

Community Development Committee

Meeting date: July 19, 2021

Environment Committee

Meeting date: July 27, 2021

For the Metropolitan Council meeting of August 11, 2020

Subject: City of Lexington 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22410-1

District(s), Member(s): District 10, Peter Lindstrom

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

Staff Prepared/Presented: Jake Reilly, Senior Planner (651-602-1822)
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 Lexington to place its 2040 Comprehensive Plan into effect.
2. Advise the City to:
 - a. Provide to the Council the date the Watershed District approved the local water management plan, and the date the City adopted the final local water management plan when they are available.
 - b. Provide the Council with a copy of the final adopted local water management plan that will be included in the final Plan document that the City adopts.
 - c. Implement the advisory comments in the Review Record for transportation and forecasts.

Recommendation of the Environment Committee

1. Approve the City of Lexington's Comprehensive Sewer Plan.

Advisory Comments

The following Advisory Comments are part of the Council action authorizing the City of Lexington 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 Lexington is located in northern Anoka County. It is surrounded by the communities of Blaine and Circle Pine.

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 \$10,000 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 Lexington 2040 Comprehensive Plan

Review File No. 22410-1, Business Item No. 2021-184 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. Anoka County would be the Park implementing agency for Regional Parks System components in the City of Lexington, however there are no Regional Parks System components in the City. There are no state or federal recreation lands in 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. 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 City's Plan accurately accounts for the metropolitan highway system of principal arterials. There are no Principal Arterials (PA) in Lexington, with the closest PA to the city being I-35W approximately 1/2 mile to the west.

The Plan accurately reflects the regional functional classification map of A-minor arterials roadways and has identified major collector roads. The Plan notes that the City has minor collector roadways as well.

The Plan identifies all the required characteristics of the community's roadways, including existing and future functional classification, right-of-way preservation needs, and existing and forecasted traffic volumes for principal and A-minor arterials. Forecasting was done consistent with regional methodology. The Plan also includes guidelines on how access will be managed for principal and A-minor arterials.

Transit

The Plan conforms to the Transit system element of the TPP. It shows the location of existing transit routes and facilities and acknowledges the City is within Transit Market Area III.

The Plan discusses the City's support for transit developments and improvements in the northern metropolitan area.

Aviation

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

Bicycling and Walking

The Plan is consistent with the Bicycling and Pedestrian chapter of the TPP. The Plan describes the City's long-term plans for addressing bicycle and pedestrian facilities and includes a map of facilities. The Plan identifies that there is one Tier 2 alignment of the RBTN within the city limits.

Freight

The Plan is consistent with Freight policies of the TPP. The Plan identifies the needs of freight movement in and through the community, noting that there are few freight generators in the City and that most freight is carried on I-35 to the rest of the region.

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 Metropolitan Council's citywide forecast totals for all forecast years.

Advisory Comment

On page 4-10, the Plan mentions the Anoka County Traveler Transit Link but the final adopted plan should also note that the County is providing this service under a contract with the Council. Any description of Transit Link service should clarify that Transit Link is the Twin Cities' shared dial-a-ride service for the general public and is available within the Twin Cities metro area where regular fixed-route transit service is more than a ½ mile away (1/4 mile in winter). Transit Link is for trips that can't be accomplished on regular transit routes alone. More information about Transit Link can be found at www.metrocouncil.org/Transportation/Services/TransitLink.aspx.

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 4-NS-523 to the Metropolitan Council's Metropolitan Treatment Plant in St. Paul for treatment. The Plan projects that the City will have 950 sewer households and 640 sewer 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 does not provide City total sanitary flow projections. However, a process for projecting future flow within the City was provided in the Plan with assigned 2040 projections to each of the five lift stations in the City. The rationale for peak hourly flow 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 sewer forecasts as stated in the sewer element of the Plan.

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

The Plan defines the community's goals, policies, and strategies for preventing and reducing excessive inflow and infiltration (I/I) in both the local municipal (city) and private property sanitary sewer systems. The Plan identifies an annual process of televised inspections of pipes and visual inspections of manhole structures. Any deficiencies found during these inspections are addressed. The City's televised inspection of the public collection system is scheduled so that the entire system is inspected once every three years. During televised inspection of the public collection system, the condition of private service lateral connections to the public main is noted for any issues. The Plan states that the City will explore additional activities for I/I reduction from private sources such as sump pumps and service laterals. The City's Capital Improvement Plan reflects an annual budget of \$25,000 through 2025 for sanitary sewer system inspection and repair.

