

Community Development Committee

Meeting date: September 8, 2020

Environment Committee

Meeting date: September 22, 2020

For the Metropolitan Council meeting of September 23, 2020

Subject: City of South St. Paul 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22398-1

District(s), Member(s): District 13, Chai Lee

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

Staff Prepared/Presented: Patrick Boylan, Planning Analyst (651-602-1438)
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 South St. Paul to place its 2040 Comprehensive Plan into effect.
2. Revise the City's forecasts downward as shown in Table 1 of the attached Review Record.
3. Revise the City's 2021-2030 affordable housing need allocation to 57 units.
4. Advise the City to:
 - a. Provide the Council with the date that they adopted the final Surface Water Management Plan.
 - b. Within 60 days after receiving DNR final approval, the City must adopt the Mississippi River Critical Corridor 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 South St. Paul's Comprehensive Sewer Plan.
2. The City shall submit to the Council a copy of the Resolution that adopts the revisions to the Sewer System Ordinance Section 62 requiring the disconnection of clearwater sources from the sanitary sewer system.

Advisory Comments

The following Advisory Comments are part of the Council action authorizing the City of South St. Paul 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 South St. Paul is located along the northern border of Dakota County. It is surrounded by the communities of St. Paul, Newport, Inver Grove Heights, and West St. Paul.

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, with the proposed changes
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

None.

Known Support / Opposition

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

REVIEW RECORD

City of South St. Paul 2040 Comprehensive Plan

Review File No. 22398-1, Business Item No. 2020-229 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. Dakota County is the Park Implementing Agency for Regional Parks System components in South St. Paul, for which the Plan accurately describes the Regional Parks System components. Regional Trails located within the City include the Mississippi River Greenway and River to River Greenway (formerly North Urban) regional trails (Figure 1). 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. 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.

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 all the required characteristics of the City's roadways, 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 the Concord Street Improvements study, which informs MnDOT proposed pavement resurfacing, drainage upgrades, and pedestrian accommodations.

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 and III.

Aviation

The Plan conforms to Aviation system element of the TPP. The Plan includes practice that protects regional airspace from obstructions and describes how airspace will be protected.

The Plan identifies the South St. Paul Airport (Fleming Field) and addresses elements of its long-term comprehensive plan. The Plan addresses issues including land use compatibility, noise sensitivity, and runway clear zones. The community has an adopted airport zoning.

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, including accessibility to freight terminals and facilities. These specific needs include several terminals and freight facilities near the Mississippi River.

Water Resources

Wastewater Service

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

The Plan conforms with 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 accepted 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 Interceptors 7111-1&2, 8027, and 7102-1B&C with treatment at the Metropolitan Council's Metropolitan Wastewater Treatment Plant in St. Paul. The Plan projects that the City will have 8,995 sewered households and 6,690 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 Urban Center 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) sanitary sewer systems and private property sources. The Plan includes a summary of activities and programs intended to mitigate I/I in both the public and private property collection systems including inspection, evaluation, and mitigation. The Plan summarizes work the City completed in the 1980s and 1990s in its sewer separation efforts. It states that small areas of combined sewer service areas continue to be identified and are separated as they are discovered through City projects and redevelopment.

The Plan also identifies an annual program of rebuilding deteriorated sanitary sewers as part of the City's annual street reconstruction program. This work includes replacement of vented maintenance hole (MH) covers, pipelining, and MH rehabilitation. The City's program includes televised inspection one year, then follow-up I/I work the next year. This program reflects an I/I reduction expenditure of approximately \$400,000 every two years for the foreseeable future. The Plan also identifies activities related to private property I/I, consisting of sump pump disconnections and public education and encouragement for private property owners to proactively inspect and repair services that are beyond their life expectancy. They acknowledge the challenge for property owners to pursue these activities without some sort of financial assistance and therefore will continue to seek funding assistance for this work. (MH) covers, pipelining, and MH rehabilitation. The City's program includes televised inspection one year, then follow-up I/I work the next year. This program reflects an I/I reduction expenditure of

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The Plan describes the requirements and standards for minimizing I/I and references City Sewer System Ordinance (Section 62-132) stating that it is unlawful to discharge or cause to be discharged any storm water, surface water, groundwater, roof runoff, subsurface drainage, uncontaminated cooling water, or unpolluted industrial process water to the sanitary sewer. The Plan also states that the ordinance will be amended within 6 months of the Comprehensive Plan adoption to include the required disconnection of existing clearwater sources.

