

Community Development Committee

Meeting date: August 3, 2020

Environment Committee

Meeting date: August 11, 2020

For the Metropolitan Council meeting of August 26, 2020

Subject: City of Cottage Grove 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22236-1

District(s), Member(s): District 12, Francisco J. Gonzalez

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

Staff Prepared/Presented: 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 Cottage Grove to place its 2040 Comprehensive Plan into effect.
2. Revise the City's sewer-serviced forecasts upward as shown in Table 2 of the attached Review Record.
3. Advise the City to:
 - a. Provide the date the City adopts the final LWMP and provide a copy of the final adopted LWMP for the Council's records.
 - b. Within 60 days after receiving DNR final approval, the City must adopt the MRCCA Plan, and submit a copy of the final adopted plan and evidence of adoption to the DNR, Council, and National Park Service within 10 days after the adoption.
 - c. Implement the advisory comments in the Review Record for Forecasts, Land Use, and Water Supply.

Recommendation of the Environment Committee

1. Approve the City of Cottage Grove's Comprehensive Sewer Plan.
2. Advise the City that it will need to submit a revised breakdown of regionally sewered and unsewered forecasts that reflects the total City-wide forecasts when the County SSTS information is available.

Advisory Comments

The following Advisory Comments are part of the Council action authorizing the City of Cottage Grove 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 Cottage Grove is located in southern Washington County. It is surrounded by the communities of Woodbury, Afton, Denmark Township, Hastings, Nininger Township, Rosemount, Inver Grove Heights, Grey Cloud Island Township, St. Paul Park, and Newport.

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 Cottage Grove 2040 Comprehensive Plan

Review File No. 22236-1, Business Item No. 2020-213 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* for the Regional Parks System element. Washington County is the Park Implementing Agency for Regional Parks System components in Cottage Grove, for which the Plan accurately describes the Regional Parks System components. Regional Parks, Park Reserves, or Special Recreation Features in the City include Cottage Grove Ravine and Grey Cloud Island regional parks. Regional Trails located within the City include the Central Greenway, Mississippi River, and Prairie View regional trail search corridors. The Plan also appropriately acknowledges State recreation lands within the City, including the Grey Cloud Dunes Scientific and Natural Area (Minnesota Department of Natural Resources) (Figure 1).

The City's 2030 comprehensive plan designated Lower Grey Cloud Island for rural residential development. The 2030 Plan and now the 2040 Plan guide the majority of the island for the Transitional Planning future land use category with Rural Residential along the northern and eastern shore while regarding the properties that Washington County has since acquired on the island to Park. Washington County, the regional parks implementing agency for the City of Cottage Grove and all of Washington County, developed a Master Plan for Lower Grey Cloud Island, and the Master Plan was adopted by the Metropolitan Council in 1994.

There have been various discussions regarding the future of the current sand and gravel mining but no consensus has been built around the island's future. Future plan updates and discussions with current private landowners, the public, and adjacent and affected jurisdictions will determine the appropriate mix of development and park and open space uses on Lower Grey Cloud Island. The City of Cottage Grove continues to work with Washington County in advocating for an update to the 1994 Master Plan for Lower Grey Cloud Island as soon as possible in order to resolve these issues.

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. 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.

Roadways

The Plan conforms to the Roadways system element of the TPP. The Plan accurately accounts for the metropolitan highway system of principal arterials.

The Plan identifies a potential new interchange on U.S. Highway 61 between Keats Avenue South and Manning Avenue South. No plan has been reviewed by the MnDOT/Metropolitan Council joint interchange committee. However, the Plan acknowledges that this interchange must be submitted for approval under the Highway Interchange Request Review Procedure before it is added to the TPP or constructed.

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 and existing and forecasted traffic volumes for principal and A-minor arterials. Forecasting is consistent with regional methodology. The Plan also includes guidelines on how access will be managed for principal and A-minor arterials.

The Plan identifies a 2008 study of potential roadway improvements to the southwest area of Cottage Grove. The study included recommendations for an east/west alignment and interchange improvements at Highway 61 and Keats Road (Innovation Road).

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 Emerging Transit Market Area III and Transit Market Area IV.

The Plan incorporates the Red Rock Corridor transitway that is part of the Increased Revenue Scenario in the TPP. The Plan's maps and narrative acknowledge the uncertainty of the transitway.

The Plan is consistent with the policies of the Transit system element of the TPP. The Plan addresses opportunities and challenges related to its Transit Market Area(s). The Plan strengthens the existing transit system and lays the groundwork for improved transit services by addressing land use opportunities near two bus rapid transit stations.

Aviation

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

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 is also consistent with Bicycle and Pedestrian policies of the TPP by planning for local pedestrian and bicycle connections to transit and regional trails.

Freight

The Plan is consistent with Freight policies of the TPP. The Plan identifies the needs of freight movement in and through the City.

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). It 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 to the City by the Metropolitan Council Environmental Services (MCES). Wastewater generated within the City is conveyed by Council Interceptor 9701 with treatment at the Metropolitan Council's Eagles Point Wastewater Treatment Plant in Cottage Grove. The Plan projects that the City will have 16,720 sewered households and 8,670 sewered employees by 2040. The Metropolitan Disposal System with its scheduled improvements has or will have adequate capacity to serve the City's growth forecasts.

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 Metropolitan 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 Land Use Plan reflects an overall minimum residential sewered density that is consistent with Council policy for future sewered residential growth for Suburban Edge communities.

