Community Development Committee
Meeting date: November 1, 2021

Environment Committee
Meeting date: November 9, 2021

For the Metropolitan Council meeting of November 10, 2021

Subject: City of Robbinsdale 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22039-1

District(s), Member(s): District 7, Robert Lilligren

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

Staff Prepared/Presented: Michael Larson, Planning Analyst (651-602-1407)
Angela R. Torres, Local Planning Assistance Manager (651-602-1566)
Kyle Colvin, Wastewater Planning and Community Programs Manager (651-602-1151)

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

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

Recommendations of the Community Development Committee
1. Authorize the City of Robbinsdale to place its 2040 Comprehensive Plan into effect.
2. Revise the City’s forecasts upward as shown in Table 1 of the attached Review Record.
3. Revise the City’s affordable housing need allocation for 2021-2030 to 101 units.

Recommendation of the Environment Committee
1. Approve the Robbinsdale’s Comprehensive Sewer Plan.
2. Advise the City to:
   a. Incorporate Chapter VII of the City Code for Public Utilities as part of the final locally adopted version of the Comprehensive Plan.
Advisory Comments
The following Advisory Comments are part of the Council action authorizing the City of Robbinsdale 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. § 473.864, subd. 1)
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 Robbinsdale is located in the eastern part of Hennepin County. It is surrounded by the communities of Brooklyn Center, Minneapolis, Golden Valley, and Crystal.

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.

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

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

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

**Conformance with Regional Systems**

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

**Regional Parks and Trails**

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

The Plan conforms to the 2040 Regional Parks Policy Plan (RPPP). The Minneapolis Park and Recreation Board (MPRB) and Three Rivers Park District (TRPD) are the Park Implementing Agencies for different Regional Parks System components in Robbinsdale, for which the Plan accurately describes the Regional Parks System components. Regional Trails located within the City include Victory Memorial Parkway (MPRB), Twin Lakes (TRPD), and Crystal Lake (TRPD) regional trails (Figure 1). 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). It accurately reflects transportation system components of the TPP and is 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 highway system element of the TPP. The Plan accurately reflects Trunk Highway 100 as a principal arterial, which is the sole metropolitan highway within the City’s boundaries. 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 community’s roadways, including existing and future functional class, right-of-way preservation needs, and existing and forecasted traffic volumes for principal and A-minor arterials. Forecasting was done consistent with regional methodology. The Plan also includes guidelines on how access will be managed for principal and A-minor arterials.

The Plan identifies several transportation corridor studies that include recommendations regarding transit improvements.

**Transit**

The Plan shows the location of existing transit routes and facilities within the city limits and acknowledges the City is within Transit Market Areas II and III.

The Plan incorporates existing transit routes and future transitways from the TPP. This includes the Blue Line Extension transitway. In August 2020, after
years of unsuccessful discussions regarding co-location of light rail transit and freight rail along the BNSF corridor, Hennepin County and the Metropolitan Council began to explore alternative alignments for the METRO Blue Line. The Plan identifies the status of the Blue Line Extension project, which is consistent with Council policies and the TPP. Furthermore, the Plan discusses the other transit elements in the City, and those are consistent with the TPP.

**Aviation**
The Plan conforms to the Aviation system element of the TPP. North Memorial Hospital Heliport is the only aviation facility in the City; and the City and hospital continue to work together to mitigate noise and keep helicopters on approach paths. There is no airport in Robbinsdale but the Crystal Airport is located within three miles. The Plan includes policies that protect regional airspace from obstructions due to the proximity of Crystal Airport.

**Bicycling and Walking**
The Plan is consistent with the Bicycling and Pedestrian chapter of the TPP. The Plan identifies existing and planned regional trails as well as planned alignments and corridors of the Regional Bicycle Transportation Network (RBTN) within and proximate to the City. The Plan also identifies existing and planned local connections to these facilities.

**Freight**
The Plan is consistent with Freight policies of the TPP. The Plan identifies railroads and the needs of freight movement in and through the City which occurs primarily on TH 100 and the BNSF rail line. Primary issues to improve freight movement includes building roadways to freight standards and decreasing signals along freight routes.