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 74% of the total residential households within the City have clay tile services and suggests that the majority of I/I within the City originates in the private collection system. The significance of clay tile pipe is that as it ages, it can become more susceptible to I/I. Using winter water use data between 2010 and 2017 to estimate average base flow (dry weather) and actual wastewater flow for the same period, the Plan suggests that the City's average annual I/I ranges between 7% and 16%, and peak month I/I (2011) was approximately 35% I/I.

Sewer Element Comments

The Sewer Element of the Plan has been reviewed against the requirements for Comprehensive Sewer Plans for Urban Center communities. It was found to be complete and consistent with Council policies. 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 Sewer Plan. A copy of the City Council Resolution adopting its Plan needs to be submitted to the Metropolitan Council for its records.

Advisory Comment

The City shall submit to the Council a copy of the Resolution that adopts the revisions to the Sewer System Ordinance Section 62 requiring the disconnection of clearwater sources from the sanitary sewer system.

Community and individual Subsurface Sewage Treatment Systems (SSTS)

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

The Plan indicates that there are five individual residential SSTS, five commercial properties, three airport hangars, and a cemetery that are also served by SSTS. There are no public or privately-owned Community Wastewater Treatment Systems in operation in the City. The City has adopted the Dakota County SSTS ordinance and entered into a cooperative agreement with the County to oversee system maintenance monitoring. Dakota County SSTS Ordinance 113 and their maintenance management program are consistent with Minnesota Pollution Control Agency Chapter 7080-7083 Rules and Council 2040 Water Resources Policy Plan requirements.

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 Council's 2040 Water Resources Policy Plan for local surface water management. The Plan satisfies the surface water management requirements for 2040 comprehensive plans. South St. Paul lies within the oversight boundaries of the Lower Mississippi River Watershed Management Organization (WMO). The City submitted a draft Surface Water Management Plan (SWMP) update to the Metropolitan Council

(Council) on October 25, 2018. Council Water Resources staff reviewed and commented on the draft SWMP to the City and WMO in a letter dated November 14, 2018. The SWMP was approved by the WMO on December 13, 2018. The Plan incorporates the City’s SWMP in Appendix B.

Advisory Comments

The City needs to provide the Council with the date that they adopted the final Surface Water Management Plan.

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 provides a proposed forecast revision (Plan tables 1.1, 4.3; and figure 2.1). Employment has declined in the City, and residential development has lagged what was previously forecasted. Council staff agree with the proposed forecast shown below in Table 1 below (changes underlined).

Table 1. City of South St. Paul Forecasts

	Census 2010	Estimated 2019	Council’s Current Forecasts			City Proposed Forecast		
			2020	2030	2040	2020	2030	2040
Population	20,160	20,774	21,500	21,500	21,800	<u>20,850</u>	<u>20,900</u>	<u>21,200</u>
Households	8,186	8,417	8,900	9,200	9,400	<u>8,400</u>	<u>8,650</u>	<u>9,000</u>
Employment	8,557	6,742	9,600	10,100	10,700	<u>6,800</u>	<u>7,000</u>	<u>7,500</u>

A sewer-serviced forecast table appears as table 8.5 in the Sanitary Sewer section of the Plan. Throughout the forecast period, 810 jobs, 5 households, and 12 people are not serviced by sanitary sewer; the balances are serviced.

The Council will revise the community-wide and sewer-serviced forecasts for South St. Paul, simultaneous with action on the Plan.

With this forecast revision, the 2021-2030 Affordable Housing Need for South St. Paul is revised. The new 2021-2030 Affordable Housing Need numbers are: 28 units at <=30% AMI, 4 units at 31 -50% AMI; 25 units at 51-80% AMI; 57 units total. This is acknowledged in Plan table 6.1.

Chapter 4 of the Plan describes and inventories land supply for future development and redevelopment (see specifically tables 4.5 and 4.6 in the Plan). Most of the new housing capacity is associated with the supply of mixed use residential land. If the identified land supply is fully developed and absorbed, the City can add 417 (at minimum density) to 941 (max) housing units (Plan table 4.5). This accommodates the 2020-2040 forecast of 600 households growth.

Advisory Comments

The Council expects a consistent presentation of forecasts throughout the Plan. The discussion in Chapter 2 states “employment levels are forecasted to increase in the future, with over 2,000 new jobs forecasted by 2040 by the Metropolitan Council.” (page 2.11) With our agreement on the forecast revision, the expected growth will be 700 jobs (not two thousand). The City must correct this page in the Plan’s final submitted version.

