

Community Development Committee

Meeting date: April 20, 2020

Environment Committee

Meeting date: April 28, 2020

For the Metropolitan Council meeting of May 13, 2020

Subject: City of New Germany 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22098-1

District(s), Member(s): District 4, Deb Barber

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

Staff Prepared/Presented: Raya Esmaeili, Senior Planner (651-602-1616)
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 New Germany to place its 2040 Comprehensive Plan into effect.
2. Advise the City to implement the advisory comments in the Review Record for Surface Water Management, and Water Supply.

Recommendation of the Environment Committee

1. Approve the City of New Germany's Comprehensive Sewer Plan.

Advisory Comments

The following Advisory Comments are part of the Council action authorizing the City of New Germany 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. Stat. §§ 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 New Germany is located in northwest Carver County. It is surrounded by the communities of Hollywood Township and Camden Township.

The City submitted its 2040 Comprehensive Plan (Plan) to the Council for review to meet the Metropolitan Land Planning Act requirements (Minn. Stat. §§ 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.

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

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

The Metropolitan Council awarded the City a Planning Assistance Grant of \$32,000 to complete its 2040 comprehensive plan. The first half of this grant was paid to initiate the local planning process. The

second half of the grant will be paid after Council authorization of the City’s plan, local adoption, and the City’s submittal of final reporting requirements.

Known Support / Opposition

There is no known local opposition to the 2040 comprehensive plan.

REVIEW RECORD

City of New Germany 2040 Comprehensive Plan

Review File No. 22098-1, Business Item No. 2020-119 JT

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

Reviewer: Colin Kelly, Community Development (CD) - Regional Parks (651-602-1361)

The Plan conforms to the 2040 Regional Parks Policy Plan (RPPP) for the Regional Parks System element. Carver County is the Park implementing agency for Regional Parks System components in New Germany, for which the Plan accurately describes the Regional Parks System components. Regional Trails located within the City include the Dakota Rail Regional Trail. There are no State or Federal recreation lands within the City.

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) adopted in 2015. 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.

Roadways

The Plan conforms to the Highways system element of the TPP. The plan accurately accounts for the metropolitan highway system of principal arterials of which there are none in New Germany. 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. The nearest principal arterial is MN Highway 7, which is located north of the City. Forecasting is consistent with regional methodology.

The Plan identifies roadway and corridor studies that include recommendations regarding alignments, changes in access, and/or changes in land use. It includes a section that discusses other studies that impact the City, including the Carver County Comprehensive Plan. The Plan accurately describes the status of such facilities, including needs for right-of-way and the likelihood and timing of funding.

Transit

The Plan conforms to the Transit system element of the TPP. The City does not have any existing transit routes and facilities, and acknowledges the City is within Transit Market Area V.

The Plan is consistent with the policies of the Transit system element of the TPP. The Plan addresses City roles related to its Community Designation.

Aviation

The Plan conforms to Aviation system element of the TPP. The Plan includes policies that protect regional airspace from obstructions.

Bicycling and Walking

The Plan is consistent with the Bicycling 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 discusses how the Dakota Rail Regional Trail is a Tier 2 corridor to the east around Waconia, but it is not designated a corridor or alignment in New Germany.

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.

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. There are no active rail lines and no specific needs for freight at this time.

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 city-wide 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 community's Thrive designation.

Water Resources

Wastewater Service

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

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 assigned forecasts for population, households, and employment.

Current wastewater treatment services are provided by a wastewater treatment facility owned and operated by the City. The Plan projects that the City will have 330 sewer households and 90 sewer employees by 2040.

The City's wastewater treatment facility consists of a two-cell stabilization pond system with an outfall to Carver County Ditch No. 9, which flows to the South Fork Crow River. The Plan states that the existing treatment facility is nearing capacity and does not have adequate capacity to provide service for growth to 2040. It also states that the Minnesota Pollution Control Agency has issued a draft of the City's new National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) permit. The new permit will include new limits for phosphorous.

Facing additional growth, and limited reserve capacity at the City's wastewater treatment facility, the City and Council entered into an acquisition agreement for the City's wastewater treatment works in 2010. Under that agreement a new wastewater treatment facility would have been constructed, and wastewater treatment services would be provided by the Council. However, with the lingering effects of the economic downturn in 2008-2009 that eliminated growth pressure, and I/I mitigation efforts by the City in both the public and private wastewater collection systems which regained capacity in the wastewater treatment facility, the new treatment facility has not been constructed. In 2015, the acquisition agreement was amended to give the City until December 31, 2030, to re-initiate the

acquisition process. The amendment also gives the Council the option to extend the notice period for an additional ten (10) year term.