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 sanitary sewer systems. The Plan includes a summary of activities and programs intended to mitigate I/I in both the public and private systems, including system inspection, evaluation, and rehabilitation. The schedule of the City's inspection program of the public collection system reflects covering the entire system every five years. Mitigation work includes general repair and rehabilitation when defects are identified. Much of this work is coordinated with the City's Pavement Management Program. Sump pump inspections are performed when water meter replacements occur, and potential private property I/I sources are noted during televising of the public system. The Plan outlines a Capital Improvement Plan that reflects an annual I/I implementation plan of \$225,000.

The Plan describes the requirements and standards for minimizing I/I and includes a reference and link to the City's webpage where City Ordinance (8-1-13A) could be found. The Ordinance prohibits the discharge of storm water or groundwater into the sanitary sewer system. The Plan states that the City will work with the property owner when such connections are identified. The Ordinance does not state that disconnection of such connections is required upon discovery.

The Plan describes the sources, extent, and significance of existing I/I within the entire City wastewater collection system and provides a description of an implementation plan for preventing and eliminating excessive I/I from entering both the public and private collection systems. The Plan states that approximately 23% of all residential units within the City were built prior to 1970 when clay tile pipe services were commonly used. The significance of clay tile pipe is that as it ages, it can become more susceptible to I/I. Using wastewater flow data between 2010 and 2014, the City's average annual I/I is approximately 3%, and peak month I/I (2014) was approximately 9% I/I.

Comprehensive Sewer Plan Comments

The Sewer Element of the Plan has been reviewed against the requirements for Comprehensive Sewer Plans for Suburban Edge 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.

Advisory Comments

The forecasted employment figures between Tables 7-3 (Total Forecasts), 7-8 (SSTS), and 7-9 (Sewered Forecasts by MCES Interceptor) are inconsistent. The Plan assigns all subsurface sewage treatment systems (SSTS) to the housing forecasts. The difference in the employment forecasts between these two tables could be explained either in part or entirely on the fact that employment associated with the 3M facility located in the southern area of the City is provided wastewater service through a private wastewater treatment facility owned and operated by 3M and would not be considered regionally served. Washington County is responsible for administering the City’s SSTS program. The City has stated that SSTS information was not available at the time of finalizing the Sewer Plan due to the County’s inability to access this data during the COVID-19 pandemic. The City will need to submit a revised breakdown of regionally sewered and unsewered forecasts that reflects the total City-wide forecasts when the County SSTS information is available.

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. The Plan satisfies the surface water requirements for 2040 comprehensive plans. Cottage Grove lies within the oversight boundaries of the South Washington Watershed District (Watershed). The City submitted a draft Local Water Management Plan (LWMP) update to the Council on March 8, 2019. Council Water Resources staff reviewed and commented on the draft LWMP to the City and Watershed in a letter dated April 11, 2019. The Watershed approved the LWMP on May 14, 2019.

Advisory Comments

Council staff request that the City provide the date the City adopts the final LWMP. Council staff also request that the City provide the a copy of the final adopted LWMP for our records.

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 the Council forecasts for Cottage Grove (Plan tables 1.3 and 7.3) For reference, Council’s forecast are shown in Table 1 below.

Table 1. City of Cottage Grove Forecasts

	Census 2010	Estimated 2017	2020	Council Forecasts	
				2030	2040
Population	34,589	37,795	38,400	42,200	47,000
Households	11,179	12,867	13,300	15,200	17,300
Employment	6,484	9,125	7,700	8,400	9,000

The City requested an increase to the sewer-serviced forecast (Plan table 7.9). Council staff find the sewer-serviced forecast is reasonable and does not cause a system impact. The revisions reflecting changes to the sewer-serviced forecasts are shown underlined in Table 2 below.

Table 2. City of Cottage Grove Sewer-Serviced Forecasts (served by Blue Lake WWTP)

	2010	City Proposed		
		2020	2030	2040
Population	34,589	<u>36,100</u>	<u>40,600</u>	<u>45,400</u>
Households	11,179	<u>12,513</u>	<u>14,623</u>	<u>16,722</u>
Employment	6,484	<u>7,556</u>	<u>8,188</u>	<u>8,674</u>

Council staff will approve the revised sewer-serviced forecast, as detailed above, simultaneous with action on the Plan. Please note, the Affordable Housing Need number for Cottage Grove is unaffected by this sewer-serviced forecast revision.

Council requires that the Plan address how land supply for future development (or redevelopment) accommodates the City’s growth forecast. Chapter 2 of the Plan describes 941 acres of land supply available during 2018-2040 for urbanized residential development (Plan table 2.3). If fully-developed at the mid-point of allowed density ranges, this land supply will accommodate the forecast.

Advisory Comments

Employment levels in the City have surpassed the 2040 employment forecast in 2019. Council staff recommend the City and the Council consider an employment forecast revision through a future comprehensive plan amendment, or at the time of the next System Statement.

Thrive MSP 2040 and Land Use

Reviewer: Angela R. Torres, CD – Local Planning Assistance (651-602-1566)

The Plan is consistent with *Thrive MSP 2040* and its land use policies. The Plan acknowledges the Thrive community designation of Suburban Edge (Figure 2). Thrive describes Suburban Edge communities as communities that have experienced significant residential growth beginning in the 1990s and continuing to the 2010s. At least 40% of the land in these cities is developed, but significant amounts of land remain for future development.

Suburban Edge 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, Suburban Edge communities are expected to target opportunities for more intensive development near regional transit investments at densities and in a manner articulated in the TPP.

Existing development in the City is focused in the northwest quadrant, primarily north of U.S. Highway 61, with commercial and mixed use development concentrated along the highway corridor. Industrial development is located south of U.S. Highway 61 and along the Mississippi River. The eastern portion of the City is agricultural, which is the predominant land use in the community (30%). Residential land uses account for about 22% of the City’s area, while existing parks and water features comprise 22%, since the City’s jurisdiction includes large portions of the Mississippi River (Figure 3).

