Community Development Committee
Meeting date: June 17, 2019

Environment Committee
Meeting date: June 25, 2019

For the Metropolitan Council meeting of July 10, 2019

Subject: City of Bloomington 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 21953-1

District(s), Member(s): District 5, Molly Cummings

Policy/Legal Reference: Metropolitan Land Planning Act (Minn. Stat. § 473.175), Minn. Stat. § 473.513

Staff Prepared/Presented: Michael Larson, Senior Planner (651-602-1407)
Angela R. Torres, Local Planning Assistance Manager (651-602-1566)
Kyle Colvin, Engineering Programs, Manager (651-602-1151)

Division/Department: Community Development / Regional Planning
Environmental Services / Technical Services

Proposed Action
That the Metropolitan Council adopt the attached Advisory Comments and Review Record and take the following actions:

Recommendations of the Community Development Committee
1. Authorize the City of Bloomington to place its 2040 Comprehensive Plan into effect.
2. Revise the City’s forecasts upward as shown in Table 1 of the attached Review Record.
3. Revise the City’s affordable housing need allocation to 842 units.

Recommendation of the Environment Committee
1. Approve the City of Bloomington’s Comprehensive Sewer Plan.
2. Once approved, the City shall submit to the Council a copy of the final adopted Ordinance that requires the disconnection of any identified prohibited discharges to the sanitary sewer system.
Advisory Comments
The following Advisory Comments are part of the Council action authorizing the City of Bloomington to implement its 2040 Comprehensive Plan (Plan).

Community Development Committee
1. As stated in the Local Planning Handbook, the City must take the following steps:
   a. Adopt the Plan in final form after considering the Council’s review recommendations as contained in the body of this report.
   b. Submit one hard copy and one electronic copy of the Plan to the Council. The electronic copy must be submitted as one unified file.
   c. Submit to the Council a copy of the City Council resolution evidencing final adoption of the Plan.
2. The Local Planning Handbook also states that local governments must formally adopt their comprehensive plans within nine months after the Council’s final action. If the Council has recommended changes to the Plan, local governments should incorporate those recommended changes into the Plan or respond to the Council before “final adoption” of the comprehensive plan by the governing body of the local governmental unit. (Minn. Stat. § 473.858, subd. 3)
3. Local governments must adopt official controls as identified in their 2040 comprehensive plans and must submit copies of the official controls to the Council within 30 days after the official controls are adopted. (Minn. Stat. § 473.865, subd. 1)
4. Local governmental units cannot adopt any official controls or fiscal devices that conflict with their comprehensive plans or which permit activities in conflict with the Council’s metropolitan system plans (Minn. Stats. §§ 473.864, subd. 2; 473.865, subd. 2). If official controls conflict with comprehensive plans, the official controls must be amended within 9 months following amendments to comprehensive plans (Minn. Stat. § 473.865, subd. 3).

Environment Committee
1. The Council-approved Comprehensive Sewer Plan becomes effective only after the Plan receives final approval from the local governmental unit’s governing body. After the Plan receives final approval from the City and the Comprehensive Sewer Plan becomes effective, the City may implement its Plan to alter, expand, or improve its sewage disposal system consistent with the Council-approved Comprehensive Sewer Plan.
2. A copy of the City Council resolution adopting its 2040 comprehensive plan, including its Comprehensive Sewer Plan, must be submitted to the Council.
Background
The City of Bloomington is located in southeastern Hennepin County. It is surround by the communities of Edina, Richfield, Fort Snelling, Eagan, Burnsville, Savage, and Eden Prairie.

The City of Bloomington submitted its 2040 Comprehensive Plan (Plan) to the Council for review to meet the Metropolitan Land Planning Act requirements (Minn. Stats. §§ 473.851 to 473.871) and the Council’s 2015 System Statement requirements.

