Business Item

Community Development Committee



Committee Meeting Date: August 1, 2022 For the Metropolitan Council: August 24, 2022

Environment Committee Date: August 9, 2022

Business Item: 2022-218 JT

City of Maple Plain 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22407-1

District(s), Member(s): District 1, Judy Johnson

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

473.513

Staff Prepared/Presented: Freya Thamman, Planning Analyst (651-602-1750)

Angela R. Torres, Local Planning Assistance Senior Manager

(651-602-1566)

Kyle Colvin, Wastewater Planning and Community Programs Manager,

(651-602-1151)

Division/Department: Community Development / Regional Planning

Environmental Services / Technical Services

Proposed Action

That the Metropolitan Council adopt the attached Review Record and Advisory Comments and take the following actions:

Recommendations of the Community Development Committee

- 1. Authorize the City of Maple Plain to place its 2040 Comprehensive Plan into effect.
- 2. Revise the City's population forecasts to round to the nearest hundred, as shown in Table 2 of the attached Review Record.
- 3. Advise to the City to send the Local Water Management Plan (LWMP) to the Pioneer Sarah Creek Watershed Management Commission for review and approval. When approved, send the Council the watershed's approval date and the date the City adopts the final Local Water Management Plan.
- 4. Advise the City:
 - a. To incorporate supplemental information on employment-bearing land use intensity received on May 24, 2022 into the Final Plan prior to final adoption.
 - b. To implement the advisory comments in the Review Record for regional parks and trails, surface water management, and forecasts.

Recommendation of the Environment Committee

- 1. Approve the City of Maple Plain's Comprehensive Sewer Plan.
- 2. Advise the City that the Final Plan submitted to the Council must include a copy of the City's ordinance related to the prohibition of sump pump connections to the sanitary sewer system.

Advisory Comments

The following Advisory Comments are part of the Council action authorizing the City of Maple Plain 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 plan 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 Maple Plain is in western Hennepin County. It is surrounded by Medina to the east, and Independence to the south, west, and north (Figure 2).

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	Thrive MSP 2040 and Land Use	Consistent
Consistency with Council Policy	Forecasts	Consistent
Consistency with Council Policy	2040 Housing Policy Plan	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 of Maple Plain a Planning Assistance Grant of \$32,000 to complete its 2040 comprehensive plan. The first half of this grant was paid to initiate the local planning process. The second half of the grant will be paid after Council authorization of the City's Plan, local adoption, and the City's submittal of final reporting requirements.

Known Support / Opposition

There is no known opposition.

REVIEW RECORD

City of Maple Plain 2040 Comprehensive Plan

Review File No. 22407-1, Business Item No. 2022-218 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. Three Rivers Park District is the Park implementing agency for Regional Parks System components in Maple Plain. The Plan accurately describes the Regional Parks System components in the City, which includes the planned Baker-Carver Regional Trail (formerly known as the Minnetrista Extension Regional Trail Search Corridor) (Figure 1). There are no state or federal recreation lands in the City.

Advisory Comments

The "Regional Partners and Connections" section on page 4-1 and "Figure 4-1: Regional Parks and Trails near Maple Plain" on page 4-2 both reference the "Luce Line Regional Trail." Although a portion of the Luce Line corridor is considered a regional trail (between Plymouth and Minneapolis), the majority of the corridor (including the portion south of Maple Plain) is the Luce Line State Trail. Council staff recommend modifying the Luce Line references in the Final Plan submittal to "Luce Line State Trail".

Regional Transportation, Transit, and Aviation

Reviewer: Bethany Brandt-Sargent, Metropolitan Transportation Services (651-602-1725) The Plan conforms to the 2040 Transportation Policy Plan (TPP) adopted in 2015. 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 U.S. Highway 12 as the only principal arterial within the City's boundaries. The Plan also 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.

Transit

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

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

Aviation

The Plan conforms to Aviation system element of the TPP. The City does not contain an airport. 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 City and County pathways as well as existing and planned regional trails. There are no Tier 1 or 2 corridors/alignments in the City.

