landslides could cut parts of the city off from one another, a challenge especially concerning to Highwood where there are few ways to get in and out of the neighborhood. Drought and freight disruptions could limit the region’s access to food at times. Climate scientists have documented these scenarios as very real possibilities in the future, and the plan should account for how Saint Paul will address them. The City Council passed Resolution 18-1361 outlining the dangers of climate change and solutions that the City can take use to address this threat. The plan should provide supporting language to begin implementing significant solutions as soon as possible.

We also submit the following comments on individual policies and figures.

Introduction

pg. 9: We appreciate the deliberate engagement to reach all communities in Saint Paul and for including the results on that engagement by race.

Land Use

pg. 29: LU-2, we request that this policy be changed to read “Pursue the potential for redevelopment of Opportunity Sites (generally sites larger than one acre identified as having potential for redevelopment) as higher-density mixed-use development, employment centers, and the addition of community services that are completely absent in the surrounding area, with increased full-time living wage job intensity (Figure LU-3).” Opportunity sites may be some of our best opportunities to add services to a community that are currently lacking. Since different

opportunity sites have different land use categories, the exact ratio of these three outcomes will be very different from site to site.

LU-6, we request an additional point be added that reads “recognizing the ecosystem services provided by a development parcel and guiding development to preserve and enhance that community benefit.” It is important to us to acknowledge that natural systems perform important functions for the metro area. Trees moderate temperature, produce oxygen, and reduce particulate pollution. Wetlands filter water and act as a sponge. These services are going to become even more important in a changing climate. We believe that we can increase population and employment density while still preserving these important functions.

pg. 30: LU-10, add “wide sidewalks” to the list.

pg. 31: LU-13, add “and strengthening parking maximums citywide.”

pg. 32: LU-20, we acknowledge the importance of the Tree Preservation Overlay District and the River Corridor Overlay District, and ask for specific engagement as the river corridor ordinances are brought into conformance with the new state Critical Area rules.

pg. 33: Add White Bear-Minnehaha and Suburban Commercial District to the Neighborhood Nodes list. See note for pg. 43.

pg. 35: Change LU-39 to “Continue to require large lots for residential parcels with private utilities and/or steep slopes by use of a zoning overlay district rather than underlying zoning to preserve the natural ecosystem along the river bluffs.” Residents who choose to continue using private utilities need larger lots for health and environmental reasons, but residents who choose to connect to public utilities should not be obligated to retain the large lots necessary for private utilities.

Change LU-40 to “Promote cluster development with public utilities on the flat portion of sites with steep slopes and heavy tree canopy to add density in a way that preserves the natural ecosystem along the river bluffs.”

Add a new Semi-Rural policy that reads “promote the concentration of infill development and redevelopment on flatter parcels, especially those on arterial and/or collector streets, at densities similar to Urban Neighborhoods while being sensitive to the context of the surrounding area and preserving the natural feeling of the area.”

Add a new Semi-Rural policy that reads “continue to expand the availability of public utilities, where feasible, to provide the opportunity for voluntary utility connection to abutting properties.”

Add a new Industrial policy that reads “require future uses of riverfront industrial parcels be those where access to and use of a surface water feature is an integral part of normal business operations.”

Add a new Industrial policy that reads “encourage investment in industrial uses that use green practices and in the production of green technology.” We view these terms very broadly. Example industrial uses could include those that engage in urban agriculture including a future cannabis economy, those that produce renewable energy systems or energy efficient machinery, those that are water- and energy-efficient, and those that use lower-impact production processes.

pg. 42: Add language to the Downtown description to acknowledge downtown’s role as a regional transportation hub.

Add a sentence to the end of the Semi-Rural description to read “infill development and redevelopment will be concentrated on arterial and/or collector streets and on flatter sites.”

pg. 43: We agree with the placement of all Neighborhood Nodes already identified in District 1. We request additional Neighborhood Nodes be designated at/around White Bear Ave & Minnehaha Ave and along Suburban Ave between White Bear Ave and Ruth St. The first addition provides a node in an area with residences over a mile from any other node and at the intersection of a state highway and county highway, and the second acknowledges a need for a neighborhood node south of a significant community barrier (I-94) and near existing multi-family housing.