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

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

**Water Resources**

**Wastewater Service**
*Reviewer: Kyle Colvin, Environmental Services (ES) – Wastewater Planning and Community 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 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 1-MN-315, 1-MN-316, and 1-GV-490 to the Metropolitan Council’s Metropolitan Treatment Plant in St. Paul for treatment. The Plan projects that the city will have 7,200 sewered households and 7,400 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 does not provide sanitary flow projections for the 20-year planning horizon. It states that through property connection reductions related to highway improvements and per capita water use reduction, the existing system has adequate capacity to provide service through 2040. 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 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 provides a description of projects including individual spot repairs and public infrastructure replacement projects, maintenance hole structure rehabilitation and private drain tile improvements, and a sump pump inspection program. The Plan also describes a program of private service replacement as part of the City’s street reconstruction program. Services that are found to be defective between the connection to the main pipe and the property line are replaced with the street improvements. The Plan states that an average of $580,000 per year will be spent between 2001-2030 on infrastructure replacement and rehabilitation. The City’s Capital Improvement Plan was included in the Plan and reflects this level of investment.

The Plan included a copy of City Code Chapter VII, Public Utilities which describes the requirements for utilizing the wastewater collection system for service and standards for minimizing I/I. The Plan describes the requirements and standards for minimizing I/I and references Section 700.43 which prohibits the connections of roof downspouts, foundation drains, sump pumps, yard drains or pond overflows to the public sanitary sewer. The Code also requires the disconnection of these prohibited connections unless otherwise approved by the City Engineer and the Minnesota Pollution Control Agency.

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 86% of the homes within the city 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. The Plan states that 38% of the homes built prior to 1970 have been inspected for illicit clear water connections but does not state whether any residential services have been evaluated for I/I susceptibility. Using wastewater flow data between 2011 through 2019 to determine base dry weather, average daily, and peak monthly flow, the Plan states that the City’s annual I/I averages between 4% and 21%, and annual peak month I/I can be as high as 37% (2014).

**Sewer Plan 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 submitted Chapter VII of the City Code for Public Utilities to the Council after its initial Plan completeness determination. This Chapter must be included as part of the final locally adopted version of the Comprehensive Plan that is submitted to the Council.

**Surface Water Management**

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

Robbinsdale is located within the oversight boundaries of the Shingle Creek and Bassett Creek Watershed Management Commissions (WMCs). Robbinsdale submitted a draft Local Water
Management Plan (LWMP) to the Metropolitan Council (Council) in November 2018. Council Water Resources staff reviewed and commented on the draft LWMP to the City and Watershed Management Commissions in a letter dated December 24, 2018. The LWMP was conditionally approved by the Shingle Creek WMC on December 13, 2018 and approved by the Bassett Creek WMC on February 21, 2019.

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 a revised forecast (Plan tables 1 and 3) and discusses demand and conditions for higher-density, transit-oriented residential redevelopment. City and Council staff agreed on the population and employment numbers earlier in the City’s planning process. Since then, employment has fallen short of expectation, due to the 2020 recession. Council staff will honor that agreement for the revision. The revised forecast are shown in Table 1 below with changes underlined:

<table>
<thead>
<tr>
<th>Table 1. City of Robbinsdale Forecasts</th>
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<tbody>
<tr>
<td></td>
</tr>
<tr>
<td>Population:</td>
</tr>
<tr>
<td>2020: 14,646 2020: 14,750 2030: 15,100 2040: 15,300</td>
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<tr>
<td>2020: 15,100 2030: 15,900 2040: 16,400</td>
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<tr>
<td>Households:</td>
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<tr>
<td>2020: 6,289 2020: 6,300 2030: 6,600 2040: 6,800</td>
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<tr>
<td>2020: 6,500 2030: 6,900 2040: 7,200</td>
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<tr>
<td>Employment:</td>
</tr>
<tr>
<td>2020: 6,402 2020: 7,000 2030: 7,100 2040: 7,200</td>
</tr>
<tr>
<td>2020: 7,400 2030: 7,400 2040: 7,400</td>
</tr>
</tbody>
</table>

With this forecast revision, the 2021-2030 Affordable Housing Need for the City increases. The Plan acknowledges (Plan table 13) the revised 2021-2030 affordable housing need allocation of 101 units, 50 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 50 of which are needed at prices affordable to households earning between 51 and 80% of AMI.

The forecast revision and adjusted Affordable Housing Need allocations and will be approved simultaneous with Council action on the Plan.

In addition to candidate locations for redevelopment (see Land Use Review below), the Plan discusses in more detail active and potential redevelopment scenarios and infill sites that could result in a combined total of 1,332 to 1,837 housing units if fully realized. This is sufficient land supply to accommodate the growth forecast.

