

# RESPONSES TO COMMENTS REPORT

May 8, 2019



**COMPREHENSIVE PLAN  
CITY OF EDINA**

2018



**2018 City of Edina Comprehensive Plan Update**

**Responses to Comments Reports**

Prepared for:

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# I. Introduction

## Background

The draft 2018 City of Edina Comprehensive Plan was published on March 7, 2019 and uploaded to **Better Together Edina**, a website developed by the City to receive comments and input on a range of City projects and activities, including the draft Comprehensive Plan. The formal Comment Period was opened on March 7 and was closed on April 8, 2019. Comments received on the draft plan during this 30-day period were reviewed and analyzed by the City of Edina Planning Commission, and responses, documented in this report, were developed for each comment.

Comments received after the formal Comment Period ended were also reviewed and analyzed. Responses, however, are not documented in this report.

## Purposes

### *30-Day Comment Period and Better Together Edina*

The 30-day Comment Period was implemented to obtain input from Edina residents on the draft Comprehensive Plan. Residents who accessed **Better Together Edina** to review the draft plan document were asked one question for each of the plan's 15 chapters and four small area plans that were prepared as part of the Comprehensive Plan planning process. That question was:

***What change would you suggest to make to improve this chapter?***

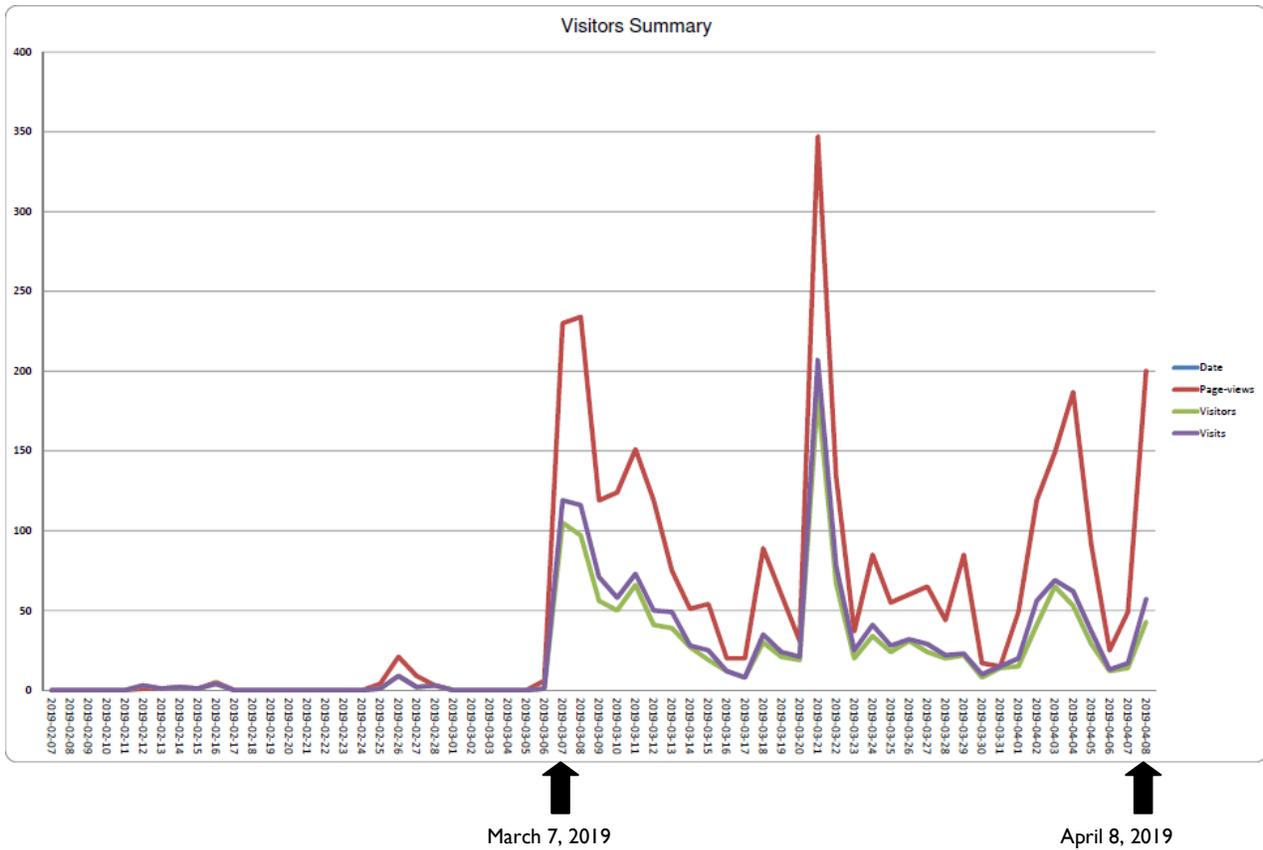
A single and brief question? Yes, but intentionally asked to not steer respondents but, instead, to encourage them to read the chapter (or small area plan), study it, give it thought and consideration, and, without guidance or suggestions, determine:

- How they feel
- If additional information is needed to make points more clear
- If data are accurate, supportable, or reasonable
- If there is agreement or disagreement with goals and policy directions

In total, 95 comments were submitted during the 30-day Comment Period.

The City learned that **Better Together Edina** is an excellent vehicle for posting information about its initiatives and projects and that the volume of responses received from residents is higher than it has ever been. There were 1,560 visits to **Better Together Edina** to review the draft plan and small area plans, and, of these, 107 visitors downloaded draft comprehensive plan chapters and/or the small area plans. Additionally, 33 others submitted questions in the FAQ section of the site.

A chart showing the daily distribution of visitors to Better Together Edina to view the draft plan and small area plans follows on the next page.



### Proposed Amendments to the Draft Comprehensive Plan

As hoped, Edina residents demonstrated their thoughtful review of the draft plan’s chapters and the small area plan documents and provided questions, comments, and suggestions ranging from grammatical corrections, questions about analysis assumptions and conclusions, to agreements and disagreements about the City’s goals and policy directions. Based on the Planning Commission’s review, 50 (53 percent) of the 95 comments received were identified as those that would improve the draft Comprehensive Plan.

This report documents those comments as proposed amendments to the Draft Comprehensive Plan and will be before the Commission for approval at its April 24 Public Hearing on the 2018 Draft Comprehensive Plan. The next chapter of this report details those comments.

### Community Engagement

An important element of the comprehensive planning process was community engagement, which included: workshops, Small open houses and community meetings held for the small area plans and the Southdale District Plan, pop-up information-sharing events, Planning Commission and City Council Public Hearings on the small area plans and Southdale District Plan, and an open house event for the Draft Comprehensive Plan. Comments and input received from residents through **Better Together Edina** is an additional community engagement activity.

This report was prepared to document the comments that were received through **Better Together Edina** and responses that were developed. It is a report that is available to the public that will give residents an opportunity to see how their questions, comments, and suggestions were treated and how their input has contributed to the development of the draft plan. An appendix to this report includes all 95 comments received through **Better Together Edina**.

## II. Proposed Amendments to the 2018 Draft Comprehensive Plan

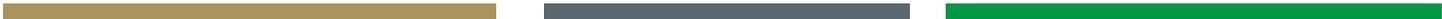
### Chapter Organization

The 50 comments identified a proposed amendments to the 2018 Draft Comprehensive Plan are organized by chapter. Respecting the anonymity of the individuals who submitted comments, no identifying information is included in this report.

Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
2: Community Profile	1	High Property Values Are a Positive Not a Negative The document throughout treats high property values as an obstacle or problem. They are the opposite. High values reflect Edina’s desirability. They attract high-value, high-skill residents. They allow retirees to downsize with money to spare or to fund retirement with home sales. The Draft uses the misleading term “affordability” to cast high values as something to be overcome. High values reflect high-value businesses, great schools, ample amenities, low crime, and good neighbors. The Draft should have as a goal to increase property values as much as possible throughout Edina. High values reflect a glaring fact the Draft ignores: Edina is an intentional community. Edinans, by and large, choose Edina. They plan and save and work to live here. This intentionality, and the high values it produces, is the magic of Edina – we want to be here, we worked hard to get here, we place a very high value in living here with all that Edina offers, and we work hard to keep it excellent and make it better. We have “skin in the game.” The Draft laments that Edinans spend a higher percentage of income on housing – that’s because Edinans place a higher value on living in a great community and they are willing to spend more of their income to do it. That is the common bond that links us in Edina. Allowing housing for people who do not place such a high priority on it fundamentally disrupts Edina.	Chapter will be reviewed to ensure property value references are treated neutrally.
	5	Morningside area is cut off in figure 2.5	Map will be adjusted.
3: Land Use & Community Design	7	"...an increased interest in mixed-use/live-work scenarios." Whose interest? How has this been determined?	Provide language and data from Vision Edina process to support this.
	7	"Additionally, younger residents who are now reaching adulthood have shown interest in different land use patterns, in particular, better connected mixed-use districts." What is the basis for this statement? It may be true, but how true is it? What data from Edina supports it?	Provide data as to housing preferences from Vision Edina process.
	9	First and second bullet points under top paragraph: What does this mean?	Add more explanatory language regarding content and purpose of comprehensive amendments

Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
	9	Reference to "Grandview Heights" in bottom paragraph. Delete "Heights."	Make change as requested.
	10	"Long known as a retail center for the southwest metro area, Edina also contains prime office space whose occupants include several large corporations." Use of "whose" -- rephrase to "occupants of which include several large corporations. Prime office space -- I have been told there is no class A office space, or very little. Is it prime office space? Several large corporations – vague. This is an example of a sentence that doesn't say much because it is too general. These should be cut, because all they really add are words, or rephrased.	Rephrase sentence to be more specific, based on Economic Competitiveness chapter's evaluation of office market.
	10	"Richards" is included in list of golf courses but is no longer a golf course. Delete.	Make change as requested.
	10	Railway paragraph. I have only heard residents refer to the rail line as CP or Dan Patch, not Soo Line, so I don't know that "Soo Line" is how it is known locally.	Clarify name of rail line, including as it is known locally.
	11	"However, this is not always allowed under ordinance or encouraged by policy. An example of this situation could be a location where land values may make it economically feasible to develop at a scale beyond what is allowed under city policy and regulation." How true is this? What specific city policy or regulation? Since the council can change city policy and regulations to allow for developments, and that is what they do, why not say that instead?	Reword as requested.
	11	Is Edina double counting Fred Richards and/or Braemar as both a Parks and Rec area and Golf Course area? I'm referring specifically to this snippet: "Parks and Recreation. Edina has an extensive public park system that serves the community and area residents. Parklands include a golf course ... Golf Course. Edina has four major golf courses located in these public parks and private country clubs: Braemar, Interlachen, Richards, and Edina."	Should there be a statement on the City's commitment to the golf course?
	23	Table 3.5 and others: source of data not provided. Should be provided.	Add data sources to tables.
	25	Weber Woods is guided as low density residential. It was discussed to be a dog park and storm water facility-essentially stay open space. When did it change to low density residential?	Make adjustment to map as discussed with City staff.
	37	1 and 3 under Principles -- rephrase so both are easily understandable. 1 under Guidelines -- "Recent zoning changes have PARTIALLY addressed this issue." Add "partially."	Make changes as requested
	43	In general, goals are not succinct and clearly actionable. It is better to have fewer, tighter, more actionable goals.	The plan will be edited for clarity and conciseness.
	44	Reference the Implementation chapter for implementation steps.	Add reference as requested
	20	This sentence has a big message but I don't believe it is phrased correctly: "For the purposes of transportation planning, it is an indicator of where development can support non-motorized modes such as transit." Transit, as I think of it, is motorized. Examples would be LRT, buses, and streetcars. These all are	Correct phrasing as requested.

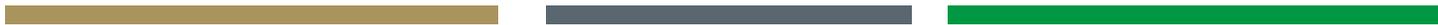
Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
		multiple passenger forms of transit which work better in areas of higher density.	
		<p>This is a very convoluted process for obtaining public input on the comp plan. It is a full time job to try and review then cite all the specific pages of each particular chapter to comment. If this is how residents are to supply input, then this review period should be extended to 6 months at minimum. Thirty days is not sufficient. There is not adequate time to make detailed comments in this format in a timely and efficient manner. I would recommend a different format be utilized for something as broad as public input on the entire comprehensive plan. With that said, with regard to land use, zoning and density, I have major concerns with the increased density across many areas, particularly the areas indicated as change areas. The city of Edina is designated as Urban, not urban core or urban center. An Urban designated city, per Met Council, is to have an average density per developable acre of 10. The proposed increased density in this new comprehensive plan is an average density of 20 units per developable acre. That is DOUBLE what it should be as an Urban area. Twenty units per acre is consistent with an Urban Center designation, which the City of Edina is not. This absolutely needs to be reduced or it will have negative impact on market sustainability and infrastructure, artificially inflates values, impacts taxes and affordability, can lead to future instability in the marketplace, and is inconsistent with an Urban designation. We should not be doubling the recommended density. Comprehensive metro-wide planning occurs for a reason and we as a city should not be exceeding recommendations. In addition, the city has already exceeded the Met Council projections for needed housing units by the year 2040. By rough count, we have added approximately 1700+ multi-family housing units and the projected need, per Met Council, is 1595 by 2040! We are well over that number already. If we continue to allow developers to triple and quadruple units per acre on future development, we will have a complete saturation of market which will have a negative affect on property value across the city, could lead to high vacancy rates, and many of these new developments are funded with TIF, which if continued at the proposed allowed pace and density, could ultimately result in a negative outcome for the tax payer and residents on their investment. The plan includes an increase of multi-family zoning and a loss of office/retail/commercial/industrial acreage. I am concerned at the loss of land for economic development opportunities that would otherwise sustain a greater population growth, higher rents and sale prices that go along with inflated values. I think this needs to be addressed and accounted for, and revised to ensure we maintain and promote adequate opportunity for economic development, not just low paying, becoming-obsolete-retail. The average rent, per the plan, of the new developments exceeds the incomes of the renters who are living in these areas. This is NOT sustainable development. We MUST consider economic development as an equal means. Also, there are serious infrastructure concerns. The congestion that will result with the density proposed cannot be managed with current infrastructure. There is also no where for infrastructure to expand with the current plan. We must take this into consideration before it results in the need for eminent domain. The plan does not account for the expansion of infrastructure in any way, shape or form. This MUST be a part of the comprehensive plan, but it is not. We need to consider and add this. This will have a huge impact on quality of life as well. My final comment here is my concern for the ultimate lack of form-based planning. If we remove specific building height restrictions and give developers broad ability to densify areas without proper controls, we lose our ability to effectively manage development to ensure it fits in a long term comprehensive plan. By removing such specificity from the plan, we set a precedent for uncontrollable development and outcomes. Amendments and variances are granted for a reason - to maintain</p>	<p>The plan will be available for public review and comment during a six month period starting later this year. This initial review is just to prepare the plan for its initial release for wider review. The density ranges included in this plan are the result of small area plans that were recently completed through community-based processes and adopted by the City Council. They represent participants' vision of what is appropriate for these areas in terms of desired development. Employment is expected to grow at a slower rate than residential, based on regional forecasts, and growth patterns have been adjusted accordingly. Add reference to Economic Competitiveness chapter, which outlines approach to</p>