The Plan states that a facility plan is currently being developed and will be completed in tandem with the development of the proposed NPDES permit renewal. The facility plan will identify the timing, financing, and type of improvements necessary to accommodate future growth and respond to the pending regulatory requirements for the new wastewater facility. It is anticipated that the facility planning effort will take place over the next 3 to 5 years. The City is currently considering four potential options. They are:

1. Expanding the existing stabilization pond system
2. Conversion of the stabilization ponds to aerated ponds
3. Construction of a new mechanical wastewater treatment plant (WWTP)
4. Diverting all or a portion of the City's flow to the City of Mayer for treatment at their WWTP

The Plan does not state that the City is considering a renewed request to connect to the Metropolitan Disposal System by 2040, nor does it request that the City's wastewater treatment works be acquired by the Council outside of the above explanation.

The Plan defines the City's goals, policies, and strategies for preventing and reducing excessive inflow and infiltration (I/I) in the local municipal (city) and private sanitary sewer systems by reference to a program of on-going system replacement of aging mains and laterals that are susceptible to I/I, and a point of sale service lateral inspection and repair program.

The Plan describes the requirements and standards for minimizing I/I and references City Ordinance (51.02) that prohibits the discharge of storm water, ground water, and roof runoff through sump pumps and roof leaders to the sanitary sewer system and requires a point of sale inspection for conformance.

Comprehensive Sewer Plan Comments

The Sewer Element of the Plan has been reviewed against the requirements for Comprehensive Sewer Plans for Rural Center communities. It was found to be complete and consistent with Council policies and the regional wastewater system plan. Upon adoption of the Plan by the City, the action of the Council to approve the Comprehensive 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 Metropolitan 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 in conformance with the WRPP for local surface water management. New Germany is located within the oversight boundaries of the Carver County Watershed Management Organization (County). The City submitted a draft Local Water Management Plan (LWMP) update to the Council in conjunction with their Preliminary Plan on September 28, 2018. Council Water Resources staff reviewed and commented on the draft LWMP to the City and County in a letter dated November 2, 2018. The Plan incorporates the December 2018 final draft LWMP version in Appendix B.

Advisory Comments

When available, Council staff request that the City provide the date the County approves the final LWMP, and the date the City adopts the final LWMP. Staff also request that the City provide a copy of the final adopted LWMP that will be included in the final Plan document that the City adopts, if it differs from the December 2018 version in the Plan submitted to the Council on December 31, 2018.

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: Paul Hanson, CD – Research (651-602-1642)

The Plan includes the Metropolitan Council forecasts for the City of New Germany. For reference, Metropolitan Council forecasts are shown in Table 1 below.

Table 1. City of New Germany Forecasts

	Census	Estimated	Council Forecasts		
	2010	2017	2020	2030	2040
Population	372	432	440	590	700
Households	146	175	190	270	330
Employment	46	48	70	80	90

All forecast tables throughout the Plan are consistent. The inventory and capacity of New Germany's land supply for 2030 and 2040 accommodates their forecasted growth.

Thrive MSP 2040 and Land Use

Reviewer: Raya Esmaeili, CD – Local Planning Assistance (651-602-1616)

The Plan is consistent with *Thrive MSP 2040* and its land use policies. The Plan acknowledges the *Thrive* community designation of Rural Center (Figure 2). *Thrive* describes Rural Center communities as local commercial, employment, and residential activity centers serving rural areas in the region. These small towns are surrounded by agricultural lands and serve as centers of commerce to those surrounding farm lands and the accompanying population.

Rural Center communities are expected to plan for forecasted population and household growth at average densities of at least 3-5 units per acre for new development and redevelopment. In addition Rural Center communities should strive for higher-density commercial uses and compatible higher-density residential land uses in the commercial core of the community to ensure efficient uses of existing infrastructure investments.

The predominant existing land use in the City is agricultural (41.8%) followed by undeveloped/vacant land (38%). Residential land uses are just above 11% of the total land. Retail and other commercial land (1.8%) are along State Avenue South and Broadway Street East. 4.6% of the City is designated as park and recreation (Figure 3).

Based on the Future Land Use map (Figure 4), the majority of the City continues to be designated as Agricultural (47.4%) and Residential (about 40%). Most of the undeveloped land has been designated with a future land use of Low Density Residential. The City growth staging for these areas identifies them for the 2016-2020 and 2021-2030 timeperiods (Figure 5). Non-residential land uses are mostly planned along Broadway Street East and State Avenue North. There are no agricultural preserves properties within the City.

The overall minimum density of planned development in the City is 3.29 units per acre, which is consistent with land use and residential density policies for a Rural Center community designation as shown in Table 2 of this staff report.

