

Internal Memorandum

DATE: November 27, 2012
TO: Community Development Committee
FROM: Freya Thamman, District 1 Sector Representative
LisaBeth Barajas, Local Planning Assistance Manager
Guy Peterson, Community Development Director
SUBJECT: Greenfield 2030 Comprehensive Plan Update
Additional Information for Background & Discussion

Background

At its November 19, 2012 meeting, the Community Development Committee (CDC) made a motion to bring the Greenfield Comprehensive Plan Update (Business Item 2012-357, Review File No. Review File No. 20590-1) back to the December 3, 2012, CDC meeting for further discussion of staff findings.

Council staff found the Update conforms to regional system plans, is consistent with Council policies, and compatible with the plans of adjacent and affected jurisdictions. No changes have been made to the November 19, 2012, staff report.

Conforms with the Water Resource Management Policy Plan/Consistent with Diversified Rural Policy

The Greenfield Comprehensive Plan Update (Update) is in conformance with regional system plans and would not more likely than not to have a substantial impact to regional system plans. Greenfield currently is not in an identified long-term sewer service area and currently there is not a specific plan to provide wastewater services to Greenfield, except for the small area on Lake Sarah area that is currently served.

The Update is in conformance with the *2030 Water Resources Management Policy Plan (WRMPP)*. Substantial impacts or departures are in the context of the Wastewater System Plan. The *WRMPP* discusses potential future treatment plants and service areas in order to initiate a discussion with communities that, in conjunction with further technical and environmental studies, will eventually lead to development of a more specific plan. For example, the Council successfully worked with Scott County to have their 2030 comprehensive plan update identify the potential long-term service area of the proposed western Scott County Wastewater Reclamation Plant, which also allowed the County to change the designation of a portion of the southeastern part of the County from Diversified Rural to Rural Residential. In Carver County, the Council has a Memorandum of Understanding that commits the Council to its Rural Growth Center policy (acquiring treatment plants from small communities at their request) in exchange for the County's commitment to stringently protect agricultural areas at 1 per 40 density. In northern Anoka County and eastern Washington County, the Council has approved numerous Comprehensive Plan Updates with 1 per 5 density or 1 per 2.5 density, because they are outside the long-term regional wastewater service area. Allowing Greenfield to put this Update into effect is consistent with other previous Council actions in its implementation of the Council's policies and system plans.

The Update achieves a density of 1 unit per 10 acres overall in the unsewered area and is consistent with the *Regional Development Framework (RDF)* density policy for Diversified Rural areas. The Update guides the rural area of the City at 1 unit per 5 acres, but the unsewered forecasted household growth in this area is 76 units by the year 2030. The

previously reviewed Update from Greenfield had almost all of the City's growth on septic systems in the rural area. With this Update, the City reduced their forecasted household growth through 2030 in the rural area and focused most of the household growth in their locally-sewered area which has existing infrastructure. The residential land uses in this area are "Sewered Residential" at 3+ units/acre and "Residential Townhome" at 6+ units/acre. This new area supports, *RDF Policy 1*, which indicates that Council should "work with communities to accommodate growth in a flexible, connected, and efficient manner." The RDF also encourages communities to guide growth in adequately sewered areas.

The Rockford Areas School District (Paul Durand and Ted Botten) has provided written support for the Greenfield Update and its new "Sewered Residential" area (see attachment).

Soils and Subsurface Treatment Systems (SSTS)

The dominant soil associations in Greenfield are primarily characterized as medium to finely textured glacial till soils, which exhibit only moderate limitations for the siting of septic drainfields. These soils are common in Hennepin County and are therefore well known to the designers of septic systems for residential developments in the county. The certification and continuing education requirements of all professionals working in the field of design, installation, and maintenance of systems in the state ensures that soils associations are properly accounted for. For these reasons, staff is less concerned with the ability to properly site and construct a septic drainfield on a 5-acre parcel.