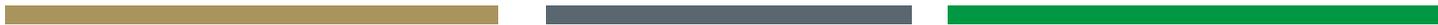
Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
		the ability to properly govern and control development that is in the best interest of the city, its residents and businesses. If we remove that control, we no longer have the ability as a city to adequately plan for the future and ensure outcomes can be managed effectively. Please take these issues seriously. The future of our city depends on it!	economic development. Height restrictions are not being removed. They will be maintained largely as is within the city's zoning code. They were removed from the comprehensive plan to make it more straightforward to modify them in the future as needed, without needing a comprehensive plan amendment.
	25	These pages (25-35) should be revised to reflect the lower maximum dwelling units per acre and the new Mixed Used designation adopted by the Council on April 2.	Update numbers and calculations to reflect most updated density ranges
	2	Table 3.1 shows data from MSP Thrive as of January 2019. This table shows population growing from 47,941 in 2010 to 63,600 in 2040 or 33% growth. When I visit the official Met Council Thrive website it shows (as of January 1, 2019) the population growing from 47,941 in 2010 to 59,600 in 2040 or 24% growth. I know the Met Council will revise their forecast based on input from the local government so I am assuming the City Council requested this upward revision in the projected population. These numbers drive the Comp Plan so it would be great to have an explanation of this change. There seems to be a general argument being made that the Comp Plan is the City's response to how it will manage its fair share of the regional growth. If in fact the City has successfully requested higher population growth than the MET Council originally projected, this should be clearly pointed out and the reasons why clearly explained.	These forecasts have been revised based on mutual agreement between the City and Metropolitan Council. Additional language will be added to clarify that in this section.
	21	Reference to Grandview Development Framework (2012). It is not a SAP and was not included in the SAPs attached to this document. Will it be incorporated by reference? If yes, why, when it is not a SAP and when there has been significant public input on the area since? Edina resident Stephanie Mullaney prepared and submitted a consolidation of public input related to Grandview. It should be included along with the Framework if the Framework is included.	Clarify that Grandview plan referenced here is a development framework, not a small area plan
	22	Figure 4.4: North France Avenue was listed as a potential area of change in the 2008 comp plan. It is not shown as a potential area of change in the 2018 draft. Some explanation would be appropriate.	Small area plan covered the area where change is



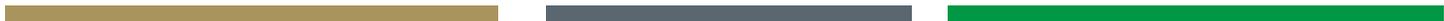
Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
			occurring. Will evaluate the need to study North France Avenue in the future, with potential development of E Line.
	27	Table 3.6 -- "maximum FAR per zoning code" It would help to know what zoning districts correspond to which land use categories, and also how this relates to PUD.	Remove references to FAR from chapter. Zoning districts may be changed or amended based on the comprehensive plan, so there is not a full correspondence between districts and land use designations.
	41	Building Placement and Design -- need illustrations to show what this means. General comment -- photos should be labeled. what are they illustrating?	Adding graphics illustrating building placement and design, as well as captions where needed to explain point
	35	"Public utilities and services have already been extended to all parts of the city, so there is no need to show staging for extension of infrastructure." What about expansion of infrastructure? For example, proposed conversion of DQ office building was rejected due to insufficient water or sewer.	The Public Works Department and Engineering will study needs for service capacity improvements throughout the city.
<b>4: Housing</b>	3	Use of the word "currently." Some data 3 years old. Is it current? Change to "as of this writing" or similar.	Revised text as suggested
	1	"The City of Edina has taken proactive steps regarding affordability via its Housing Succession Plan and the subsequent adoption of its Affordable Housing Policy, but evaluation is needed to determine if this is sufficient." Housing Succession Plan was from 2005. Was it reviewed for relevance? Was it enacted? Remove, or if left in, add date. Add date to Affordable Housing Policy. It is now renamed. Note that it is limited in scope to inclusionary affordable housing.	Revised text as suggested
	1	I'm not sure how you legislate or plan for equality and diversity. The plan says "Now is time to change course, to be more welcoming and inclusive by seeking to provide housing for households with a broader	The opening sentence will be



Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
		<p>range of incomes." Edina is an inclusive community. Show me the statistics that show Edina has a high rate of hate crime, racial tension, and discrimination. Our minority rates are in line with Minnesota demographics percentages and when comparing the demographics of our average household incomes and home values, Edina's % of minorities in those incomes and home values exceeds averages.</p> <p>The solution to increase Edina's diversity can't be solved by Edina's City Council. This is a complicated social-economic issue that has to do with many factors. It seems through this plan that Edina's solutions are more high density housing, more multi-use development, and more low income housing. None of these solutions guarantee diversity. In certain minority groups, their average household income and average home values are lower. It would take social-economic change and advancements within those groups to be more represented in Edina, a community of higher than average household incomes and higher than average home values.</p> <p>Edina's property values are based on desirability. Edina's proximity to Minneapolis, their highly rated schools, and their quiet wooded neighborhoods drive the housing prices. Edina's housing prices perpetuate the demand in that people move here because they know their home will appreciate and hold its value. It doesn't matter what type of housing you build in Edina, the high demand will drive its price up. The only way to reverse that would be to enact policies that go against every reason most of us moved to Edina; or in other words, to enact policies that decrease home values and decrease school ratings.</p> <p>Edina residents do not want the increases in traffic and infrastructure that high density housing brings. Edina residents do not want crowded schools that high density housing brings. Edina residents do want their neighborhoods re-zoned.</p> <p>What about the large area of Edina residents in the Northwest corner of our city whose Children are not zoned in Edina schools? Why aren't we focusing on bringing all families who live within the city limits of Edina into our schools? In other words, why are we not focusing on the needs of our own residents instead of focusing on an ideological dream of transforming our community from the outside?</p> <p>Your housing plan seems like it's goal is to be more like Minneapolis. Many of the families who have moved to Edina came from Minneapolis and left there because of the schools. Why are we are looking to be more like Minneapolis when clearly many of the policies they have enacted have caused a large wage gap among residents, high density areas of poverty, areas of low property values, crime, and poor school ratings?</p> <p>We elect our City Council members to look out for the best interests of our residents; which are to uphold policies and ordinances that to maintain our property values, maintain our highly rated schools, maintain our streets and parks, maintain the character of our community, and allow our police and fire departments to keep us safe. It is not the City Councils job to legislate a vision of the future that does not align with the current residents' best interest.</p>	<p>revised to eliminate, "Now is time to change course, to be more welcoming and inclusive by seeking to provide housing for households with a broader range of incomes."</p> <p>Instead the language will reflect the City's already adopted policy which implies that because Edina is a welcoming and inclusive city, it will strive to improve the range of affordable housing.</p>
	2	<p>Most of my changes are suggestions to improve accuracy or clarity. I support the overall themes of the chapter. I am especially pleased with how it incorporates affordable housing.</p> <p>p 4.2 The change in population from 2020 to 2040 per the bar chart is +8,600 or 15.6% not +5,800 or 24% as stated in the text</p> <p>p 4.5 Please define the "Twin Cities Region" as (the 7 county greater metropolitan area) in the box on Definition - affordability. Using this broad area to define AMI has significant implications.</p> <p>p4.6 I don't know if you can change Table 4.1 as it comes from the Metropolitan Council but it could be improved. The total should appear at the top of each subsection as it does in the first two subsections. In</p>	<p>Make changes as requested to increase clarity</p>

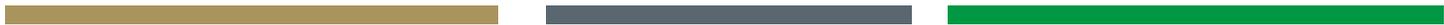


Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
		<p>the the third subsection the total is at the bottom. The Housing units subsection has two further subsections that both total to the overall total. The use of bold dividing lines or an additional blank row might help the readability of this chart.</p> <p>P4.6 Table 1 shows a total number of affordable units at 7,525. Later in Table 4.4 there is a goal cited of 1220 affordable units. I have heard at City Council and Planning Commission meetings that our number of affordable units is more like 994. The disconnect between the 7525 number and the much smaller numbers shown later must be explained.</p> <p>p4.11 Please explain what is meant by the parenthetical expression (formally and informally) related to high density housing in the second to last sentence</p> <p>p4.12 Please explain what is meant by the term "value capture" in the sentence: In general Edina needs approaches that are focused on value capture of current and forecasted growth. This may be familiar jargon in the planning world but it is not to me.</p> <p>P4.12 The last sentence ends with: addressing the barriers to creating affordable housing such as zoning restrictions. Would it help to provide an example of this type of zoning restriction in parentheses?</p> <p>p4.13 Please provide a definition of congregate housing.</p> <p>p4.14 In the section on Missing Middle housing please repeat the list of examples you provided in the first section on page 4.12. This is an important concept so the repetition will help ensure people understand it.</p> <p>p4.15 "Live and work" - Is Centennial Lakes a model for this concept - ie housing in close proximity to office buildings and retail workplaces. If it is then list it as an example. p4-15 There is a new multifamily affordable housing policy. Should this be included in this section about the City's Affordable Housing policy</p> <p>p4.16 Here is an example of some language that occurs through the remainder of this chapter: "Housing for young families, including first-time homebuyers. The strength of the school district in Edina attracts families with school aged children. There will be a continued need for housing options that work for families, including affordably priced ones." The latest demographic study for the school system pointed out that the type of housing with the highest yield for students was the most expensive single family homes (+\$750,000). Hazel made the point that families with kids are now often older than in earlier generations. We should be careful that this document does not perpetuate concepts that are not borne out in the latest demographic data. (young families/first home buying families are the source for kids for the school. While certainly true as a general statement, in Edina it may be that middle age move-up families are the primary source for kids in school)</p> <p>p4.17 Again reconcile the disconnect between chart 4.4 and chart 4.1 on p4.6</p> <p>p4.19 Under Goal 1, section 3. e there is the sentence : Providing lifecycle housing opportunities for community renewal. I am not sure what this means. I understand the idea of housing for each part of someone's life cycle but the link to community renewal is a little vague. Does this mean: we want to ensure that there are always sufficient housing options for each lifecycle stage so that with each new generation we can start the lifecycle journey over again?</p> <p>p4.19 Goal 2 Point 2 Please add the NOAH acronym at the end. (so it becomes familiar)</p> <p>p4.20 Goal 3 Point 4 - This is another NOAH idea but is it realistic given all the forces driving the teardown trend. There may be a more specific subset of lower square footage housing that can be identified and preserved because tearing down is not financially attractive (ie very small or undesirable lot.)</p>	

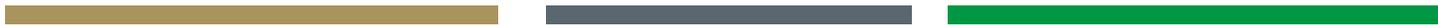


Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
		Thank you for providing this feedback tool!	
	I	I would like to see a greater emphasis on the links between housing policy and climate change throughout this and the Land Use chapter. A recent NYTimes article, <a href="https://www.nytimes.com/2019/03/25/opinion/california-home-prices-climate.html?action=click&amp;module=Opinion&amp;pgtype=Homepage">https://www.nytimes.com/2019/03/25/opinion/california-home-prices-climate.html?action=click&amp;module=Opinion&amp;pgtype=Homepage</a> points out that according to recent research, higher densities not only facilitate affordable housing development, they also support public transportation that reduces greenhouse gas emissions from cars. Research showed that the impact of housing policies had a greater effect on reducing carbon emissions than the promotion of electric cars. Insisting that Edina maintain its disproportionate land use devoted to solely to low and very low density single family home neighborhoods raises land prices, reduces housing affordability, inhibits/prevents the development of public transit, and increases car traffic and greenhouse gas emissions. (And the same people who oppose higher density hate increased traffic.) Higher densities and mixed use developments are fine near existing public transit lines but we need to promote the possibility of higher densities in single family residential areas as well. (You could easily get four housing units in to a new McMansion not far from my house in the Concord neighborhood). Otherwise we'll never meet our growing need for affordable housing or build out public transit fast enough to meet the urgent challenge of climate change.	Add language to the plan regarding the role housing policy has in supporting sustainability goals, with reference to Energy & Environment chapter
	27	First, there needs to be a definition of "senior housing". Do you mean different housing models for older adults, or age-segregated housing? I have led several discussions about housing options with the "baby boomer" generation (of which I am one). It appears that traditional age-segregated "senior housing" is not favored by many in this very large cohort--unless there is some need for special services with the housing.. Most I've talked to value a more natural, multigenerational "neighborhood" setting either by aging in place in their own homes, or in, for example, co-housing communities. I would strongly suggest that the City have a conversation with "seniors" before building more age-segregated senior housing. I think many boomers want out of that box!	Add definition of senior housing to cover the range of housing options typically given this title. Senior housing, in various forms, has been identified repeatedly as a priority for Edina as existing residents transition from single family homes.
	I	Data Is Suspect: The data is in many places suspect, particularly in the Housing section. That section uses Census tract data to calculate average home prices and incomes. This is wildly off the mark. The tract where I live, 239.03, has a "hard division" of street grid between 2 dramatically different land uses. East is large multi-family apartment buildings (and commercial) while west is large-lot single-family homes. Yet the home prices and incomes are calculated collectively, with no accounting for this dramatic difference. When I lived in an apartment, I couldn't possibly have afforded my house – I expect the same is roughly true here. It's misleading at best and dishonest at worst to claim that housing is too expensive because the average income of apartment-dwellers and homeowners is not enough to buy the homes. We cannot trust any calculations based on this faulty background data. The final Plan must correct this faulty data and faulty use of it. Other bad data includes population projections – The Met Council projects slow growth, up to 53,000 in 2040 (2015	Census tract data are used to provide comparable information to what is in the existing plan. Unfortunately, it is not possible to correct for arbitrary boundaries within commonly available

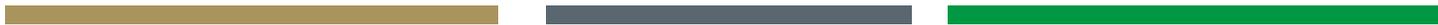
Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
		<p>System Statement) yet the Draft projects 63,000, fully 20% higher. From the same source, the Met Council projects need for 878 low- and moderate-income housing units, while the Draft projects 1,220. The Draft uses units per acre as a density measure, when in reality people per acre is a much better measure – a one-bedroom apartment creates much less density than a single-family home with 6 or more people, and that’s magnified where it is a single elderly retiree versus a big busy family, yet the Draft counts both as 1 unit. The Cost Burden tables of 4-8 are estimates made by comparing average cost of housing in an area with average income. That’s hogwash. If I have a modest home and a small income and my neighbor has an expensive mansion and a huge income, averaging both incomes and housing costs might show that both of us are “experiencing cost burden” when in fact neither of us are.</p>	<p>data sets. However, citywide data show similar patterns related to affordability. The projections used here have been revised upwards from the 2015 System Statement, based on mutual agreement between the City and Metropolitan Council. While this is stated elsewhere in the plan, it will be added here as well for clarification Units per acre are used as a baseline because of Metropolitan Council requirements. This is also reflected in city zoning. However, population forecasts are also included, as they are more relevant to identifying needs for services like schools and parks. The cost burden tables are based on HUD and Metropolitan Council analysis of Census micro data, which pairs households and incomes. It is not based just on</p>