The Plan continues to carry forward plans for accommodating forecasted residential growth, extending the timeframe out to 2040. Since the adoption of the 2030 Comprehensive Plan, the City has conducted several small area planning processes and environmental reviews, which have been incorporated into the 2040 Plan (Figure 4). This includes planning for bus rapid transit station areas, business park and industrial expansions, and redevelopment on specific properties. These planning efforts are described in the Plan and are reflected in changes to land use guiding, as well as illustrated on Figure 2-9 of the Plan (Figure 5 of this Report). The East Ravine Master Plan, first developed in 2006, continues to be the guiding plan for supporting development on the east side of the urbanized extent of the community, extending north of Cottage Grove Ravine Regional Park and incorporating the preservation of the natural features in the area as open spaces.

The City plans to support their forecasted residential growth primarily through Mixed Use guiding, which is focused in future BRT station areas and other major intersections in the community. Development in the Mixed Use category is intended to be mixed vertically with 100% of the land area available allowed to support residential development. The Plan further articulates the standard of reserving street level uses within 300 feet of a major roadway for commercial, retail, or office uses. The Plan supports additional residential growth in the Low Density Residential land use category, with smaller areas for Medium and High Density Residential. The Plan accommodates residential development at a minimum density of 5 units per acre, consistent with the Council’s density policy for planned residential development in Suburban Edge communities.

Table 3. Planned Residential Density, City of Cottage Grove

Category	Density			Min Units	Max Units
	Min	Max	Net Acres		
Low Density Residential	2	4	690	1380	2760
Medium Density Residential	5	13	98	490	1274
High Density Residential	14	30	45	630	1350
Mixed Use	20	40	110	2200	4400
TOTALS			943	4700	9784
Overall Density				5.0	10.4

Red Rock Bus Rapid Transit Station Areas

As identified in the 2040 Transportation Policy Plan (TPP), the Red Rock Corridor (Corridor) is part of the Current Revenue scenario and links Hastings to Saint Paul and Minneapolis. The Corridor was studied through an Alternatives Analysis update in 2014. The analysis recommended a staged approach to developing highway BRT in the corridor. Within Cottage Grove, the Corridor is planned to run along U.S. Highway 61 with planned station areas located at Highway 61 and 80th Street (Gateway North District) and at Highway 61 and Jamaica Avenue (Cottage View District). As discussed above, these station areas are guided for Mixed Use, with an emphasis on pedestrian-oriented businesses and housing. The Plan identifies the goal of uses within the districts to support one another and the use of walking, biking, and transit. The Plan guides development in the station areas at densities of 20-40 units per acre, which is consistent with and exceeds the minimum density requirement of 8 units per acre as articulated in the TPP.

Agricultural Preserves

The Plan accurately identifies 27 parcels that are currently enrolled in the Metropolitan Agricultural Preserves Program (Program). Parcels enrolled in the Program must allow for on-going agricultural use and limit density to no more than 1 unit per 40 acres (Minn. Stat. § 473H), until they expire out of the program. The Plan identifies those parcels in Plan figure 2-6, with most of those parcels being located within the Agricultural land use category in the eastern portion of the community. There are two properties totaling about 58 acres located east of Ideal Avenue and south of 100th Street that are guided for future Industrial use. The Business Park Alternative Urban Areawide Review (AUAR) was conducted in 2017 that includes these 58 acres (Review File No. 21811-2). Both the Plan and the AUAR identify that these parcels as currently enrolled in the Program and have not yet initiated expiration. The AUAR had indicated the City’s support for expiration in order to support business development if and when that were to occur. Since then, the business interests have not moved forward, and the property owner remains enrolled in the Program.

Advisory Comments

The Plan indicates that the Medium Density land use category density limit can be “adjusted upward on a case-by-case basis.” The Plan, however, does not include limits on how much upward the density could be adjusted, nor under what principles the adjustment might be made. The Council strongly encourages the City to consider whether this language is necessary and a reguiding to High Density

Residential would not accomplish the same objectives. Alternatively, if the intent is to allow this flexibility in Medium Density areas, then the Plan should be revised, through a comprehensive plan amendment, to identify both the upper limits of that adjustment and the conditions or principles under which those adjustments might be made. Council staff can provide examples of how other communities in the region have addressed similar flexibility.

To support continued enrollment in the Metropolitan Agricultural Preserves Program for the 58 acres of land in the Industrial district, the Plan should be revised either to allow agricultural uses as an allowable interim land use or should reguide those properties to the Agricultural land use category.

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 more than 12,000 homes including nearly 1,000 multifamily units and nearly 11,300 single-family homes. About 1,700 homes are rented. More than 8,000 housing units are currently affordable to households earning under 80% of Area Median Income (AMI), however, nearly 1,500 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. There are less than 400 units affordable to households with income at or below 30% AMI and more than 400 cost burdened households with incomes at or below 30% AMI.

The Plan identifies existing housing needs including housing for seniors, multi-family units near transit, maintenance of existing housing stock and affordable housing of many kinds. The City has nearly 600 units of publicly subsidized housing, including more than 150 that are age-restricted for seniors.

The Plan acknowledges the 2021-2030 affordable housing need allocation of 568 units; 333 of which are needed at prices affordable to households earning 30% of AMI or less, 221 of which are needed at prices affordable to households earning between 31 and 50% of AMI, and 14 of which are needed at prices affordable to households earning between 51 and 80% of AMI. As shown in Figure 7, 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 910 new housing units.