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 community, which is primarily on US 12 and the BNSF rail line. Maple Plain has one main freight corridor as well as one railway. There are currently no issues to improve freight movement.

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.

The City's planned land uses and areas identified for development and redevelopment can accommodate the TAZ forecasted allocations in the Plan, and at densities consistent with the community's Thrive designation and applicable TPP policies.

Water Resources

Wastewater Services

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). The Plan represents the City's guide for future growth and development through the year 2040. It includes growth forecasts that are consistent with the Council's assigned forecasts for population, households, and employment.

Current wastewater treatment services are provided to the City by the Metropolitan Council Environmental Services (MCES). Wastewater generated within the City is conveyed by Council Interceptor 8352. All wastewater generated within the City is conveyed to, and treated at, the Blue Lake Treatment Plant in Shakopee. The Plan projects that the City will have 1,000 sewered households and 2,300 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 average day 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 sewered forecasts as stated in the sewer element of the Plan.

The Land Use Plan reflects an overall minimum residential sewered density that is consistent with Council policy for future sewered residential growth for Suburban 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 portions of the sanitary sewer system. The Plan provides a description of activities including system inspection, evaluation, and rehabilitation, in both the public and private collection systems, including considering new ordinances focusing on I/I reduction, and coordinating I/I work efforts during street reconstruction projects. The Plan also states that a total of \$1.4 million was spent on I/I related work between 2012 and 2018 on repair of private sanitary sewer laterals and replacement or lining of existing public sewer lines. Several residents

participated in the Council's private property grant program in 2008. The Plan also states that the City's Capital Improvement Plan reflects approximately \$1.4 million of additional I/I related improvements through 2030.

The Plan includes a single page of its ordinance (Section 52.06) that cites the prohibition of discharges, either directly or indirectly, of any storm water or ground water into the city sewer system from sump pumps, rooftop downspouts, foundation drains, or air conditioning condensate drains. However, it does not include a citation within the attached page that states a requirement for the disconnection of such non-compliant discharges if discovered.

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 both collection systems. The Plan indicates that approximately 63% 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 all pre-1970 home service laterals have been inspected for I/I susceptibility. Using wastewater flow data between 2017 through 2021 to determine base dry weather, average daily, and peak daily flow, the Plan states that the City's annual I/I average is 20.3% and 81% I/I for a day peak which occurred on May 14, 2019.

Comprehensive Sewer Plan

The Sewer Element of the Plan has been reviewed against the requirements for Comprehensive Sewer Plans for Suburban communities. It was found to be sufficiently complete and consistent with Council polices. 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 Comments

The Plan references an Appendix G that is supposed to include a copy of the City's ordinance related to the prohibition of sump pump connections to the sanitary sewer system. The Plan did not include the referenced Appendix G containing the cited ordinance. The Final Plan submitted to the Council shall include the referenced ordinance. The City did submit information related to the City's restriction of these types of connections which allowed the Council to determine the Plan complete for this item.

Surface Water Management

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

The Plan is consistent with Council policy requirements and in conformance with the WRPP for local surface water management. The Plan satisfies the surface water management requirements for 2040 comprehensive plans.

Maple Plain lies within the oversight boundaries of the Pioneer Sarah Creek Watershed Management Commission and the Minnehaha Creek Watershed District. The City submitted a draft Local Water Management Plan (LWMP) update in February of 2020. Council Water Resources staff reviewed and commented on the draft LWMP to the City and Watershed Management Organizations in March of 2020. The LWMP was approved by the Minnehaha Creek Watershed District on July 9, 2020. The Pioneer Sarah Creek Watershed Management Commission has not reviewed or approved the LWMP. The Plan includes the LWMP in its appendix. Therefore, the Plan was found to be consistent with Council policy requirements and in conformance with the Council's 2040 WRPP for local surface water management.