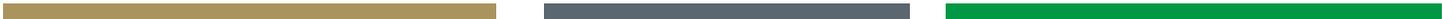
Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
			averages in these areas. Information about how this is calculated can be added to the plan for clarification.
	11	The topic of walk-ability is mentioned. Can you tell where your data came from that Edina residents want improved walk-ability from what we currently have? Edina is mostly a community of sprawling single family neighborhoods with land. It's Edina's proximity to urban areas, while maintaining quiet residential neighborhoods with larger lots that is one of the reasons for it's high demand.	Add reference to feedback from prior planning efforts, including Vision Edina and the recent bicycle/pedestrian plan
	17	"The strength of the school district in Edina attracts families with school aged children." Your arguments for affordable housing follow this sentence. But in reality, neighborhoods are currently turning over to younger families without any affordable housing measures driving the turnover. Young families are buying homes and tearing them down or buying newly built teardowns in combinations with buying existing homes. The young families that are moving to Edina can afford the homes being sold. Elementary schools are not seeing a decline in local enrollments.	Add reference to regional data regarding income levels, including feedback from residents that family members are unable to find housing here
	6	I'm very concerned about affordable housing, as a member of Edina's Affordable Housing Group under chair Hope Melton. Why doesn't NOAH include ownership rather than just rental as part of the category? Is there any way to stop teardowns in East Edina that bring about "McMansions"? I think it is important that officials focus on need heavily, and minimally on residents' preferences. Granted City Council is elected and must respond to people who voted for them, but they also have a larger responsibility to the community at large.. I think this needs to be pointed out to the "naysayers" regarding affordable housing.	Add clarifications as needed that NOAH includes both rental and ownership housing. Housing affordability will be discussed in more detail in follow-up housing study
	26	Is there any way to increase the categories of financing that would deal with 30% of AMI? There seems to be only spot where that percentage comes up. Many of the jobs in the Greater Southdale area are service jobs that would fit into this category of income.	Many of these tools are intended to cover levels of affordability up to 80% AMI, inclusive of 30%. Add language that clarifies that point.
	16	I would like to see more discussion of affordable home ownership for the young families mentioned on page	Add more discussion



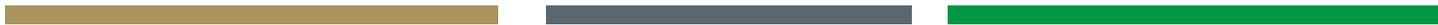
Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
		16. Affordable rental units, especially those at the 30%, 50% and 60% level, are greatly needed. However it is also desirable to have ownership options, and these need not all be single-family detached homes. Duplexes, triplexes and condominiums can also be part of the affordable home ownership mix.	on these points as indicated
	10	Add to household types that need specialized housing: childless couples, single professionals, empty nesters. There is a need to a different type of housing for these groups who do not want to be in a multi-unit building. The concept of ADUs (Accessory Development Units) or "Granny Flats" who provide a smaller square footage single family home that would allow a more affordable dwelling type as it could be built on the same property as a single family home. Minneapolis has successfully implemented this housing type. They could also be rented under specific guidelines such as requiring the lessor to live in the main house on the property. This would be a great options for families who want to care for their senior parents.	Add household types as indicated. The plan already includes a recommendation to consider the possibility of allowing ADUs in the future
	1	'General comments about the chapter: Most info is surface level. Wish the city would have drilled down more to identify the types of housing that fit specific needs in the community, whether housing with services, senior coop, or other. --Related, I wish the chapter would have looked at how housing stock shapes a community. For example, how the ratio of owner-occupied to rental housing is shifting as more rental units are being constructed. As a higher percentage of residents are renting, what impacts does that have (sure some research has been done on this). I wish the chapter would have looked at property taxes and TIF. The property tax burden is primarily borne by residential property owners (non apartments). The number of new developments in TIF districts heightens this. Related, I wish the chapter would have looked at how property taxes are burdening many who live in more affordable homes--especially in areas where there have been teardown/rebuilds. Also, how special assessments can burden property owners. Those in modest properties pay a high percentage of their home's value in special assessments. Edina's reliance on the tax capacity of residential properties (non apartments) means that it has an interest in increasing values, which can work against goals for affordability. Edina's reliance on revenue from special assessments for road reconstruction means those in more modest homes are generally more burdened than those in more expensive homes. The chapter would have been both more interesting, and more useful, if it had dug into these issues. Overall, it is too wordy. Cut as much as possible. Put as much as possible into tables, charts, maps, etc. and minimize narrative.	Add examples of housing types in response to identified needs Additional topics related to affordability will be covered in a follow-up housing study. Include cross references to Economic Competitiveness chapter.
	1	Conclusion: The Draft, if followed, will fundamentally change Edina to be bigger, busier, more congested, more polluted, and poorer. Edina's family neighborhoods of single-family homes that parents have worked hard and highly prize, will largely be overwhelmed, politically and by the externalities, of the 20% population increase, consisting largely of people who don't necessarily want to live in Edina but for whom it just happens to be convenient and cheap. This will be particularly galling to the prosperous families who paid high taxes to subsidize the growth, while those same high taxes undercut the price of homes and drive seniors out of their lifelong family homes. I would urge a different path of preserving the predominance of high-value single-family homes, allowing the free market to produce new housing at prices set by the collective action of the market, and to increase the price of existing homes as it has in past decades, so that Edina maintains a population of people who intentionally choose to live and invest in Edina. Growth should return to historic levels, not the inflated levels of the past 5 years, continuing to 2040 and beyond. I would urge a clear and unequivocal statement that Edina's taxpayers will not bear the burden of alleviating regional problems, and that Edina will not compromise its building and zoning standards solely to socially engineer the income levels of building	Clarify the role and benefits of affordable housing to the community, based on City Council direction and adopted policy. Clarify that single family neighborhoods are guided to remain largely the same, according to this comprehensive plan.



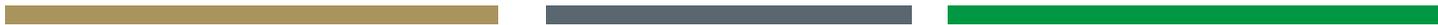
Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
		residents.	
<b>5: Transportation</b>	1	<p>I can supply a Word document with changes marked, if requested. Summary of changes:</p> <ol style="list-style-type: none"> <li>1. DOT's system is known as "intercity", so the parentheses should be reversed.</li> <li>2. The sentence at the end of the first paragraph clarifies the intercity rail concept.</li> <li>3. At the start of the third paragraph, "commuter" was changed to "light". The interest of residents was in exploring light rail concepts, not heavy, hazardous commuter rail.</li> <li>4. The recommendation was that the City not continue the study, so so "not to" was changed to "that the City not".</li> <li>5. The paragraph added at the end recognizes other's efforts that may have a significant effect on transportation planning in Edina.</li> </ol> <p>The changed text:  Passenger Rail  MnDOT's 2015 update to the Minnesota Comprehensive Statewide Rail Plan guides the future of both freight and intercity (passenger) rail systems and rail services in the state. While there is no specific mention of Edina, the plan generally provides strong support for increased investment in passenger rail as a response to growing congestion on highways serving the metropolitan area and exurban communities. The Rail Plan identifies a passenger rail line that extends from the Twin Cities to Northfield that would pass through the City of Edina by way of the Canadian Pacific Minneapolis, Northfield and Southern Railway (CP MN&amp;S) subdivision. This corridor is also known as the Dan Patch Corridor and is identified as a Phase I project in the plan. This identification indicates it is a desirable project within a 0- to 20-year (2015 - 2035) implementation horizon. Intercity rail is a concept for express service between Minneapolis and Northfield with fast, heavy trains moving through Edina and other communities with no stops along the way.  A study conducted in 2002 examined the feasibility of establishing commuter rail service along the Dan Patch corridor. At that time, responding to opposition from residents, former State Representative Ron Erhardt introduced legislation that would prohibit state and regional agencies from spending any money to study, plan or design a commuter rail line in this corridor. This legislation, which was passed and has been referred to as the "gag order," applies to state agencies and affected Regional Railroad Authorities but not cities.  Based on interest in light rail expressed by Edina residents, the City in 2017 conducted a study to gauge public support for passenger rail in the Dan Patch corridor through Edina. The majority of public feedback was not supportive of passenger rail in the corridor; particularly noted are comments coming from residents who live along the route. The study, which is documented in the Passenger Rail Community Engagement Report, concluded with a recommendation that the City not pursue passenger rail in the Dan Patch corridor at that time.  The City may benefit from interest in light rail by other communities, particularly Savage, which sees a light rail crossing of the Minnesota River and connection to Southwest Light Rail as a means to relieve congestion on the US Highway 169 bridge. Light rail concepts being considered are less noisy and safer than heavy alternatives such as intercity and commuter rail, can be implemented quickly, and will cost a small fraction of recent Twin Cities light rail projects. If implemented, a light rail system between Saint Louis Park and Savage along the Dan Patch corridor (with two or three stops in Edina) will have a profound effect on transportation, will stimulate development, and will increase property values along the route</p>	<p>The information provided in the Comprehensive Plan is technically accurate. These comments address stylistic preferences. This section will be reviewed and, where appropriate, changes in style will be made.</p>



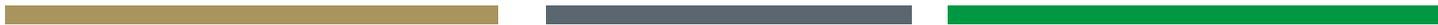
Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
6: Parks, Open Space and Natural Resources	6	Reference to Fred Richards Golf Course -- it is no longer a golf course.	A correction will be made to the Comp Plan that goes to adjacent cities for review and the Met Council.
	8	A correction will be made to the Comp Plan that goes to adjacent cities for review and the Met Council.	A correction will be made to the Comp Plan that goes to adjacent cities for review and the Met Council
	9	Policy 1-C -- will the city also consider purchasing land for park use and/or converting publicly owned land from existing use to park use? If yes, add it. If no, why not?	Yes. Policy 1-C should have opened with the following line: "It is the intent of the City to maintain and, when feasible, increase its current park and open space property.
	10	Policy 3-A -- what about the parks strategic plan, community center study, parks/recreation data from community surveys, etc. Not clear why only Vision Edina (2015) and Big Ideas Workshop (2017/2018) are referenced as providing guidance when other valuable guidance is found in these other documents.	Indeed. Many sources were considered in the development of this plan, and many will help guide recommendations in the future. While Park Master Plans and Small Area Plans are called out in other policy aspects of this goal, it is a miss NOT to also include the Edina P&R Strategic Plan as a core guiding document to future



Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
			recommendations. This would be a good addition to Policy 3-A in the Parks section.
	2	The 2016 population number used is outdated at this point. The 2020 (next year) estimate is 55,000. This works out to about 28.5 acres per 1,000. By 2030, it will be about 26 acres per 1,000 and by 2040 just under 25 acres per person. Yet, there is no policy in this chapter to purchase land for park and open space use when good options become available.	Good catch. A line was dropped from the initial draft that should be added back as the opening line of Policy 1-C: "It is the intent of the City to maintain and, when feasible, increase its current park and open space property."
	10	Policy 3-A. What about recommendations in the parks strategic plan, community center study, quality of life surveys, etc. Why only Vision Edina and the Big Ideas workshop. The exclusion of other parks/recreation processes that happened in recent years seems strange.	Indeed. Many sources were considered in the development of this plan, and many will help guide recommendations in the future. While Park Master Plans and Small Area Plans are called out in other policy aspects of this goal, it is a miss NOT to also include the Edina P&R Strategic Plan as a core guiding document to future recommendations. This would be a good addition to Policy 3-A in the Parks section
	10	Policy 1-C	This item under the



Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
		<p>What does it mean to reduce wild life migration away from their natural habitat?            Someone's backyard can be the natural habitat for a coyote, rabbit, raccoon, deer or other urban wildlife. Not sure what this means.</p>	<p>Natural Resources section could be stated more clearly. The intent behind this policy is the following: "Wildlife will be nurtured and protected. Animal and bird populations that are considered a threat to public health or safety, or may be considered hazardous to the environment or infrastructure within Edina, will be proactively managed." We will review for a better statement of the intent.</p>
<p><b>Chapter 8:            Energy and Environment</b></p>	<p>91</p>	<p>In both the energy and environment section and the natural resources section, there should be a discussion of the impact of emerald ash borer on the city's tree canopy. Other cities have incurred substantial unanticipated costs in treatment, removal, and replacement of ash trees. Edina should direct the city forester to plan for the expected loss of trees and to explore treatment options where appropriate. There are bills currently moving in the state legislature that will provide grants to cities for this work. In addition, there are now treatments that are effective for preserving some trees and avoiding the wholesale loss of large numbers of trees at the same time.</p>	<p>Information is available in the Planning Department that describes steps the city is taking (and steps residents are encouraged to take) to address Emerald Ash Borer infestations. The City currently coordinates with Hennepin County and the Minnesota Department of Agriculture.</p>
<p><b>50th &amp; France            Small Area Plan</b></p>	<p>32</p>	<p>Issue: COLORS IN LEGEND ARE OFF            The legend shows BEIGE as "low density residential" and YELLOW as "Low Density Attached Residential."</p>	<p>This map and the associated legend will</p>



Draft Comprehensive Plan Chapter	Page	Comment or Suggestion	Proposed Treatment
		These colors do not correspond to the map. The map appears to be various shades of green.	be reviewed and corrected.
	34	Pages 34-35 of the SAP should be re-drafted to include the Council's recommendations on April 2 to lower the maximum density and revise the language about when the city should allow heights of over 4 stories.	The Council's recommendation has already been included.



## III. Appendix

### Contents

Provided on the following pages are all the comments received through **Better Together Edina**.

As shown, the comments were categorized (1 through 6) during the Planning Commission's review and analysis:

- 1. Change.** The City's consultant team will incorporate the comment in the version of the draft plan that goes to the Metropolitan Council
- 2. Potential Change.** Incorporate a change to the draft Comprehensive Plan based on direction from the Planning Commission.
- 3. No Change.** Do not incorporate the comment or change and explain why.
- 4. No Change.** Refer the comment to the appropriate City Commission or staff to consider outside the Comprehensive Planning process.
- 5. No Change.** The Comprehensive Plan does not address this level of detail and a follow-up study will be conducted after the Comprehensive Planning process is completed.
- 6. No Change.** This question has already been answered. This comment is a statement.

Comments that were categorized as either **1** or **2**, described above, are those that are included in the group of Proposed Amendments to the 2018 Draft Comprehensive Plan. These are discussed in Chapter 2 of this report.

Comments that were categorized as **3**, **4**, **5**, or **6** are included in the Appendix. Explanations are provided to show why they were not included as Proposed Amendments.