The housing implementation plan component of the Plan describes that the City will consider TIF, LCA programs and tax abatement for projects that help meet their affordable housing need allocation. The Plan also indicates that the City will explore the use of tools that preserve unsubsidized affordable housing and continue to operate a city-wide housing maintenance program. The City states that they will partner with Washington County CDA to preserve existing LIHTC properties.

Water Supply

Reviewer: John D. 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.

Cottage Grove prepared a local water supply plan (LWSP) in 2016 that was submitted to both the Minnesota Department of Natural Resources (DNR) and Metropolitan Council, and reviewed separately. Council comments were shared with the DNR on April 10, 2017. The DNR found the plan to be complete in July 2018.

Advisory Comments

In order to ensure plan consistency, Council staff strongly recommend that any changes that may have been made during the Department of Natural Resources's review of the local water supply plan are reflected in the version of the plan included with the City's Final 2040 comprehensive plan.

Community and Subsurface Sewage Treatment Systems (SSTS)

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

The Plan indicates that according to the Washington County database there are approximately 808 individual SSTS within the City. 3M has a facility located in the southern portion of the City that owns and operates a private wastewater treatment facility. The Plan states that there are no other privately-owned treatment facilities in the City. The City has deferred all program oversight and maintenance management responsibilities to Washington County. The County SSTS program and Ordinance No. 206 are consistent with Minnesota Pollution Control Agency Chapter 7080-7083 Rules and the Council's 2040 WRPP requirements.

Special Resource Protection

Mississippi River Corridor Critical Area (MRCCA)

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

The Plan includes a Mississippi River Corridor Critical Area Plan (MRCCA) component that was reviewed by Minnesota Department of Natural Resources (DNR) staff and found to be substantially consistent with Minnesota Statutes 116G and Minnesota Rules Chapter 6106. Council staff also find the MRCCA plan component to be consistent with Thrive land use policies, and Minnesota Rules Chapter 6106. The DNR's April 6, 2020, conditional approval letter is attached as an appendix. Final DNR approval of the MRCCA Plan will be sent to the community after the Council authorizes local adoption of the Plan.

Advisory comment

Within 60 days after receiving DNR final approval, the City must adopt the MRCCA Plan, and submit a copy of the final adopted plan and evidence of adoption to the DNR, Council, and National Park Service within 10 days after the adoption.

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 is consistent with statutory requirements (Minn. Stat. 473.859) and Council policy regarding planning for the development, redevelopment, and preservation of aggregate resources. The Plan indicates, consistent with the Council's aggregate resources inventory included in *Minnesota Geological Survey Information Circular 46*, that there are known and significant, deposits of aggregate resources present within the community.

Historic Preservation

Reviewer: Jerome Benner II, CD – Local Planning Assistance (651-602-1566)

The Plan includes a historic preservation chapter that outlines goals and policies to protect and enhance the City's heritage resources. The City has identified 16 locally designated historic properties, four of which are on the National Register of Historic Places, including the Schilling Archaeological District. As of 1985, City of Cottage Grove is a Certified Local Government (CLG) by State Historic Preservation Office that allows the City identify, evaluate, and protect local historic resources, as well as eligibility to apply for grants and a formal role in the National Register process.

Plan Implementation

Reviewer: Jerome Benner II, CD – Local Planning Assistance (651-602-1566)

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 contained in individual chapters of the Plan, with capital improvements planning detailed 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

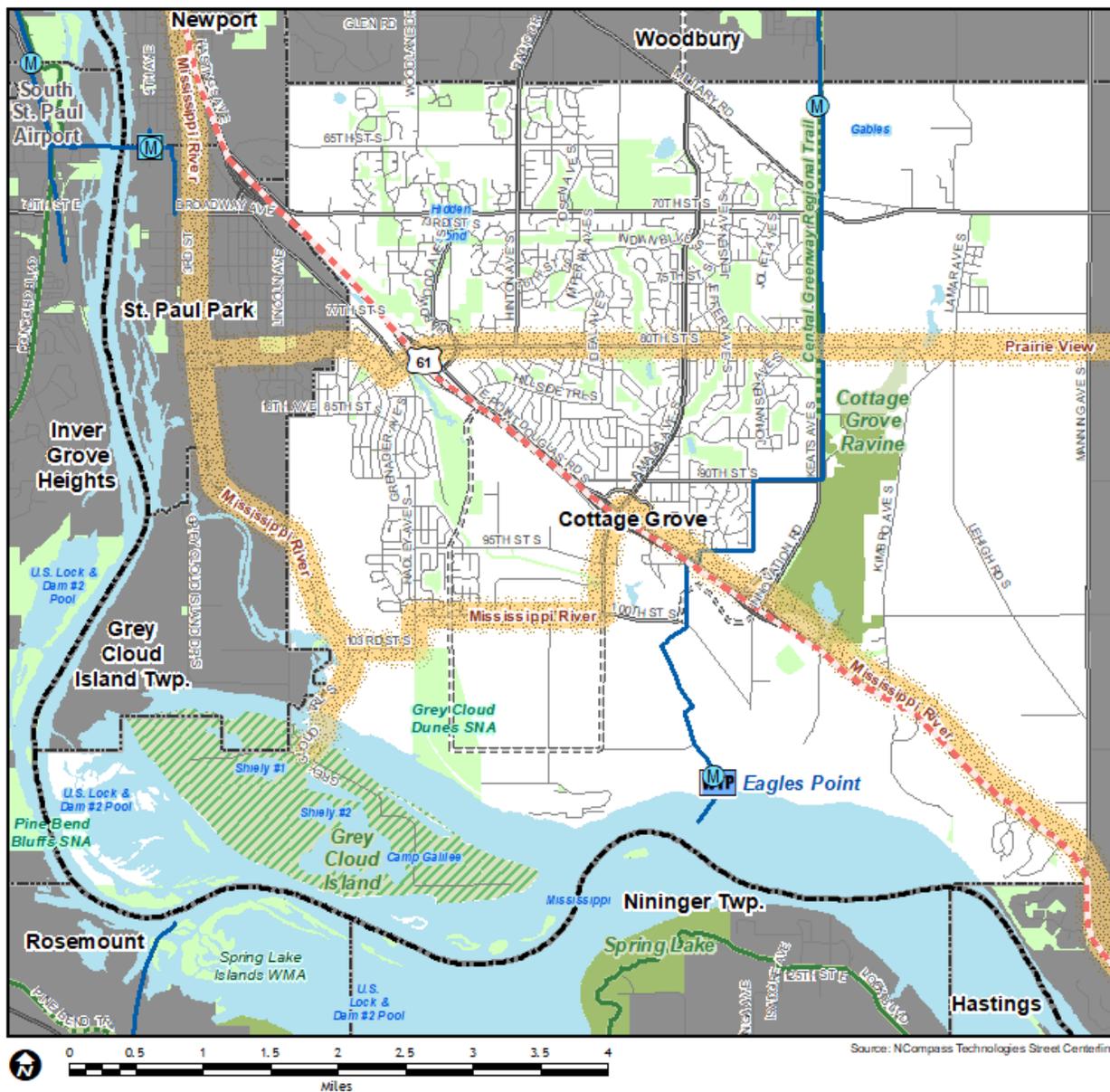
In response to the 2015 System Statement, the City submitted the following documents for review:

- March 27, 2019: Cottage Grove 2040 Comprehensive Plan
- April 1, 2019: Local Water Supply Plan and Local Surface Water Management Plan
- March 18, 2020: Revised Comprehensive Plan Responding to Council Incomplete Items for Parks and Trails, Wastewater, Transportation, Forecasts, Land Use, Housing, Aggregate Resources, Implementation, and Mississippi River Corridor Critical Area (MRCCA).
- June 10, 2020: Revised Comprehensive Plan Responding to Council Incomplete Items for Wastewater, Forecasts, and Land Use.

Attachments

- Figure 1: Location Map with Regional Systems
- Figure 2: *Thrive MSP 2040* Community Designations
- Figure 3: 2016 Generalized Land Use
- Figure 4: 2040 Future Land Use
- Figure 5: Future Land Use Change Areas
- Figure 6: Mississippi River Corridor Critical Area (MRCCA) Conditional Approval Letter
- Figure 7: Land Guided for Affordable Housing

Figure 1. Location Map with Regional Systems



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

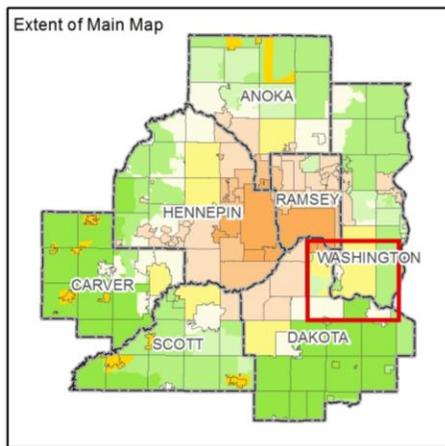
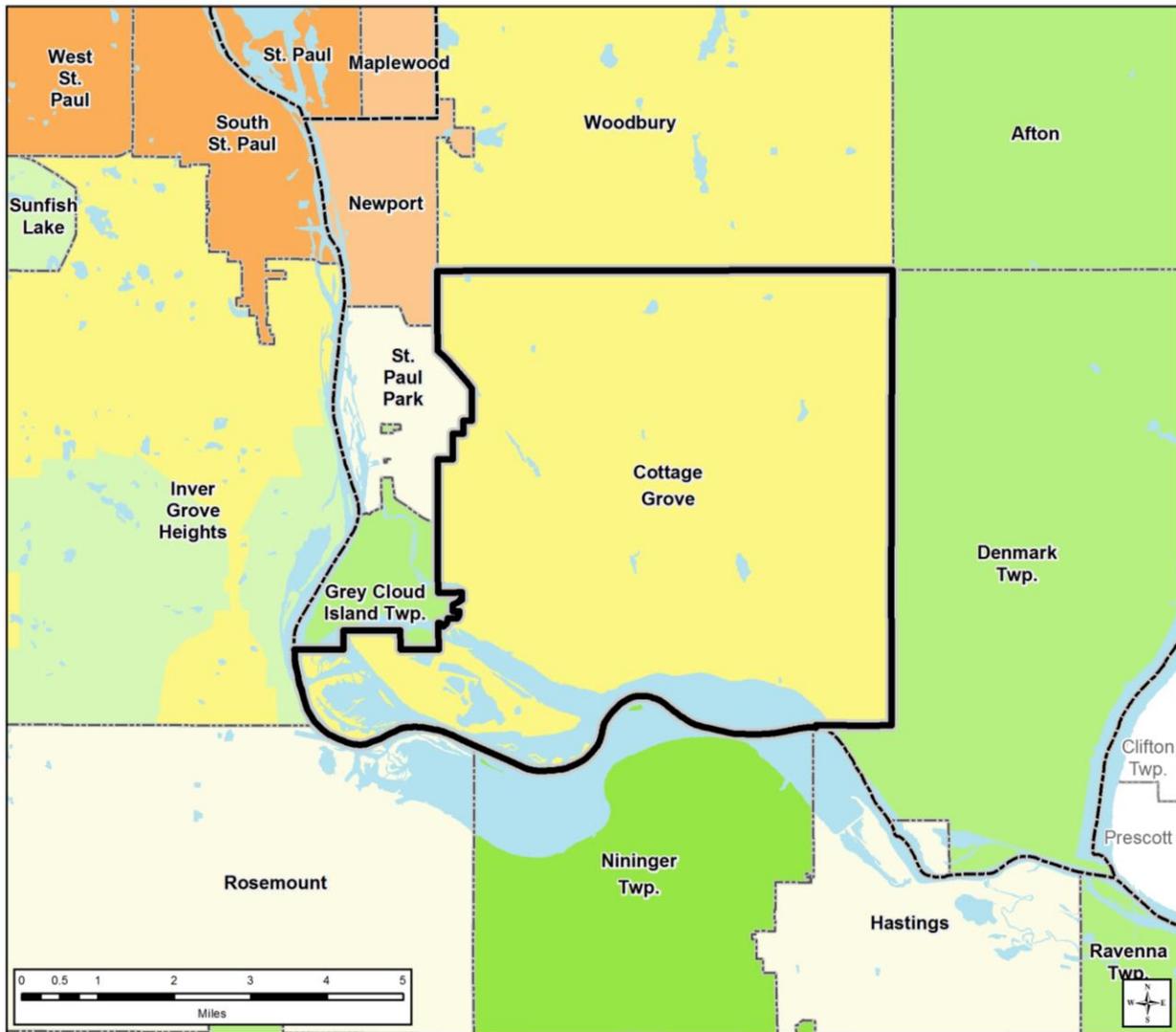
- Meters
- Lift Stations
- MCES Interceptors
- MCES Treatment Plants