Advisory Comments

The City needs to immediately send their LWMP to the Pioneer Sarah Creek Watershed Management Commission for review and approval. When approved, please send the Council the watershed's approval date and the date the City adopts the final LWMP.

Additionally, the Council recommends the Plan's table of contents indicate that the LWMP is in

the Appendix.

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 forecast tables in several chapters (Plan tables 1.1, 1.2, 1.5, 3.1, 6.1 and 6.2). In a revised Chapter 6 (received May 17, 2022), the City proposes the population forecast for each year be rounded to the nearest hundred (per Table 6.2). Council staff will revise the population forecast as shown below in Table 1.

Table 1. City of Maple Plain Forecasts (with City-requested rounding of population)

	Census	Census	Council Forecasts			
	2010	2020	2020	2030	2040	
Population	1,768	1,743	1,900	2,100	2,300	
Households	723	734	790	890	1,000	
Employment	1,579	1,949	2,000	2,200	2,300	

The Council requires a 2020-2040 sewer-serviced forecast. Chapter 6 includes this as Table 6.2 (supplemental information, May 17, 2022). All of Maple Plain is sewer-serviced throughout the planning period.

Chapter 2 includes a discussion of land supply and future development. Table 2.3 documents a future land supply, which accommodates the growth forecast.

Advisory Comments

Supplemental information on employment-bearing land use intensity (Mark Kaltsas email, May 24, 2022) must be incorporated into the Final Plan submitted to the Council.

The Council requires forecasts be consistently presented in all chapters of the Plan. In the City's Final Plan, the City will need to include the revised the forecasts in Tables 1.1, 3.1, and 6.1 to match the recently requested population revision: rounding population numbers to the nearest hundreds, as shown in the Plan's Table 6.2.

Thrive MSP 2040 and Land Use

Reviewer: Freya Thamman, CD – Local Planning Assistance (651-602-1750)

The Plan is consistent with *Thrive MSP 2040* 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 5 units per acre. Plans are also required to identify areas for redevelopment, particularly areas that are well-served by transportation options.

The existing residential land uses in Maple Plain include low density residential (28.9%) with smaller areas of multi-family (2%), medium density (0.1%), and mixed uses (0.2%). The City's has industrial, (15.2%), commercial (3%), and institutional (4%) areas, most of which are near Highway 12. Park/Open Space (4.3%) is located both to the north and south of Highway 12. Vacant buildable areas (4.4%) in the City are limited, with large areas of wetland (17.2%) and road and rail right-of-way (18.8%).

Given the limited vacant buildable land in the City, the Plan focuses on opportunities for redevelopment. The Plan identifies three areas that are targeted for redevelopment: Downtown, the Gateway, and Budd Avenue/Highway 12. These areas are generally along the Highway 12 corridor and are guided as Downtown Mixed Use and General Mixed Use. With the 2040 Plan, the City has increased the minimum allowed density in these areas, with the General Mixed Use land use category having a density of 5-20 units per acre and the

Downtown Mixed Use with a range of 20-40 units per acre.

The Plan is consistent with Thrive for land use and residential density policies for a Suburban community. Thrive calls for Suburban communities to plan for forecasted population and household growth at overall average densities of at least 5 units per the acre. The Plan allows for a minimum overall residential density of 8.0 unites/acre, as shown in Table 2 below.

Table 2. Planned Residential Density, City of Maple Plain

2020-2040 Change

	Density				
Category	Min	Max	Net Acres	Min Units	Max Units
Low Density Residential	1	4	3.6	4	14
General Mixed Use*	5	20	25.5	127	509
Downtown Mixed Use*^	20	40	8.3	167	334
	TOTALS		37.4	297	856
	Overall Density			8.0	22.9

^{*50%} residential. **35% residential; Table based on Table 2-3 of the Plan.

The table shows the acres anticipated as residential. The General Mixed Use district will allow for a wide mix of uses with a minimum of 50% residential anticipated. The Downtown Mixed Use district will allow a wide mix of uses which can integrate residential units vertically above the main level uses with a minimum of 35% residential anticipated.