Review Authority & Rationale
Minn. Stat. § 473.175 directs the Metropolitan Council to review a local government’s comprehensive plan and provide a written statement to the local government regarding the Plan’s:

- **Conformance** with metropolitan system plans
- **Consistency** with the adopted plans and policies of the Council
- **Compatibility** with the plans of adjacent governmental units and plans of affected special districts and school districts

By resolution, the Council may require a local government to modify its comprehensive plan if the Council determines that “the plan is more likely than not to have a substantial impact on or contain a substantial departure from metropolitan system plans” (Minn. Stat. § 473.175, subd. 1).

Each local government unit shall adopt a policy plan for the collection, treatment, and disposal of sewage for which the local government unit is responsible, coordinated with the Metropolitan Council's plan, and may revise the same as often as it deems necessary (Minn. Stat. § 473.513).

The attached Review Record details the Council’s assessment of the Plan’s conformance, consistency, and compatibility, and is summarized below.

<table>
<thead>
<tr>
<th>Review Standard</th>
<th>Review Area</th>
<th>Plan Status</th>
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<tbody>
<tr>
<td>Conformance</td>
<td>Regional system plan for Parks</td>
<td>Conforms</td>
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<tr>
<td>Conformance</td>
<td>Regional system plan for Transportation, including Aviation</td>
<td>Conforms</td>
</tr>
<tr>
<td>Conformance</td>
<td>Water Resources (Wastewater Services and Surface Water Management)</td>
<td>Conforms</td>
</tr>
<tr>
<td>Consistency with Council Policy</td>
<td>Thrive MSP 2040 and Land Use</td>
<td>Consistent</td>
</tr>
<tr>
<td>Consistency with Council Policy</td>
<td>Forecasts</td>
<td>Consistent</td>
</tr>
<tr>
<td>Consistency with Council Policy</td>
<td>2040 Housing Policy Plan</td>
<td>Consistent</td>
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<tr>
<td>Consistency with Council Policy</td>
<td>Water Supply</td>
<td>Consistent</td>
</tr>
<tr>
<td>Consistency with Council Policy</td>
<td>Community and Subsurface Sewage Treatment Systems (SSTS)</td>
<td>Consistent</td>
</tr>
<tr>
<td>Compatibility</td>
<td>Compatible with the plans of adjacent and affected governmental districts</td>
<td>Compatible</td>
</tr>
</tbody>
</table>

**Thrive Lens Analysis**
The proposed 2040 comprehensive plan is reviewed against the land use policies in *Thrive MSP 2040*. To achieve the outcomes identified in Thrive, the metropolitan development guide defines the Land Use Policy for the region and includes strategies for local governments and the Council to implement. These policies and strategies are interrelated and, taken together, serve to achieve the outcomes identified in Thrive.

**Funding**
None.
Known Support / Opposition
There is no known local opposition to the 2040 comprehensive plan.
The following Review Record documents how the proposed Plan meets the requirements of the Metropolitan Land Planning Act and conforms to regional system plans, is consistent with regional policies, and is compatible with the plans of adjacent and affected jurisdictions.

Conformance with Regional Systems
The Council reviews plans to determine conformance with metropolitan system plans. The Council has reviewed the City’s Plan and finds that it conforms to the Council’s regional system plans for Regional Parks, Transportation (including Aviation), and Water Resources.

Regional Parks and Trails
Colin Kelly, Community Development (CD) – Regional Parks (651-602-1361)  
The Plan conforms to the 2040 Regional Parks Policy Plan (RPPP). The City of Bloomington and Three Rivers Park District are both Park implementing agencies for different Regional Parks System components in the City, for which the Plan accurately describes the Regional Parks System components (Figure 1).

Regional Parks, Park Reserves, or Special Recreation Features located within the City include Hyland-Bush-Anderson Lakes Park Reserve. Regional Trails located within the City include Nine Mile Creek and Nokomis-Minnesota River (previously known as Intercity) regional trails; and Nokomis-Minnesota River (previously known as Intercity) Extension, South Hennepin East, and South Hennepin West (CP Rail) regional trail search corridors. The City also appropriately acknowledges State and Federal lands within the City, including Fort Snelling State Park and Minnesota Valley National Wildlife Refuge.