Thrive MSP 2040 and Land Use

Reviewer: Patrick Boylan, CD – Local Planning Assistance (651-602-1438)

The Plan is consistent with *Thrive MSP 2040* and its land use policies. The Plan acknowledges the Thrive community designation of Urban Center (Figure 2). Thrive describes Urban Center communities as the largest, most centrally located, and economically diverse communities in the region. These communities are experiencing growth mostly through redevelopment.

Urban Center communities are expected to plan for forecasted population growth at overall average densities of at least 20 units per acre for new development and redevelopment, and target opportunities for more intensive development near regional transit investments at densities and in a manner articulated in the TPP. Plans are also required to identify areas for redevelopment, particularly areas that are well-served by transportation options and nearby amenities and that contribute to better proximity between jobs and housing.

The existing land use in South St. Paul is 42.9% residential, 3.9% commercial, and 11.8% industrial; the airport comprises 5% of the land area of the City (Figure 3). The key industrial areas of the city are located in the east and southeast areas of the City which are adjacent to or along the Mississippi River and generally north of Interstate 494.

The City has developed policy and is actively re-developing the industrial areas which are served by existing railroad corridors and along Concord Boulevard (State Highway 156). Although Fleming Field (South St. Paul airport) is within the City, the majority of industrial land is located to the north between Concord and the river. As illustrated in Figure 4, the Plan allows higher densities along transportation corridors, encouraging high density residential uses mixed with office and commercial areas which are located generally in the east and southeast areas of the City.

The City plans to update existing corridor plans and create a new small area plan to guide industrial development for the Concord Exchange Corridor along Concord Street (from Wentworth to I-494) and also to create a small area plan that will address redevelopment of the North Concord Corridor. The Plan is consistent with Thrive’s land use and residential density policies for an Urban Center community designation. The Plan shows growth within High Density and Mixed Use categories of 29.5 acres yielding a range of 793 to 1,938 units at a minimum of 24.6 units per acre as shown in Table 2 below.

Table 2. Planned Residential Density, City of South St. Paul

Category	Density		Net Acres	2018-2040 Change	
	Min	Max		Min Units	Max Units
High Density	20	60	2.8	56	168
Mixed Use	25	60	29.5	737	1770
TOTALS			32.3	793	1938
Overall Density				24.6	60.0

The Plan allows up to 40% residential uses in the Mixed Use category. Table 2 above reflects total net acres and for the purpose of the residential density analysis, all acres shown in Table 2 are available for residential development.

Advisory Comments

The City needs to regulate the the Open Space parcel adjacent to the Metro Plant to “Utility” to be consistent with potential future plans for operations of the wastewater treatment plant.

Housing

Reviewer: Ashleigh Johnson,, CD – Housing (651-602-1106)

The Plan is consistent with the *2040 Housing Policy Plan*. As of 2016, the City has 8,732 homes of which 71 percent are single-family (6,177 units), 29 percent are multifamily (2,505 units) and less than 1 percent are manufactured or 'other' (50 units).

About 2,936 homes, or 34 percent of all homes are rented. The City has 518 publicly subsidized housing units. As of 2016, nearly 95 percent of homes (8,225 units) are affordable to households earning at or below 80% of Area Median Income (AMI). However, at this income level, approximately 2,210, or 1/4 of households are cost-burdened, or paying more than 30% of their income toward housing costs.

The Plan acknowledges the revised 2021-2030 affordable housing need allocation of 57 units; 28 of which are needed at prices affordable to households earning 30% of AMI or less, four units needed between 31% and 50% of AMI and 25 units between 51% and 80% of AMI. As shown in Table 6.12: Affordable Housing Potential in the Plan and Figure 5 of this report, the Plan guides sufficient land expected to develop in the 2021-2030 time period at a minimum of 20 units per acre to allow for the development of at least 142 new housing units.

The Plan identifies three existing housing needs: preservation of existing housing stock, a variety of housing types for all stages of life, and housing that is affordable to a range of income levels, especially moderate and low-income households.