Table 2. Planned Residential Density, City of New Germany

Category	2016-2040 Change				
	Density		Net Acres	Units	
	Min	Max		Min Units	Max Units
Low Density Residential	3	4	50.7	152	203
Mixed Use*	8	10	3.1	25	31
	TOTALS		53.8	177	234
			Overall Density	3.29	4.35

*50% residential. Acreage reflects the residential use only.

Orderly Annexation

The Plan acknowledges three existing Orderly Annexation Agreements (OAA) with Hollywood and Camden townships and their expiration in 2030. The Plan mentions that the City does not have plans to renew these agreements and that there is enough land within the current jurisdiction of the City to accommodate growth prior to 2040. Further, the Plan indicates that annexation requests will be evaluated based on the cost of providing public utilities.

Housing

Reviewer: Hilary Lovelace, CD – Housing (651-602-1555)

The Plan is consistent with the 2040 Housing Policy Plan. As of 2016, the City has about 175 homes including more than 25 multifamily units and nearly 150 single-family homes. Approximately 45 homes are rented. More than 170 housing units are currently affordable to households earning under 80% of Area Median Income (AMI). However, nearly 60 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. There are 7 units affordable to households with income at or below 30% AMI and more than 33 cost burdened households with incomes at or below 30% AMI.

The Plan identifies existing housing needs including maintenance and reinvestment in existing housing stock, maintaining existing homeownership, a variety of housing types for all stages of life with an emphasis on first-time homebuyers and housing for seniors, and housing that is affordable to a range of income levels, especially moderate and low income households. The City has 3 units of publicly subsidized housing, none of which are designated specifically for seniors or people with disabilities.

The Plan acknowledges the 2021-2030 affordable housing need allocation of 21 units; 9 of which are needed at prices affordable to households earning 30% of AMI or less, none of which are needed at prices affordable to households earning between 31 and 50% of AMI, and 12 of which are needed at prices affordable to households earning between 51 and 80% of AMI. As shown in Figure 6, the Plan guides sufficient land expected to develop in the 2021-2030 time period at a minimum of eight units per acre to allow for development of at least 21 new housing units. All land guided to help meet their affordable housing need allocation is in the Mixed Use land use designation.

The housing implementation plan component of the Plan describes that the City will consider TIF and tax abatement for projects that are either multifamily development in downtown or provide senior or affordable units. The Plan also indicates that the City will partner with Carver County CDA by referring residents and developers to them for preservation using 4d and landlord education. The City states that they will consider the exploration and development of an inclusionary zoning policy. The commitments that New Germany has made in the Plan are exemplary for a community of this size.

Water Supply

Reviewer: John Clark, ES – Water Supply Planning (651-602-1452)

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 (LWSP) in 2018 that was submitted to both the Minnesota Department of Natural Resources (DNR) and the Metropolitan Council and reviewed separately. Council comments were shared with the DNR on January 2, 2019.

Advisory Comments

If changes are made to the LWSP resulting from DNR's review, the City will need to provide the Council and DNR with the updated information.

Community and Subsurface Sewage Treatment Systems (SSTS)

Reviewer: Kyle Colvin, ES – Engineering Programs (651-602-1151)

The Plan indicates that municipal sanitary sewer service is provided to all households and businesses in the City, and construction of new SSTS is prohibited in the City. Three existing farmsteads of record continue to be served by individual SSTS outside the sanitary sewer service limits of the City, within its Agricultural land use area. Carver County continues to provide SSTS oversight for these systems, utilizing Carver County SSTS Ordinance Chapter 52, which is consistent with Minnesota Pollution Control Agency Chapter 7080-7083 Rules and Council's WRPP 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 required solar planning elements.

Aggregate Resource Protection

Reviewer: Cameran Bailey, CD – Local Planning Assistance (651-602-1212)

The Plan indicates, consistent with the Council's aggregate resources inventory included in *Minnesota Geological Survey Information Circular 46*, that there are no known deposits of viable aggregate resources available for mining within the community.

Historic Preservation

Reviewer: Raya Esmaeili, CD – Local Planning Assistance (651-602-1616)

The Plan mentions that there are no historical structures that are on the National Register of Historic Places or identified as significant by the Minnesota Historical Society within the City. The Plan states that the City will work with the State of Minnesota, Carver County Land and Water Services Division, and the Carver County Historical Society to identify any potential historic resources and to preserve the rural character of the City.

Plan Implementation

Reviewer: Raya Esmaeili, CD – Local Planning Assistance (651-602-1616)

The Plan includes a description of and schedule for any necessary changes to the capital improvement program, the zoning code, the subdivision code, the SSTS code, and the housing implementation program.

The Plan, with supplemental materials, describes the official controls and fiscal devices that the City will employ to implement the Plan. Specific implementation strategies are included within the Implementation chapter of the Plan, with capital improvements planning detailed in Appendix C.