Because District 1 was developed mid-century around a notion that residents would drive to every destination, there are far fewer existing nodes and commercial corridors than are seen in neighborhoods developed around the streetcar. We request additional nodes be designated at a scale and intensity less than Neighborhood Nodes, but still providing a mix of uses that serve the neighborhood they are in. We would like these minor nodes at: Minnehaha Ave & Ruth St, 3rd St & Ruth St, Upper Afton Rd & Ruth St, Upper Afton Rd & McKnight Rd, and Carver Ave & Point Douglas Rd. We do not specifically propose how to designate them on the map, but request that some designation be added to allow development similar to the T1 zoning district at these locations. This concept of minor nodes may also be useful to other districts with similar patterns of past development.

We request you color green the Fish Creek Open Space. This is a significant County-owned park space that is part of a larger park complex stretching into Maplewood.

We request you designate the parcels along McKnight Rd, Carver Ave, Point Douglas Rd, and the east-west portion of Highwood Ave in South Highwood as Urban Neighborhood to correspond with the proposed Semi-Rural policy changes.

Finally, we are disappointed to see the designation of corridors removed in the transition from the 2030 Comp Plan to the 2040 Plan. Again, District 1 lacks historic streetcar corridors and so it needs intentional land use planning to concentrate uses along designated corridors to make businesses, transit, and multi-family housing more viable. We request some designation on the map that would allow a minimum of RM1 zoning along all collectors and arterials and higher intensities such as continuous RM2 or T2 zoning, with T3 zoning at major intersections, along more major arterials such as White Bear Ave and McKnight Rd. These streets should probably be designated mixed use. Intentional corridor-making will prevent incoherent, scattershot

development in the district. Neighborhood Nodes should connect to one another along built-up corridors.

pg. 45: We appreciate the delineation of Boys Totem Town as a different land use designation from Sun Ray and Suburban reflecting the fundamentally different future scale and function of these sites. A deliberate community outreach effort needs to be conducted before any changes are made to the Boys Totem Town site to determine what uses are needed by the community and appropriate on the site and what design standards are appropriate to administer in any future development.

pg. 46: We ask for specific engagement as the significant public views are identified, as many of our public comments during the Critical Area rulemaking process revolved around how views were defined and administered.

pg. 51: In Figure LU-4, we request that the residential density range for Semi-Rural be changed to 2-15 units/acre. This reflects both the RL lot size of a half-acre (2 units/ac) and acknowledges the density likely to be seen in a cluster development. It also provides overlap with Urban Neighborhood to provide flexibility in the future and transition between the two designations.

Transportation

pg. 55: T-3, we want to underscore how critical this policy is on its own and how all other transportation safety policies stem from it.

T-12, add “and on parkways” to the end.

Add a new policy to Goal 2 to read “promote highway turnbacks to maximize local control of arterial road design, including providing financial resources to maintain the road after turnback.”

pg. 56: T-15, add “including the use of smaller freight delivery vehicles.”

pg. 57: T-26, remove reference to Highwood. Sidewalk policies should be consistent citywide.

Add a new policy in Goal 4 to read “work to transition downtown to being single-occupant vehicle-free, at least during peak hours, while giving special consideration to people with mobility challenges.” Initial steps that could advance this are completion of the Capital City Bikeway, increasing transit priority on streets that carry transit lines, implementation of the 4th Street Market District, and disincentivizing the construction of new parking capacity in downtown.

pg. 58: T-31, we request that you also include policy language encouraging the dedication of public trail easements in places where a street grid is infeasible, or in addition to the street grid. An example in Saint Paul is Central Village.

Add a new policy in Goal 4 to read "Coordinate with Saint Paul Public Schools to consolidate school bus routes and/or provide additional transportation options to both reduce bus traffic in

neighborhoods and provide transportation options to students that does not require use of personal vehicles."

T-41, we find it important to acknowledge that just because a new technology is fun and flashy, it must still meet other City goals, including the VMT reduction goal.

