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390 Robert Street North
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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 are 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.

Regards,



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