Hennepin County provides permitting, inspection, and enforcement program oversight of approximately 5,000 systems in 30 cities that have delegated program responsibilities to the County. The County has received an extension until 2014 to bring their SSTS Ordinance up to date with new State requirements for SSTS. Greenfield has not, however, delegated authority over the septic systems to the County. The County does not enforce system maintenance/pumping requirements. Therefore, the County has not expressed concern about the soil suitability for SSTSs.

In addition, the *WRMPP* states that a community is responsible for the costs incurred when private systems fail. The *WRMPP* also states, that the Council will "allow the community to connect a failing private wastewater system to the Metropolitan Disposal System (MDS), where there is available capacity, at the community's expense." Connection to the MDS must be made by municipal request.

Agricultural Land/Prime Agricultural Soils

Unlike areas in Carver and Dakota Counties, only portions of Greenfield have soils that are considered prime agricultural soils. These areas are primarily located in the north and eastern portions of the community. About 4,100 acres in the City are either enrolled in Agricultural Preserves or in Green Acres programs, and these areas cover the larger, farmable parcels with prime soils. This represents about half of the area guided for Rural Residential use.

Conclusion

As discussed above and in the staff report, the Greenfield Comprehensive Plan Update does not represent a substantial impact to the Council's regional systems and conforms to the Council's regional system plans. The staff report's proposed actions remain the same.

ATTACHMENT



Rockford Area Schools – District #883

Comments to Metropolitan Council in respect to the Greenfield Comprehensive Plan Update

There are two components that comprise how school districts generate revenue. The first of these is how many students attend a district and the second is how much revenue—both in terms of state formulas and local voter-approved levies—are attributed to each student. The proposed housing development in Greenfield would be extremely beneficial to Rockford Independent School District #883, as it would both the district's enrollment and its property wealth.

Rockford Independent School District #883 is among an interesting set of school districts that straddles the boundaries of the metropolitan area. The district's territory is equally divided between Hennepin and Wright counties. The district's proximity subjects it to a number of cost pressures related to the metropolitan area labor market. Unfortunately, the district lies well away from the path followed by most commercial and industrial development, leaving taxpayers in the school district at a disadvantage when attempting to generate revenue through voter-approved operating levies. For property taxes payable in 2012, the Wayzata school district, a Hennepin County school district that borders the Rockford district, has per pupil property wealth that is approximately 90% higher than that of Rockford's. This property wealth difference, when combined with income differences that exist between the communities, has provided Wayzata with a considerably higher voter-approved operating levy (\$1,605 per pupil unit in Wayzata to \$395 per pupil unit in Rockford).

While the proposed Greenfield Comprehensive Plan, if realized, by itself would not eliminate the property wealth difference that exists between the two aforementioned school districts, it would certainly bring greater enrollment to the Rockford school district. Over the past 20 years, Rockford's enrollment has been almost flat. The number of students in the district during the 1995-96 school year was 1,532. For the current school year, the enrollment is 1,595. As state funding formulas have not kept pace with inflation, the need for steady student growth has become even more important than it otherwise would, as growth often allows districts to add revenue attributed to each student without necessarily having to add staff or classrooms to accommodate the increasing number of students.

On November 6th, 2012 the voters in the Rockford Area Schools successful passed a 27 million dollar bond that will ensure that the district's building space and other facility-related student supports will be sufficient to handle increased student numbers that would likely result from any future Greenfield housing developments. Two of our schools (Rockford Elementary and Rockford High School) are within walking distance of the proposed high density housing land. The Rockford Area Schools are an active member of the North West Suburban Integration School District. Two of our schools Rockford Middle School – Center for Environmental (RMS-CES) Studies and Rockford Elementary Arts Magnet School (REAMS) are magnet schools within this collaborative.

A school is a vital part of a healthy community and Greenfield, Rockford, Corcoran, and the other individual communities that comprise Rockford Independent School District #833 takes pride in its school. Increased student growth would certainly help the district in a number of ways, as increased enrollment would solidify the district's financial situation and create a greater number of opportunities for students.