# Draft Comprehensive Plan Public Review

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- 5. No Change - Comp Plan doesn't address this level of detail/follow up study planned after Comp Plan
- 6. This question was already answered/this is a statement

Comment #	PC Direction	Chapter	Page #	What change would you suggest to improve this chapter?	Suggested Response
1	6	Chapter 1: Intro and Vision	1	The comprehensive plan is supposed to support the services, infrastructure, public facilities and re/development "in a manner that sustains and improves the health and uncommonly high quality of life enjoyed by our residents...". The relentless densification of our city, and especially in the Grandview, 50th and 44th small areas is doing just the opposite. Stop the development of any apartments over 4 stories, stop the densification that is clogging our streets and making parking a nightmare. Just stop, please, and ask the residents how much development and degree of density they would like.	The plan is consistent with City Council direction for responding to growth and change expected to occur in the city
60		Chapter 1: Intro and Vision	4	No suggestion for change, just an appreciation that the plan sets out to weave education throughout the community rather than just in the schools.	
74	3	Chapter 1: Intro and Vision	1	I found the eight principles listed in the vision section of the 50th and France small area plan provided a succinct summary and structure for all that followed. Can you use that same concept to help provide structure to this much larger document? In this Comp Plan document the Mission and Vision statement are followed by lists of ideas with no attempt to synthesize them into guiding principles that the reader will then see reflected or woven into all the following chapters. I personally would recommend that "Provide affordable housing" be one of the ideas or principles that guides the writing. Some of the principles from the 50th and France SAP, like "connectivity", would also seem to be appropriate for the Comp Plan.	These are reflected I the "Big Ideas" that are listed and discussed on pages 1-7 through 1-14. The synthesis of ideas from the mission statement and vision are discussed in detail in the small area plans that were prepared as part of the process for developing the Comp Plan. The small area plans are the appropriate documents for detailed discussions on these topics. Except for the small area plans, the Comprehensive Plan is largely an update.
81	4	Chapter 2: Community Profile	1	Edina Is Delicately Balanced Edina has no big lake or other outstanding natural feature, no dominating corporate headquarters, university, or government building. There's no fixed factor that keeps Edina a premier community. It could decline at any time, for any one or a combination of factors. Among others, Myron Orfield has studied community "tipping points" and found that it's easy for a school or city to "tip" from prosperous to declining, and that once it tips, it rarely comes back. An uptick in the crime rate, encroaching noise or traffic, high taxes, loss of employers and any number of other factors can tip a community. Richfield, once Edina's rival, has now tipped in many areas. Low crime, great schools, high property values, good transportation, and strong neighborhoods keep Edina from tipping. Loss of any of those factors, or an increase in any negatives, risks tipping Edina as well. The central reason Edina stays high-value is the common commitment Edinans share that living in the best possible place carries such a high priority. If Edina loses that shared commitment, Edina tips. The Draft never acknowledges this nor does it analyze it.	The contributors to housing value and affordability will be covered in more detail in a follow-up housing study
3	1	Chapter 2: Community Profile	2.5	Morningside area is cut off in figure 2.5	Adjust map to show area completely

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Comment #	PC Direction	Chapter	Page #	What change would you suggest to improve this chapter?	Suggested Response
79	1	Chapter 2: Community Profile	1	High Property Values Are a Positive Not a Negative The document throughout treats high property values as an obstacle or problem. They are the opposite. High values reflect Edina's desirability. They attract high-value, high-skill residents. They allow retirees to downsize with money to spare or to fund retirement with home sales. The Draft uses the misleading term "affordability" to cast high values as something to be overcome. High values reflect high-value businesses, great schools, ample amenities, low crime, and good neighbors. The Draft should have as a goal to increase property values as much as possible throughout Edina. High values reflect a glaring fact the Draft ignores: Edina is an intentional community. Edinans, by and large, choose Edina. They plan and save and work to live here. This intentionality, and the high values it produces, is the magic of Edina – we want to be here, we worked hard to get here, we place a very high value in living here with all that Edina offers, and we work hard to keep it excellent and make it better. We have "skin in the game." The Draft laments that Edinans spend a higher percentage of income on housing – that's because Edinans place a higher value on living in a great community, and they are willing to spend more of their income to do it. That is the common bond that links us in Edina. Allowing housing for people who do not place such a high priority on it fundamentally disrupts Edina.	Chapter will be reviewed to ensure property value references are treated neutrally
5	4	Chapter 3: Land Use and Community Design	7	"How can the City balance the desire of some residents for larger homes with state-of-the-art features and developers seeking to offer housing units that appeal to today's market, with the interests of neighbors who object to the size and scale of some new construction." Good question, but it frames the issue incorrectly. Smaller homes would also appeal to today's market. Smaller homes can have state-of-the-art features. But developers are choosing to build larger homes, to meet the demands of this segment of the market. For all we know, some people are moving into homes that are larger than what they want, but that is what is available in Edina. Consider a more nuanced framing.	This topic will be addressed in a follow-up housing study
6	1	Chapter 3: Land Use and Community Design	7	"...an increased interest in mixed-use/live-work scenarios." Whose interest? How has this been determined?	Provide language and data from Vision Edina process to support this.
7	1	Chapter 3: Land Use and Community Design	7	"Additionally, younger residents who are now reaching adulthood have shown interest in different land use patterns, in particular, better connected mixed-use districts." What is the basis for this statement? It may be true, but how true is it? What data from Edina supports it?	Provide data as to housing preferences from Vision Edina process.
8	1	Chapter 3: Land Use and Community Design	9	First and second bullet points under top paragraph: What does this mean?	Add more explanatory language regarding content and purpose of comprehensive amendments
9	1	Chapter 3: Land Use and Community Design	9	Reference to "Grandview Heights" in bottom paragraph. Delete "Heights."	Make change as requested

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Comment #	PC Direction	Chapter	Page #	What change would you suggest to improve this chapter?	Suggested Response
10	1	Chapter 3: Land Use and Community Design	10	"Long known as a retail center for the southwest metro area, Edina also contains prime office space whose occupants include several large corporations." Use of "whose" -- rephrase to "occupants of which include several large corporations" Prime office space -- I have been told there is no class A office space, or very little. Is it prime office space? Several large corporations -- vague This is an example of a sentence that doesn't say much because it is too general. These should be cut, because all they really add are words, or rephrased.	Rephrase sentence to be more specific, based on Economic Competitiveness chapter's evaluation of office market
11	1	Chapter 3: Land Use and Community Design	10	"Richards" is included in list of golf courses but is no longer a golf course. Delete.	Make change as requested
12	1	Chapter 3: Land Use and Community Design	10	Railway paragraph. I have only heard residents refer to the rail line as CP or Dan Patch, not Soo Line, so I don't know that "Soo Line" is how it is known locally.	Clarify name of rail line, including as it is known locally
13	1	Chapter 3: Land Use and Community Design	11	"However, this is not always allowed under ordinance or encouraged by policy. An example of this situation could be a location where land values may make it economically feasible to develop at a scale beyond what is allowed under city policy and regulation." How true is this? What specific city policy or regulation? Since the council can change city policy and regulations to allow for developments, and that is what they do, why not say that instead?	Reword as suggested
14	2	Chapter 3: Land Use and Community Design	21	Reference to Grandview Development Framework (2012). It is not a SAP and was not included in the SAPs attached to this document. Will it be incorporated by reference? If yes, why, when it is not a SAP and when there has been significant public input on the area since? Edina resident Stephanie Mullaney prepared and submitted a consolidation of public input related to Grandview. It should be included along with the Framework if the Framework is included.	Clarify that Grandview plan referenced here is a development framework, not a small area plan
15	2	Chapter 3: Land Use and Community Design	22	Figure 4.4 North France Avenue was listed as a potential area of change in the 2008 comp plan. It is not shown as a potential area of change in the 2018 draft. Some explanation would be appropriate.	Small area plan covered the area where change is occurring. Will evaluate the need to study North France Avenue in the future, with potential development of E Line.
16	1	Chapter 3: Land Use and Community Design	24	Table 3.5 and others: source of data not provided. Should be provided.	Add data sources to tables
17	1	Chapter 3: Land Use and Community Design	25	Weber Woods is guided as low density residential. It was discussed to be a dog park and storm water facility--essentially stay open space. When did it change to low density residential?	Make adjustment to map as discussed with City staff

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18	2	Chapter 3: Land Use and Community Design	27	Table 3.6 -- "maximum FAR per zoning code" It would help to know what zoning districts correspond to which land use categories, and also how this relates to PUD.	Remove references to FAR from chapter. Zoning districts may be changed or amended based on the comprehensive plan, so there is not a full correspondence between districts and land use designations.
19	6	Chapter 3: Land Use and Community Design	1	General comment/question: the chapter does not include building heights. SAPs do. Will height overlay districts map be updated to reflect heights as shown in SAPs? Will height, FAR, density limits in zoning districts be updated to reflect height, FAR, density in tables in this chapter and/or SAPs? If there is a discrepancy between height/FAR/density in SAPs and this chapter, which governs?	Building heights are included in small area plans. The only height overlay change resulting from the small area plans will be in the 70th & Cahill area.
20	4	Chapter 3: Land Use and Community Design	35	"Public utilities and services have already been extended to all parts of the city, so there is no need to show staging for extension of infrastructure." What about expansion of infrastructure? For example, proposed conversion of DQ office building was rejected due to insufficient water or sewer.	Public Works (engineering) will study needs for service capacity improvements throughout the city.
21	1	Chapter 3: Land Use and Community Design	37	1 and 3 under Principles -- rephrase so both are easily understandable. 1 under Guidelines -- "Recent zoning changes have PARTIALLY addressed this issue." Add "partially."	Make changes as requested
22	2	Chapter 3: Land Use and Community Design	41	Building Placement and Design -- need illustrations to show what this means. General comment -- photos should be labeled. what are they illustrating?	Adding graphics illustrating building placement and design, as well as captions where needed to explain point
23	1	Chapter 3: Land Use and Community Design	43	In general, goals are not succinct and clearly actionable. It is better to have fewer, tighter, more actionable goals.	The plan will be edited for clarity and conciseness
24	1	Chapter 3: Land Use and Community Design	44	Reference the Implementation chapter for implementation steps.	Add reference as requested
25	3	Chapter 3: Land Use and Community Design	2	I fundamentally disagree that land use should be based around accommodation of growth – in population, the economy, public services, or anything else. I understand part of this direction is coming from the Met Council and I'll tell them the same thing. When we speak about sustainability, the truly sustainable approach is to have a vision toward a post-growth ( <a href="https://en.wikipedia.org/wiki/Post-growth">https://en.wikipedia.org/wiki/Post-growth</a> ) community. Specifically, I'm commenting on this language: "Since a plan to accommodate growth is one of the central functions of this comprehensive plan, this land use element will focus primarily on how this can be accomplished in a way that is sustainable and consistent with overall community goals."	This is a baseline assumption of the structure of the comprehensive plan. While there are alternative ways to structure it, that was not the direction given.

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26	6	Chapter 3: Land Use and Community Design	7	A big "Heck yes!" to this snippet: "Adding walkability and bikeability. Much of Edina was developed during post-WWII decades, when auto-oriented suburbs did not prioritize accommodating pedestrians and bicycles. A transportation network that allows for additional transit and non-motorized travel options increases the movement capacity of the existing public right-of-way and capitalizes on resident needs for more active lifestyles."	Thank you for your comment
27	6	Chapter 3: Land Use and Community Design	8	7% of total acres in 2016 are for golf courses – the 3rd highest use of space in Edina. In what way does this align with the vision and priorities set in the rest of the draft Comp Plan? At the very least, I would hope that the City would eventually get out of the running of golf courses business. Despite hearing arguments for maintaining the golf course status quo – from financial, environmental, social, or other angles – I'm still left with my eyes bulging at the wasted opportunity that such a commitment of land and resources entails.	Comment acknowledged
28	1	Chapter 3: Land Use and Community Design	11	Is Edina double counting Fred Richards and/or Braemar as both a Parks and Rec area and Golf Course area? I'm referring specifically to this snippet: "Parks and Recreation. Edina has an extensive public park system that serves the community and area residents. Parklands include a golf course ... Golf Course. Edina has four major golf courses located in these public parks and private country clubs: Braemar, Interlachen, Richards, and Edina."	Should there be a statement on the City's commitment to the golf course?
72	6	Chapter 3: Land Use and Community Design	3	I think there needs to be a focus on the reason for projected growth. What I hear from Edina citizens is a desire for "no change", "no growth", "stay the way we are". To just say there is "projected growth" is not enough for those folks!	The chapter is consistent with city guidance for responding to expected growth and change
73		Chapter 3: Land Use and Community Design	39	I'm not seeing much, if anything, that looks innovative in the single-family principles. I notice we want to manage massing in east Edina's smaller lots. What about the large lots in west Edina. There are half-acre+ lots that could accommodate several households. Imagine two large adjacent lots being turned into a cute pocket neighborhood with some shared common space. Right now all the incentives point to redeveloping with 4000+sf homes. How about creating incentives and a mechanism to create some new 1000-1500 sf homes that aren't in highrise buildings?	Different housing types will be covered in a follow-up housing study. The current plan generally addresses preserving and strengthening neighborhoods
77	1	Chapter 3: Land Use and Community Design	20	This sentence has a big message but I don't believe it is phrased correctly: "For the purposes of transportation planning, it is an indicator of where development can support non-motorized modes such as transit." Transit, as I think of it, is motorized. Examples would be LRT, buses, and streetcars. These all are multiple passenger forms of transit which work better in areas of higher density.	Correct sentence phrasing as recommended

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95	1	Chapter 3: Land Use and Community Design	1	<p>This is a very convoluted process for obtaining public input on the comp plan. It is a full time job to try and review then cite all the specific pages of each particular chapter to comment. If this is how residents are to supply input, then this review period should be extended to 6 months at minimum. Thirty days is not sufficient. There is not adequate time to make detailed comments in this format in a timely and efficient manner. I would recommend a different format be utilized for something as broad as public input on the entire comprehensive plan. With that said, with regard to land use, zoning and density, I have major concerns with the increased density across many areas, particularly the areas indicated as change areas. The city of Edina is designated as Urban, not urban core or urban center. An Urban designated city, per Met Council, is to have an average density per developable acre of 10. The proposed increased density in this new comprehensive plan is an average density of 20 units per developable acre. That is DOUBLE what it should be as an Urban area. Twenty units per acre is consistent with an Urban Center designation, which the City of Edina is not. This absolutely needs to be reduced or it will have negative impact on market sustainability and infrastructure, artificially inflates values, impacts taxes and affordability, can lead to future instability in the marketplace, and is inconsistent with an Urban designation. We should not be doubling the recommended density. Comprehensive metro-wide planning occurs for a reason and we as a city should not be exceeding recommendations.</p> <p>In addition, the city has already exceeded the Met Council projections for needed housing units by the year 2040. By rough count, we have added approximately 1700+ multi-family housing units and the projected need, per Met Council, is 1595 by 2040! We are well over that number already. If we continue to allow developers to triple and quadruple units per acre on future development, we will have a complete saturation of market which will have a negative affect on property value across the city, could lead to high vacancy rates, and many of these new developments are funded with TIF, which if continued at the proposed allowed pace and density, could ultimately result in a negative outcome for the tax payer and residents on their investment. The plan includes an increase of multi-family zoning and a loss of office/retail/commercial/industrial acreage. I am concerned at the loss of land for economic development opportunities that would otherwise sustain a greater population growth, higher rents and sale prices that go along with inflated values. I think this needs to be addressed and accounted for, and revised to ensure we maintain and promote adequate opportunity for economic development, not just low paying, becoming-obsolete-retail. The average rent, per the plan, of the new developments exceeds the incomes of the renters who are living in these areas. This is NOT sustainable development. We MUST consider economic development as an equal means. Also, there are serious infrastructure concerns. The congestion that will result with the density proposed cannot be managed with current infrastructure. There is also no where for infrastructure to expand with the current plan. We must take this into consideration before it results in the need for eminent domain. The plan does not account for the expansion of infrastructure in any way, shape or form. This MUST be a part of the comprehensive plan, but it is not. We need to consider and add this. This will have a huge impact on quality of life as well. My final comment here is my concern for the ultimate lack of form-based planning. If we remove specific building height restrictions and give developers broad ability to densify areas without proper controls, we lose our ability to effectively manage development to ensure it fits in a long term comprehensive plan. By removing such specificity from the plan, we set a precedent for uncontrollable development and outcomes. Amendments and variances are granted for a reason - to maintain the ability to properly govern and control development that is in the best interest of the city, its residents and businesses. If we remove that control, we no longer have the ability as a city to adequately plan for the future and ensure outcomes can be managed effectively.</p>	<p>The plan will be available for public review and comment during a six month period starting later this year. This initial review is just to prepare the plan for its initial release for wider review.</p> <p>The density ranges included in this plan are the result of small area plans that were recently completed through community-based processes and adopted by the City Council. They represent participants' vision of what is appropriate for these areas in terms of desired development.</p> <p>Employment is expected to grow at a slower rate than residential, based on regional forecasts, and growth patterns have been adjusted accordingly. Add reference to Economic Competitiveness chapter, which outlines approach to economic development.</p> <p>Height restrictions are not being removed. They will be maintained largely as is within the city's zoning</p>
98	4	Chapter 3: Land Use and Community Design	6	<p>On p. 3-6 it says " How can the City balance the desire of some residents for larger homes with state-of-the-art features and developers seeking to offer housing units that appeal to today's market, with the interests of neighbors who object to the size and scale of some new construction?" There is no answer to this question later in the chapter. I suggest the city sponsor a design contest in which designers could submit plans they have developed for low-rise but modern and desirable homes for families. The focus could include up-to- date features like "visitability" (universal design that makes the house in a way that when you have a visitor with a disability, they can manage well in your home); energy-efficient design, and flexible-use spaces (e.g. so part of the home can become a "grandma" or "boomerang-kid" apartment at some point). Houses don't have to be tall to be wonderful.</p> <p>A complementary approach would be to have a set of straightforward plans for upgrades to 50s ramblers and other legacy homes, along with promised streamlining of permits if the plans are followed. Developers are not original thinkers, especially in nneighborhoods where they can't sell a new house for over amillion dollars. Please help out the older and less expensive neighborhoods!</p>	<p>These recommendations can be explored in more detail in the housing study that is recommended as an implementation step for the comprehensive plan</p>

