



July 14, 2018

Heather Worthington
Director of Long Range Planning
City of Minneapolis
Community Planning and Economic Development
105 Fifth Avenue South #200
Minneapolis, MN 55401

RE: Minneapolis 2040 Plan

Dear Ms. Worthington:

The Linden Hills Neighborhood Council has been actively reviewing the City's proposed land use/zoning plan, commonly referred to as the "2040 Plan." We have, on behalf of ourselves and the residents of Linden Hills, coordinated with the City to create informational boards, handouts, and other resources that would allow the neighborhood residents to be introduced to or better understand the dynamics of the 2040 Plan, and provide input on the same.

We recognize that the 2040 Plan will inform and guide growth, development and zoning decisions for our city far into the future. Accordingly, while this letter is presented to you on behalf of the Board with respect to the 2040 Plan, further comment (assuming the 2040 Plan is adopted) is reserved until the specifics of the proposed zoning are prepared and presented to the public for comment.

Based on the feedback that we have received, it is difficult to discern a consensus within the Linden Hills community regarding all aspects of the 2040 Plan. For example, there are both enthusiastic supporters and concerned detractors regarding "density" and what some would characterize as a free-market approach to accomplish the 2040 Plan's goal of equity for all residents of our city. There are also those with serious reservations about how the plan will be implemented and enforced and those who remain confident in its policy aspirations, assuming it is adopted by the City.

By way of background, and prior to providing any comments, it is important to understand the process through which the Council reached out to the community for comments. The City itself instituted a semi-interactive web-based comment process (one which could intake comments, but could not answer questions people might have), but people of the community reported difficulties accessing and understanding the Plan in this format, especially for those with limited or no access to internet. The Council

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believed it was necessary to help create awareness, highlight certain items of interest to the Linden Hills community, and afford its residents alternative and additional platforms to raise and voice their concerns.

For example, at the Linden Hills Festival on May 20, 2018 (the “Festival”), the Council hired an individual who had worked with the City previously to capture comments and to put them on a “thought board” that generally reflected comments of the community members present at the Festival. This thought board, as well as handouts that included general descriptions of the categories of proposed changes and maps about how those changes would be implemented (as well as maps that showed the current land use) were located in an informational tent that the Council prepared and hosted at the Festival. Included as part of this were informational boards, which provided additional detail and allowed any passersby to see aspects of the Plan on a large-scale basis.

Community outreach was further done through e-mail blasts, The Line, Next Door and Facebook. An electronic comment board was created on the Council’s website and the public was encouraged to comment on the City’s website as well. In addition to the comments from the community, Board members, who are also members of the community, have provided their comments and input into the 2040 Plan and into this letter.

In order to provide you with the full flavor of the comments that the Board received, we are attaching to the electronic version of this letter those comments in their native format. In reviewing these, please note that Councilmember Palmisano recently mailed a letter to her constituents in an effort to inform them of the 2040 Plan, its implications on Southwest Minneapolis, and the opportunity to provide input. Since that time, there has been a noticeable uptick in comments to Board Members regarding the 2040 Plan. Among other comments, many community members have expressed that it would be prudent to allow more time for residents to review and consider the 2040 Plan and to voice their support, opposition, or other concerns.

From the Board’s perspective, it appears that there is general support for the 2040 Plan on a policy level. The principal goals of providing affordable housing and addressing economic disparity associated with the same are laudable, and are viewed as being part of an overall program by the City to address economic and racial disparities. How the goals of the 2040 Plan are implemented, and the lack of detail on this included in the 2040 Plan, is where that support begins to erode. **The 2040 Plan leaves many unanswered questions and raises serious concerns on how, will, or whether it can be implemented.** There are questions about how the Plan will be balanced (if at all) with the existing Small Area Plan and the ability of the citizens of Linden Hills to determine the look, feel, and characteristics of the neighborhood in which they have chosen to live.