Thrive MSP 2040 and Land Use
Reviewer: Michael Larson, CD – Local Planning Assistance (651-602-1407)
The Plan is consistent with Thrive MSP 2040 (Thrive) 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. They 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 2040 Transportation Policy Plan. 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 City is a fully developed community of approximately three square miles with only 1% undeveloped land. Approximately 55% of the City is residential as illustrated in Figure 3. Another 11% of the community is comprised of public land in the form of park and recreational uses. Commercial uses represent 4% of the land while only 1% of the City is industrial. The City has a traditional main street downtown along West Broadway Avenue where there is a mix of commercial uses and higher density residential uses. This area will be served by the planned extension of the METRO Blue Line.

The Plan identifies candidate development and redevelopment areas at densities that exceed the Urban Center density policy minimums. This minimum planned density is consistent with regional Urban Center land use policies that require an average net residential density of at least 20 units per acre in areas of new development and redevelopment. As shown in Table 2 below, the expected overall density of planned residential growth is a minimum of 35.1 units per acre. The Plan identifies areas with redevelopment potential, primarily along a linear corridor in the downtown area along West Broadway Avenue and Bottineau Boulevard. Because of the small size of the City, most of the focus for redevelopment is proximate to its future METRO Blue Line Station.

Table 2. Planned Residential Density, City of Robbinsdale

<table>
<thead>
<tr>
<th>Category</th>
<th>Density</th>
<th>Net Acres</th>
<th>Min Units</th>
<th>Max Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medium Density Residential</td>
<td>8</td>
<td>12</td>
<td>4.0</td>
<td>32</td>
</tr>
<tr>
<td>High Density Residential</td>
<td>25</td>
<td>76</td>
<td>1.9</td>
<td>47</td>
</tr>
<tr>
<td>Commercial (50% residential)</td>
<td>50</td>
<td>76</td>
<td>2.0</td>
<td>98</td>
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<tr>
<td>Mixed Use Residential (75% residential)</td>
<td>50</td>
<td>76</td>
<td>4.4</td>
<td>218</td>
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<tr>
<td>Mixed Use Commercial (25% residential)</td>
<td>50</td>
<td>76</td>
<td>2.1</td>
<td>107</td>
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<tr>
<td><strong>TOTALS</strong></td>
<td><strong>14.3</strong></td>
<td><strong>502</strong></td>
<td><strong>826</strong></td>
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<tr>
<td>Overall Density</td>
<td>35.1</td>
<td>57.8</td>
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</table>

Station Area Planning

The Plan recognizes planned transitways that are part of the Current Revenue Scenario of the TPP. For the City of Robbinsdale, this is the planned extension of the METRO Blue Line with its station in Downtown Robbinsdale. The Plan recognizes and conforms to minimum densities established in the TPP for station areas (within 1/2-mile radius). As an Urban Center community, the City is expected to plan for an average minimum density of 50 units per acre in this area. The Plan is also consistent with policies in the TPP for incorporating station area planning and targeting the most intense mix of uses near transit. As with other communities along the METRO Blue Line Extension, the City participated in developing the Robbinsdale Light Rail Station Area Plan, which was completed in July 2016. This document is incorporated as Appendix A and summarized in the body of the Plan.

In August 2020, after years of discussions regarding co-location of light rail transit and freight rail along the BNSF corridor, Hennepin County and the Metropolitan Council began to explore alternative alignments for the METRO Blue Line. The alternative alignment for Robbinsdale is within and along County Road 81 (Bottineau Boulevard), approximately 1/4 mile to the east. The goal of the project partners is to identify a single community supported route option by the end of 2021 including new station locations. At that time, revised environmental review and engineering work would begin. Two station location alternatives for Downtown Robbinsdale are currently being explored: a split station on either side of 41st Avenue and a center-platform station just south of 40th Avenue. Despite this potential shift, most of the areas that the Plan identifies for redevelopment and intensification would remain within 1/2 mile of either station location alternative.
**Housing**
*Reviewer: Hilary Lovelace, CD – Housing (651-602-1555)*

The Plan is consistent with the 2040 Housing Policy Plan (HPP). As of 2016, the City has more than 6,500 homes including more than 1,600 multifamily units and 4,800 single-family homes. Approximately 2,200 homes are rented. More than 5,900 housing units are currently affordable to households earning under 80% of Area Median Income (AMI); however, nearly 1,600 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. There are about 740 units affordable to households with income at or below 30% AMI and 590 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 including market rate rentals, mixed income housing developments, and owner-occupied townhomes. The City has at least 450 publicly subsidized housing units, many of which are age-restricted for seniors and designed for people with disabilities.

The Plan acknowledges the 2021-2030 affordable housing need allocation of 101 units; 50 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 50 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 at a minimum of eight units per acre to allow for development of at least 239 new housing units.