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88	1	Chapter 3: Land Use and Community Design	25	These pages (25-35) should be revised to reflect the lower maximum dwelling units per acre and the new Mixed Used designation adopted by the Council on April 2.	Update numbers and calculations to reflect most updated density ranges
100	1	Chapter 3: Land Use and Community Design	2	Table 3.1 shows data from MSP Thrive as of January 2019. This table shows population growing from 47,941 in 2010 to 63, ,600 in 2040 or 33% growth. When I visit the official Met Council Thrive website it shows (as of January 1, 2019) the population growing from 47,941 in 2010 to 59,600 in 2040 or 24% growth. I know the Met Council will revise their forecast based on input from the local government so I am assuming the City Council requested this upward revision in the projected population. These numbers drive the Comp Plan so it would be great to have an explanation of this change. There seems to be a general argument being made that the Comp Plan is the City's response to how it will manage its fair share of the regional growth. If in fact the City has successfully requested higher population growth than the MET Council originally projected, this should be clearly pointed out and the reasons why clearly explained.	These forecasts have been revised based on mutual agreement between the City and Metropolitan Council. Additional language will be added to clarify that in this section.
29	1	Chapter 4: Housing	3	Use of the word "currently." Some data 3 years old. Is it current? Change to "as of this writing" or similar.	Revised text as suggested
30	1	Chapter 4: Housing	1	"The City of Edina has taken proactive steps regarding affordability via its Housing Succession Plan and the subsequent adoption of its Affordable Housing Policy, but evaluation is needed to determine if this is sufficient." Housing Succession Plan was from 2005. Was it reviewed for relevance? Was it enacted? Remove, or if left in, add date. Add date to Affordable Housing Policy. It is now renamed. Note that it is limited in scope to inclusionary affordable housing.	Revised text as suggested
31	4	Chapter 4: Housing	12	"The city's inclusionary housing policy is a key example. of this, but will need to be supported by addressing the barriers to creating affordable housing such as zoning restrictions." p. 12 Promote the preservation and production of affordable housing through the areas of Edina accessible to transit by addressing financial and zoning barriers." p. 20 "Edina has worked for decades to protect and grow value, sometimes to the extent of excluding types of development or even people. Now is time to change course, to be more welcoming and inclusive by seeking to provide housing for households with a broader range of incomes." p. 11 Comments: Has zoning prevented affordable housing construction? If yes, how and when? If there are zoning restrictions that prevent affordable housing development, specify them or remove. It does not help to repeat these ideas if they are not founded in fact. "...sometimes to the extent of excluding certain types of development or people." If factual, specify. What types of development have been excluded in the past decade or so? What people have been excluded? There is a history of racial covenants and redlining, as there was in other communities, and there are ongoing disparities as a result. If that is what this is referring to, be specific. "...by seeking to provide housing for people with a broader range of incomes." What is the income distribution now? Much of Edina's housing stock is modest, and much is occupied by people who could not afford to buy the same house today, but whose housing costs are low because they have lived in their homes for many years. Edina has an identity of an affluent community and it can be as though the many people living in modest homes, on modest incomes, are unseen. Use of the word "diversity" (multiple pages). Be specific. When not defined, does "diversity" refer to economic, racial,	This topic of affordable housing will be addressed in a follow-up housing study  The term diversity will be clarified where appropriate. If not otherwise specified, it refers to a broad range of diversity by race, income, ethnicity, origin, age, etc.

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32	2	Chapter 4: Housing	1	<p>General comments about the chapter:</p> <p>--Most info is surface level. Wish the city would have drilled down more to identify the types of housing that fit specific needs in the community, whether housing with services, senior coop, or other.</p> <p>--Related, I wish the chapter would have looked at how housing stock shapes a community. For example, how the ratio of owner-occupied to rental housing is shifting as more rental units are being constructed. As a higher percentage of residents are renting, what impacts does that have (sure some research has been done on this).</p> <p>--I wish the chapter would have looked at property taxes and TIF. The property tax burden is primarily borne by residential property owners (non apartments). The number of new developments in TIF districts heightens this. Related, I wish the chapter would have looked at how property taxes are burdening many who live in more affordable homes--especially in areas where there have been teardown/rebuilds. Also, how special assessments can burden property owners. Those in modest properties pay a high percentage of their home's value in special assessments. Edina's reliance on the tax capacity of residential properties (non apartments) means that it has an interest in increasing values, which can work against goals for affordability. Edina's reliance on revenue from special assessments for road reconstruction means those in more modest homes are generally more burdened than those in more expensive homes. The chapter would have been both more interesting, and more useful, if it had dug into these issues.</p> <p>--Overall, it is too wordy. Cut as much as possible. Put as much as possible into tables, charts, maps, etc. and minimize narrative.</p>	<p>Add examples of housing types in response to identified needs</p> <p>Additional topics related to affordability will be covered in a follow-up housing study. Include cross references to Economic Competitiveness chapter.</p>

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33	1	Chapter 4: Housing	2	<p>Most of my changes are suggestions to improve accuracy or clarity. I support the overall themes of the chapter. I am especially pleased with how it incorporates affordable housing.</p> <p>p 4.2 The change in population from 2020 to 2040 per the bar chart is +8,600 or 15.6% not +5,800 or 24% as stated in the text</p> <p>p 4.5 Please define the "Twin Cities Region" as (the 7 county greater metropolitan area) in the box on Definition - affordability. Using this broad area to define AMI has significant implications. p4.6 I don't know if you can change Table 4.1 as it comes from the Metropolitan Council but it could be improved. The total should appear at the top of each subsection as it does in the first two subsections. In the the third subsection the total is at the bottom. The Housing units subsection has two further subsections that both total to the overall total. The use of bold dividing lines or an additional blank row might help the readability of this chart.</p> <p>P4.6 Table 1 shows a total number of affordable units at 7,525. Later in Table 4.4 there is a goal cited of 1220 affordable units. I have heard at City Council and Planning Commission meetings that our number of affordable units is more like 994. The disconnect between the 7525 number and the much smaller numbers shown later must be explained.</p> <p>p4.11 Please explain what is meant by the parenthetical expression (formally and informally) related to high density housing in the second to last sentence</p> <p>p4.12 Please explain what is meant by the term "value capture" in the sentence: In general Edina needs approaches that are focused on value capture of current and forecasted growth. This may be familiar jargon in the planning world but it is not to me.</p> <p>P4.12 The last sentence ends with: addressing the barriers to creating affordable housing such as zoning restrictions. Would it help to provide an example of this type of zoning restriction in parentheses?</p> <p>p4.13 Please provide a definition of congregate housing.</p> <p>p4.14 In the section on Missing Middle housing please repeat the list of examples you provided in the first section on page 4.12. This is an important concept so the repetition will help ensure people understand it.</p> <p>p4.15 "Live and work" - Is Centennial Lakes a model for this concept - ie housing in close proximity to office buildings and retail workplaces. If it is then list it as an example. p4-15 There is a new multifamily affordable housing policy. Should this be included in this section about the City's Affordable Housing policy</p> <p>p4.16 Here is an example of some language that occurs through the remainder of this chapter: "Housing for young families, including first-time homebuyers. The strength of the school district in Edina attracts families with school aged children. There will be a continued need for housing options that work for families, including affordably priced ones." The latest demographic study for the school system pointed out that the type of housing with the highest yield for students was the most expensive single family homes (+\$750,000). Hazel made the point that families with kids are now often older than in earlier generations. We should be careful that this document does not perpetuate concepts that are not borne out in the latest demographic data. (young families/first home buying families are the source for kids for the school. While certainly true as a general statement, in Edina it may be that middle age move-up families are the primary source for kids in school)</p> <p>p4.17 Again reconcile the disconnect between chart 4.4 and chart 4.1 on p4.6</p> <p>p4.19 Under Goal 1, section 3. e there is the sentence : Providing lifecycle housing opportunities for community renewal. I am not sure what this means. I understand the idea of housing for each part of someone's life cycle but the link to community renewal is a little vague. Does this mean: we want to ensure that there are always sufficient housing options for each lifecycle stage so that with each new generation we can start the lifecycle journey over again?</p>	Make changes as requested to increase clarity
43	3	Chapter 4: Housing	1	Include strong provisions in the plan to protect of the number of existing number affordable housing units especially as part of a redevelopment project with a clear one for one replacement policy that preserved both the number of affordable units by bedroom size.	The plan includes a policy that existing affordable units be preserved. The issue will be addressed in more detail in a subsequent housing study.
44	4	Chapter 4: Housing	1	Include a more liberal use of R-2 zoning and allow single family housing to convert space to efficiency and one bedroom units in existing homes, over garages or a " casita " (a small house next to a large home found in the US southwest and some Latin American homes) to allow homeowners to accommodate extended family or cover housing expenses. A sudden or gradual change in the economy or household preferences may not be able to support all these supersized houses that have been built recently.	The plan includes a policy supporting the exploration of potential for accessory dwelling units. The issue will be addressed in more detail in a subsequent housing study.

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45	4	Chapter 4: Housing	1	Promote limited equity cooperative housing for seniors such as 7500 York along with subsidies for lower income seniors to buy existing shares.	A reference to cooperative housing models is included in the implementation section of the chapter. The issue will be addressed in more detail in a subsequent housing study.
46	4	Chapter 4: Housing	1	Promote of affordable rental and owner occupied townhouses for families with children such as the designed used at York Townhomes.	The plan recommends affordable housing for families, among other types. The issue will be addressed in more detail in a subsequent housing study.
47	4	Chapter 4: Housing	1	Study the possible impact and change in housing demands due to the 2018 Federal Tax changes that impose a limit on the deduction of state and local taxes such as property taxes and the interest from mortgages that were over \$750,000 Homeowners may be less inclined to take on large mortgages and properties with high real estate taxes because of these changes and shift their spending on other items.	The issue will be addressed in more detail in a subsequent housing study.
48	1	Chapter 4: Housing	1	<p>I would like to see a greater emphasis on the links between housing policy and climate change throughout this and the Land Use chapter. A recent NYTimes article, <a href="https://www.nytimes.com/2019/03/25/opinion/california-home-prices-climate.html?action=click&amp;module=Opinion&amp;pgtype=Homepage">https://www.nytimes.com/2019/03/25/opinion/california-home-prices-climate.html?action=click&amp;module=Opinion&amp;pgtype=Homepage</a> points out that according to recent research, higher densities not only facilitate affordable housing development, they also support public transportation that reduces greenhouse gas emissions from cars.</p> <p>Research showed that the impact of housing policies had a greater effect on reducing carbon emissions than the promotion of electric cars.</p> <p>Insisting that Edina maintain its disproportionate land use devoted to solely to low and very low density single family home neighborhoods raises land prices, reduces housing affordability, inhibits/prevents the development of public transit, and increases car traffic and greenhouse gas emissions. (And the same people who oppose higher density hate increased traffic.)</p> <p>Higher densities and mixed use developments are fine near existing public transit lines but we need to promote the possibility of higher densities in single family residential areas as well. (You could easily get four housing units in to a new McMansion not far from my house in the Concord neighborhood).</p>	Add language to the plan regarding the role housing policy has in supporting sustainability goals, with reference to Energy & Environment chapter
49	1	Chapter 4: Housing	27	<p>First, there needs to be a definition of "senior housing". Do you mean different housing models for older adults, or age-segregated housing?</p> <p>I have led several discussions about housing options with the "baby boomer" generation (of which I am one). It appears that traditional age-segregated "senior housing" is not favored by many in this very large cohort--unless there is some need for special services with the housing.. Most I've talked to value a more natural, multigenerational "neighborhood" setting either by aging in place in their own homes, or in, for example, co-housing communities.</p> <p>I would strongly suggest that the City have a conversation with "seniors" before building more age-segregated senior housing. I think many boomers want out of that box!</p>	Add definition of senior housing to cover the range of housing options typically given this title. Senior housing, in various forms, has been identified repeatedly as a priority for Edina as existing residents transition from single family homes.