The concerns and criticisms, in general themes, are set forth below:

1. Affordable Housing for Renters and Home Owners and the Integrity of Neighborhoods. As you may be aware, renters already make-up a significant percent of Linden Hills residents. These renters are disbursed throughout Linden Hills in multi-family dwellings, fourplexes, duplexes, townhomes and single-family dwellings. They are mingled in to the neighborhoods and generally reflect the unique architecture associated with the same.

The question, then, is how will the four (or more, with conditional use permits) story buildings that are to be built on corridors and the fourplexes that are to be built on interior one, play out in the Linden Hills neighborhood? With admittedly high raw land or lot costs, builders will be required to accommodate or make adjustments to fit with the goal of providing affordable housing. The concern is that this means, or potentially could mean, buildings of lesser quality (aesthetically and otherwise) as builders squeeze down the construction costs to provide not only affordable housing, but also cost-effective construction that can meet market rates. This raises concern that this may also have a negative impact on the quality of the housing stock and aesthetics of the neighborhood.

There is also the question of whether these new housing units in our community will be renter- or owner-occupied? The 2040 Plan is not clear on whether much of its development proposals will provide financial equity to city residents. As noted in the Plan, financial equity has been denied people of color in the past, but the equity policy of the Plan is not clear on whether social equity and fiscal equity go hand in hand. Although Linden Hills residents are predominantly white and middle-to-upper class, but the community openly voices support for increased diversity and equal access to owner-occupied housing within Linden Hills. This should be clearly promoted in the 2040 policy goals. While easy to say, there are serious challenges to be answered which revolve around how we, with the support of the City, will make real and substantive equity happen for citizens who have been denied access to housing in our community, because of market forces driving the ever-rising cost of housing.

2. Parking and Transportation. While the 2040 Plan serves a laudable goal of pushing citizens towards alternative modes of transportation (bus, bike, rideshare, and perhaps, light rail), that is not the current reality in the Linden Hills neighborhood. Many neighborhood residents have accordingly raised concerns relating to parking and transportation under the 2040 Plan.

First, many residents are concerned that the Plan does not *require* that new developments (*e.g.*, multi-family and fourplexes) provide for parking, which will push more parked cars onto already-crowded streets. (While developers will not be required to provide parking, the Council recognizes that the increased demand

for parking anticipated under the Plan may nevertheless incentivize developers to include parking in their building plans.) While the statistics available suggest that alternative modes of transportation are trending up, the question is whether those trends are significant enough and are expected to continue to the extent that the City should abandon, from a planning perspective, how to address parking and the use of a car. And even assuming these alternative modes of transportation predominate by 2040, the Plan does not adequately address the evolution from today's car-centric reality to that future. Accordingly, the 2040 Plan should address anticipated parking needs, especially in neighborhoods like Linden Hills that are not downtown-adjacent or connected to any existing light rail line.

Second, in addition to the concerns of the 2040 Plan relying upon transportation like the MTC Bus System, one of the principal transportation alternatives available in Linden Hills over which the City has little or no control, there are concerns that the 2040 Plan will put more pressure and vehicles on tight, crowded roads. This goes hand in hand with the nuanced application of the 2040 Plan and the comments on parking, discussed below.

3. Nuance in Application. While the goals of the 2040 Plan are laudable, there is a real question on whether it fits within Linden Hills. The corridors identified in the Plan include Sheridan and 44th, amongst others. Yet both of these streets are narrow, normal, or customary residential streets that already carry bike lane designations and bus routes. In fact, Sheridan is so narrow that it prohibits parking on one side of the street from William Berry Parkway to 44th to accommodate the current traffic. Down 44th, while there is parking on both sides, it is a narrow, normal-width residential street; in the winter, at times, the street is down to a lane or lane and a half, at best.

Notwithstanding, the 2040 Plan treats these streets the same as Hennepin Avenue, Lyndale Avenue, France Avenue, and 50th Street. All of these are four-lane and/or adapted two-lane roads that are wide and sweeping boulevards that can better accommodate the 2040 Plan.

In order for the 2040 Plan to work, and to accommodate this on a city-wide basis, a more nuanced application should be applied. Not all commercial corridors are created equal. Accordingly, the 2040 Plan should be scaled back to accommodate "corridors" such as Sheridan and 44th, which are not physically capable of supporting four (or more) story buildings.