Regional Transportation, Transit, and Aviation
Reviewer: Russ Owen, Metropolitan Transportation Services (MTS) (651-602-1724)  
The Plan conforms to the 2040 Transportation Policy Plan (TPP). It accurately reflects transportation system components of the TPP as well as applicable land use policies for regional transitways. The Plan is also consistent with Council policies regarding community roles, the needs of non-automobile transportation, access to job concentrations, and the needs of freight. The Plan is compatible with the plans of adjacent and affected governmental units (including Hennepin County).

Roadways
The Plan conforms to the Roadways system element of the TPP. The Plan accurately accounts for the metropolitan highway system of principal arterials, including planned additions and improvements identified in the Current Revenue Scenario, and any right-of-way preservation needs.

The Plan accurately reflects the regional functional classification map of A-minor arterials and has delineated major and minor collectors.

The Plan identifies all the required characteristics of the City’s roadways, including existing and future functional class, right-of-way preservation needs, and existing and forecasted traffic volumes for principal and A-minor arterials. Forecasting was done consistent with regional methodology. The Plan also includes guidelines on how access will be managed for principal and A-minor arterials.
Transit
The Plan conforms to the Transit system element of the TPP. It shows the location of existing transit routes and facilities and acknowledges the City is within Transit Market Areas II, III, and IV.

The Plan incorporates existing and future transitways that are part of the Current Revenue Scenario in the TPP. These include the METRO Orange Line Bus Rapid Transit (BRT) and Chicago-Emerson-Fremont Arterial (D-Line) BRT. The Plan incorporates guiding land use for station areas that meet the minimum density targets of the TPP.

The Plan also incorporates transitways that are part of the Increased Revenue Scenario in the TPP. The Plan’s maps and narrative acknowledge the uncertainty of these transitways. This includes the American Boulevard transitway.

The Plan is consistent with the policies of the Transit system element of the TPP. The Plan addresses community roles related to the City’s community designation of Urban, as well as the opportunities and challenges related to its Transit Market Areas.

Aviation
The Plan conforms to Aviation system element of the TPP. The Plan includes policies that protect regional airspace from obstructions and describes how off-site air navigation aids will be protected.

The Plan identifies the Minneapolis-St. Paul International Airport (MSP) and addresses elements of its long-term comprehensive plan. The Plan addresses issues including land use compatibility, noise sensitivity, and the protection of airspace from obstructions. The Plan addresses the importance of MSP to the success of Bloomington businesses and its impact as a large employer in the City. The community has an adopted airport zoning ordinance and participates in a Joint Airport Zoning Board (JAZB).

Bicycling and Walking
The Plan is consistent with the Bicycle and Pedestrian chapter of the TPP. The Plan identifies existing and future segments of and connections to the Regional Bicycle Transportation Network (RBTN) and regional trails. The Plan proposes a preferred alignment for an RBTN corridor and clearly identifies the alignment as “proposed for the RBTN”.

The Plan is also consistent with Bicycle and Pedestrian policies of the TPP by planning for local pedestrian and bicycle connections to transit, regional trails, regional job concentrations, and other regional destinations as identified on the RBTN map.

Freight
The Plan is consistent with Freight policies of the TPP. The Plan identifies the needs of freight movement in and through the City, including accessibility to freight terminals and facilities. These specific needs include barge traffic on the Minnesota River and heavy commercial vehicle traffic associated with freight arriving at MSP Airport.

Transportation Analysis Zones (TAZs)
The Plan conforms to the TPP regarding TAZ allocations. The City’s TAZ allocations for employment, households, and population appropriately sum to the Council’s citywide forecast totals for all forecast years.