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)

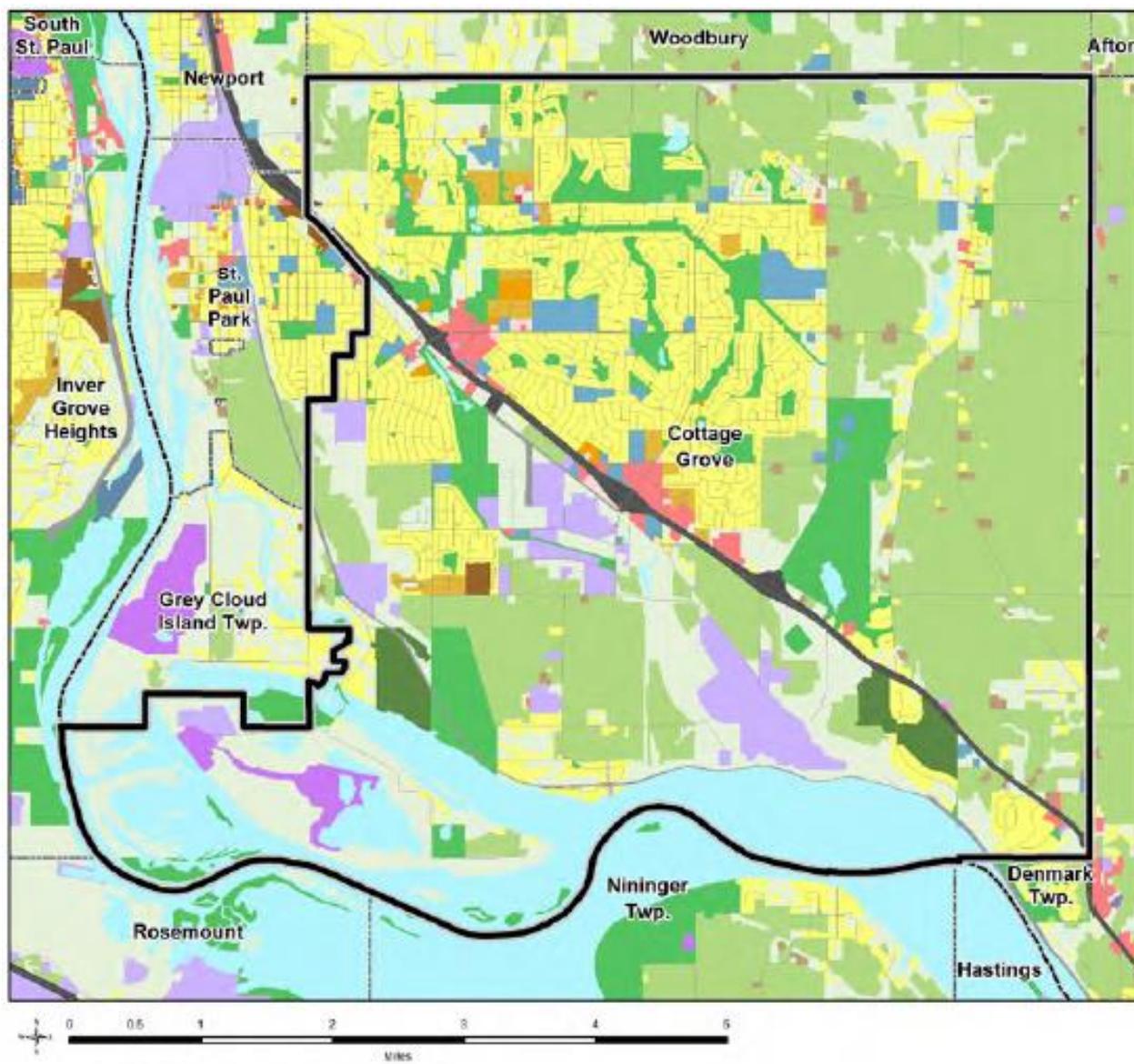
Figure 2. Thrive MSP 2040 Community Designations