We urge you to give favorable consideration the updates to the Greenfield Comprehensive Plan. Its importance to Rockford Independent School District #833 cannot be understated.

Ted Botten serves as Chairman of the Board of Education and Paul Durand is Superintendent of Schools

763-477-9165 x4002 or durandp@rockford.k12.mn.us

ROCKFORD AREA SCHOOL DISTRICT #883 FACTS

1. Rockford ranks 291st out of 336 school districts in total revenue per pupil unit.
2. See table below for differential property tax “power” on operating referendum. Rockford falls far below other western Hennepin County school districts in terms of referendum per pupil unit divided by property tax burden per \$100,000 of value for taxes payable in 2012.

#	District	Referendum Per Pupil Unit	Burden per \$100,000 of Value	Power Ratio
276	MINNETONKA	\$1,860	\$225	8.26
273	EDINA	\$1,824	\$208	8.75
270	HOPKINS	\$1,755	\$166	10.58
278	ORONO	\$1,605	\$125	12.88
284	WAYZATA	\$1,605	\$188	8.54
883	ROCKFORD	\$395	\$83	4.76

3. State average referendum revenue per pupil unit for taxes payable in 2012 is \$899 per pupil unit; two and one-quarter times Rockford’s \$395 per pupil unit.
4. 2010 Census Data for Rockford Independent School District #833 communities:
 - a. Rockford
 - i. Median Home Value: \$192,873 (State Average is \$200,400)
 - ii. Median Income: \$48,861 (State Average is \$55,616)
 - b. Corcoran
 - i. Median Home Value: \$319,300
 - ii. Median Income: \$87,404
 - c. Greenfield
 - i. Median Home Value: \$209,000
 - ii. Median Income: \$61,559
5. 2010 Census Data for Comparison Communities
 - a. Wayzata
 - i. Median Home Value: \$443,413
 - ii. Median Income: \$63,743
 - b. Plymouth
 - i. Median Home Value: \$328,300
 - ii. Median Income: \$81,748
 - c. Orono
 - i. Median Home Value: \$717,571
 - ii. Median Income: \$115,279

C Community Development Committee
Meeting date: November 19, 2012

E Environment Committee
Meeting date: December 11, 2012

ADVISORY INFORMATION

Subject:	City of Greenfield 2030 Comprehensive Plan Update Review File No. 20590-1 Tier II Comprehensive Sewer Plan
District(s), Member(s):	District 1, Council Member Roxanne Smith
Policy/Legal Reference:	Minnesota Statutes Section 473.175
Staff Prepared/Presented:	Freya Thamman, Principal Reviewer, 651-602-1750 LisaBeth Barajas, Local Planning Assistance Manager, 651-602-1895 Kyle Colvin, Engineering Services Asst. Manager, 651-602-1151
Division/Department:	Community Development / Regional Planning Environmental Services / Engineering Services

Proposed Action

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

Recommendations of the Community Development Committee:

1. Authorize the City of Greenfield to put its 2030 Comprehensive Plan Update into effect.
2. Adopt the revised forecasts as detailed in Table 2 of the attached Review Record.
3. Change the planning area designation for the locally sewerred area of the City from "Diversified Rural" to "Developing" in the *2030 Regional Development Framework*.
4. Advise the City to implement advisory comments in the Review Record for transportation, surface water management, land use, and subsurface sewage treatment systems (SSTS).

Recommendations of the Environment Committee:

Approve the City of Greenfield's Tier II Comprehensive Sewer Plan.