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

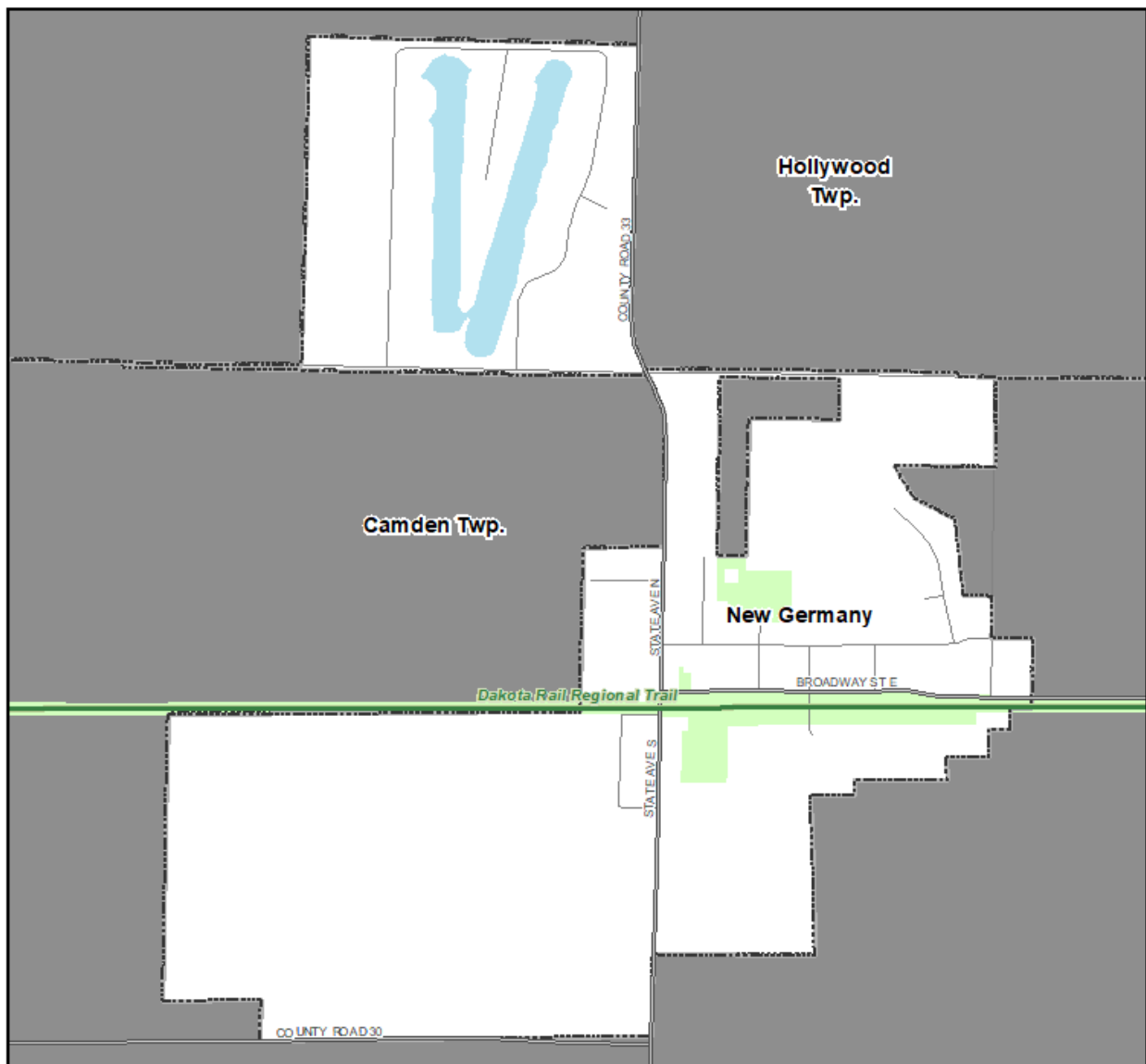
In response to the 2015 System Statement, the City submitted the following documents for review:

- September 28, 2018: New Germany Preliminary 2040 Comprehensive Plan
- December 31, 2018: New Germany 2040 Comprehensive Plan
- January 2, 2019: Local Water Supply Plan
- December 24, 2019: Revised Comprehensive Plan Responding to Council Incomplete Items for Land Use, Housing, Wastewater, Water Supply, Surface Water Management, and Submission Requirements.
- February 6, 2020: Revised Comprehensive Plan Responding to Council Incomplete Items for Wastewater, Land Use, and Housing.
- February 28, 2020: Deadline Extension Request
- March 3, 2020: Revised Wastewater Chapter
- March 4, 2020: Revised Land Use Chapter
- March 17, 2020: Revised Comprehensive Plan