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. 2016 Generalized Land Use



2016 Generalized Land Use

- | | | |
|-----------------------------|--------------------------------|------------------------------|
| Farmstead | Mixed Use Residential | Major Highway |
| Seasonal/Vacation | Mixed Use Industrial | Railway |
| Single Family Detached | Mixed Use Commercial and Other | Airport |
| Manufactured Housing Park | Industrial and Utility | Agricultural |
| Single Family Attached | Extractive | Undeveloped |
| Multifamily | Institutional | Water |
| Retail and Other Commercial | Park, Recreational or Preserve | County Boundaries |
| Office | Golf Course | City and Township Boundaries |
| | | NCompass Street Centerlines |

Source: Metropolitan Council

Figure 4. 2040 Future Land Use

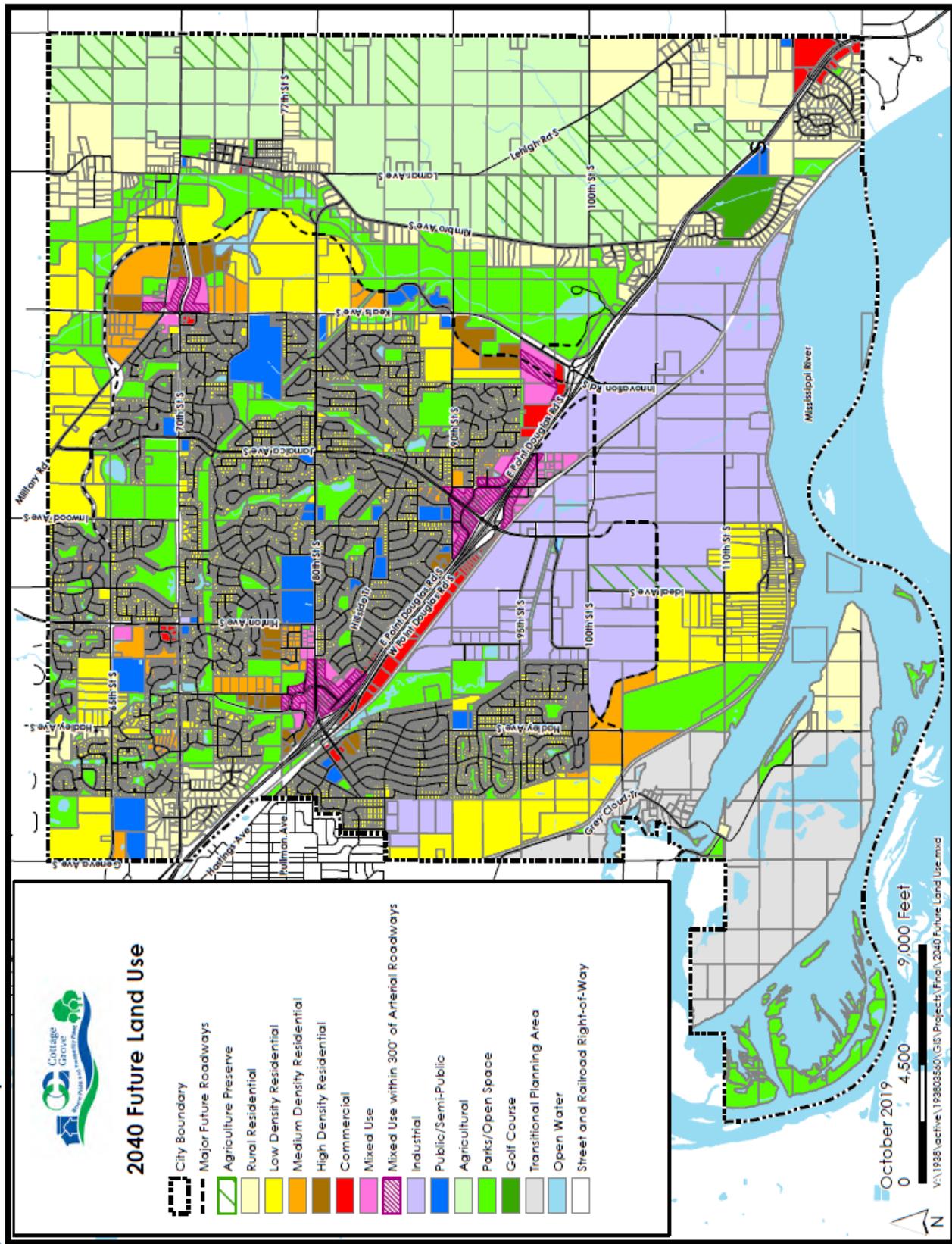


Figure 5. Future Land Use Change Areas

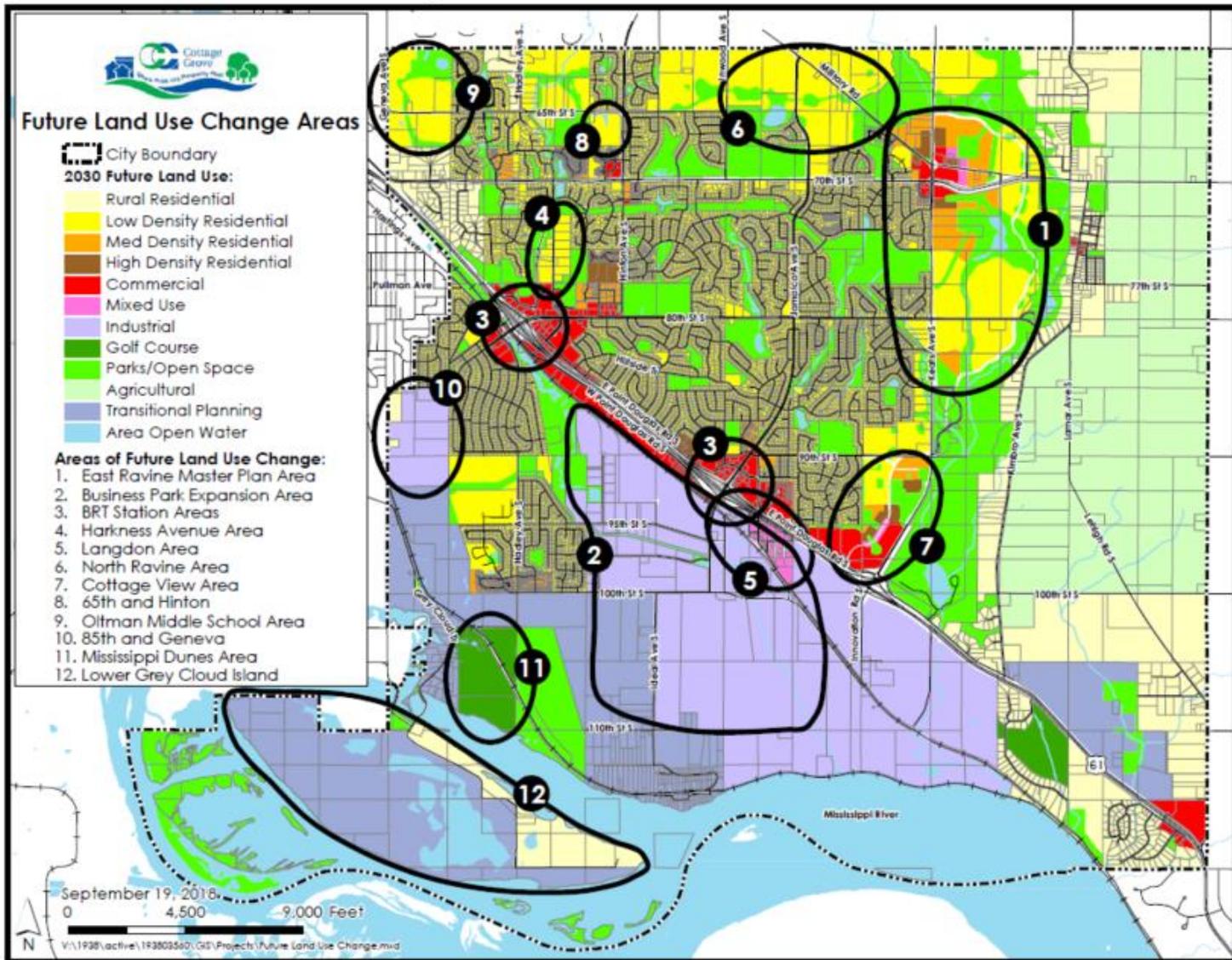


Figure 6. Mississippi River Corridor Critical Area (MRCCA) Conditional Approval Letter



April 6, 2020

City of Cottage Grove
Attn: John Burbank
12800 Ravine Parkway South
Cottage Grove, MN 55016

Re: Conditional Approval of City of Cottage Grove MRCCA Plan

Dear Mr. Burbank:

I am pleased to inform you that the Minnesota Department of Natural Resources (DNR) conditionally approves the City of Cottage Grove's Mississippi River Corridor Critical Area (MRCCA) plan.

We reviewed the MRCCA plan chapter of your 2040 Comprehensive Plan submitted to the Metropolitan Council on March 26, 2020. We have found that the MRCCA plan is substantially consistent with Minnesota Statutes, §116G and Minnesota Rules, chapter 6106. We will send final approval of your MRCCA plan after the Metropolitan Council authorizes the city to put the comprehensive plan into effect. Within 60 days of receiving DNR final approval, the city must adopt the MRCCA plan. The city must then submit a copy of the final adopted plan, with evidence of adoption, to the DNR, the Metropolitan Council, and the National Park Service within ten days of the adoption.