T-42, we request some wording that emphasizes that the City will not bear all of the cost of adapting to new private modal technologies.

pg. 68: Show the transit lines that operate on McKnight Rd.

pg. 69: Extend the arrow for Red Rock all the way to the southern border.

We request you add a new "proposed transitway" that follows the alignment proposed in the East 7th St ABRT study and that is currently served by the 54M bus. This transitway is identified on pg. 6.67 of the Transportation Policy Plan under the Increased Revenue Scenario.

pg. 73 & 74: Show the AADT of McKnight Rd. Traffic volume is a significant factor in decisions made about that road in the future.

Parks, Recreation, and Open Space

pg. 102: We request you add a new "proposed regional trail search corridor" along the Union Pacific RR Altoona Subdivision from Johnson Pkwy to the eastern city limits to be named "Phalen - Lake Elmo" and connecting those two regional parks.

Housing

pg. 111: H-1, add language that code enforcement will be done in such a way as to not disparately impact racial or ethnic groups. Protection of tenants who trigger enforcement from retaliation will be a top priority.

pg. 112: H-16, add language to ensure that promotion of housing choice among diverse income levels will not be used to upscale units in poor neighborhoods.

H-17, does the City even need a regulatory definition of "family?" Could the zoning use of kitchen/bathroom/bedroom comprising a dwelling unit be used in its place?

H-19, add language about reducing racial disparities and the history of unfair housing practices similar to language used in H-20.

pg. 114: H-22, add "Any promotion of housing ownership will be done with a racial justice lens and with an eye to remedy of historic housing discrimination."

pg. 116: H-26, add an acknowledgement that the City is aware that tenant rights need additional support and will work to increase them.

Add a new policy that reads “engage in fair housing testing to determine the depth of racial, gender, or cultural bias in the rental and ownership of housing.”

Add a new policy that reads “encourage landlord education on topics of affordable housing options including the acceptance of Section 8 vouchers.”

pg. 117: H-32, we request the policy be revised so that the City’s target for new rental construction affordability will be determined by our Met Council affordability goals. Given 830 units at 30% AMI, 130 units at 50% AMI and 1010 units at 60% AMI, our goals will be 25% at 30% AMI, 5% at 50% AMI and 15% at 60% AMI (100% of the 30% goal and 50% of the 50% and 60% goals).

H-33, we request that the policy be revised so that the City’s target for new ownership will be determined by Met Council affordability goals. Given approximately 130 units at 50% AMI and 1010 units at 60% AMI, our goals will be 5% at 50% AMI and 15% at 60% AMI (half of the goals at 50% and 60%).

H-41, we request that this policy be changed to read “use official controls to require affordable housing to achieve mixed-income neighborhoods.”

H-44, achieving the Met Council Affordable Housing goals should be a top priority in planning, legislative priorities, and comprehensive plan language. This policy should be strengthened to ensure that the goals are met.

Thank you again for the opportunity to comment on this draft and for your careful consideration of our comments.

Sincerely,



Paul Sawyer
Chair, District 1 Land Use Committee
On Behalf of the Board of Directors

To: Lucy Thompson, Principal Planner, Planning & Economic Development

From: Dan Marshall and Millie Adelsheim
882 Tatum Street, Saint Paul

Thank you for extending the comment deadline until today for the 2040 Comprehensive Plan. Our family lives in the Midway neighborhood near Newell Park and owns Mischief Toy Store on Grand Avenue.

We strongly believe that the comprehensive plan should promote and allow density throughout the city, not just along transit corridors. We should follow Minneapolis' lead and abolish exclusionary zoning that allows only single family homes. By design, single family zoning promotes car use, reduces walkability, and tends to exclude low-income residents, stratifying our city by income.

There is high demand for more housing throughout the city. Promoting increased density will not only help meet this growing need, but will also increase the city's tax base, promote transit over car use, and provide more customers for local small businesses. Density needs to be encouraged everywhere in order to prevent gentrification and sprawl. If we don't allow growth in more affluent neighborhoods currently dominated by single family homes, then growth will occur only in less affluent neighborhoods and the exurbs.

