



Wednesday, September 20, 2017

Dear Mayor Coleman and members of the St. Paul City Council,

On behalf of The Alliance, a 33 member coalition of environmental, social justice and community-based advocacy organizations, I wish to call on city of St. Paul leaders to commit to truly affordable housing goals for the Ford redevelopment site. Our coalition works on urban growth and development issues in the seven county region, and we apply a racial and economic equity lens to our work.

We Support for the Current Zoning Plan ...

We are on record as supporting the current Ford Site Zoning and Public Realm Master Plan and would urge the city council and mayor's office to work towards maximizing the residential density of the project, bringing up to 4,000 units of new housing opportunities to St. Paul. We would also remind the city of its obligation to affirmatively further fair housing opportunities in the city, and there is no better place to showcase the city's commitment to this goal than this 135 acre redevelopment site.

Density equals destiny - for a city that wants to grow its future population and preserve the strength of its political representation at the local, county, state and federal level, the site must optimize the residential component in the plan.

This is a major development opportunity, one of the most desirable plots of land anywhere in the metro area, it will have a positive impact for the whole city in terms of economic benefits, jobs, population growth and increased tax base - but it is also a development site of "regional significance" because of its use of regional wastewater and transit services, and the impact it will have on its neighbor cities, as well as on the local/county/state roadway systems. Furthermore, it promises to provide a vital boost to the regional economy, promote urban livability and will be a premier example of sustainable urban growth for years to come.

While we support the current plan, there is one major area where we feel the city needs to improve on the project.

... But the City Needs to Commit to Truly Affordable Housing Goals

Our main concern is that the city does not have a specific goal to build housing for low-wealth families making \$20,000-\$26,000 per year in annual income, no goals for seniors on fixed income, no goals for Section 8 housing opportunities, and no goals for persons with disabilities on limited incomes.

From what we've seen, the city is targeting families that make between \$43,000-\$53,000 per year for their affordable housing goals, but it has yet to show us their plan to include individuals and families making less than \$43,000 per year, and from a Fair Housing and Civil Rights perspective, that is raising some very serious concerns.

It has been the practice of the city in the past to require developments receiving city assistance to set aside 20% of the residential units as truly affordable – at the maximum density allowed by the zoning plan, this would equal up to 800 units on the Ford site. Half of those units would need to be affordable to households incomes of \$18,000 - \$26,000 per year; the other units would need to be affordable to households incomes of \$30,000 - \$43,000 per year, depending on family size. Affordable housing advocates have pointed to this “Inclusionary Housing” policy as a model for other cities in the region.

Unfortunately, city staff have questioned whether their Inclusionary Housing policies would apply to the Ford site. They say the policy is usually triggered by city subsidies to the actual buildings, not the infrastructure. We respectfully suggest that this is a distinction without a difference. Does it really matter if the city provides a direct monetary contribution, a zoning variance, TIF or tax abatements, curb-and-gutter infrastructure improvements, new roads, new traffic signals, new light poles, restrooms for recreational fields, street signs or new trails?

The plan’s affordability targets are not representative of the future need or the city’s regional housing obligations. We find it very troubling that the city has no housing targeted at 30% of the AMI, despite the demonstrated need in the next decade to build 832 units of housing at or below that affordability range – an issue you will soon be grappling with as you formulate your Comprehensive Plans for 2021 – 2030.

We would also like to see more specificity in the plan for a variety of types of housing, 2-3 bedroom units, rental as well as ownership opportunities.

Finally we have some very serious concerns about the latest amendment that limits the height of some buildings and incents the creation of more green space. This policy could serve to restrict housing opportunities if it cuts into the number of 4-6 story buildings, where we typically see greater opportunity to build at affordable levels vs. 8 – 10 story buildings. The city needs to reexamine that incentive and consider building in additional rewards to the developer for hitting affordability goals.

Building an Inclusive, Equitable Community

If we truly believe that "All Are Welcome Here" in St. Paul, then we must, as a community, commit ourselves to inclusive planning to ensure that all have access to this regional gem - and that we have a balance of housing choices and options that will allow a diverse range of people and incomes to live and work at the Ford site.

Thank you very much for this opportunity to provide our perspective,

Sincerely,

A handwritten signature in black ink, appearing to read "Russ Adams". The signature is fluid and cursive, written on a light-colored background.

Russ Adams, Executive Director