The City’s planned land uses and areas identified for development and redevelopment can accommodate the TAZ forecasted allocations in the Plan, and at densities consistent with the City’s Thrive community designation of Urban and applicable TPP policies for transit station areas. (Please also refer to the Land Use section of this Review Record.)
Water Resources

Wastewater Service
Reviewer: Kyle Colvin, Environmental Services (ES) – Engineering Programs (651-602-1151)

Comprehensive Sewer Plan Comments
The Plan conforms to the 2040 Water Resources Policy Plan (WRPP). The Plan represents the City’s guide for future growth and development through the year 2040. It includes growth forecasts that are consistent with the Council’s forecasts for population, households, and employment.

Current wastewater treatment services are provided to the City by Metropolitan Council Environmental Services. All wastewater generated within the City is conveyed through the following Council Interceptors: 3-BN-499, 9003, and 7031. All flow generated within the City is treated at the Council’s Seneca Wastewater Treatment Plant in Eagan. The Plan projects that the City will have 42,510 sewered households and 112,050 sewered employees by 2040. The Metropolitan Disposal System with its scheduled improvements has or will have adequate capacity to serve the City’s forecasted growth.

The Land Use Plan reflects an overall minimum residential sewered density guiding of 11.06 units per acre, thus satisfying the Council’s policy for future sewered residential densities for Urban communities.

The Plan provides sanitary flow projections in 10-year increments. The rationale for the projections is given in the Plan and determined appropriate for planning local services. The Council is committing to provide the level of wastewater service based on the sewered forecasts as stated in the sewer element of the Plan.

The Plan defines the City’s goals, policies, and strategies for preventing and reducing excessive inflow and infiltration (I/I) in both the local municipal (city) and private property sanitary sewer systems. The Plan outlines the City’s program of annual televised inspection of the public collection system in which approximately 200,000 feet of sewer mains get inspected. During these inspections the condition of private services are noted, and the presence of possible leaking services investigated. The Plan does not summarize what corrective actions, if any, are taken if clear water is observed coming from a private service from non-sump pump sources. Included in its annual maintenance and street construction programs is $300,000 for sewer main and maintenance hole repairs related to I/I.

The Plan describes the requirements and standards for minimizing I/I and references a City Code (Section 11.31(b)(3)) that prohibits discharge of stormwater, groundwater and roof runoff, surface water and unpolluted drainage or industrial cooling water to the sanitary sewer system. The City also has a “Time-of-Sale Housing Inspection Program” which requires an inspection at time sale for sump pump connections to the sanitary sewer system and requires the disconnection of such connections if discovered.

The Plan describes the sources, extent, and significance of existing I/I within the entire collection system. The Plan does not provide a breakdown nor characterize the significance between the public collection system and private property sources. The Plan provides information that estimates that over 67% of the total housing units in the City, approximately 16,000, were built prior to 1970. Private services for homes built prior to this time are at or over half a century in age, generally consist of clay tile pipe, and in many cases nearing their normal life expectancy. The Plan outlines programs and activities that focuses on sump pump connections to the sanitary system and their disconnection but does not summarize in detail any specific activities on assessing the condition of or addressing sources of I/I from private services. The City should evaluate the potential impact that this portion of the collection system has on I/I.
Sewer Element Comments

The Sewer Element of the Plan has been reviewed against the requirements for Comprehensive Sewer Plans for Urban communities. Staff found the Plan to be complete and consistent with Council polices and the regional wastewater system plan. Upon adoption of the Plan by the City, the action of the Council to approve the Sewer Plan becomes effective. At that time, the City may implement its Plan to alter, expand, or improve its sewage disposal system consistent with the approved Comprehensive Sewer Plan. A copy of the City Council Resolution adopting its Plan needs to be submitted to the Council for its records.

Surface Water Management

Reviewer: Judy Sventek, ES – Water Resources (651-602-1156)

The Plan is consistent with Council policy requirements and conforms to the WRPP for local surface water management. The Plan satisfies the requirements for 2040 comprehensive plans. Bloomington lies within the oversight boundaries of the Riley-Purgatory-Bluff Creek, Lower Minnesota River, and Nine Mile Creek Watershed Districts (WDs), and the Richfield-Bloomington Watershed Management Organization.