The housing implementation component of the Plan describes that the City will consider multiple sources of funding for preservation, affordability and housing diversity, including Community Development Block Grants (CDBG), Community Action Partnership (CAP) Agency grants, local 4D Tax Program rate reductions, Tax Increment Financing (TIF), and housing bonds. To meet their identified primary need, the City will consider housing maintenance, a mix of tools are being considered including code enforcement, rental licensing and inspections, and loans for home improvement and rental rehabilitation. The City states that they will consider developing a local Fair Housing Policy to advance housing equity within the City.

Water Supply

Reviewer: Brian Davis, ES – Water Supply Planning (651-602-1519)

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) that was submitted to both the Minnesota Department of Natural Resources (DNR) and Metropolitan Council and reviewed under separate cover. The LWSP was considered complete by the Council, and a review letter was sent to the DNR on April 15, 2019.

Advisory Comment

If changes are made to the City's LWSP based on the DNR review, the City will need to provide the Council with the updated version of the LWSP plan to ensure consistency with the City's 2040 Plan.

Special Resource Protection

Mississippi River Corridor Critical Area (MRCCA)

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

The Plan includes a Mississippi River Corridor Critical Area Plan (MRCCA Plan) 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 MSP 2040* land use policies, and Minnesota Rules Chapter 6106. The DNR's February 21, 2020 conditional approval letter is attached to the Council staff report as Figure 6. Final DNR approval of the MRCCA Plan will be sent to the City 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 does not contain a section on aggregate resources. The Council's aggregate resources inventory information contained in *Minnesota Geological Survey Information Circular 46* indicates that while there are a number of natural deposits mapped within the City, most do not meet industry standards, and the community is nearly fully urbanized. Therefore, no changes to the Plan are necessary.

Historic Preservation

Reviewer: Patrick Boylan, CD – Local Planning Assistance (651-602-1438)

The Plan contains a section on historic preservation and supportive policies. The Plan notes that there are three buildings on the National Register, and that the City will encourage the preservation of these structures. The Plan includes detailed policies to support the preservation of historic places and buildings.

Plan Implementation

Reviewer: Patrick Boylan, CD – Local Planning Assistance (651-602-1438)

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:

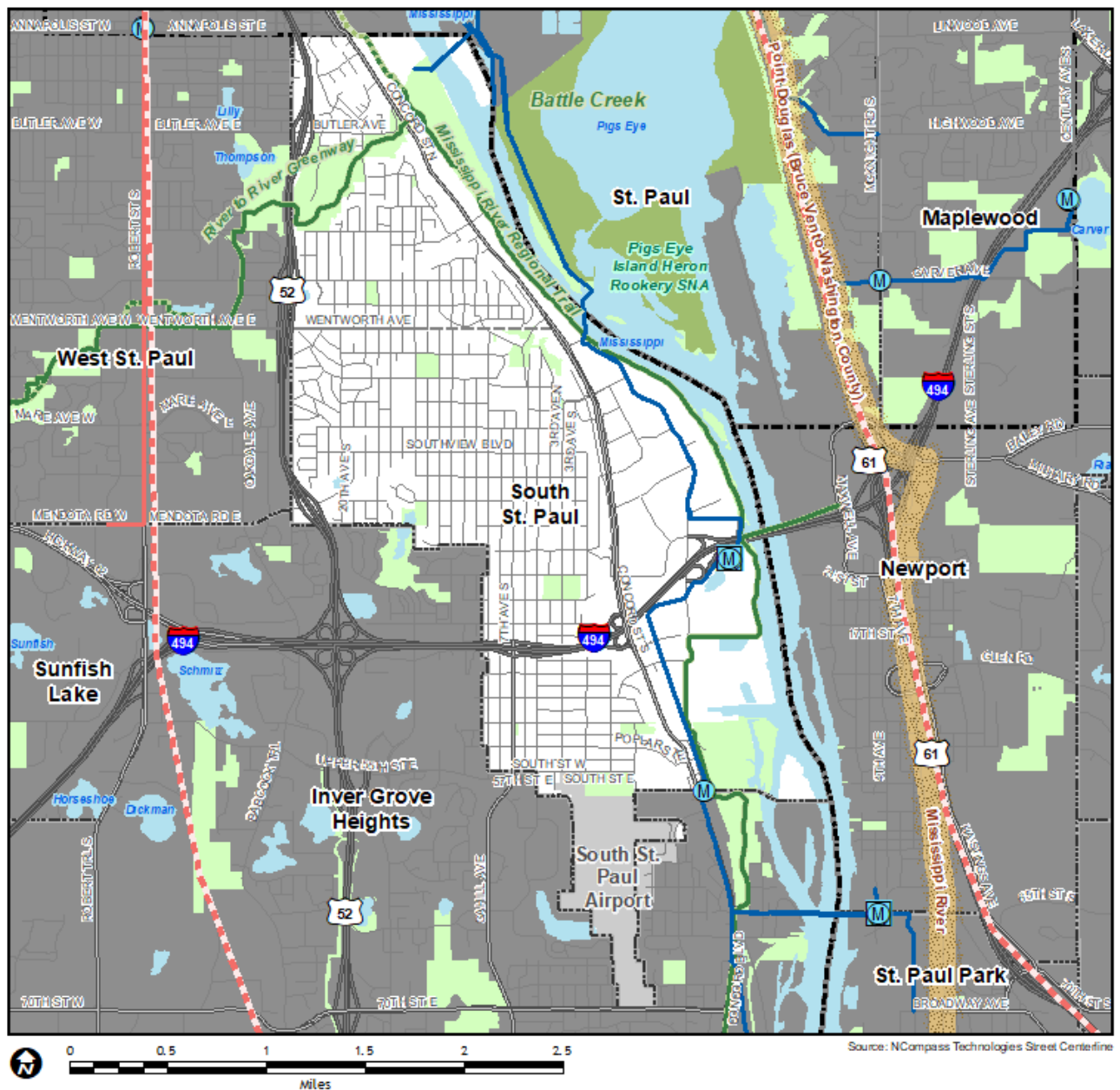
- December 31, 2019: South St. Paul 2040 Comprehensive Plan
- July 6, 2020: Revised Comprehensive Plan Responding to Council Incomplete Items for Wastewater, Transportation, Transit, Aviation, Forecasts, Housing, Land Use, and Mississippi River Corridor Critical Area (MRCCA).