Attachments

- Figure 1: Location Map with Regional Systems
- Figure 2: *Thrive MSP 2040* Community Designations
- Figure 3: Existing Land Use
- Figure 4: 2040 Future Land Use
- Figure 5: Development Staging Map
- Figure 6: Land Guided for Affordable Housing

Figure 1. Location Map with Regional Systems



Source: NCompass Technologies Street Centerline



Regional Systems

Transportation

Transitways

2040 Transportation System Policy - adopted January 2015

- Existing
- Planned Current Revenue Scenario
- Planned Current Revenue Scenario - CTIB* Phase 1 Projects
- Potential Increased Revenue Scenario

Regional Highway System

- Existing Principal Arterials
- Planned Principal Arterials
- Existing Minor Arterials
- Planned Minor Arterials
- Existing Other Arterials
- Planned Other Arterials

Recreation Open Space

Regional Parks

- Existing (Open to Public)
- In Master Plan (Not Open to Public)
- Planned Units

Regional Trails

- Existing (Open to Public)
- Existing (Not Open to Public)
- Planned

Wastewater

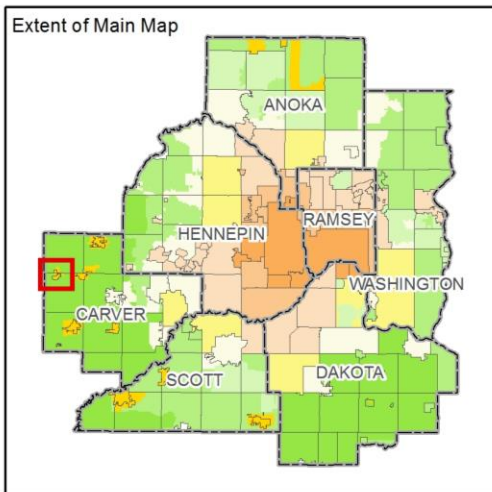
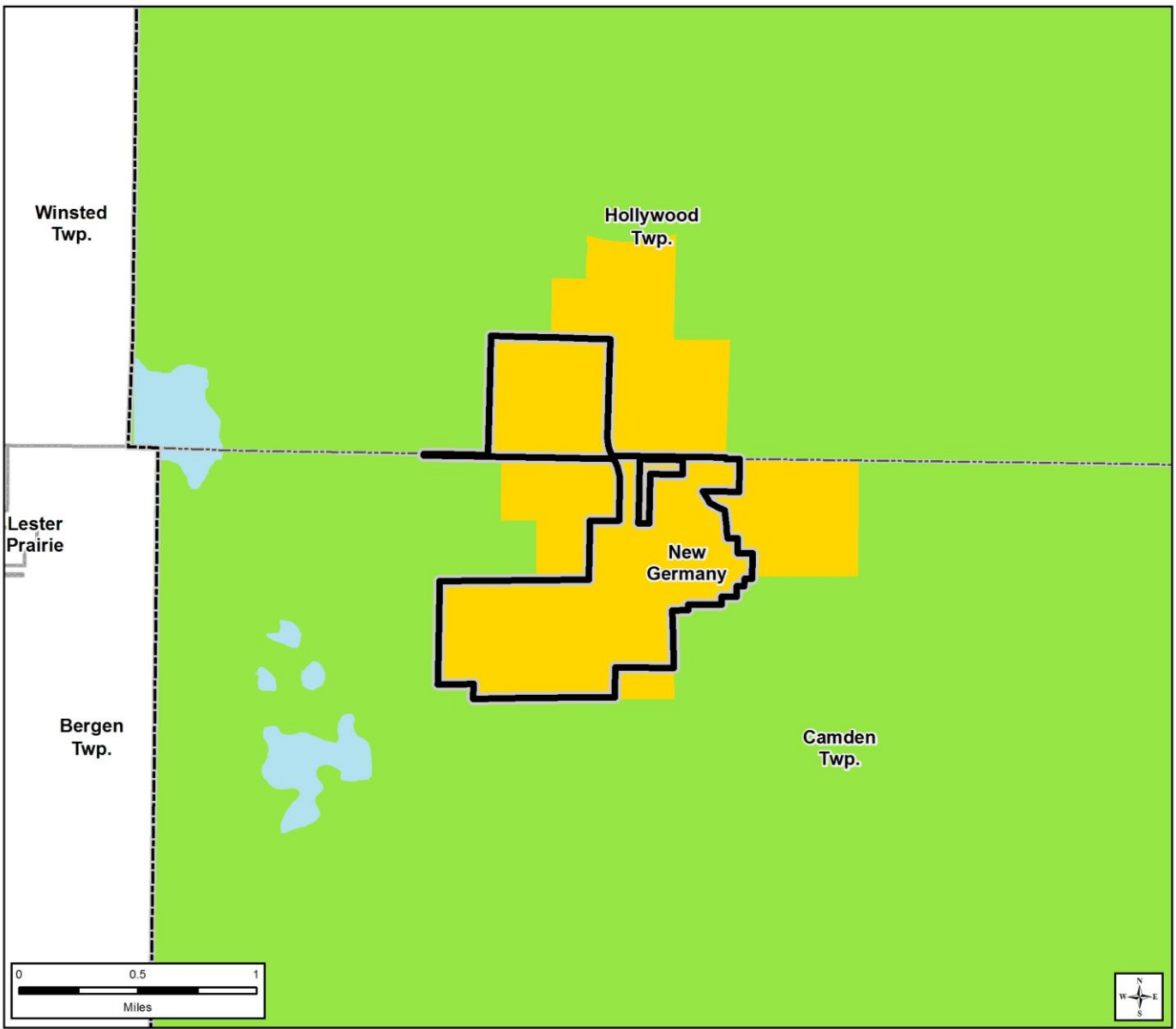
- Meters
- Lift Stations
- MCES Interceptors
- MCES Treatment Plants