The housing implementation plan component of the Plan describes that the City will continue to use many tools they already employ regularly, including TIF, housing bonds, site assembly, and strong partnerships with affordable housing developers. The Plan also indicates that the City will continue their partnership referring homeowners to Hennepin County for maintenance and rehabilitation funds. The City states that they will consider tax abatement in the future pending changes to their tax base and continue their practice of effective referrals.

**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.

Because the City has a municipal public water supply system, the Local Water Supply Plan (LWSP) must be – and is – included as part of the 2040 Plan. The City prepared a LWSP that was submitted to both the MN Department of Natural Resources (DNR) and the Council and reviewed under separate cover. The initial LWSP was considered complete by the Council for Council water supply requirements, and a review letter was sent to the DNR on January 14, 2019. The DNR approved the LWSP in a letter to the City on March 30, 2020 and requested adoption of a Critical Water Deficiency Ordinance. The City responded with a copy of the Critical Deficiency Ordinance and a Certificate of Adoption dated April 7, 2020 in an email to DNR on April 15, 2020.

**Community and Subsurface Sewage Treatment Systems (SSTS)**
*Reviewer: Kyle Colvin, ES - Wastewater Planning and Community Programs, (651-602-1151)*

The Plan indicates that there are three SSTS remaining in operation in the city. The Plan infers that the connection of these properties to the public wastewater system will be difficult and does not reflect the phase-out of any of these SSTS by 2040. There are no public or privately-owned Community Wastewater Treatment Systems in operation in the City. In 1998, the City delegated by resolution all authority for the construction of new and maintenance management of existing SSTS to Hennepin County.
Special Resource Protection

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

Aggregate Resource Protection  
Reviewer: Cameran Bailey, CD – Local Planning Assistance (651-602-1212)  
The Plan indicates, consistent with the Council’s aggregate resources inventory information contained in *Minnesota Geological Survey Information Circular 46*, that there are no viable aggregate resource deposits available for extraction within the fully developed City.

Historic Preservation  
Reviewer: Michael Larson, CD – Local Planning Assistance (651-602-1407)  
The Plan addresses historic and cultural resources as required by the Metropolitan Land Planning Act. The Plan includes an Historical Overview section describing the history and development of the City, including how that is reflected in the lot and block patterns as well as home architectural characteristics. The Plan also includes an Historic Preservation and an Historic Buildings section. The City includes one building on the National Register of Historic Places (old library building) and lists an inventory of historic buildings and open space areas that are protected by the City.

Plan Implementation  
Reviewer: Michael Larson, CD – Local Planning Assistance (651-602-1407)  
The Plan includes an Implementation Chapter that articulates tools and strategies including zoning and other official controls, transit oriented development, and affordable housing tools. The chapter references the role of the capital improvement plan (CIP), which is included as Appendix D. More detailed implementation content is incorporated in the Public Facilities Chapter as well as appendices that incorporate the Water Supply Plan and Local Surface Water Management 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:

- August 10, 2018: Robbinsdale 2040 Preliminary Plan
- December 27, 2018: Robbinsdale 2040 Comprehensive Plan
- February 20, 2020: Revised Robbinsdale 2040 Comprehensive Plan
- November 20, 2020: Supplemental information regarding Appendix F and Intercommunity Agreements
- August 4, 2021: Revised Robbinsdale 2040 Comprehensive Plan
- August 6, 2021: Supplemental information regarding authorizing resolution
- August 27, 2021: Revised Robbinsdale 2040 Comprehensive Plan
- September 21, 2021: Revisions to sanitary sewer plan element
Attachments
Figure 1: Location Map with Regional Systems
Figure 2: *Thrive MSP 2040* Community Designation
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
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

<table>
<thead>
<tr>
<th>Available Acres</th>
<th>Minimum Density (units per acre)</th>
<th>Expected % Residential (if mixed use)</th>
<th>Minimum Units Possible</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medium Density Residential</td>
<td>4.00</td>
<td>8</td>
<td>100%</td>
</tr>
<tr>
<td>High Density Residential</td>
<td>1.27</td>
<td>25</td>
<td>100%</td>
</tr>
<tr>
<td>Mixed Use Residential</td>
<td>4.66</td>
<td>50</td>
<td>75%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>10</strong></td>
<td></td>
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</table>

Sufficient/(insufficient) units possible against share of regional need: **138**

Affordable units built since 2021: **0**

Sufficient/(insufficient) units possible adjusted for affordable units built: **138**

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