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61	6	Chapter 4: Housing	1	<p>I am oppose to the significant increase in density which probably requires undesirable height. The strength of Edina is the single family neighborhoods and surrounding them with high density is wrong. Not only does density challenge the neighborhoods, but it also challenges our infrastructure.</p> <p>Developers will use "public realm" and "Affordable Housing" to force Edina into decisions not in the interest of the City or residents.</p> <p>The emphasis of Affordable Housing is miss directed.</p> <ol style="list-style-type: none"> <li>1. When 20% is forced into a new apartment project, the result is troublesome for 2 reasons:               <ol style="list-style-type: none"> <li>a. It forces market rate units in the project to a higher rental to cover the rental shortfall from the Affordable units, or</li> <li>b. I t requires huge public subsidy.</li> </ol> </li> <li>2. Edina should use all the available methods to develop Affordable Housing and on a permanent basis. Home ownership is far better than rentals.               <ol style="list-style-type: none"> <li>a. To increase Affordable Housing, Edina should assist families to purchase NOAH (SFR) homes. Programs like return to Edina are good. TIF should be used to ex[pand this type of program.</li> <li>b. Edina should also encourage NOAH as apartments age such as Galleria Flats.</li> <li>c. Edina should develop cooperative programs with Affordable Housing Experts such as AEON. These will result in building such as West 66th and the proposed West 76th projects. This type of effort will help increase our numbers rapidly.</li> </ol> </li> </ol> <p>The use of TIF needs a plan and limits. Despite Mike Fischer's presentation, I still believe it takes funds from the Schools District. As noted in the StarTribune today, Governor Walsh indicated many districts in MN are facing serious problems supporting the teachers and staff. Similar problems are happening all over the nation. We need to get ahead of the problem(s).</p> <p>Updating our infrastructure is also a better use of TIF rather than marginal Public Realm items.</p>	<p>The focus on affordable housing in the plan is consistent with past City Council direction and adopted policy.</p> <p>The programs identified in this comments are included as potential tools in the chapter's implementation section. A more specific and targeted approach may be developed in a subsequent housing study recommended as an implementation step.</p>

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78	1	Chapter 4: Housing	1	<p>Data Is Suspect</p> <p>The data is in many places suspect, particularly in the Housing section. That section uses Census tract data to calculate average home prices and incomes. This is wildly off the mark. The tract where I live, 239.03, has a “hard division” of street grid between 2 dramatically different land uses. East is large multi-family apartment buildings (and commercial) while west is large-lot single-family homes. Yet the home prices and incomes are calculated collectively, with no accounting for this dramatic difference. When I lived in an apartment, I couldn't possibly have afforded my house – I expect the same is roughly true here. It's misleading at best and dishonest at worst to claim that housing is too expensive because the average income of apartment-dwellers and homeowners is not enough to buy the homes. We cannot trust any calculations based on this faulty background data. The final Plan must correct this faulty data and faulty use of it.</p> <p>Other bad data includes population projections – The Met Council projects slow growth, up to 53,000 in 2040 (2015 System Statement) yet the Draft projects 63,000, fully 20% higher. From the same source, the Met Council projects need for 878 low- and moderate-income housing units, while the Draft projects 1,220. The Draft uses units per acre as a density measure, when in reality people per acre is a much better measure – a one-bedroom apartment creates much less density than a single-family home with 6 or more people, and that's magnified where it is a single elderly retiree versus a big busy family, yet the Draft counts both as 1 unit. The Cost Burden tables of 4-8 are estimates made by comparing average cost of housing in an area with average income. That's hogwash. If I have a modest home and a small income and my neighbor has an expensive mansion and a huge income, averaging both incomes and housing costs might show that both of us are “experiencing cost burden” when in fact neither of us are.</p>	<p>Census tract data are used to provide comparable information to what is in the existing plan. Unfortunately, it is not possible to correct for arbitrary boundaries within commonly available data sets. However, citywide data show similar patterns related to affordability.</p> <p>The projections used here have been revised upwards from the 2015 System Statement, based on mutual agreement between the City and Metropolitan Council. While this is stated elsewhere in the plan, it will be added here as well for clarification.</p> <p>Units per acre are used as a baseline because of Metropolitan Council requirements. This is also reflected in city zoning. However, population forecasts are also included, as they are more relevant to identifying needs for services like schools and parks.</p> <p>The cost burden tables are based on HUD and Metropolitan Council analysis of Census microdata, which pairs households and incomes. It is not based just on averages in these areas. Information about how this is calculated can be added to the plan for clarification.</p>
80	4	Chapter 4: Housing	1	<p>Property Taxes Needlessly Drive Up Housing Costs</p> <p>I see no mention of property taxes in the Housing sections or sections about housing and land use. Property taxes are a he contributor to the cost of living in Edina. In many neighborhoods, and average home will pay around \$1,000 per month in property taxes. My taxes have more than doubled in 14 years, while my assessed value has risen about 50%. I own property in other cities where the taxes have grown far, far less – most are around 50% growth, reflecting values that have grown about 50%in that span. The cost of government is far too high in Edina, and the residential tax portion of that is ridiculously high, considering the enormous property taxes Edina reaps from high-value commercial property. These ultra-high property taxes needlessly force prices up. Edina's government must get more efficient and cost less. A failure to do so is the maior controllable contributor to Edina's high housing cost.</p>	<p>The contributors to housing value and affordability will be covered in more detail in a follow-up housing study</p>

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82	4	Chapter 4: Housing	1	<p>Housing Deception</p> <p>Edina is the most expensive large suburb, with 3 of the 4 wealthiest zip codes in Minnesota. Despite that, fully one-third of it's total housing units are "affordable" to households making 80% of the median income, including 1,351 units available to the "very poor" 30% median income level (4-6). This is incredible – all of the amenities of living in Edina, including schools, parks, sports leagues, public safety, shopping choices, jobs, etc. are freely available to thousands of households making an income well below average, and are available to more than a thousand of the very poorest tier of households. The Draft itself states that "the Metropolitan Council has recognized that affordable housing is a regional issue." Further, housing is specifically cited as an issue to keep low-paying jobs: "employers may have trouble finding all the workers they need for these [low-wage] jobs." (4-16).</p> <p>Edina should not tax its residents to subsidize housing so that low-wage businesses can have a pool of workers. We read daily about Wal-Mart workers needing government benefits so that Wal-Mart can keep paying them such low wages. Edina's residents are not paying property taxes so that businesses can pay lower wages. This is particularly true when Richfield and South Minneapolis, both within walking distance of Edina's biggest job concentrations, have thousands more units of lower-cost housing.</p> <p>I all the discussion of "affordable" housing, the Draft fails to mention any negative financial impact. Yet the industry widely publicizes that affordable housing requires a subsidy of \$80,000 to \$140,000 per unit, and that this subsidy will continue to increase. The 1,220 units will therefore require a subsidy of, at minimum, \$100,000,000, with a maximum approaching \$200,000,000, over the next 10 years. Is the Metropolitan Council prepared to contribute that amount of regional funds for this regional issue? Several other funding mechanisms are mentioned, many of which either cost Edina taxpayers directly (tax abatement, City-funded infrastructure, site assembly), divert collected taxes from other Edina uses (TIF, bonds), or depress assessed values (rent controls and other property restrictions), resulting in lower tax revenues. Edina will be deprived of the higher tax revenue which would be yielded by the same building at higher market rents (because revenue stream determines building value). Because of these factors, the true cost of 1,220 income-restricted units is likely to exceed the \$200,000,000 cost over the next 10 years. Where does the subsidy come from, and who replaces the money Edina diverts or never collects? The Draft provides no reckoning of this enormous cost, and in fact, so far as I can see, fails to even mention it as an issue.</p> <p>The Housing section undermines other land use controls, stating several times that the City is willing to impose zoning controls on market-rate housing but waive it for income-restricted housing. The sole difference between market-rate and income-restricted housing is the income of the residents. The building is the same size, produces the same traffic, and throws off the same externalities whether the residents make 80% of the AMI or 90% or 110%. Any other claim is absurd. There is simply no way the City can credibly impose zoning restrictions on market rate housing yet waive it if the exact same building is placed under income restrictions. In limited cases, this can be upheld due to the lower impact of senior housing, but this is valid only for senior housing.</p> <p>One of the major factors adding value to housing is accessibility to high-value jobs, such as the skilled doctors at Fairview Southdale. So it is surprising to see the emphasis on increasing Edina's land-use devoted to housing and decreasing the amount devoted to such high-paying jobs. This is especially puzzling for areas with excellent transportation access (Pentagon Park and the south Cahill Road area have two major freeways, multiple access points, a major arterial at 77th Street, a rail line, and in addition 9 Mile Creek, a lovely natural feature). Both these areas are extremely attractive to business, and high-value jobs should be preferred there over relatively low-value, high-externality housing.</p> <p>I'm spending so much time on housing because this section of the Draft, if allowed to stand, poses the greatest threat to Edina. Adding 13,000+ residents in tall high-density housing with the attendant traffic and crowding, including thousands of households of low-income housing will fundamentally change Edina. It will be bigger, busier, denser, more congested, more polluted, and poorer. The Draft notably fails to provide any comparisons with any other cities or neighborhoods that look like</p>	<p>Clarify in the plan the need for public subsidy to support affordable housing, and the community goals that are met by that housing, particularly for seniors and young families. Additional detail on housing strategy and approach will be addressed in a subsequent housing study recommended as an implementation step.</p> <p>Clarify that new residential development in the plan is primarily in areas guided for mixed use, so that housing and commercial/office can be incorporated in the same development. Also clarify that growth forecasts show a stronger demand for growth in population/households than in new jobs for the city through 2040.</p>
85	2	Chapter 4: Housing	1	<p>Conclusion</p> <p>The Draft, if followed, will fundamentally change Edina to be bigger, busier, more congested, more polluted, and poorer. Edina's family neighborhoods of single-family homes that parents have worked hard and highly prize, will largely be overwhelmed, politically and by the externalities, of the 20% population increase, consisting largely of people who don't necessarily want to live in Edina but for whom it just happens to be convenient and cheap. This will be particularly galling to the prosperous families who paid high taxes to subsidize the growth, while those same high taxes undercut the price of homes and drive seniors out of their lifelong family homes. I would urge a different path of preserving the predominance of high-value single-family homes, allowing the free market to produce new housing at prices set by the collective action of the market, and to increase the price of existing homes as it has in past decades, so that Edina maintains a population of people who intentionally choose to live and invest in Edina. Growth should return to historic</p>	<p>Clarify the role and benefits of affordable housing to the community, based on City Council direction and adopted policy.</p> <p>Clarify that single family neighborhoods are guided to remain largely the same, according to this comprehensive plan.</p>
86	1	Chapter 4: Housing	11	<p>The topic of walk-ability is mentioned. Can you tell where your data came from that Edina residents want improved walk-ability from what we currently have? Edina is mostly a community of sprawling single family neighborhoods with land. It's Edina's proximity to urban areas, while maintaining quiet residential neighborhoods with larger lots that is one of the reasons for it's high demand.</p>	<p>Add reference to feedback from prior planning efforts, including Vision Edina and the recent bicycle/pedestrian plan.</p>

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87	1	Chapter 4: Housing	17	"The strength of the school district in Edina attracts families with school aged children." Your arguments for affordable housing follow this sentence. But in reality, neighborhoods are currently turning over to younger families without any affordable housing measures driving the turnover. Young families are buying homes and tearing them down or buying newly built teardowns in combinations with buying existing homes. The young families that are moving to Edina can afford the homes being sold. Elementary schools are not seeing a decline in local enrollments.	Add reference to regional data regarding income levels, including feedback from residents that family members are unable to find housing here
90	1	Chapter 4: Housing	6	I'm very concerned about affordable housing, as a member of Edina's Affordable Housing Group under chair Hope Melton. Why doesn't NOAH include ownership rather than just rental as part of the category? Is there any way to stop teardowns in East Edina that bring about "McMansions"? I think it is important that officials focus on need heavily, and minimally on residents' preferences. Granted City Council is elected and must respond to people who voted for them, but they also have a larger responsibility to the community at large.. I think this needs to be pointed out to the "naysayers" regarding affordable housing.	Add clarifications as needed that NOAH includes both rental and ownership housing.  Housing affordability will be discussed in more detail in follow-up housing study
94	1	Chapter 4: Housing	1	I'm not sure how you legislate or plan for equality and diversity. The plan says "Now is time to change course, to be more welcoming and inclusive by seeking to provide housing for households with a broader range of incomes." Edina is an inclusive community. Show me the statistics that show Edina has a high rate of hate crime, racial tension, and discrimination. Our minority rates are in line with Minnesota demographics percentages and when comparing the demographics of our average household incomes and home values, Edina's % of minorities in those incomes and home values exceeds averages. The solution to increase Edina's diversity can't be solved by Edina's City Council. This is a complicated social-economic issue that has to do with many factors. It seems through this plan that Edina's solutions are more high density housing, more multi-use development, and more low income housing. None of these solutions guarantee diversity. In certain minority groups, their average household income and average home values are lower. It would take social-economic change and advancements within those groups to be more represented in Edina, a community of higher than average household incomes and higher than average home values. Edina's property values are based on desirability. Edina's proximity to Minneapolis, their highly rated schools, and their quiet wooded neighborhoods drive the housing prices. Edina's housing prices perpetuate the demand in that people move here because they know their home will appreciate and hold its value. It doesn't matter what type of housing you build in Edina, the high demand will drive its price up. The only way to reverse that would be to enact policies that go against every reason most of us moved to Edina; or in other words, to enact policies that decrease home values and decrease school ratings. Edina residents do not want the increases in traffic and infrastructure that high density housing brings. Edina residents do not want crowded schools that high density housing brings. Edina residents do want their neighborhoods re-zoned. What about the large area of Edina residents in the Northwest corner of our city whose Children are not zoned in Edina schools? Why aren't we focusing on bringing all families who live within the city limits of Edina into our schools? In other words, why are we not focusing on the needs of our own residents instead of focusing on an ideological dream of transforming our community from the outside? Your housing plan seems like its goal is to be more like Minneapolis. Many of the families who have moved to Edina came from Minneapolis and left there because of the schools. Why are we are looking to be more like Minneapolis when clearly many of the policies they have enacted have caused a large wage gap among residents, high density areas of poverty, areas of low property values, crime, and poor school ratings? We elect our City Council members to look out for the best interests of our residents; which are to uphold policies and ordinances that to maintain our property values, maintain our highly rated schools, maintain our streets and parks, maintain the character of our	Add reference to city's stated positions on equity and diversity in adopted directives and policies. Include link to Human Rights chapter where issues are discussed in more detail. Revised language will state, "Edina is a welcoming and inclusive community. As part of that, we a striving to improve the range of affordable housing options within the City."