The Plan describes the requirements and standards for minimizing I/I and references City Code (Chapter 3, Section 3.30, Subd 5) which prohibits the discharge of clear water (roof water, ground water, or any other natural precipitation) from the municipal sanitary sewer system. The Code also requires the disconnection of these prohibited connections.

The Plan describes the sources, extent, and significance of existing I/I within the entire public and private wastewater collection system and provides a description of an implementation plan for preventing and eliminating excessive I/I from entering the public and private property collection systems. The Plan indicates that approximately 48% of the homes were built before 1970 when services were predominately made of clay tile pipe. The significance of clay tile pipe is that as it ages it can become more susceptible to I/I. Using wastewater flow data between 2014 through 2018 to determine base dry weather, and average daily flow, the Plan states that the City's average annual I/I is approximately 10%. The Plan did not provide an estimate of peak month I/I.

Comprehensive Sewer Plan Comments

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

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 requirements for 2040 comprehensive plans. Lexington lies within the oversight boundaries of the Rice Creek Watershed District. The City submitted a draft Local Water Management Plan (LWMP) update in January 2020. Council staff reviewed and commented on the draft LWMP to the City and Watershed in a letter dated February 18, 2020. The Plan incorporates the draft LWMP update in Appendix B.

Advisory Comments

When they are available, we request that the City provide to the Council the date the Watershed District approved the LWMP, and the date the City adopted the final LWMP. We also request that the City provide the Council with a copy of the final adopted LWMP that will be included in the final Plan document that the City adopts.

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 System Statement forecast for the City (pages 1.7, 3.2, 5.6, 6.3, and 9.2). For reference, Metropolitan Council forecasts are shown in Table 1 below.

Table 1. City of Lexington Forecasts

	Census 2010	Estimated 2019	2020	Council Forecasts	
				2030	2040
Population	2,049	2,356	2,100	2,270	2,430
Households	787	893	820	880	950
Employment	467	560	600	630	640

The Land Use Chapter includes a table quantifying land supply and expecting housing counts (page 3.16). Council staff find that that land supply identified in the Plan will accommodate the 2040 forecast.

Advisory Comments

Developers recently completed two new apartment buildings in Lexington (Ephesians and Landings at Lexington) that together add 225 apartment units (page 3.28 of supplemental information). The City will surpass the 2040 forecast when these are open and fully absorbed. Council staff advised the City to request an increased forecast. The City noted the advice, and is not requesting a forecast revision at this time. As such, no forecast revision is proposed at this time.

Thrive MSP 2040 and Land Use

Reviewer: Jake Reilly, CD – Local Planning Assistance (651-602-1822)

The 2040 comprehensive plan is consistent with *Thrive MSP 2040* (Thrive) and its land use policies. The Plan acknowledges the Thrive community designation of Suburban (Figure 2). Suburban communities are expected to plan for forecasted population and household growth at overall average densities of at least five units per acre, 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.

As shown in Figure 3, existing land uses in Lexington are predominately residential (77%), with most commercial uses (11%) near Lake Drive, the City’s main thoroughfare. Approximately 5% of the City is parks and open space and 5 percent is undeveloped land, which is defined in the Plan as parcels/properties with no existing structures and not designated as open space, park, or right-of-way.

The City’s pattern of development is typical of cities in Minnesota incorporated after the Second World War with a defined street grid and a central business district. Portions of the central business district are defined in the Plan as “Commercial Redevelopment Districts,” representing areas that are targeted for future redevelopment to address health and safety issues and meet the needs of the growing city and changing region.

As shown in Table 2 and illustrated in Figure 4, the City is planning 8.2 acres of land guided for Medium Density Residential and 13.7 acres of land guided for High Density Residential to be developed/redeveloped between now and the 2040 planning horizon for a overall average minimum density of 8.1 units per acre. The City also identifies that in the future, those areas could be developed as mixed use, as long as they meet or exceed the expected minimum densities.