Housing

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

The Plan is consistent with the *Housing Policy Plan* (HPP). As of 2016, the City has almost 800 homes, including nearly 300 multifamily units and more than 500 single-family homes. Approximately 300 homes are rented. More than 646 housing units are affordable to households earning under 80% of Area Median Income (AMI); slightly over 100 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. Maple Plain has almost 40 units of publicly subsidized housing, all of which are age-restricted for older adults.

The Plan acknowledges the 2021-2030 affordable housing need allocation of 28 units; 15 of which are needed at prices affordable to households earning 30% of AMI or less; 4 of which are needed at prices affordable to households earning between 31 and 50% of AMI; and 9 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 99 new housing units.

The housing implementation plan component of the Plan states that Maple Plain will consider Tax Increment Financing (TIF), density bonuses, and an ongoing partnership with Hennepin County for affordable housing development. The Plan also indicates that the City will consider additional programming to rehabilitate existing homes. The City is in the process of developing a Fair Housing Policy as a tool to address housing needs within the community.

Water Supply

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

The Plan is consistent with WRPP policies related to water supply, including the policy on sustainable water supplies, the policy on assessing and protecting regional water resources, and the policy on water conservation and reuse.

Maple Plain prepared a Local Water Supply Plan (LWSP) that was submitted to both the Minnesota Department of Natural Resources (DNR) and Council and reviewed under separate cover. The LWSP was considered complete by the Council, and a review letter was sent to the DNR on February 25, 2019. The DNR approved the LWSP on July 22, 2019.

Community and Subsurface Sewage Treatment Systems (SSTS)

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

The Plan indicates that there are no individual SSTS and no identified public or privately-owned Community Wastewater Treatment Systems in operation in the city. The Plan states that the City has delegated all authority to Hennepin County for the administration of its SSTS program in the event that new systems are necessary within the City. Maple Plain Code reinforces the County's regulations by requiring that all new systems be installed according to Minnesota Pollution Control Agency (MPCA) rule 7080 permit requirements.

Special Resource Protection

Solar Access

Eric Wojchik, CD – Local Planning Assistance (651-602-1330)

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

Eric Wojchik, CD – Local Planning Assistance (651-602-1330)

The Plan indicates, consistent with *Minnesota Geological Survey Information Circular 46* information, that there are no known deposits of viable aggregate resources within the community.

Historic Preservation

Reviewer: Freya Thamman, CD – Local Planning Assistance (651-602-1750)

The Plan includes a section on historic resources. The Plan identifies goals and policies related to historic resources and indicates that the City is committed to promoting the use of historic structures and sites for education, pleasure, and welfare. In addition, it also indicates that design guidelines established for redevelopment efforts will take historic preservation into account.

Plan Implementation

Reviewer: Freya Thamman, CD – Local Planning Assistance (651-602-1750)

The Plan includes a description of the zoning, subdivision, SSTS codes, and the housing implementation program. The Plan describes official controls and fiscal devices the City will employ to implement the Plan and includes a capital improvement 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 14, 2020: Maple Plain Comprehensive Plan
- May 13, 2022: Resubmittal of Maple Plain Comprehensive Plan
- May 17, 2022: Wastewater, Transportation, Implementation
- May 24, 2022: FAR/Forecasts
- May 27, 2022: Land Use Map, Adjacent Community
- June 2, 2022: Housing, Land Use, and Wastewater
- June 7, 2022: Wastewater
- June 9, 2022: Wastewater Inflow/Infiltration

- June 17, 2022: Land Use, Staging Table
- June 20, 2022: Wastewater Inflow/Infiltration
- June 24, 2022: Wastewater Inflow/Infiltration