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96	4	Chapter 4: Housing	15	"desire to protect and enhance the neighborhood". How do we convince people that some density is not going to wreck their neighborhood??	The chapter includes language on the benefits of growth and density, and indicates that the most recent levels were set through community-based planning processes.
97	1	Chapter 4: Housing	26	Is there any way to increase the categories of financing that would deal with 30% of AMI? There seems to be only spot wher that percentage comes up. Many of the jobs in the Greater Southdale area are service jobs that would fit into this category of income.	Many of these tools are intended to cover levels of affordability up to 80% AMI, inclusive of 30%. Add language that clarifies that point.
99	1	Chapter 4: Housing	16	I would like to see more discussion of affordable home ownership for the young families mentioned on page 16. Affordable rental units, especially those at the 30%, 50% and 60% level, are greatly needed. However it is also desirable to have ownership options, and these need not all be single-family detached homes. Duplexes, triplexes and condominiums can also be part of the affordable home ownership mix.	Add more discussion on these points as indicated
101	1	Chapter 4: Housing	10	Add to household types that need specialized housing: childless couples, single professionals, empty nesters. There is a need to a different type of housing for these groups who do not want to be in a multi-unit building. The concept of ADUs (Accessory Development Units) or "Granny Flats" who provide a smaller square footage single family home that would allow a more affordable dwelling type as it could be built on the same property as a single family home. Minneapolis has successfully implemented this housing type. They could also be rented under specific guidelines such as requiring the lessor to live in the main house on the property. This would be a great options for families who want to care for their senior parents.	Add household types as indicated. The plan already includes a recommendation to consider the possibility of allowing ADUs in the future
102	4	Chapter 4: Housing	21	Under housing affordability add: Reduce excessive permitting and other new construction fees to improve housing affordability.	Housing tools to support affordability will be covered in more detail in follow-up housing study
103	4	Chapter 4: Housing	15	Big ideas housing types should include: * ADUs (Accessory Dwelling Units) also called "Granny Flats" would allow small square footage single family homes on land with existing single family homes. This would provide a more affordable home to fit the lifestyles if empty nesters, single professionals, childless couples, and children of homeowners just exiting college and starting their careers. *Pocket Neighborhoods: This would be small, clustered, cottage style single family home that would be built on land adjacent to transportation nodes. This would lower land costs and make a single family home more affordable for empty nesters, single professionals, childless couples, and children of homeowners just exiting college and starting their careers.	The plan already includes a recommendation to consider ADUs. Additional strategies will be covered in follow-up housing study

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104	4	Chapter 4: Housing	15	<p>Eliminate goals for affordable housing. Edina residents should not subsidize housing for people who can't otherwise afford Edina housing. Those people can instead live in lower cost neighborhoods, probably outside Edina, where they can afford to live without subsidy.</p> <p>For example, I have a close relative with limited income. He bought a home in St Paul about five years ago for \$57,000. He has since made improvements that he did himself and that probably increased his total investment to \$70,000. His family of three lives there and enjoys it. The cost per person is about \$70,000/3 = \$23,000 per person. I contrast that with 66 West which cost \$10M for 39 single unit apartments. The cost per person is \$256,410. This is over TEN TIMES the cost per person of my relative! IT'S NUTS! This is not social justice - this is most definitely social injustice!</p> <p>When I was a young man I lived in an Army barracks for a year - one room shared with 39 other guys. We each had half a bunk bed and a locker. It was fine, in fact it was luxurious compared to my subsequent housing in Vietnam. And I was a college grad. Where is the justice in requiring Edina residents to subsidize people to live in \$256K single occupant housing?</p> <p>The same thing goes for seniors (and I'm a senior). Edina residents should not subsidize senior housing. If a senior can't afford to live in Edina without subsidy, he/she should move to a neighborhood and a home that he/she can afford (without subsidy)</p>	Affordable housing goals are set at a regional level and supported by adopted city policy.
34	3	Chapter 5: Transportation	54	Just a question, no change: What does "Not Endorsed by City Of Edina" refer to for the three areas crossed out refer to?	These represent roadway segments that Hennepin County would like to "turn back" to the City of Edina. The City does not agree with the County and would prefer that the County maintains jurisdiction over these segments.
35	3	Chapter 5: Transportation	1	<p>I would like the city to acknowledge the fact that access to Maple Rd from 48th and 49th St off France Avenue has created an opportunity for an increasing number of vehicles to bypass the congestion at 50th &amp; France. These vehicles do not obey the stop signs nor the posted speed limit. We have already witnessed a vehicle rollover right in the middle of Maple Rd last summer. Excessive speed and disobeying the stop sign were contributing factors! We would like the city to reduce and enforce a 20 MPH speed limit, enforce vehicles to obey the stop signs, and possibly install some form of speed reduction.</p> <p>With the construction of Nolan Main, we have also observed an increase number of vehicles parked on Maple Rd, specifically at the corner of 50th and Maple. These cars are parked for 6-8 hours per day, sometimes on both sides of the street making it very difficult to turn left onto Maple especially during rush hour. Turning left from Maple to 50th is almost impossible during rush hour causing significant back up on Maple Rd.</p> <p>I am not against the development at 50th and France, I just want the city to acknowledge and address these issues.</p>	Concerns in this comment address localized traffic issues. The Comp Plan's focus is on regional issues. The 50th & France Small Area Plan is the appropriate document for addressing local traffic issues and that document does recognize that there are local traffic issues that can result from implementation of new development and includes a policy to address these types of

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50	1	Chapter 5: Transportation	196	<p>I can supply a Word document with changes marked, if requested. Summary of changes:</p> <ol style="list-style-type: none"> <li>1. DOT's system is known as "intercity", so the parentheses should be reversed.</li> <li>2. The sentence at the end of the first paragraph clarifies the intercity rail concept.</li> <li>3. At the start of the third paragraph, "commuter" was changed to "light". The interest of residents was in exploring light rail concepts, not heavy, hazardous commuter rail.</li> <li>4. The recommendation was that the City not continue the study, so so "not to" was changed to "that the City not".</li> <li>5. The paragraph added at the end recognizes other's efforts that may have a significant effect on transportation planning in Edina.</li> </ol> <p>The changed text:            Passenger Rail            MnDOT's 2015 update to the Minnesota Comprehensive Statewide Rail Plan guides the future of both freight and intercity (passenger) rail systems and rail services in the state. While there is no specific mention of Edina, the plan generally provides strong support for increased investment in passenger rail as a response to growing congestion on highways serving the metropolitan area and exurban communities. The Rail Plan identifies a passenger rail line that extends from the Twin Cities to Northfield that would pass through the City of Edina by way of the Canadian Pacific Minneapolis, Northfield and Southern Railway (CP MN&amp;S) subdivision. This corridor is also known as the Dan Patch Corridor and is identified as a Phase 1 project in the plan. This identification indicates it is a desirable project within a 0- to 20-year (2015 - 2035) implementation horizon. Intercity rail is a concept for express service between Minneapolis and Northfield with fast, heavy trains moving through Edina and other communities with no stops along the way. A study conducted in 2002 examined the feasibility of establishing commuter rail service along the Dan Patch corridor. At that time, responding to opposition from residents, former State Representative Ron Erhardt introduced legislation that would prohibit state and regional agencies from spending any money to study, plan or design a commuter rail line in this corridor. This legislation, which was passed and has been referred to as the "gag order," applies to state agencies and affected Regional Railroad Authorities but not cities. Based on interest in light rail expressed by Edina residents, the City in 2017 conducted a study to gauge public support for passenger rail in the Dan Patch corridor through Edina. The majority of public feedback was not supportive of passenger rail in the corridor; particularly noted are comments coming from residents who live along the route. The study, which is documented in the Passenger Rail Community Engagement Report, concluded with a recommendation that the City not pursue passenger rail in the Dan Patch corridor at that time.</p>	<p>The information provided in the Comprehensive Plan is technically accurate. These comments address stylistic preferences. This section will be reviewed and, where appropriate, changes in style will be made.</p>
51	1 and 4	Chapter 5: Transportation	1	<p>To encourage the use of MTC's express bus service by promoting access during the week to underused parking lots located near bus stops and owned by public and private owners. Perhaps incentives could be made to reward owners who offer some of their underused parking spaces for this purpose.</p>	<p>Language will be added to the Goals, Policies, and Implementation sections to address this concern. Additionally, the concern will be directed to the ETC for consideration outside the Comp Plan.</p>

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52	4	Chapter 5: Transportation	1	Modify Edina's on street parking ordinances to allow commuters to park their cars on public streets for up to 12 hours located within two hundred yard of bus stops especially on express bus stops. Because express buses are not within walking distance for most residents, these two changes in parking options, would encourage the use of express bus services serving primarily downtown Minneapolis and could reduce the heavier use of private vehicles in and around Edina.	This concern will be directed to the ETC for consideration outside the Comp Plan.
89	3	Chapter 5: Transportation	48	The section on page 48 regarding 50th and France should reflect the SAP decision to require a traffic study one year after the completion of Nolan Mains. This section should further note the need to be sensitive to the impact of cut-through traffic on adjacent neighborhoods.  The sections on France Avenue should also note that the 44th and France working group discussed the need for additional pedestrian safety at 44th and France.	Concerns in this comment address localized traffic issues. The Comp Plan's focus is on regional issues. The 50th & France Small Area Plan is the appropriate document for addressing local traffic issues and that document does recognize that there are local traffic issues that can result from implementation of new development and includes a policy to address these types of
36	1	Chapter 6: Parks, Open Space and Natural Resources	6	Reference to Fred Richards Golf Course -- it is no longer a golf course.	A correction will be made to the Comp Plan that goes to adjacent cities for review and the Met Council.
37	1	Chapter 6: Parks, Open Space and Natural Resources	8	Weber Woods is not included in Open Space table. Is it included with Weber Park acreage or is it not considered park land? It is in the current CIP to be a dog park.	A correction will be made to the Comp Plan that goes to adjacent cities for review and the Met Council.
38	1	Chapter 6: Parks, Open Space and Natural Resources	9	Policy 1-C -- will the city also consider purchasing land for park use and/or converting publicly owned land from existing use to park use? If yes, add it. If no, why not?	Yes. Policy 1-C should have opened with the following line: "It is the intent of the City to maintain and, when feasible, increase its current park and open space property."

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39	1	Chapter 6: Parks, Open Space and Natural Resources	10	Policy 3-A -- what about the parks strategic plan, community center study, parks/recreation data from community surveys, etc. Not clear why only Vision Edina (2015) and Big Ideas Workshop (2017/2018) are referenced as providing guidance when other valuable guidance is found in these other documents.	Indeed. Many sources were considered in the development of this plan, and many will help guide recommendations in the future. While Park Master Plans and Small Area Plans are called out in other policy aspects of this goal, it is a miss NOT to also include the Edina P&R Strategic Plan as a core guiding document to future recommendations. This would be a good addition to Policy 3-A in the Parks section.
40	3	Chapter 6: Parks, Open Space and Natural Resources	1	General statement -- the goals are vague and, as a result, not that useful. Perhaps some can be combined, made more specific.	We will continue to refine goal statements to add specificity. Combining goals does not seem to make sense as that would tend to further dilute intent.
41	3	Chapter 6: Parks, Open Space and Natural Resources	2	Questions: 1) How did we come to 15% as the commitment number for parks and green space? Why isn't it higher or lower? 2) Does the mention of hardscape mean that future hardscape spaces will count towards parks and open space areas – even if they aren't naturally occurring spaces? I'm commenting specifically on this snippet: "Edina has committed to a minimum of 15 percent of its land area to be used as parks and green space. (As of the most recent census, we are right at this threshold.) Future standards will need consider "hardscape" environments as represented in the Greater Southdale District Plan."	To the best recollection of staff, the 15% target was based off of insight from the NRPA (National Recreation and Park Association). Yes – future hardscape spaces would also likely be included in this metric as they would be serving a particular role as a park.
63	3	Chapter 6: Parks, Open Space and Natural Resources	1	Shouldn't there be more information on what will happen with Fred Richards Park included? Like a timetable of completion, cost, parking, etc?	There is a separate Master Plan, approved by City Council, that addresses the improvements at Fred Richards. Details regarding that plan are available through the city. It is not the intent of the Comprehensive Plan to include all broad strategic or specific park master plans.

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64	3	Chapter 6: Parks, Open Space and Natural Resources	1	The Major Challenge text box: Edina's population has increased 14.6% this decade (2010-2020). It is expected to increase at a lower rate over the next two decades (about 9% over 20 years). We are in the challenging growth period now. The challenge is that we are not yet seeing the full impacts of this growth. Looking forward is good, but there is also a need to seek to understand how this growth is affecting Edina now.	A good point. Addressing "Edina now" comes from the direction of City Council and the priorities of our last strategic plan. Setting some guidance for "Edina future" is the intent of this Comp Plan.
65	1	Chapter 6: Parks, Open Space and Natural Resources	2	The 2016 population number used is outdated at this point. The 2020 (next year) estimate is 55,000. This works out to about 28.5 acres per 1,000.  By 2030, it will be about 26 acres per 1,000 and by 2040 just under 25 acres per person. Yet, there is no policy in this chapter to purchase land for park and open space use when good options become available.	Good catch. A line was dropped from the initial draft that should be added back as the opening line of Policy 1-C: "It is the intent of the City to maintain and, when feasible, increase its current park and open space property."
66		Chapter 6: Parks, Open Space and Natural Resources	9	Policy 1-C addresses potential of selling parks/open space property. It should also address possibility of purchasing property for parks/open space used and also converting non-park public property (such as parcels the city currently owns) to park/open space use.	Policy 1-C should have opened with the following line: "It is the intent of the City to maintain and, when feasible, increase its current park and open space property."
67	1	Chapter 6: Parks, Open Space and Natural Resources	10	Policy 3-A. What about recommendations in the parks strategic plan, community center study, quality of life surveys, etc. Why only Vision Edina and the Big Ideas workshop. The exclusion of other parks/recreation processes that happened in recent years seems strange.	Indeed. Many sources were considered in the development of this plan, and many will help guide recommendations in the future. While Park Master Plans and Small Area Plans are called out in other policy aspects of this goal, it is a miss NOT to also include the Edina P&R Strategic Plan as a core guiding document to future recommendations. This would be a good addition to Policy 3-A in the Parks section

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68	4	Chapter 6: Parks, Open Space and Natural Resources	10	Policy 3-C Is the EPRD and PARC going to be taking an active role in development review? If yes (or no) what does it mean to "support the successful development and execution of" small area plans? What if the plans conflict with increasing parks/recreation facilities?	The Small Area Planning process has been driven by the Edina Planning Commission. It has been a community focused effort to provide a thoughtful approach to what fits best for the future structure and utilization of these designated areas. Both ERPD and PARC members have been engaged in those development processes. Going forward, these plans will become another input in the future direction of Edina's parks and programs.
69	1	Chapter 6: Parks, Open Space and Natural Resources	10	Policy 1-C What does it mean to reduce wild life migration away from their natural habitat? Someone's backyard can be the natural habitat for a coyote, rabbit, raccoon, deer or other urban wildlife. Not sure what this means.	This item under the Natural Resources section could be stated more clearly. The intent behind this policy is the following: "Wildlife will be nurtured and protected. Animal and bird populations that are considered a threat to public health or safety, or may be considered hazardous to the environment or infrastructure within Edina, will be proactively managed." We will review for a better statement of the intent.
70	3	Chapter 6: Parks, Open Space and Natural Resources	11	Policy 1-G "The structure, content, and oversight of these plans will be at the sole direction of the City Council in coordination with the Edina city manager."  What is the intent of this statement and is it necessary? Is it saying the PARC has no role?	The PARC is an advisory body. The City Manager is the operational lead. The City Council is the decision making authority. The PARC believes that part of its role as an advisory council is to also ensure an adequate amount of transparency to monitor the successful use of assets in our parks and programs.
92	4	Chapter 6: Parks, Open Space and Natural Resources	62	Edina has a good bike path system and should have mountain bike trails also. Can the city elaborate on this. I've seen the plans but have not seen any updates on actual trail building. With the Edina HS having a mountain bike team it would seem very beneficial to have a trail system so close. Also, cyclists will come from other cities to ride & spend money. Look at Lebanon Hills Eagan & Theodore Wirth in Golden Valley. These trails bring in riders from miles around. Edina has the terrain and space to make and excpetional trail.	This issue will be refered to the Parks and Recreation Commission.