Table 2. Planned Residential Density, City of Lexington

Category	2018-2040 Change				
	Density			Min Units Max Units	
	Min	Max	Net Acres	Min Units	Max Units
Medium Density Residential	5	10	8.2	41	82
High Density Residential	10	20	13.7	137	274
	TOTALS			178	356
	Overall Density			8,1	16.3

Housing

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

The Plan is consistent with the 2040 Housing Policy Plan (HPP). As of 2016, the City has more than 800 homes including 200 multifamily units and more than 500 single-family homes. Approximately 300 homes are rented. Nearly all of the housing units in Lexington are currently affordable to households earning less than 80% of Area Median Income (AMI); however, nearly 200 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. There are about 100 units affordable to households with income at or below 30% AMI and nearly 90 cost burdened households with incomes at or below 30% AMI.

The Plan identifies existing housing needs including maintenance and reinvestment in existing housing stock, variety of housing types for all stages of life, and development of additional owner-occupied single family housing opportunities. The City has 34 units of publicly subsidized housing.

The Plan acknowledges the 2021-2030 affordable housing need allocation of 14 units; 6 of which are needed at prices affordable to households earning 30% of AMI or less, 1 of which is needed at prices affordable to households earning between 31 and 50% of AMI, and 7 of which are needed at prices affordable to households earning between 51 and 80% of AMI. As shown in Figure 5, the Plan guides sufficient land expected to develop in the 2021-2030 time period consistent with the HPP policy of a minimum density of at least eight units per acre to allow for development of at least 137 new housing units.

The housing implementation plan component of the Plan describes that the City will largely rely on partnership with Anoka County Community Action Program and the Anoka County CDA to meet their housing needs. The Plan also indicates that the City will consider the preservation of manufactured housing and participation in the Livable Communities Act programs.

Water Supply

Reviewer: Lanya Ross, ES – Water Supply Planning (651-602-1803)

The Plan is consistent with the 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 has prepared a Local Water Supply Plan (LWSP) that was submitted to both the Minnesota Department of Natural Resources (DNR) and the Metropolitan Council and reviewed under separate cover in a letter dated April 4, 2019. If changes are made to the City of Lexington Water Supply Plan resulting from DNR’s review, the City will need to provide the Metropolitan Council and the DNR with the updated information.

Community and Subsurface Sewage Treatment Systems (SSTS)

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

The Plan is consistent with the policies of the WRPP for community and subsurface sewage treatment systems. The Plan states that there are no public or privately-owned wastewater treatment systems or individual SSTS within the community. All properties within the City are connected to the local sanitary sewer system.

Special Resource Protection

Solar Access Protection

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

The Plan is complete and 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).

Aggregate Resource Protection

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

The Plan is silent on the presence of aggregate resources in the City. However, the Council's aggregate resources inventory information contained in *Minnesota Geological Survey Information Circular 46* indicates there are no known viable aggregate resource deposits available for extraction within the fully developed City.

Historic Preservation

Reviewer: Jake Reilly, CD – Local Planning Assistance (651-602-1822)

The Plan addresses historic and cultural resources as required by the Metropolitan Land Planning Act. The Plan accurately notes that there are no nationally, state, or locally designated properties in the City and states that if such designations were to become desired or needed in the future, the City would consider a policy to address that need.

Plan Implementation

Reviewer: Jake Reilly, CD – Local Planning Assistance (651-602-1822)

The Plan includes a description of and schedule for any necessary changes to the capital improvement program, the zoning code, the subdivision 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 Chapter 10 of the Plan.

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:

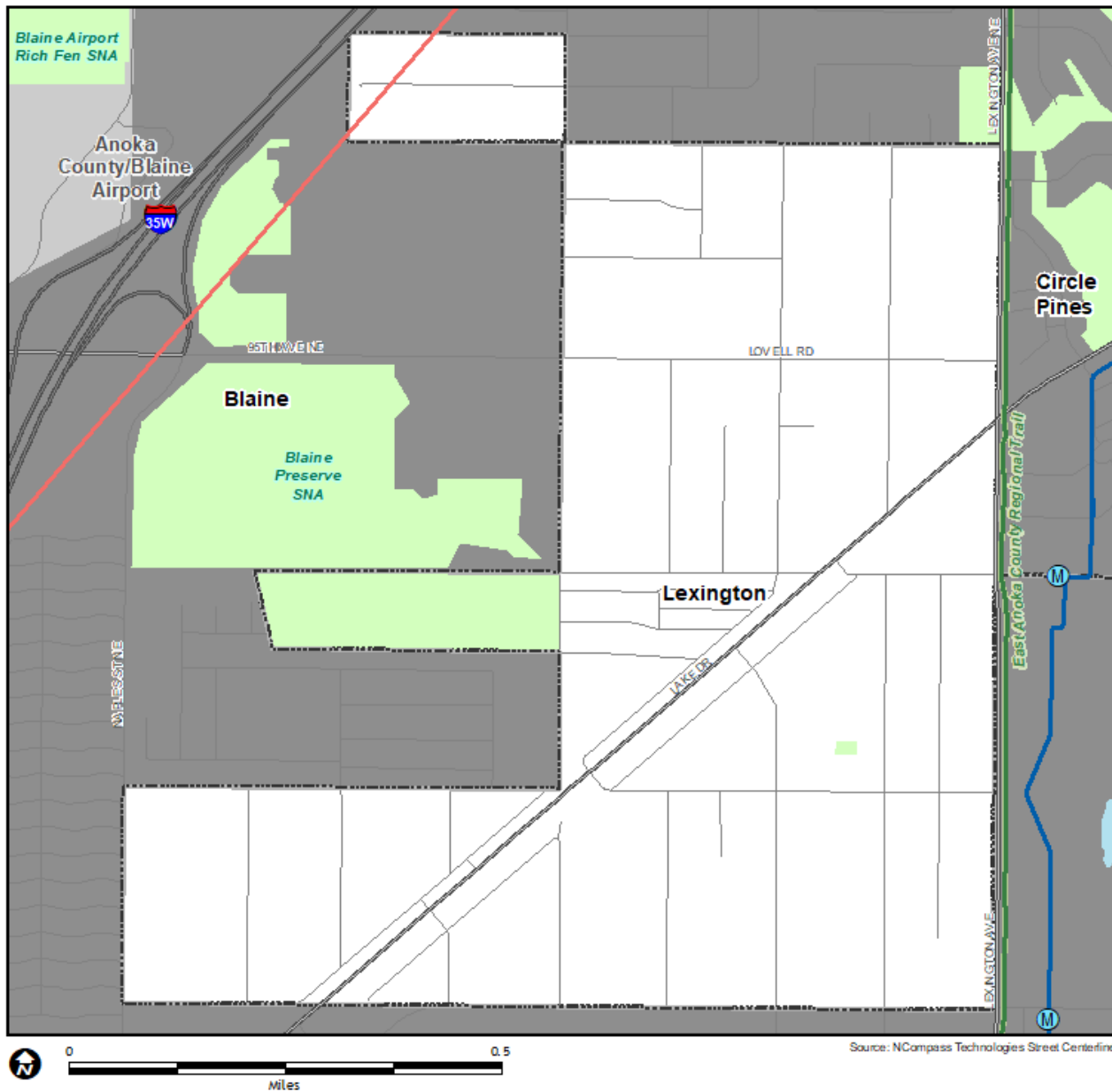
- January 28, 2020: Lexington 2040 Comprehensive Plan Update
- March 30, 2020: Revised Lexington 2040 Comprehensive Plan
- April 14, 2021: Revisions to water resources plan
- May 6, 2021: Revisions to the housing plan
- May 14, 2021: Revisions to the water management plan

- May 17, 2021: Revisions to the water resources plan
- June 9, 2021: Revised Lexington 2040 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 Planned Land Use
- Figure 5: 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