- July 22, 2020: Sewer Flow Information

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: Land Guided for Affordable Housing
- Figure 6: Mississippi River Corridor Critical Area (MRCCA) DNR Conditional Approval Letter

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

Water

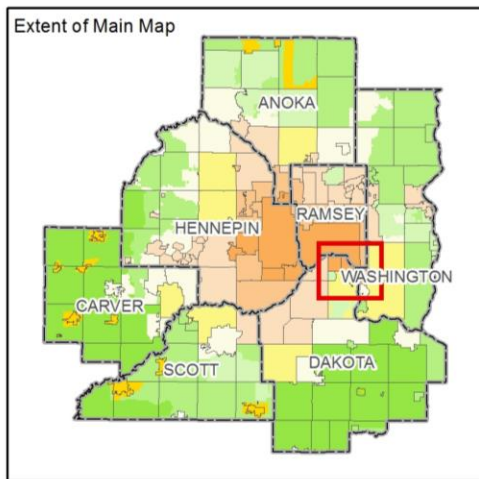
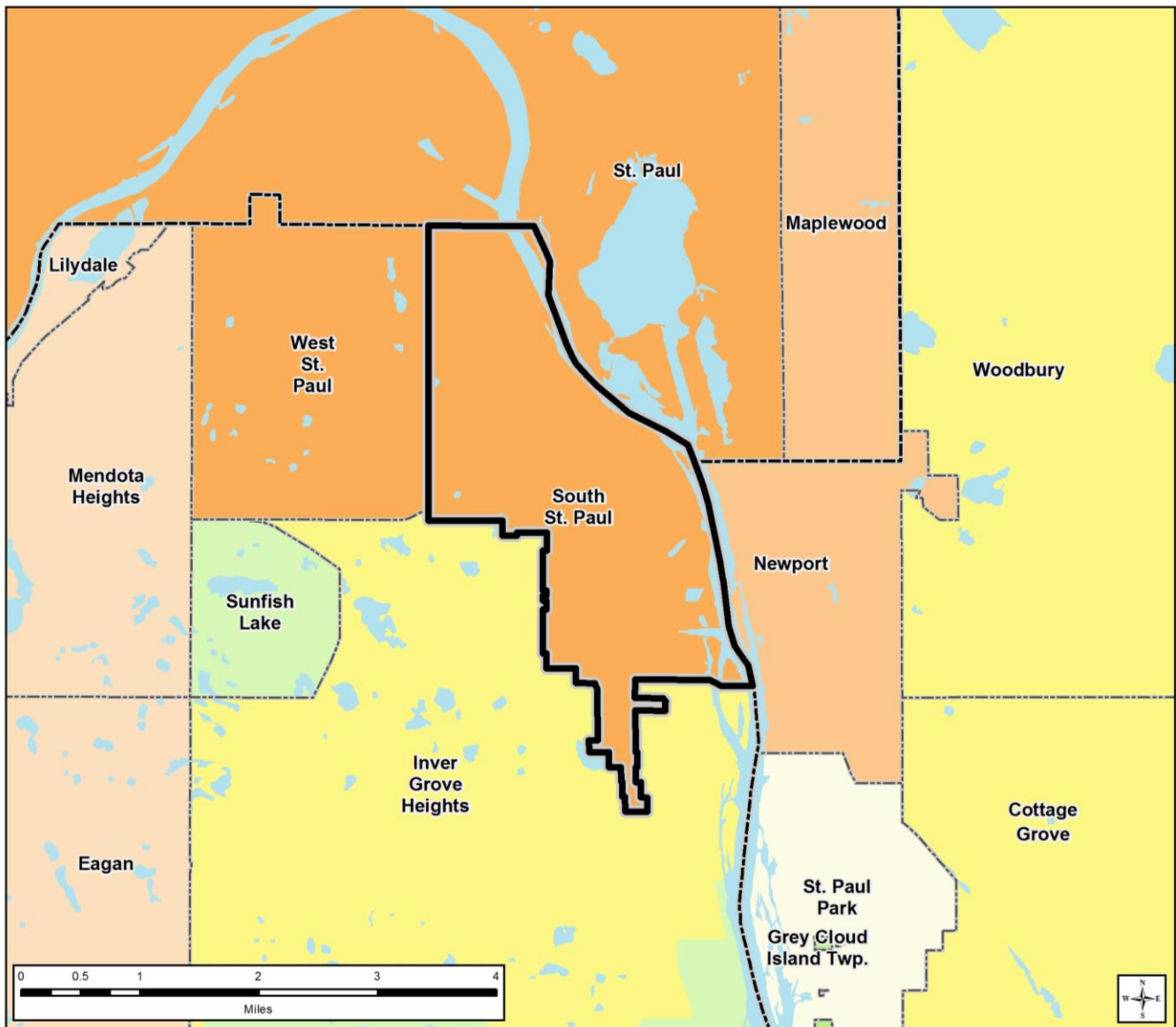
- Meters
- L Lift Stations
- MCES Interceptors
- STP MCES Treatment Plants