The City submitted a draft Local Water Management Plan (LWMP) to the Council in February 2018. Council Water Resources staff reviewed and commented on the draft LWMP to the City and four Watersheds in a letter dated April 3, 2018. The LWMP was approved by the Riley-Purgatory-Bluff Creek WD on April 4, 2018, the Lower Minnesota River WD on April 18, 2018, and the Nine Mile Creek WD on April 18, 2018. The City adopted the final LWMP on June 25, 2018. The Plan incorporates the City’s final LWMP as Appendix A that was reviewed by the four Watersheds and the Council.

Consistency with Council Policies

The Council reviews plans to evaluate their apparent consistency with the adopted plans of the Council. Council staff have reviewed the City’s Plan and find that it is consistent with the Council’s policies, as detailed below.

Forecasts

Reviewer: Todd Graham, CD – Research (651-602-1322)

The Plan includes revised employment, households, and population forecasts agreed to by City and Council staff in August 2018. (Plan tables 2.4, 2.6, 2.7, 2.8 and 3.5.) The forecast revisions reflect land use capacities and known projects now in development. The revised forecasts are shown below in Table 1.

Table 1. Metropolitan Council Forecasts for Bloomington

<table>
<thead>
<tr>
<th></th>
<th>Census 2010</th>
<th>Estimated 2017</th>
<th>Previous Council Forecasts</th>
<th>Revised Forecasts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>2020</td>
<td>2030</td>
</tr>
<tr>
<td>Population</td>
<td>82,893</td>
<td>88,885</td>
<td>86,100</td>
<td>89,400</td>
</tr>
<tr>
<td>Households</td>
<td>35,905</td>
<td>38,022</td>
<td>38,100</td>
<td>39,700</td>
</tr>
<tr>
<td>Employment</td>
<td>86,530</td>
<td>90,312</td>
<td>98,700</td>
<td>104,300</td>
</tr>
</tbody>
</table>

The Council will revise its published forecast simultaneously with action on the Plan.

With the forecast revision, above, the 2021-2030 Affordable Housing Need for the City will be increased. Table 3.20 includes the new, revised 2021-2030 Affordable Housing Need: 445 units at <=30% AMI, 246 units at 31-50% AMI; 151 units at 51-80% AMI; 842 units total.

Chapter 2 of the Plan describes how land supply will accommodate the forecasted growth. The City expects net addition of mixed-use and high density residential development with most of the new housing capacity in the South Loop district. The Plan also describes densification through
redevelopment in central Bloomington. Tables 2.10 and 2.12 in the Plan detail the location of 5,162
future units. Council staff find that land supply and staging accommodate the forecasted growth.

**Thrive MSP 2040 and Land Use**

**Reviewer: Michael Larson, CD – Local Planning Assistance (651-602-1407)**

The Plan is consistent with *Thrive MSP 2040* and its land use policies. The Plan acknowledges the
Thrive community designation of Urban (Figure 2). Thrive describes Urban communities as having
experienced rapid development during the post-World War II era and exhibit the transition toward the
development stage dominated by the influence of the automobile. Urban communities are expected to
plan for forecasted population and household growth at average densities of at least 10 units per acre
for new development and redevelopment. In addition, Urban communities are expected to target
opportunities for more intensive development near regional transit investments at densities and in a
manner articulated in the TPP.

The City is a fully developed community with only 1.1% undeveloped land. Approximately 38.3% of the
City is residential as illustrated in Figure 3. Another 33.4% of the community is comprised of public land
in the form of public right of way, parks and open space, and other public spaces. The City includes
significant concentrations of retail, office, hotel, and mixed-uses along Interstate 494. These include the
South Loop District (including the Mall of America), the Normandale Lakes District, and the Penn-
American District.