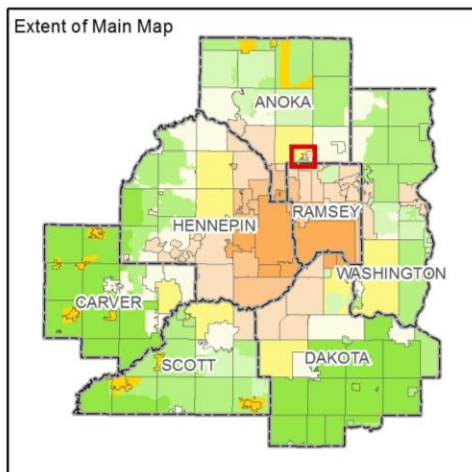
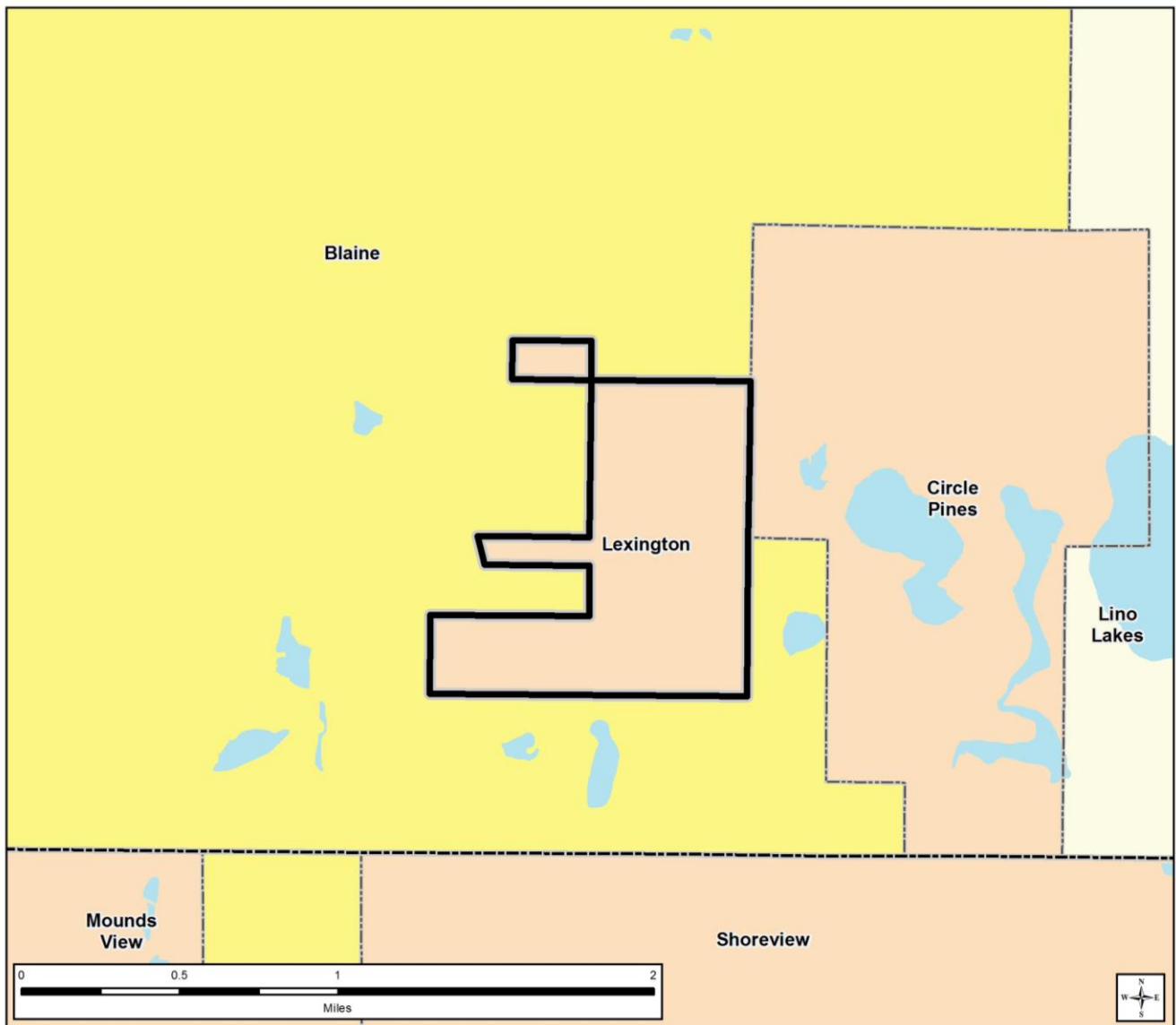
Regional Park Search Areas and Regional Trail Search Corridors