We also need to end discriminatory restrictions on student rental housing. Students should have the same right to live anywhere in the city as other tenants do. Prohibiting students from certain affluent neighborhoods is unfair and creates unintended consequences in other neighborhoods. Saint Paul should be a city for all.

We strongly believe that the comprehensive plan should value the needs of people over cars. For too long, city planners have placed vehicle throughput and parking over pedestrian safety, bicycle safety, and livability. The following policies should be included in the Comprehensive Plan:

- Road diets and traffic calming should be part of each and every road construction project. Streets should be narrowed, speeds should be reduced, sidewalks added or improved, slip lanes eliminated, and bike lanes added. Many of our neighborhood streets are built like highways and the results are predictably and avoidably deadly. This needs to change as quickly as possible throughout the city.
- Parking minimums should be eliminated throughout the city.
- The city should end the practice of playing favorites with parking by eliminating resident-only parking restrictions. Parking meters should be used instead where on-street parking demand exceeds capacity.

With these changes, we believe that Saint Paul can grow responsibly, become more environmentally sustainable, and support local businesses without sacrificing the city's historic charm or unique neighborhoods.

Thank you,

Dan Marshall and Millie Adelsheim

January 10, 2019

Re: Comprehensive Plan 2040

Friends of the Parks and Trails of St. Paul and Ramsey County, a local non-profit membership organization, was established in 1985 when a development was proposed for Crosby Farm Regional Park. A group of concerned citizens banded together to speak on behalf of our priceless parks, trails and open spaces.

The introduction to the Parks, Recreation, and Open Space Chapter of the 2040 Comprehensive Plan draft states, “The Saint Paul park system comprises a large, diverse and vibrant network of people, spaces and facilities that is recognized by Saint Paul residents as one of the city’s great shared assets.”

It goes on to say that, “Park facilities and programs improve the quality of life... foster public health...serve an important role for the city’s youth by providing safe and healthy places and activities...connect us to the Mississippi River and lakes... and are an important component of sustainable economic development, drawing and retaining residents, increasing nearby property values and attracting businesses.” We couldn’t agree more.

We appreciate and applaud the recognition this draft gives to not only the environmental benefits of parks, recreation, and open spaces, which are more intuitively acknowledged, but also the economic, social, and health benefits they provide. **Parks are fundamental building blocks when seeking environmental and economic sustainability**, one of the five goals guiding the Parks, Recreation and Open Space Chapter.

We recognize this draft was composed with the intention of being a more high-level document than previous iterations. Bearing that in mind, we strongly encourage incorporating language into the Parks, Recreation, and Open Space Chapter that reiterates the **importance of community input in development planning and vigilantly maintaining public access throughout the system.**

It is important that mention be made of the No Net Loss Provision in the Saint Paul City Charter. This provision is highly relevant to all development decisions involving our park system and yet there is no reference to it.

There is currently no official map of the city's parkland, making the goals of maintenance and asset management particularly challenging. **We recommend the city make mapping parkland a priority.**

The current Comprehensive Plan calls for a parkland zoning designation.

That designation has yet to occur. When reviewing the six Focus Areas of the entire Comprehensive Plan draft (equitable cities, aging in community, community/public health, economic development, resiliency, and urban design) parkland zoning would be a tool to help achieve them.

There is no mention in the draft of the **Parkland Dedication Ordinance**. While we recognize this is a high-level document, given the goals of the plan and the value statements, and knowing it will be referenced when making funding and development decisions, it may be helpful to make note of this valuable tool that can help us reach the desired outcomes of resiliency and sustainability.

Specific item notes on the Parks, Recreation and Open Space Chapter: **red text** indicates additional suggested language and ~~strikethrough~~ indicates suggested text removal.

Policy PR-1. Ensure equitable access to Parks and Recreation programs, resources and amenities **including, but not limited to, racial, ethnic, income, ability, and geographic diversity.** (The goal is that the users of the system are reflective of the population, not solely addressing physical access to parks but actual equity of use and opportunity. This also relates to **PR-4**.)