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. Existing Land Use

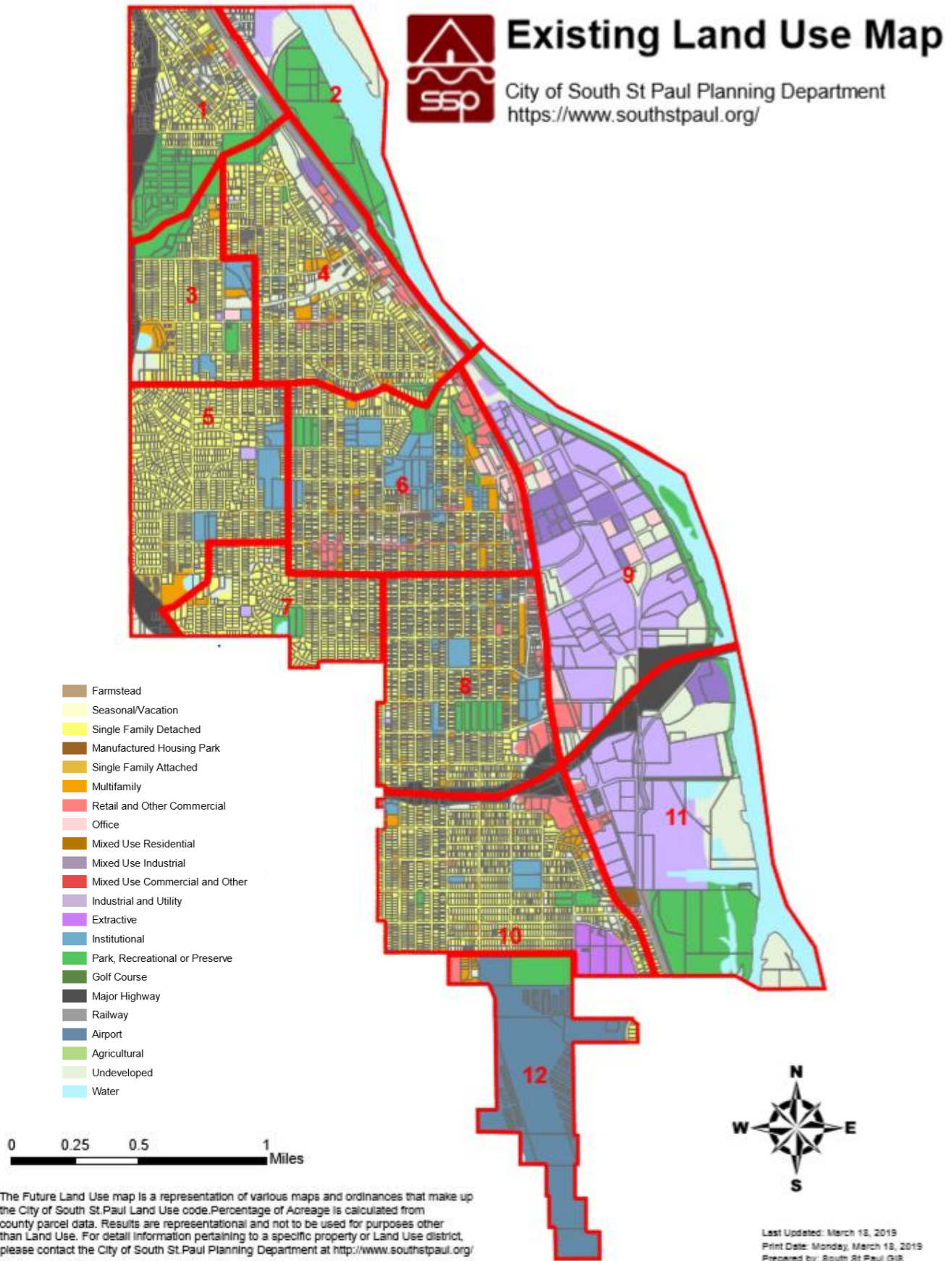
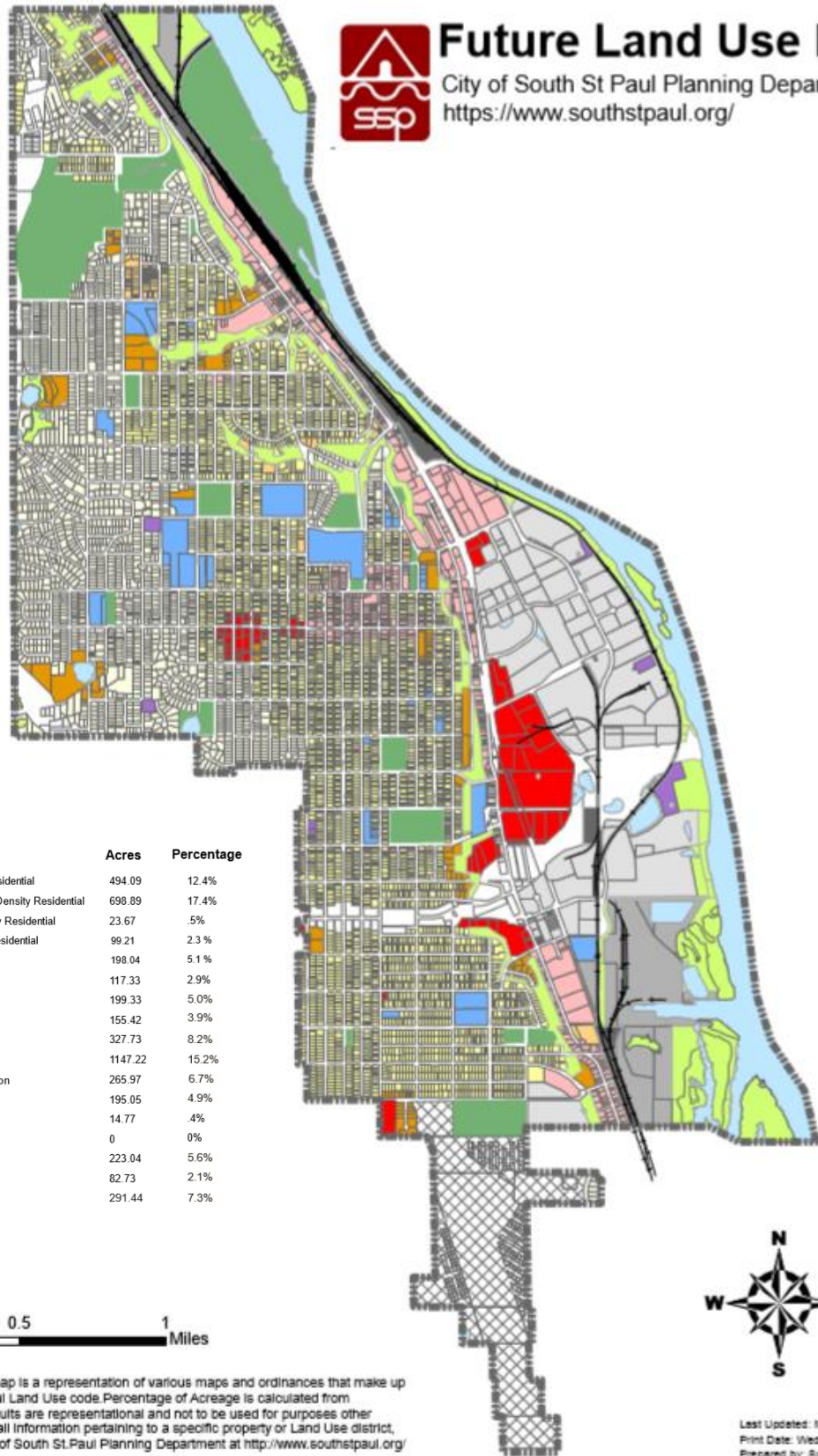