The Plan identifies development and redevelopment areas at densities that exceed the Urban density
policy minimums. This minimum planned density is consistent with regional Urban land use policies
that require an average net residential density of at least 10 units per acre in areas of new development and
redevelopment. As shown in Table 2 below, the expected overall density of planned residential growth
is a minimum of 11.1 units per acre. The Plan also incorporates a more detailed development capacity
methodology that considers small area plans, site context, development interest, and regulations. Using
this methodology, the Plan indicates a higher minimum planned density of 28.2 units per acre.

**Table 2. Planned Residential Density, City of Bloomington**

<table>
<thead>
<tr>
<th>Category</th>
<th>Density</th>
<th>% Resid.</th>
<th>Net Acres</th>
<th>Min Units</th>
<th>Max Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low Density Residential</td>
<td>0.1-5</td>
<td>100%</td>
<td>49.7</td>
<td>4</td>
<td>247</td>
</tr>
<tr>
<td>Medium Density Residential</td>
<td>5-10</td>
<td>100%</td>
<td>0.9</td>
<td>4</td>
<td>9</td>
</tr>
<tr>
<td>High Density Residential</td>
<td>10-150</td>
<td>100%</td>
<td>44.4</td>
<td>444</td>
<td>6,660</td>
</tr>
<tr>
<td>High Intensity Mixed Use</td>
<td>10-60</td>
<td>11%</td>
<td>8.8</td>
<td>88</td>
<td>528</td>
</tr>
<tr>
<td>South Loop Mixed Use</td>
<td>30-130</td>
<td>54%</td>
<td>36</td>
<td>1,080</td>
<td>4,680</td>
</tr>
<tr>
<td>Office</td>
<td>10-80</td>
<td>20%</td>
<td>14.8</td>
<td>148</td>
<td>1184</td>
</tr>
<tr>
<td>Community Commercial</td>
<td>8-80</td>
<td>40%</td>
<td>10.9</td>
<td>86</td>
<td>872</td>
</tr>
<tr>
<td>Regional Commercial</td>
<td>8-80</td>
<td>23%</td>
<td>7.5</td>
<td>60</td>
<td>600</td>
</tr>
<tr>
<td><strong>TOTALS</strong></td>
<td><strong>173</strong></td>
<td><strong>1,914</strong></td>
<td><strong>14,780</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Overall Density</strong></td>
<td><strong>11.1</strong></td>
<td><strong>85.4</strong></td>
<td></td>
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</tr>
</tbody>
</table>

Most of the focus of the future land use plan, as illustrated in Figures 4 and 5, is on redevelopment and
intensification of uses in the City’s three main redevelopment areas: South Loop (Mall of America area),
Penn-American, and Normandale Lakes. The 2040 guiding land uses includes a variety of mixed-use
designations that allow for both residential and other uses within the development. These new mixed-
use categories allow for higher residential densities. These are shown in Table 2 with their expected percentage of residential use.

**Station Area Planning**

The Plan recognizes existing and planned transitways that are part of the Current Revenue Scenario of the TPP. These include existing stations on the METRO Blue Line including American Boulevard, Bloomington Central, 28th Avenue, and Mall of America; and a METRO Red Line station at the Mall of America. The planned METRO Orange Lines includes stations at American Boulevard and 98th Street. The planned D Line Arterial BRT includes an alignment with stations along American Boulevard at Chicago/Portland, Bloomington Avenue, and Thunderbird Road, with a terminus station at Mall of America.

The Plan recognizes and conforms to minimum densities established in the TPP for station areas along transitways (areas within 1/2-mile radius) as well as arterial BRT (areas within 1/4-mile radius). For Bloomington, as an Urban community, the minimum density is 20 units per acre for dedicated transitways (METRO Blue Line station areas); 12 units per acre for highway BRT (METRO Orange Line station areas); and 15 units per acre for arterial BRT (D Line). The Plan incorporates the required minimum densities in the TPP for guiding land uses; and the City’s detailed development capacity methodology indicates expected minimum planned densities of 66 units per acre for the METRO Blue Line station areas in the South Loop, 42 units per acre for the METRO Orange American Boulevard Station Area, and 25 units per acre at the METRO Orange Line 98th Street Station Area.