Regional Park Search Areas and Regional Trail Search Corridors

- Boundary Adjustment
- Search Area
- Regional Trail Search Corridors

- Local Streets
- Existing State Trails
- Other Parks, Preserves, Refuges and Natural Areas

* Counties Transit Improvement Board (CTIB)



Community Designations

- Outside Council planning authority
- Agricultural
- Rural Residential
- Diversified Rural
- Rural Center
- Emerging Suburban Edge
- Suburban Edge
- Suburban
- Urban
- Urban Center

- County Boundaries
- City and Township Boundaries
- Lakes and Major Rivers

Figure 3. Existing Land Use

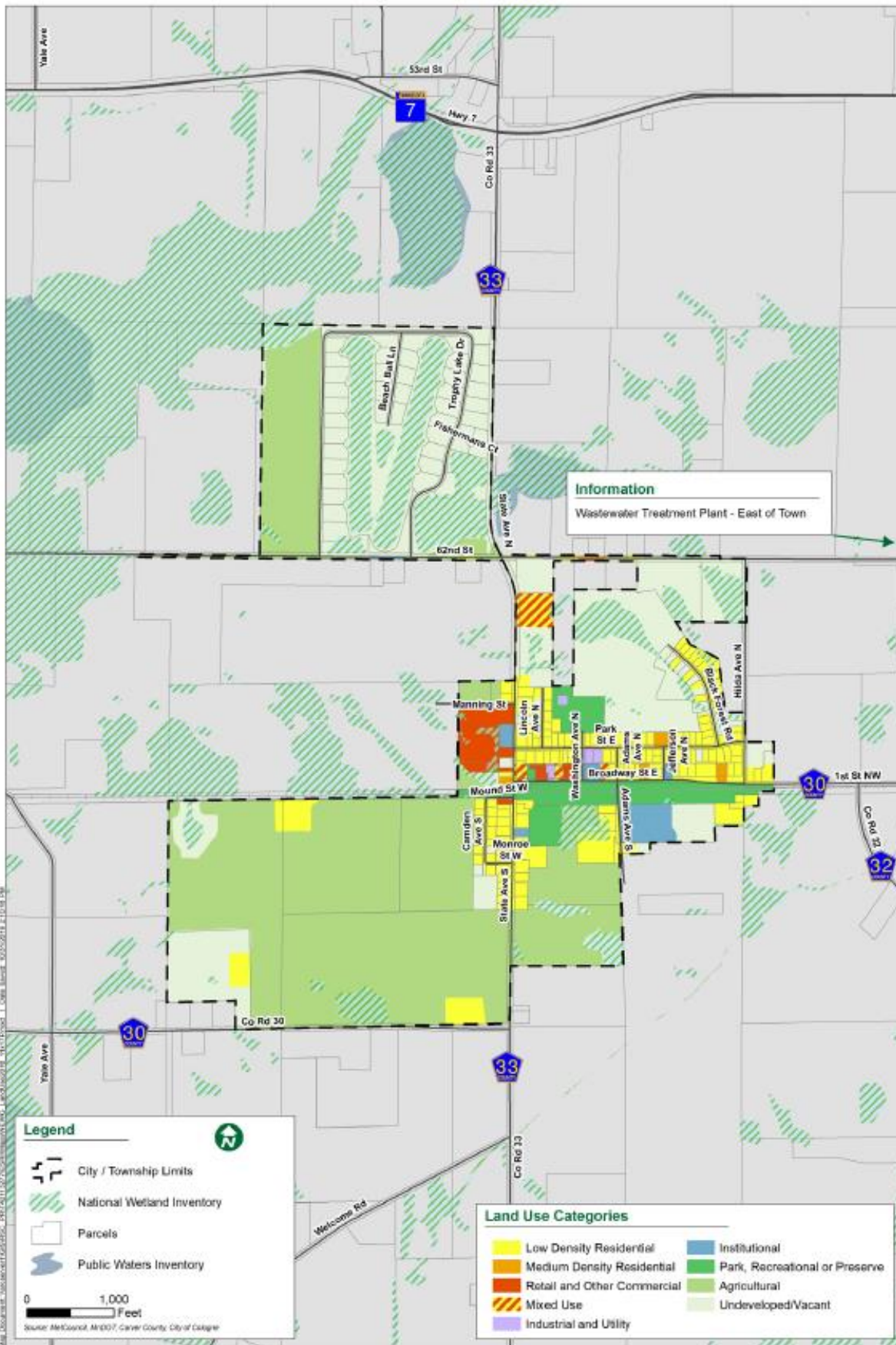


Figure 4. 2040 Future Land Use

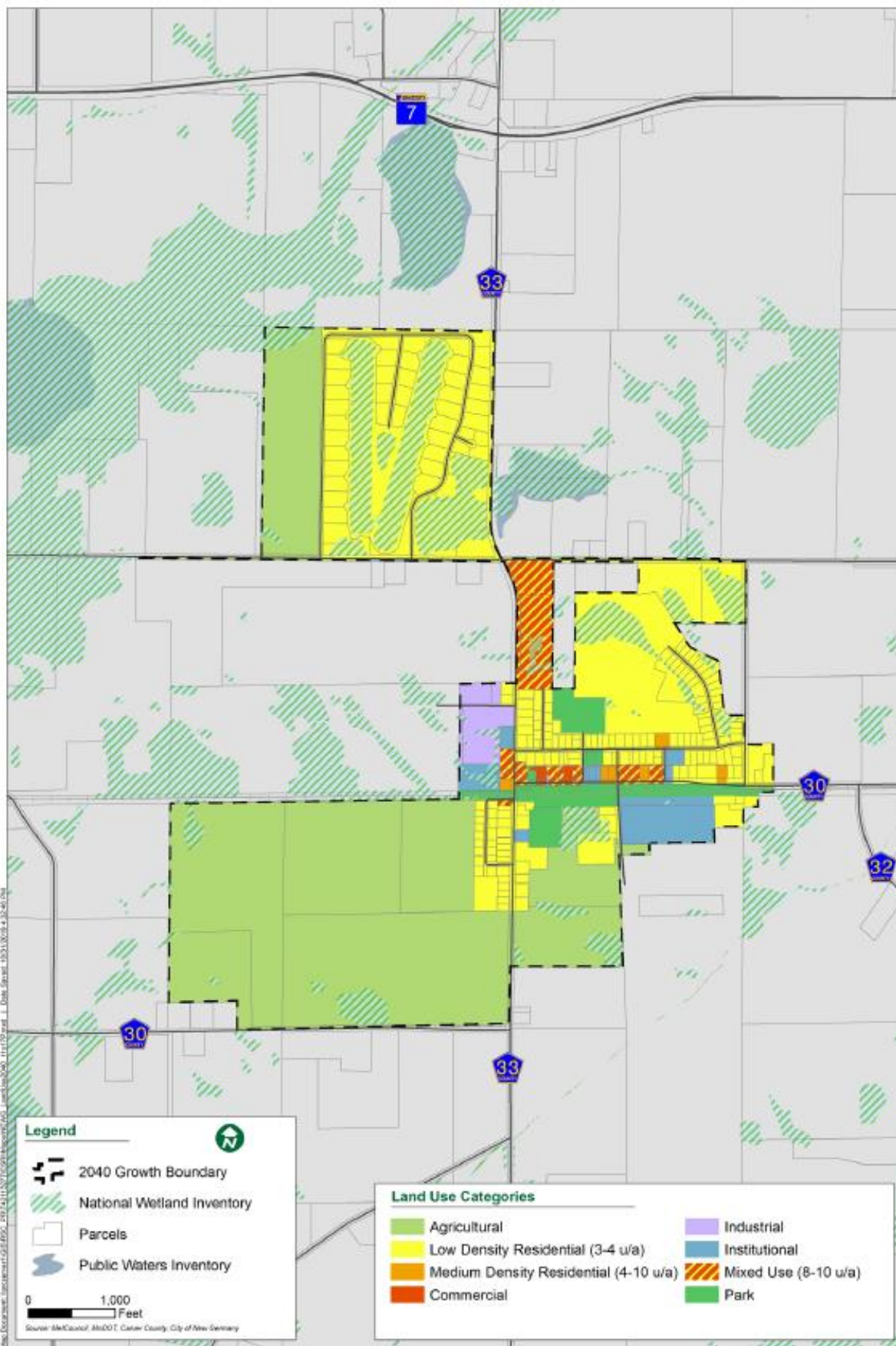


Figure 5. Development Staging Map

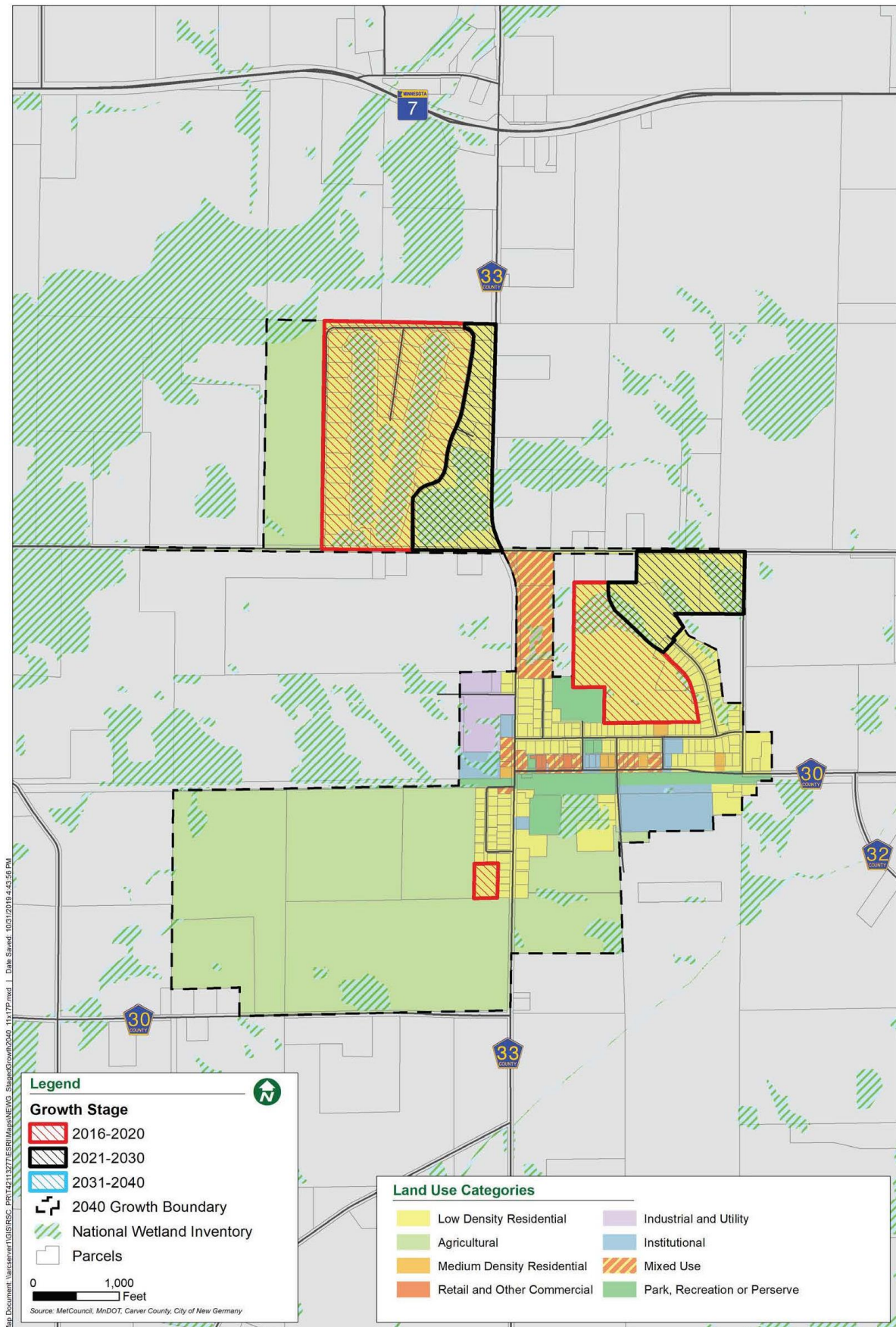


Figure 6. Land Guided for Affordable Housing

Land Guided for Affordable Housing 2021-2030

New Germany

Hennepin County

Council Member Deb Barber, District 5

2021-2030 share of regional need for Affordable Housing:	21 units
2021-2030 total regional need for Affordable Housing:	37,900 units

	Available Acres	×	Minimum Density <i>(units per acre)</i>	×	Expected % Residential <i>(if mixed use)</i>	=	Minimum Units Possible
Mixed Use	2.60		8		100%		21
Total	3						21

Sufficient/(insufficient) units possible against share of regional need: **0**

Affordable units built since 2021: **0**

Sufficient/(insufficient) units possible adjusted for affordable units built: **0**

Number of Comp Plan Amendments approved since Comp Plan Update: **0**