Attachments

Figure 1: Location Map with Regional Systems

Figure 2: Thrive MSP 2040 Community Designations

Figure 3: Existing Land Use

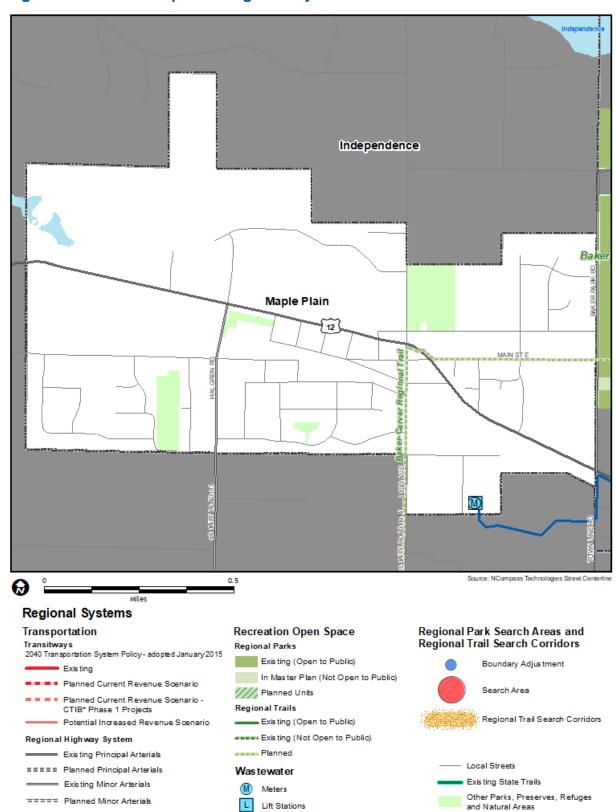
Figure 4: 2040 Planned Land Use

Figure 5: Land Guided for Affordable Housing

Existing Other Arterials

---- Planned Other Arterials

Figure 1. Location Map with Regional Systems



MCES Interceptors

MCES Treatment Plants

* Counties Transit Improvement Board (CTIB)