ADVISORY COMMENTS

City of Greenfield 2030 Comprehensive Plan Update and Tier II Comprehensive Sewer Plan

Review File No. 20590-1 – Council Business Item No. 2012-357

The following Advisory Comments are part of the Council action authorizing the City to implement its 2030 Comprehensive Plan Update (“Update”) and approving the City’s Tier II Comprehensive Sewer Plan:

Community Development Committee

1. The Council-adopted *Local Planning Handbook* states that the City must take the following steps:
 - a) Adopt the Update in final form after considering the Council’s review recommendations; and
 - b) Submit one electronic copy and one hard copy of the Update to the Council. The electronic copy must be organized as one unified document.

A copy of the City Council resolution evidencing final approval of the Update should be submitted to the Council.

2. The Council’s *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, local governments should incorporate those recommended changes into the plan or respond to the Council before “final approval” of the comprehensive plan by the governing body of the local governmental unit. (Minn. Stat. § 473.858, subd. 3)
3. Local governmental units must adopt official controls as described in their adopted comprehensive plans and must submit copies of the official controls to the Council within 30 days after 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 nine months following amendments to comprehensive plans (Minn. Stat. § 473.865, subd. 3).

Environment Committee

1. The Council-approved Tier II Comprehensive Sewer Plan becomes effective only after the Update also receives final approval from the City’s governing body. After the Update receives final approval from the City and the Tier II Sewer Plan becomes effective, the City may implement its Update to alter, expand, or improve its sewage disposal system consistent with the Council-approved Tier II Sewer Plan.
2. A copy of the City Council resolution adopting its Update, including the Tier II Sewer Plan, must be submitted to the Council.

Background

Greenfield is located on the western border of Hennepin County. The city borders Corcoran, Medina, Independence, as well as Hanover and Rockford (Figure 1). With exception of a small portion of Rockford, the Crow River is the western edge of Greenfield. Franklin Township and Rockford Township are in Wright County along the Crow River.

The *2030 Regional Development Framework (RDF)* identifies Greenfield as being within the "Diversified Rural" geographic planning area (Figure 2). The City submitted its 2030 Comprehensive Plan (Update) to the Council for review to meet the Metropolitan Land Planning Act requirements (Minn. Stat. §473.175) and the Council's 2005 Systems Statement requirements.

Previous Community Development Committee/Environment Committee Review

A previous version of the "City of Greenfield 2030 Comprehensive Plan Update/Tier II Comprehensive Sewer Plan", Council Business Item: 2011-297, was reviewed by the Community Development Committee (CDC) on November 7, 2011, and by the Environment Committee (EC) on November 8, 2011. The previously submitted Update reflected materials that that the City submitted to the Council for review in May 2009, February/March/ June 2010, as well as January/February 2011.

The CDC unanimously adopted the proposed actions of the previously submitted Update, which showed the future land use density of 1 unit per 11 acres in the northern part of the city and 1 unit per 6 acres in the southern part. The EC unanimously approved the City of Greenfield's Tier II Comprehensive Sewer Plan. The Update was scheduled for action at the December 14, 2011 Metropolitan Council meeting. However, the City submitted a revised Update on December 7, 2011, and the associated correspondence stated the following:

The Greenfield City Council requests that the Metropolitan Council cancel the hearing of the Greenfield Comprehensive Plan, scheduled for December 14, 2011 and refer this "approved" plan to staff and the Community Development and Environmental Committees for review and recommendations to a future Metropolitan Council hearing date.

The City indicated that it had numerous situations of turmoil since the Update process began, including reappointment of planning commission members and staff turnover, including more than seven administrators. The City indicated that the revised Update from December 7, 2011, should be reviewed in place of the other Update because it reflected the new city management and long-term vision for the city. Therefore, at the City's request, Council Business Item: 2011-297, "The City of Greenfield 2030 Comprehensive Plan Update/Tier II Comprehensive Sewer Plan" was taken off December 14, 2011, Metropolitan Council meeting agenda.

The revised Update's future land use plan includes a new locally sewered area of approximately 200 acres near the City's border with Rockford and a new Rural Residential designation of 1 unit per 5 acres. The Revised Update was submitted to adjacent communities and affected jurisdictions for review in January 2012.