The Plan is consistent with policies in the TPP for incorporating station area planning and for targeting the most intense mix of uses near transit. The City has conducted and incorporated district planning in its station areas including the South Loop District Plan, the Penn-American District Plan, and the 98th Street Station Area Plan. The Plan addresses the guideline for activity levels in the TPP for station areas, which is a minimum mix of 7,000 residents, employees, and/or students in each station area. The Plan indicates that targeted growth will result in each station area exceeding these levels during the planning horizon.

**Housing**

*Reviewer: Tara Beard, CD – Housing (651-602-1051)*

The Plan is consistent with the 2040 Housing Policy Plan. The City is a maturing suburb with a wide variety of housing types. Growth was initially concentrated in eastern Bloomington and began to spread west in the 1970s and 1980s. Like most suburbs, early development was primarily single family, but housing stock has diversified over time; approximately 60% of its existing housing stock is single-family. The Plan notes that future growth will be primarily through infill and redevelopment and will likely continue to trend toward multi-family housing.

The Plan notes an estimated 37,670 housing units in 2016. While roughly 70% of those units are affordable to households earning 80% of the Area Median Income (AMI) or less (or $68,000 for a family of four), affordable options decrease to just 4% for households earning 30% AMI or less (or $27,100). Roughly 22% of the City’s households earning 80% AMI or less are currently housing cost burdened. The Plan notes that preserving existing naturally occurring affordable housing (NOAH), maintaining the quality of existing housing, and improving housing stability are existing needs the City is addressing.

The Plan acknowledges the City’s share of the region’s need for affordable housing in the 2021-2030 decade, which is 842 units. As shown in Figure 6, with 153 acres of land guided for higher density residential development in that time period, the Plan sufficiently promotes the availability of land to support that share.

The Plan addresses its existing and future housing needs in the implementation plan, which thoroughly describes the policies, programs, and other tools that the City will consider. Tools discussed in the Plan include a unique local program that allows existing renters to become homeowners, as well as more
common tools such as supporting Low Income Housing Tax Credit applications and creating Tax Increment Financing districts. The City’s Housing and Redevelopment Authority (HRA) is a significant source of local funding and housing programs. The Bloomington HRA administers a large Housing Choice Voucher program. The implementation plan also considers a full spectrum of tools to preserve NOAH and provide tenant stability, including the use of local 4d tax incentives, a local NOAH Trust Fund, and a tenant protection ordinance. Few cities are maximizing available housing tools and programs as comprehensively as Bloomington to address existing and future housing needs.

**Water Supply**
*Reviewer: Lanya Ross, ES – Water Supply Planning (651-602-1803)*
The Plan is consistent with WRPP policies related to water supply, including the policy on sustainable water supplies, the policy on assessing and protecting regional water resources, and the policy on water conservation and reuse.

The City prepared a Local Water Supply Plan in 2018 that was submitted to both the Minnesota Department of Natural Resources (DNR) and the Council and reviewed separately. Council comments were shared with the DNR on September 18, 2018.

**Community and Subsurface Sewage Treatment Systems (SSTS)**
*Reviewer: Jim Larsen, CD – Local Planning Assistance (651-602-1159)*
The Plan is consistent with the policies of the WRPP for community and subsurface sewage treatment systems (SSTS). The Plan indicates that 37 properties continue to utilize SSTS and there are no public or privately-owned Community Wastewater Treatment Systems in use within the City. The City has delegated the responsibility of permitting, inspection, and maintenance management of SSTS in the City to Hennepin County, as detailed in Hennepin County Ordinance 19. Hennepin County Ordinance No. 19 was amended in 2014 and is consistent with Minnesota Pollution Control Agency Chapter 7080-7083 Rules and Council 2040 Water Resources Policy Plan requirements.

**Special Resource Protection**

**Solar Access Protection**
*Reviewer: Cameran Bailey, CD – Local Planning Assistance (651-602-1212)*
The Plan is consistent with statutory requirements (Minn. Stat. § 473.859) and Council policy regarding planning for the protection and development of access to direct sunlight for solar energy systems as required by the Metropolitan Land Planning Act (MLPA). The Plan includes the four required solar planning elements.