Figure 4. 2040 Future Land Use

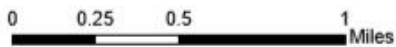


Future Land Use Map

City of South St Paul Planning Department
<https://www.southstpaul.org/>



Res. Density Units/Acre	Future Land Use	Acres	Percentage
1-5	LDR - Low Density Residential	494.09	12.4%
6-8	LMDR - Low-Medium Density Residential	698.89	17.4%
6-12	MDR - Medium Density Residential	23.67	.5%
20-60	HDR - High Density Residential	99.21	2.3%
25-60	MU - Mixed Use	198.04	5.1%
	COM - Commercial	117.33	2.9%
	AIR - Airport	199.33	5.0%
	I - Industrial	155.42	3.9%
	LI - Light Industrial	327.73	8.2%
	ROW - Right Of Way	1147.22	15.2%
	P - Parks and Recreation	265.97	6.7%
	IN - Institutional	195.05	4.9%
	UTL - Utility	14.77	.4%
	O - Office	0	0%
	OS - Open Space	223.04	5.6%
	RR - Railroad	82.73	2.1%
	WAT - Water	291.44	7.3%
	Railroad		



The Future Land Use map is a representation of various maps and ordinances that make up the City of South St Paul Land Use code. Percentage of Acreage is calculated from county parcel data. Results are representational and not to be used for purposes other than Land Use. For detail information pertaining to a specific property or Land Use district, please contact the City of South St Paul Planning Department at <http://www.southstpaul.org/>

Last Updated: March 6, 2019
 Print Date: Wednesday, November 27, 2011
 Prepared by: South St Paul GIS

Figure 5. Land Guided for Affordable Housing

2021-2030 share of regional need for Affordable Housing: **57 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	2.80		20		100%		56
Mixed Use	8.60		25		40%		86
Total	11						142

Sufficient/*(insufficient)* units possible against share of regional need: **85**

Affordable units built since 2021: **0**

Sufficient/*(insufficient)* units possible adjusted for affordable units built: **85**

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



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



February 21, 2020

Michael Healy
City Planner
125 3rd Ave North
South St. Paul, M 55075

Re: Conditional Approval of City of South St. Paul MRCCA Plan

Dear Mr. Healy:

I am pleased to inform you that the Minnesota Department of Natural Resources (DNR) conditionally approves the City of South St. Paul'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 12/31/19. 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 of South St. Paul 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 Dan Petrik at 651-259-5697 or at daniel.petrik@state.mn.us if you have any questions about next steps.

Sincerely,

A handwritten signature in blue ink that reads 'Jennifer Shillcox'.

Jennifer Shillcox
Land Use Unit Supervisor

- c: Raya Esmaeili, Metropolitan Council
- Alan Robbins-Fenger, National Park Service
- John Gleason, DNR Region 3
- Dan Petrik, 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