Policy PR-9. Use **systematically-collected** customer and resident feedback on needs, satisfaction and trends to improve park experience and bring in new users. (We make this recommendation to clarify between systematically collecting valuable feedback on which to make important decisions versus relying on a complaint-based system. Too often, when systems are based on complaints, it's the "squeaky wheel that gets the grease" and those that don't realize the necessity of speaking up or feel uncomfortable doing so are left behind.)

Policy PR-10. Embrace and integrate emerging cultural and recreation trends, particularly those that meet the recreational needs of youth, underserved populations and emerging resident groups. (How will these trends be determined?)

Policy PR-24. Develop shared-use facilities as a first option when contemplating new or replacement indoor recreation facilities **while recognizing the importance of maintaining public access**. (Privatization of public facilities doesn't seem to be the goal here so it's important for that to be put in writing somehow.)

Policy PR-26. Use data-driven evaluation of **all** park assets to develop a maintenance and replacement schedule, and plan for future budgetary needs. (We recognize the 2017 Ameresco report regarding capital assets, but this will be difficult to accomplish without comprehensive and accurate mapping of all parkland resources. The city needs to prepare accurate boundaries of parkland within the city to be able to accurately monitor those resources, thus our recommendation to make such mapping a priority.)

Policy PR-29. Seek out partnerships with private entities to finance capital and maintenance costs of Parks and Recreation facilities without compromising good design solutions, **reducing public access** or over-commercializing the public realm.

Policy PR-34. Prioritize safety and equity when filling gaps in the trail and bikeway system to ensure seamless connections throughout the city for pedestrians and bicyclists of all ages and abilities. (How will equity be used in this way? What approach will be used to evaluate?)

Policy PR-40. Provide consistent wayfinding signage in each project or park so that it is recognizable as part of the broader City system **while being cognizant of the negative impacts of signage in natural areas**.

Policy PR-41. Involve staff from the Department of Parks and Recreation **and park and community advocacy groups from the beginning in the early stages** of discussions regarding large-scale land redevelopment sites. (We acknowledge staff plays an important role when meeting with developers at the beginning of projects and we certainly don't intend for this to be an interference with that. However, we believe it is reasonable that the public should be involved in the early stages of large-scale developments and not just after potential uses have been whittled down to certain choices.)

Policy PR-42. Address physical park encroachments that impair use through effective parkland management and protection. (Accurate mapping of existing parkland is required so that this can be done. It is not possible without it.)

We thank you for this opportunity to comment and congratulate city staff on the extensive community engagement and outreach they have undertaken throughout this process. As an organization made up of community members, we recognize the importance of actively engaging with our fellow citizens.

We encourage this philosophy of citizen engagement as the city refers to the Comprehensive Plan to 2040 and beyond. As it was done in the creation of the document, we hope, too, it will continue in the implementation, calling for robust stakeholder involvement and identifying the importance of social capital while upholding the Core Values throughout all the Focus Areas and Topic Chapters.

Sincerely,

Shirley Erstad
Executive Director

Hi Bill,

It was my understanding the Planning Commission left the deadline open until 4:30 today for comments on the draft comp plan, but the online form wouldn't allow my submission just now. So here are my comments:

Transportation Chapter Comments

I greatly appreciate the city's stated priority for pedestrians first in a modal hierarchy (Policy T-3). This should not be limited only to design; maintenance and operations must also be included. Construction often is allowed to create unsafe conditions for pedestrians where sidewalks are closed yet direct routes are maintained for drivers first. Policy T-32 on construction needs to have the same modal priority applied to it. Snow and ice also endanger pedestrians trying to safely walk to their destinations.

I have appreciated the city's widespread adoption of leading pedestrian intervals, and Policy T-7 is a much needed approach citywide.

Policy T-11 should emphasize drivers in education. It is not a 50/50 shared responsibility when only one party (the driver) has the weapon that inflicts the harm. Drivers still have responsibilities to drive with due care.