This would also extend, by implication, to the accompanying "Interior 3" designated areas of the Plan. These blocks (which are on the adjacent parcels to the commercial corridors) are made up primarily of single family homes which may negatively impact the supply of often smaller and more affordable housing stock for families in the community. These blocks simply do not have the

capacity to properly handle the additional traffic, parking, and other demands that would be created as those are developed, much less the overflow of traffic and parking from the structurally insufficient commercial corridors that would run through Linden Hills under the Plan.

4. Schools and Infrastructure. With the influx of new residents, how are the schools going to accommodate new students? How about the infrastructure such as water and sewer? What about parks? The City struggles to keep up with current structural issues and maintenance. How does it propose to address these issues when there is more demand and more strain on them? These issues should be addressed as part of the 2040 Plan.

5. Shoreland Overlay. As you are aware, there is a Shoreland Overlay District that surrounds both Lake Harriet and Lake Bde Maka Ska that extends 1,000 feet from the shoreland of each body of water. The 2040 Plan does not clearly address the City's support for this State-mandated environmental protection. In fact, several development proposals within the 2040 Plan appear to encroach upon it, e.g., on the Northwest corner of Bde Maka Ska. We would like to see this addressed.

6. Cost Effectiveness and Incentive. For Linden Hills, and most of Southwest Minneapolis, there is a real question about whether the 2040 Plan can be cost effective and whether it will, in fact, serve its articulated goals of access and affordable housing. For example, assuming, conservatively, that an average lot costs \$300,000, with the estimated fees associated with preparing the lot (removal of the house and appropriate earth work), the total cost quickly approaches \$350,000. Assuming further that a fourplex will have four units that are approximately 1,000 square feet each, with approximately 500 square feet of common space (hallways, entrance, exits), the cost associated with construction at \$166 per square foot (which is average in the Twin Cities) is \$750,000. With the estimated \$350,000 for the lot and preparation for the same, the total cost is over \$1,000,000.

How is this million-dollar investment going to result in affordable rents? From a financing perspective, the cash flow is challenging, at best, and, depending upon the level of financing involved, may not work at all. The concern, then, is that there will be a number of fourplexes or other multi-family units that would be built in the areas theoretically described in the 2040 Plan that will not serve the underlying goal of allowing or ensuring that there will be affordable housing. While there may be an argument that this will relieve pressure throughout the City as more units (assuming the same are rentals) come available, within the microeconomy of Linden Hills, the 2040 Plan does not seem to make sense. With the high demand for housing in Linden Hills, there is concern that the 2040 Plan will instead provide incentive for developers to knock down houses and existing multi-family units to construct bigger, and not necessarily better, models

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of the same. This will not result in lower-cost housing, just more housing. It will also continue to consume the older, lower-cost housing stock and take away affordable first-time home buyer houses.

7. Trust in the Process. Under the current land use practices and zoning code, there are numerous exceptions to the rules in place either by statute/code or by conditional use permit. Time and again, developers apply for, and are granted, conditional use permits that allow them to deviate from the rules in place. This practice, in turn, allows other similarly situated developers to apply for and get the same (or similar) conditional use permits. This process, especially recently as the City has pushed for density, erodes confidence in the current process and skepticism in the proposed 2040 Plan that there will be any integrity in addressing applications for construction. This must be addressed in the 2040 Plan and the subsequent zoning code to follow.

Based on all of the comments and after deliberation by the Board, it is the Board's position that the 2040 Plan, as a policy draft of an overall strategy for the City, is a start. It seeks to obtain the laudable goals of ensuring economic diversity and opportunity for all Minneapolitans.

However, there are serious informational gaps and flaws associated with the Plan's implementation that the Board believes must be addressed, the most significant of which are set forth above.

We thank you for the opportunity to present this information and for your consideration. If you have any questions or further comment, please do not hesitate to contact me.

Respectfully,

Stephen M. Birch
Chair
Linden Hills Neighborhood Council

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