Figure 2. Thrive MSP 2040 Community Designations

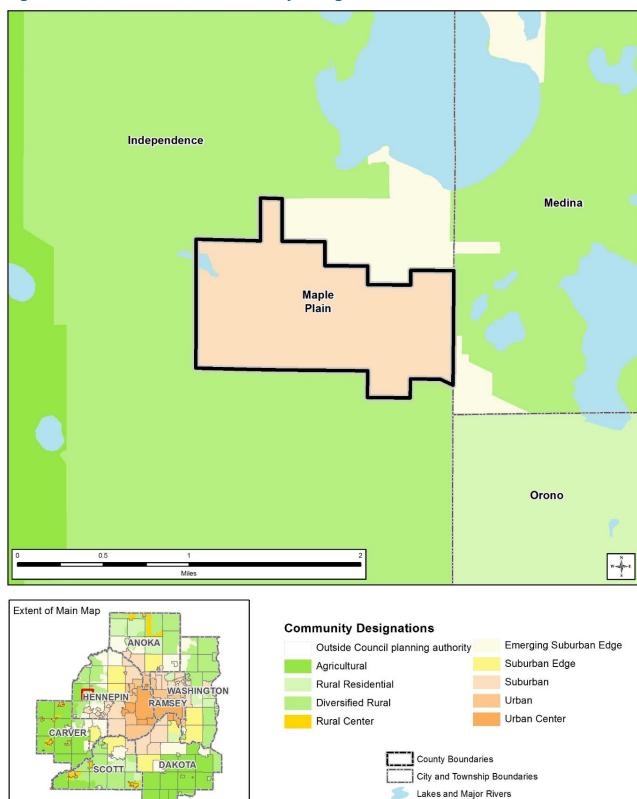


Figure 3. Existing Land Uses

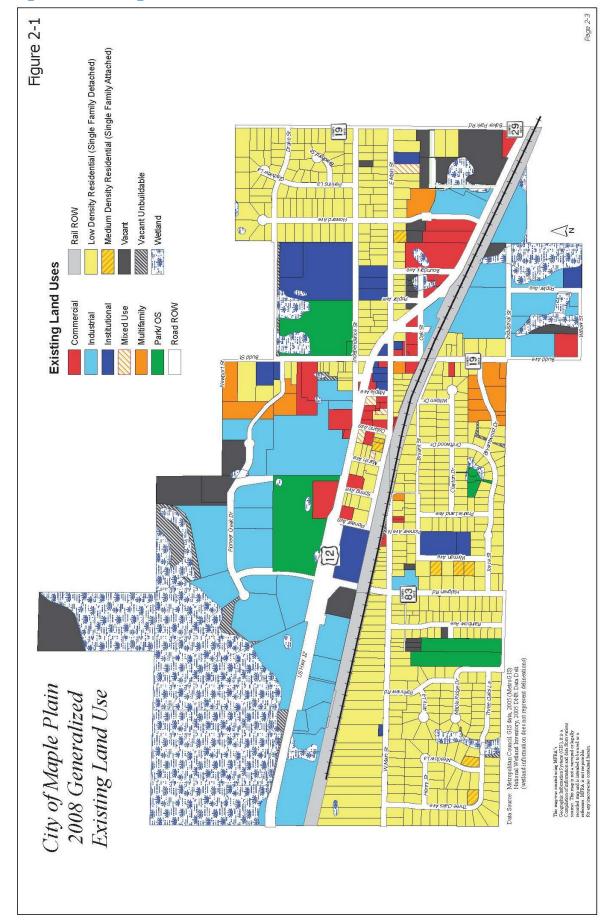


Figure 4. 2040 Planned Land Use

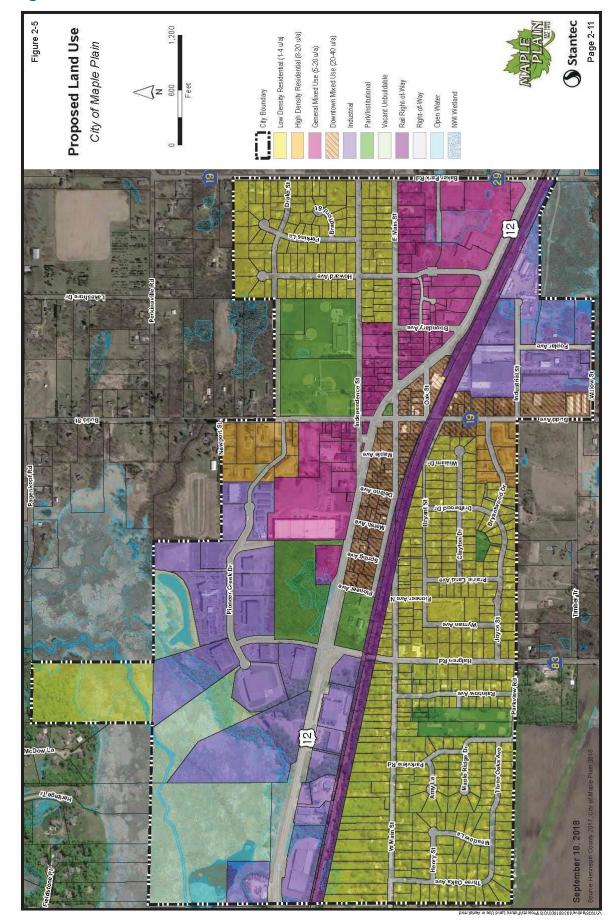


Figure 5. Land Guided for Affordable Housing

2021-2030 share of regional need for Affordable Housing: 28 units
2021-2030 total regional need for Affordable Housing: 37,900 units

	Available Acres	Minimum Density (units per acre)	Expected % Residential (if mixed use)	Minimum = Units Possible
Downtown Mixed Use	14.2	20	35%	99

14.2 99 Total

Sufficient/(insufficient) units possible against share of regional need: 71

Affordable units built since 2021: 0

Sufficient/(insufficient) units possible adjusted for affordable units built: 71

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