Only MRCCA plans and plan amendments approved by the DNR have the force and effect of law. Once in effect, local governments must implement and enforce the DNR-approved plans.

We appreciate your efforts to develop and adopt the MRCCA plan, which provides a solid basis for future ordinance amendments and MRCCA management. Please contact Matt Bauman at 651-259-5710 or at matthew.bauman@state.mn.us if you have any questions about next steps.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jennifer Shillcox'.

Jennifer Shillcox
Land Use Unit Supervisor

c: Raya Esmaeili, Metropolitan Council
Alan Robbins-Fenger, National Park Service
Jason Spiegel, DNR Region 3 Area Hydrologist
Jack Gleason, DNR Region 3
Matt Bauman, DNR Land Use Unit

Minnesota Department of Natural Resources • Division of Ecological and Water Resources
500 Lafayette Road, Box 25, Saint Paul, MN 55155-4025

Figure 7. Land Guided for Affordable Housing

2021-2030 share of regional need for Affordable Housing: **568 units**
 2021-2030 total regional need for Affordable Housing: **37,900 units**

	Available Acres	X	Minimum Density <i>(units per acre)</i>	X	Expected % Residential <i>(if mixed use)</i>	=	Minimum Units Possible
High Density Residential	15.00		14		100%		210
Mixed Use	50.00		20		70%		700
Total	15						910

Sufficient/(insufficient) units possible against share of regional need: **342**

Affordable units built since 2021: **0**

Sufficient/(insufficient) units possible adjusted for affordable units built: **342**

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