Thanks,
Heidi Schallberg
706 Mississippi River Blvd S #204 55116



SENT VIA EMAIL

January 11, 2019

Saint Paul Planning Commission
15 Kellogg Blvd. West
Saint Paul, MN 55102

RE: Saint Paul 2040 Comprehensive Plan Housing Chapter

Dear Saint Paul Planning Commissioners:

The Housing Justice Center (HJC) is a Twin Cities based public interest law firm focused on preserving and expanding the supply of affordable housing. We write to offer comments on the Housing Chapter of Saint Paul's Comprehensive Plan.

Under the Metropolitan Land Planning Act and the Metropolitan Council's 2040 Housing Policy Plan, the housing elements of comprehensive plans must include the following elements which are lacking in substantial ways in the current draft Plan:

1. Standards, plans, programs, fiscal devices, and other specific actions to be undertaken in a stated sequence which "will" meet existing local and regional affordable housing needs.
2. A description of the tools the City will employ to address housing needs and the sequence for their implementation.

The council's Planning Handbook adds the following requirements:

1. A clear and direct linkage between needs identified and tools to be employed, focusing on different levels of affordability. Plans consistent with Council policy will consider all widely accepted tools to address their housing needs.

While the current housing chapter of the 2040 Comprehensive Plan addresses some of our previous concerns about the prior draft of the 2040 Comprehensive Plan, it does not adequately address the requirements of the Minnesota Land Use Planning Act related to affordable housing, nor does it take advantage of the opportunity to make meaningful progress toward addresses the serious and persistent shortage of affordable housing in Saint Paul.

Addressing housing needs over the next decade

According to the Metropolitan Council, there will be 6,700 new households in Saint Paul in the coming decade, requiring 1,972 new units of affordable housing. Of this, 832 units must be affordable to people at or below 30% of AMI. This means that 12% of all new housing units in the city must be affordable to extremely low-income households in order for Saint Paul to meet the need as determined by the Met Council. Additionally, the Met Council determined that the city needs an additional 128 units of housing at 31-50% AMI and 1013 units at 51-80% AMI.

Policy H-32 on page 117 proposes that all new projects that receive financial assistance from the city need to be at least 30% affordable with 10% of the units at 30% AMI, 10% at 50% AMI and 10% at 60% AMI. Overall the distribution of affordable units is consistent with or better than the Met Council guidance on housing need. However, the policy is very limited in scope, will apply to very few developments, and does not take sufficient advantage of city leverage to create affordable housing opportunities. As opposed to limiting affordable housing requirements to direct project financial assistance, the city should require affordable units in all multifamily developments where the city has financial or political leverage including changes in land use. At a minimum, the requirements should be triggered when the city is asked to contribute financially to development in indirect ways such as the creation of new infrastructure supportive of a housing development.

Housing for extremely low-income households

The current iteration of the Housing Chapter acknowledges on page 164 that the most pressing need for housing is for households with incomes below 30% AMI and the failure of Low-Income Housing Tax Credit developments to address housing needs for people at or below 30% AMI. People at or below 30% AMI are also identified as the households most likely to be housing cost burdened. Currently, there are over 15,000 households with incomes at or below 30% AMI pay more than 50% of their income on housing costs. The overwhelming majority of housing cost burdened households in Saint Paul, about 77%, are households at or below 30% AMI.

A critical fact that the City's analysis fails to add is that provision of housing affordable to households with such extremely low incomes absolutely requires annual operating subsidies because 30% of these incomes generally won't be sufficient to cover rental housing operating costs. Therefore, even deep capital subsidies that eliminate the need for any amortizing debt are not sufficient. The proposed solution, as articulated on page 169 of the plan, is to lobby the state and federal government for more resources to meet this need and to "explore ways to get deeper affordability for extremely low-income households that may not need supportive services."

This does not adequately address the requirements of the Minnesota Land Use Planning Act of the Met Council's planning guide. A key legal requirement of Minnesota Statutes § 473.859 Subd. 4 is that the Comprehensive Plan must include an implementation plan setting out standards, plans, programs, fiscal devices, and other specific actions which "will" meet existing and projected local and regional affordable housing needs. The Plan fails to articulate any city actions that will even address the problem, let alone address it in a meaningful way. Asking for more money from the state and federal governments is not a city plan, program or fiscal device which will produce any units at 30% of AMI, let alone the number allocated to the city by the council.