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83	4	Chapter 6: Parks, Open Space and Natural Resources	1	Develop Parks, Eliminate Buckthorn Fred Richards Golf Course closed 5 years ago. Aside from the Regional Trail, nothing has happened there. Braemar has been closed for 3 years and buckthorn continues to take over, moving northward from the Hyland Park area where it has completely taken over the formerly-beautiful woods. Park areas that people do not use decline, and in this area that means buckthorn takes over or worse. Buckthorn should be totally eradicated from Braemar by 2020 – this can be done with volunteer labor, using simple hand tools and painting the stumps with herbicide. This should be done immediately. The easiest way to enlist volunteer labor is to design, and promise to construct, a trail system. Separate trails can be laid out for ski, snowshoe, mountain bike, and hiking/running. This trail network should wrap around at least the south and west sides, with extension across Braemar Drive to the ballfields, creek and north of the golf course if possible. This area is a gem from the standpoint of terrain, accessibility, and existing oak stock.	This issue will be referred to the Parks and Recreation Commission.
42	4	Chapter 7: Water Resources	1	Since we don't have the geography or topography to create a new spring to rival the amazing Frederick Miller Spring in Eden Prairie, how about public access to groundwater via wells or pumps? There are many of us in Edina who prefer spring water to tap water for the taste, environmental impact, or personal health impact. To channel Daniel Vitalis for a moment, there's a HUGE difference between whole, natural water and processed water. We've gotten really good at distinguishing between whole or unprocessed foods, but not thinking about water in the same way. And people may think, "Well, does that matter? Isn't it just the same?" No, it's not the same. Municipal water has chlorine (an antibiotic and disruptor to the gut microbiome), fluoride (a neurotoxin, see: <a href="https://ntp.niehs.nih.gov/pubhealth/hat/selected/fluoride/neuro-index.html">https://ntp.niehs.nih.gov/pubhealth/hat/selected/fluoride/neuro-index.html</a> ), potential acids or alkaloids to treat the pH of the water to maintain the pipe infrastructure, and other things that can't be completely filtered out like pharmaceutical drugs. If Edina is being visionary, they will have a plan to provide drinking water that doesn't come from a water treatment facility and doesn't require residents to drive to Eden Prairie to get the water we've evolved to flourish with.	Refer to Public Works staff and Energy & Environment Commission for consideration
53		Chapter 8: Energy and Environment	8.2	P. 8-1: I would like to see this as the first "chapter highlight" as it is the most important: "The City will make sustainability a foundational element of its decision-making process. The decision-making process should also take into account the goal of an equitable distribution of benefits." P. 8-2: The greenhouse gas reduction goals are incorrect on p. 8-2. It's 30% by 2025.	The order of the chapter highlights was chosen specifically by the Energy & Environment Commission  Greenhouse gas reduction goals will be review and corrected/clarified as needed

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71	4	Chapter 8: Energy and Environment	10	<p>The first change that I would suggest to improve this chapter is to set a deadline for the completion of the "integrated environmental action plan," since I believe that this could be the basis of all future environmental actions and lay out the strategy with which different aspects (waste, climate change, etc.) would be addressed. Seeing as we haven't been able to meet the goals we've set in the past and since there are environmental issues that have to be addressed with urgency such as climate change, I believe that it is important to have an action plan created as soon as possible. Additionally, a detailed and inclusive plan can help us structure and lay out the way in which we can make the necessary changes in the most efficient, beneficial and cost-effective way possible.</p> <p>Another change I would suggest would be to lower the time-frame given to make the transition to renewable energy. The IPCC report, which is referenced in the chapter, explains that we need to reach net-zero green house gas emissions globally by mid-century if we want to limit the global temperature; therefore, the current goal of "80% emission reduction by 2050" is not proportional to the scale of the actions that we have to be taking. For this reason I believe that our goals should be bolder and that we should create a plan to reach net-zero green house gas emissions by 2050 or earlier.</p>	This is being tackled outside of the Comp Plan It is on the EEC's Work Plan to make a recommendation to Council this year on deadline and framework to discuss future goals
91	4	Chapter 8: Energy and Environment	13	In both the energy and environment section and the natural resources section, there should be a discussion of the impact of emerald ash borer on the city's tree canopy. Other cities have incurred substantial unanticipated costs in treatment, removal, and replacement of ash trees. Edina should direct the city forester to plan for the expected loss of trees and to explore treatment options where appropriate. There are bills currently moving in the state legislature that will provide grants to cities for this work. In addition, there are now treatments that are effective for preserving some trees and avoiding the wholesale loss of large numbers of trees at the same time.	<p>Currently, Chapter 8 states an action of: Trees – Tree canopy has many stacked benefits (carbon sequestering, reduction in heat island effect, storm water mitigation, supporting wildlife, etc.). Review policy and actions that support tree canopy and benefits.</p> <p>We could focus on Emerald Ash Borer (EAB) but that narrows the scope as we don't know what the next disease will be.</p> <p>Currently, Forester has a strategy to manage EAB in the tree canopy in parks and right of way including diversification of tree replacements. Connect with Forester and Parks Commission if detailed action needs to go the Comp Plan or if this is a communication of current actions or a deep dive for next year's work plan. The City's existing program is coordinated with Henneping County and the Minnesota Department of</p>

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59	4	Chapter 10: Economic Competitiveness and Economic Development	2	There should be an outline of how staff works and will work with existing business to stay, grow, and prosper. The recent loss of major employers is not a good sign about the ability of Edina to be destination for employers.	This concern is already identified in Goal #3 on page 10-15. Full details of a retention/attraction strategy will be developed later (after the Comprehensive Plan is completed and approved).
62	3	Chapter 10: Economic Competitiveness and Economic Development	3	If Edina is giving 40% of commercial/industrial tax base to other cities as stated shouldn't the City of Edina get some type of credit for affordable housing other cities are creating with those dollars? Could this percentage be decreased to offset the TIF used for new affordable housing? Not sure how the policy is written but with Edina offsetting other Cities budgets from a policy setup 40 years ago it should be updated to meet modern financial times/needs.	The 40 percent referred to by the commentor is derived through the Fiscal Disparities Program, which was established in 1971 by the Minnesota State Legislature (Minnesota Fiscal Disparities Act of 1971). Rules for the program do not include "credit" for affordable housing.
76	1	Chapter 11: Human Rights and Relations	1	In the sentence on page 1 below the bullet points, the phrase "One of the aims of this chapter is to ensure that steps are taken to ensure that the City looks at its departments ..." has a redundancy. It should read, "One of the aims of this chapter is to ensure that the City looks at its departments..." The green box contains the "themes" for the chapter, which belong under the section heading, "Trends, Challenges, and Themes." On page 5, the word "increasing" in the third line of the green box should not be capitalized. The percent of population that is white in 2016 in Table 11.1 is 86.5%. On the top of page 4, it says that 85 % of residents are European American - is this a current statistic, i.e., 85% as of 2018 or 2019 (rather than 2016, when 86.5% are white). The last paragraph on page 6 was identified as a "Theme," along with the items in the green box on page 1 . The subheading "theme" has been eliminated so it appears that the last paragraph on page 6 is a "challenge." The text for the "themes" that are contained in the green box on page 1 should be [repeated] on page 6 under a	The suggested language will be incorporated in the version of the Comp Plan that is reviewed by adjacent municipalities, agencies, and the Metropolitan Council.

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84	4	Chapter 11: Human Rights and Relations	1	<p>Don't Be Racist</p> <p>As I have noted to many of you previously, the Race and Equity Task Force Report lacks essential veracity, because none of the reported incidents were ever confirmed - only 1 was investigated, and it was proven to be without merit (presaging Jussie Smollett). Edina's laws and policies are all 100% non-discriminatory (obviously if I am wrong on that, any discriminatory laws/policies should be changed immediately). As the Draft notes, restrictive covenants have been illegal to enforce for 71 years. Edina's population of racial minorities doubled from 2000-2016. In particular (as I have noted to City officials) a strong Indian community has taken root in southeast Edina, including a prominent Hindu Temple (just down the street from an African Christian church) and a tremendous racial mix at Centennial Lakes and on the 9 Mile Creek Trail. The Draft notes that 24% of Edina Public Schools students are minorities.</p> <p>Despite the obvious mixing that is occurring without social engineering, and even after acknowledging that Edina offers equality, the Draft endorses the politically-correct term "equity". It defines "equity" as "everyone gets the supports they need." (11-3). This leaves unanswered the obvious question: Need for what? The desired outcome is never specified. Without stating the desired outcome, we can't possibly know what "supports" "everyone" should get. This is crucial because the Draft states Goals and Policies based on "equity": "evaluate progress toward race equity goals" "focus on eliminating policies that create and maintain inequities based on race". The Draft subjects the City to these undefined, subjective terms, opening the City to legal liability should it ever fail to do anything that someone says is needed for "equity."</p> <p>In particular, the City will be asked to exercise favoritism by race, in hiring, housing, and other areas. Once the City commits to "equity" it will be argued that it is violating its own policy by refusing to take any "equitable" step. The City will face this challenge forever, or until there is "equity" (these are the same thing.) I would urge you not to go down this road. Instead, make your judgments based on the content of a person's character, not the color of their skin. All the evidence supports conclusion that making race a central focus of policy debates, and adopting the subjective term "equity" as your lodestar, increases rather than decreases racial discord. You will be trading a temporary peace from race activists (which you'll lose as soon as you deny anything they demand, however outrageous) in exchange for creating a two-tiered city, in which some Edinans are more equal (favored by official city "race equity" policy) than others. This is especially true when the 2016-2017 process to produce the Race and Equity Report was so fatally flawed by unproven and proven-false information.</p>	Comments will be referred to Human Rights and Relations Commission. All comments will be forwarded on to the City Council.
105	4	Chapter 11: Human Rights and Relations	7	<p>Eliminate Goal #4. The term "economic equity and justice for all" is ambiguous and our residents will have wildly differing opinions on what this means and how it should be addressed. My opinion is that free market forces are the best (albeit imperfect) way to make it happen. Those who contribute more should, and generally will, receive more and those who contribute less should, and generally will, receive less. Other residents will hold different opinions. But it should not be the business of our city to circumvent market forces or to transfer wealth from one resident to another.</p> <p>Goal 1 Policy 5 - I also find this ambiguous. I agree if the "inequities" refer to inequities in behavior toward different racial groups. I disagree if this implies the city should give preferential treatment to any racial group, even if that group is considered disadvantaged in some manner.</p>	Comments will be referred to Human Rights and Relations Commission. All comments will be forwarded on to the City Council.

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75	1	Chapter 15: Implementation	31	<p>The last box under "Strategy/Action Steps" Human Rights and Relations Goal 1, which begins, "Task the Human Rights and Relations Commission to develop and implement educational and other related projects..." is the implementation step for Human Rights and Relations Goal 2. This is the only implementation step for Goal 2.</p> <p>The "Strategy /Action Steps" listed for Goal 2, is one of the implementation steps for Goal 3 (the correct implementation step for Goal 2 is currently listed under Goal 1, as previously described).</p> <p>The second "Strategy/Action Step" that is listed for Goal 3, which begins, "Through the normal course of review and modification, departments will evaluate..." is one of the implementation steps for Goal 4.</p> <p>The last "Strategy/Action Step" that is listed for Goal 4, which begins, "Work in strong collaboration with the Edina City Council and Mayor to establish an effective working model for including the perspectives of arts and culture..." is NOT an implementation step for any Human Rights and Relations Goal; this implementation step is for an Arts and Culture goal.</p> <p>There is no Human Rights and Relations Goal 5 nor Goal 6 - these both describe Arts and Culture Goals.</p> <p>Also, there is a typo on page 15-37 in the last box under "Strategy /Action Steps: there needs to be a space between "arts" "and".</p>	<p>The suggested language will be incorporated in the version of the Comp Plan that is reviewed by adjacent municipalities, agencies, and the Metropolitan Council.</p>
54	2-Jan	SAP: 50th & France	37	<p>Issue: CLARITY OF STUDY AREA BOUNDARIES</p> <p>Because the commercial node directly abuts the single family neighborhood to the north and east, it is essential to provide an absolutely clear explanation and understanding of the study area BOUNDARIES. We have received many communications from adjacent residents concerned about subterfuge. In order to avoid further misunderstanding, enlarge the map (an excellent graphic) from page vii of the Executive Summary to use here to explain the study area, or else overlay the Study Area boundary on top of an actual Hennepin County Property Interactive Map aerial photo. The scale used in Figure 1 is far too small to be readable. Then include a clearly WRITTEN description of the Study Area as suggested below:</p> <p>The study area is limited to only the public street rights-of-way and several commercial, multi-family or mixed use parcels in the immediate vicinity of the intersection of West 50th Street and France Avenue South. The NORTHERN boundary is defined by 3901 W. 49th St., exclusive of all single family residences on 49th St. W., and inclusive of all commercial, multifamily and mixed use properties on 49-1/2 St. W. (Market St.) The EASTERN boundary is defined by all commercial, mixed use, and multifamily properties to the east side of France Ave. S. The SOUTHERN boundary is defined by all commercial, multifamily, and mixed use properties to the north of 51st St. W. and including 4075 W. 51st St., 5000 Halifax Ave., and 4121 50th St. W. The WESTERN boundary is defined by all commercial, multifamily and mixed use properties to the east of the property line formed by First Building Corporation parcels, excluding the easement buffer strip.</p>	<p>The study area's boundaries have been discussed by the the 50th and France Work Group and the Planning Commission, and decisions have already been made to leave the easement buffer strip in the study area. Revised language has already been included on page 37. "The existing 50-foot wide easement/buffer strip of land on the west side of the First Bank site within the study area is subject to an easement benefiting adjacent homeowners, pursuant to a 1972 deed executed by the then-Village of Edina. This easement restricts public use of this land, including a prohibition against use as a public park, except for public utility easements, if any, existing as of the date of the deed. Although this land is within the study area, the restriction against its development is noted. For public clarity, this easement is identified in green in drawings included with this small area plan as a buffer area between the neighborhood to the west and developable private property within</p>

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55	1	SAP: 50th & France	32	Issue: COLORS IN LEGEND ARE OFF The legend shows BEIGE as "low density residential" and YELLOW as "Low Density Attached Residential. These colors do not correspond to the map. The map appears to be various shades of green.	This map and the associated legend will be reviewed and corrected.
93	1	SAP: 50th & France	34	Pages 34-35 of the SAP should be re-drafted to include the Council's recommendations on April 2 to lower the maximum density and revise the language about when the city should allow heights of over 4 stories.	The Council's recommendation has already been included.
56	4	SAP: 70th & Cahill	24	Estimate the direct and indirect cost to existing property tax payers with the objective of minimizing tax burdens. I cant believe you left this out. It shows how far out of alignment our interests are.	This is beyond the scope of a small area plan.
57	4	SAP: 70th & Cahill	12	While talking about the creating new green space and amenities for new development, why not put solid plan to refurbish the Luwis park nearby by upgrading the more than 20 years old playground?	Lewis Park was not included within the 70th and Cahill small area plan boundaries. This comment will be referred to the Parks and Recreation Commission.
58	3	SAP: 70th & Cahill	44	Without convincing school capacity impact and school bus data and modeling, the residential density proposal would not make the whole picture here. In another view, this place is already in heart of a low density neighborhood, it will be very incoherent to bring in a big chuck high density building with possible traffic nightmare. It is indeed A "Small Area" as the SAP title says.	According to a professional demographer who has studied population and school enrollment in Edina, 88 percent of Edina Public Schools students live in single-family houses. The higher the market value of the house, the more likely it is to have school-age children. For example, houses valued at \$750,000 or more yield about 0.7 students per house. Those valued at less than \$300,000 yield just 0.23 students.