- 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

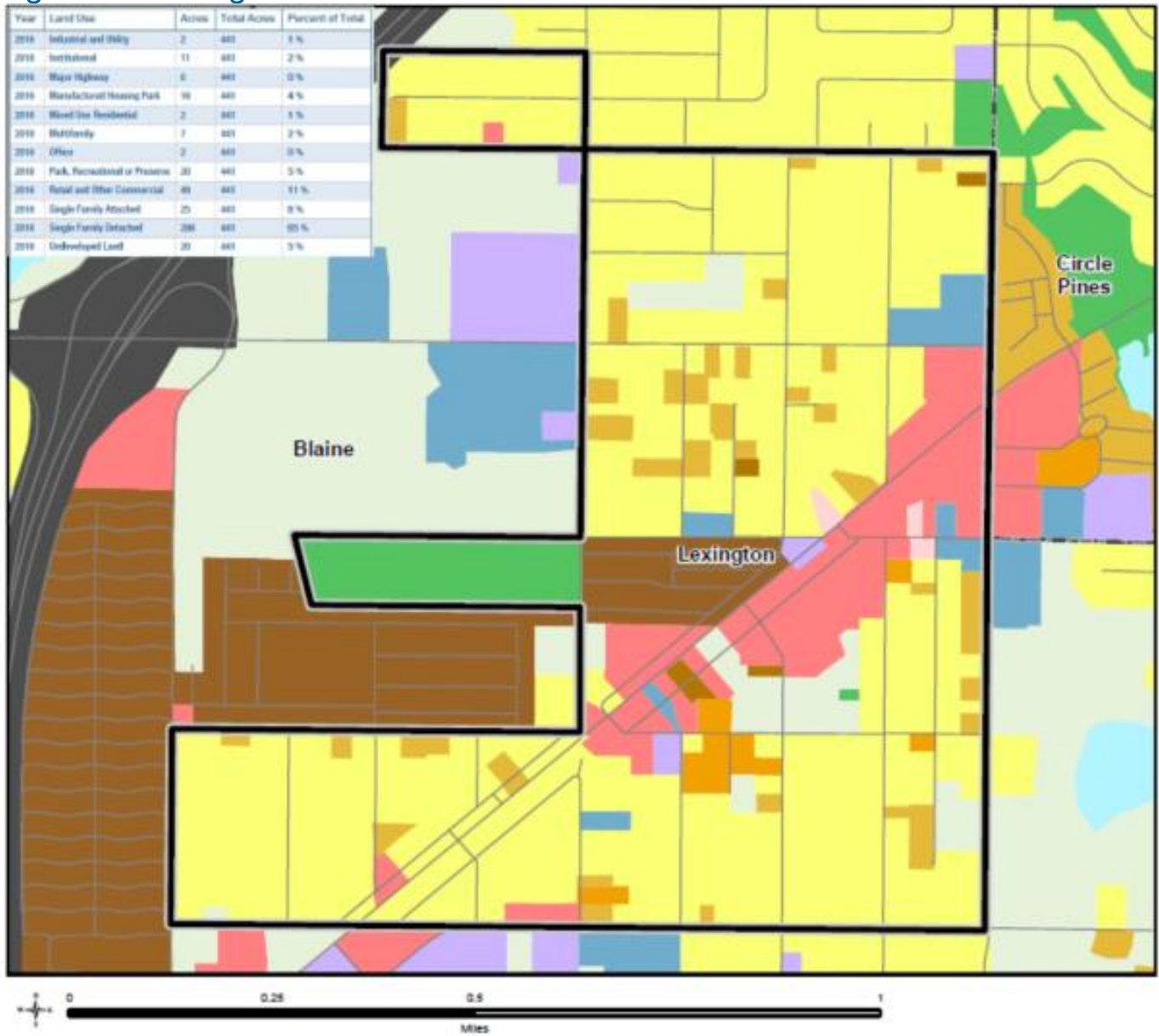


Community Designations

- 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. Existing Land Use



2016 Generalized Land Use



Figure 4. 2040 Planned Land Use



2040 FUTURE LAND USE MAP

- Low Density Residential (LDR) 3-5 Units Per Acre
- Medium Density Residential (MDR) 5-10 Units Per Acres
- High Density Residential (HDR) 10 - 20 Units Per Acre
- Commercial Business District (CBD)
- Commercial Redevelopment District (CRD)
- Parks and Open Space
- Right-of-Way
- 2021 - 2030 Residential Redevelopment Areas
- 2031 - 2040 Residential Redevelopment Areas
- Lexington City Limits

CITY OF LEXINGTON
 ANOKA COUNTY, MINNESOTA

DATA SOURCES:
 BASE DATA PROVIDED BY
 METROPOLITAN COUNCIL



Print Date: 1/16/17 11:42:00

Figure 5. Land Guided for Affordable Housing

2021-2030 share of regional need for Affordable Housing: **14 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	13.7		10		100%		137
Total	14						137

Sufficient/*(insufficient)* units possible against share of regional need: **123**

Affordable units built since 2021: **0**

Sufficient/*(insufficient)* units possible adjusted for affordable units built: **123**

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