**Aggregate Resource Protection**
*Reviewer: Jim Larsen, CD – Local Planning Assistance (651-602-1159)*
The Plan indicates, consistent with the Council’s aggregate resources inventory information contained in *Minnesota Geological Survey Information Circular 46*, that there are areas of natural aggregate resource deposits within the City. However, all identified aggregate resource areas have either already been mined or are located in areas of the City that have been fully urbanized.

**Historic Preservation**
*Reviewer: Michael Larson, CD – Local Planning Assistance (651-602-1407)*
The Plan addresses historic and cultural resources as required by the Metropolitan Land Planning Act. Preservation activities are based on the City’s evaluation in 1977 of sites of architectural, historical, and community development value or significance. The Plan references this register, which includes an inventory of both historic sites and “sites of general interest.” These sites are mapped in the Plan.

**Plan Implementation**
*Reviewer: Michael Larson, CD – Local Planning Assistance (651-602-1407)*
The Plan includes an Implementation Element that summarizes the Plan’s recommendations and identifies tools, programs, funding sources, partners, and timing/phasing. The Plan describes the official controls and fiscal devices that the City will employ to implement the Plan including its zoning and subdivision ordinances. The Plan addresses specific implementation strategies in individual chapters, with the capital improvement plan included in the appendix.

**Compatibility with Plans of Adjacent Governmental Units and Plans of Affected Special Districts and School Districts**

The proposed Plan is compatible with the plans of adjacent jurisdictions. No compatibility issues with plans of adjacent governmental units and plans of affected special districts and school districts were identified.

**Documents Submitted for Review**

In response to the 2015 System Statement, the City submitted the following documents for review:

- May 11, 2018: Bloomington 2040 Preliminary Plan
- December 27, 2018: Bloomington 2040 Comprehensive Plan
- March 15, 2019: Revisions to land use, forecasts, wastewater plan, regional parks and trails, and housing
- April 18, 2019: Revisions to the wastewater plan

**Attachments**

- Figure 1: Location Map with Regional Systems
- Figure 2: *Thrive MSP 2040* Community Designations
- Figure 3: Existing Land Use
- Figure 4: 2040 Planned Land Use
- Figure 5: Residential Growth Areas
- Figure 6: Land Guided for Affordable Housing
Figure 1. Location Map with Regional Systems
Figure 2. Thrive MSP 2040 Community Designations
Figure 3. Existing Land Use
Figure 4. 2040 Planned Land Use
Figure 5. Residential Growth Areas

Source: Bloomington Planning Division, 2018
### Land Guided for Affordable Housing 2021-2030

**Bloomington**

Hennepin County
Council Member Milly Cummings, District 5

<table>
<thead>
<tr>
<th>Available Acres</th>
<th>Minimum Density (units per acre)</th>
<th>Expected % Residential (if mixed use)</th>
<th>Minimum Units Possible</th>
</tr>
</thead>
<tbody>
<tr>
<td>High Density Residential</td>
<td>33.00</td>
<td>10</td>
<td>100%</td>
</tr>
<tr>
<td>South Loop Mixed Use</td>
<td>29.42</td>
<td>30</td>
<td>54%</td>
</tr>
<tr>
<td>Office</td>
<td>66.50</td>
<td>10</td>
<td>20%</td>
</tr>
<tr>
<td>Community Commercial</td>
<td>6.25</td>
<td>8</td>
<td>40%</td>
</tr>
<tr>
<td>Regional Commercial</td>
<td>17.39</td>
<td>8</td>
<td>23%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>153</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Sufficient (insufficient) units possible against share of regional need: 147
- Affordable units built since 2021: 0
- Sufficient (insufficient) units possible adjusted for affordable units built: 147
- Number of Comp Plan Amendments approved since Comp Plan Update: 0