While it is laudable that the city intends to "explore ways" this does not rise to the level of a strategy to meet the needs that will produce any number of units of housing that is affordable to households at 30%

AMI or below. The plan should include the specific strategy of creating a funding source for that creates housing opportunities for households at 30% and below AMI.

The Met Council's handbook requires a narrative analysis of existing housing needs clearly identifying existing needs and priorities and addressing potential barriers to meeting those needs. While the plan indicates that standard affordable housing tools fail to meet this need, it does not sufficiently explore the barriers or mention the main barrier – the need for operating subsidies - nor does it indicate what tools are available that are under the purview of the city that could be used to meet at least some of the need for deeply affordable housing. The comprehensive plan fails to indicate that rent and operating subsidies are required to make units affordable to households at 30% and below AMI. This is both a key barrier to meeting the need for more housing at 30% and below AMI, it is also an area where the city could create actual strategies, including creating specific funding sources, to meet the need as required under the Land Use Planning Act.

The Plan's failure to meaningfully address the desperate need for housing affordable to extremely low-income households has obvious fair housing consequences. HUD's 2010-2014 CHAS data indicates that households of color are more than twice as likely as white, non-Hispanic households to be severely cost-burdened renters (more than 50% of income for rent).

Strategies, Tools, and Implementation

The implementation steps outlined in the current iteration of the plan are in many cases too vague, general, or tentative to meet the standards set out in the Land Use Planning Act. Not only does the current plan fail to meet the legal standard of creating a set of specific strategies with sequenced implementation steps to carry out those strategies, but it also fails to take advantage of the opportunity to develop new ways to address the growing need for more affordable housing. This should include new local revenue sources and new policies that support the development and preservation of affordable housing opportunities, with a focus on meeting the needs of households at or below 30% AMI.

Overall the plan includes a long list of strategies, including some that have the potential to address some of the most important housing issues faced by the city, but many of these policies are not tied to specific strategies or implementation plans that would make the proposed policies meaningful. For example, while it is good to know that there are continuing discussions about the preservation of unsubsidized affordable housing, the comprehensive plan should do more than vaguely reference that there might be a plan at some future point in time.

There are a variety of other important issues that the plan mentions but does so in a manner that is too vague to be meaningful. Among these are:

1. H-15 does not include sufficient detail or analysis to be understandable or actionable.
2. H-16 mentions policies and practices to create housing choice but describes neither the practices nor the policies
3. H-20 states that the city will collaborate to address steering, but does not mention any specific ideas, policies, or strategies to address intentional steering
4. H-28 states that the city will do research about best practices and policies to address housing barriers in the tenant selection and screening process. The city should do the research as part of the comp planning process and set out specific plans for adoption of those best practices in the comp plan itself.

5. H-35 says that the city will “explore” mechanisms to ensure long term affordability of HRA developed homeownership opportunities. The city should instead “develop and implement” strategies to this end.
6. H-41 should be changed to include the adoption controls and the policies consistent with the analysis of IZ feasibility in the implementation toolkit on page 177.

A final issue that is not addressed in the Housing Chapter of the Comprehensive Plan is the substantial capital needs backlog of St. Paul PHA properties. An analysis of this issue should include discussion of the PHA’s proposed conversion of its entire stock under the HUD RAD program, and what effect if any RAD conversion will have on both the quality and affordability of this important source of deeply affordable housing.

Saint Paul has the opportunity to create new strategies, develop new resources, and enhance its ability to leverage state and federal dollars. Saint Paul is projected to continue to grow, but without more dedicated local funding sources for affordable housing development, it will remain at a competitive disadvantage in accessing state resources and will continue to fall behind in meeting its housing needs.

We greatly appreciate the time and effort that went into creating the comprehensive plan and the commitment to a just and equitable community that is apparent throughout this document. Thank you for your time and consideration.

Truly,



Margaret Kaplan
Housing Justice Center

CC:

Mayor Melvin Carter
Councilmember Dai Thao
Councilmember Rebecca Noecker
Councilmember Chris Tolbert
Councilmember Mitra Jalali Nelson
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