



February 23, 2022

**Re: City comments on HF 3256 (“Legalizing Affordable Housing Act”)**

Dear Members of the House Local Government Division:

The League of Minnesota Cities, Coalition of Greater Minnesota Cities, Metro Cities, and Municipal Legislative Commission generally oppose HF 3256, but appreciate the attention in the bill to street improvement districts and street impact fees. Cities are concerned with the bill’s broad preemption of city land use and zoning authorities, particularly as they are unlikely to address important housing issues across Minnesota. Additionally, as some provisions only impact Metro-area cities, our comments focus on provisions with statewide implications for cities.

Housing is a statewide issue, and the best way to ensure that housing issues in the Metro area and greater Minnesota are adequately addressed is to approach statewide solutions to housing in a comprehensive way that: (1) address the full housing spectrum, (2) support local innovation, (3) provide incentives instead of mandates, and (4) provide community-specific solutions throughout Minnesota.

HF 3256 unfortunately falls short of a comprehensive approach, and does not guarantee housing affordability or more affordable housing. Instead, it preempts city zoning and land use authority. As you may know, zoning is an important planning tool that benefits communities economically and socially, improves health and wellness, and helps conserve the environment ([Zoning: Why It’s Important](#)). This bill would limit this beneficial tool by:

- Requiring any housing proposal contemplated by a comprehensive plan in the future be accepted now, even if needed infrastructure isn’t available to support this new development (it would also prohibit the opportunity to study impacts of such residential development)
- Capping land dedication and park dedication fees
- Requiring land dedication for streets to be no larger than 32 feet (including for associated utilities and sidewalks) while limiting the ability for cities to require adequate off-street parking
- Requiring all cities to allow duplexes and accessory dwelling units (ADUs) in single-family zoned areas
- And more

Thank you for consideration of our concerns. We look forward to continuing to work with Rep. Elkins and other legislators to address housing challenges in cities across the state.

Sincerely,

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