This revised Update and supplemental information received after December 7, 2011, replaces the City's previously submitted information.

Rationale – Standard of Review & Findings

1. Does the proposed Update conform to Regional Systems Plans?
2. Is the Update consistent with Metropolitan Council policies?
3. Is the Update compatible with the plans of adjacent governmental units and plans of affected special districts and school districts?

Conformance with Regional Systems Plans

- | | |
|---|-----|
| 1. Regional Parks | Yes |
| 2. Transportation, including Aviation | Yes |
| 3. Water Resources Management
(Wastewater Services and Surface Water Management) | Yes |

Consistent with Council Policy Requirements

- | | |
|--|-----|
| 1. Forecasts | Yes |
| 2. Housing | Yes |
| 3. <i>2030 Regional Development Framework</i> and Land Use | Yes |
| 4. Subsurface Sewage Treatment Systems (SSTS) Program | Yes |
| 5. Water Supply | Yes |

Compatible with the Plans of Adjacent Governmental Units and Plans of Affected Special Districts and School Districts

- | | |
|--------------------------------|-----|
| 1. Compatible with other plans | Yes |
|--------------------------------|-----|

Funding

The City has received a Local Planning Assistance Grant of \$10,000 (SG2007-112) for completion of its Update.

Known Support / Opposition

No known opposition.

REVIEW RECORD

City of the Greenfield 2030 Comprehensive Plan Update

STATUTORY AUTHORITY

The Metropolitan Land Planning Act (MLPA) requires local units of government to submit comprehensive plans (plans) and plan amendments to the Council for review and comment (Minn. Stat. § 473.864, Subd. 2). The Council reviews plans to determine:

- *Conformance with metropolitan system plans,*
- *Consistency with other adopted Plans of the Council, and*
- *Compatibility with the Plans of other local jurisdictions in the Metropolitan Area.*

The Council may require a local governmental unit to modify any plan or part thereof if, upon the adoption of findings and a resolution, the Council concludes that the Update 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. Each such plan shall be submitted to the Council for review and shall be subject to the approval of the Council as to those features affecting the Council's responsibilities as determined by the Council. Any such features disapproved by the Council shall be modified in accordance with the Council's recommendations (Minn. Stat. § 473.513).

CONFORMANCE WITH REGIONAL SYSTEMS

Regional Parks

Parks and Trails

Reviewer: Jan Youngquist, CD – Regional Parks System Planning, (651-602-1029)

The Update conforms to the *2030 Regional Parks Policy Plan*. The Update acknowledges and plans for the regional parks system facilities in Greenfield, which include Lake Rebecca Park Reserve, the planned Lake Sarah Regional Park, and the Crow River Regional Trail Search Corridor. The Future Land Use Map (dated July 2012) guides the future land use of in-holding properties within the Council approved master plan boundaries of Lake Rebecca Park Reserve and Lake Sarah Regional Park as "Park". The Parks and Trails Plan Map dated March 2010 depicts the general Crow River Regional Trail Search Corridor, which will connect Lake Rebecca and Crow Hassan Park Reserves.

Transportation

Roads and Transit

Reviewer: Ann Braden, MTS – Systems Planning, (651-602-1705)

The Update conforms to the *2030 Transportation Policy Plan (TPP)* adopted in 2004 and addresses all the applicable transportation and transit requirements. There are no metropolitan highways in Greenfield.

Advisory Comments

The City should be aware that the most recently adopted TPP designates Greenfield as being in Transit Market 5. Typical service for this area is limited to general dial-a-ride.

Aviation

Reviewer: Russell Owen, MTS – Systems Planning, (651-602-1724)

The Update conforms to the *TPP* and is consistent with Council aviation policy.

Water Resources Management

Wastewater Service

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

The Update conforms to the *Water Resources Management Policy Plan (WRMPP)*. The Update summarizes the City's vision for the next 20 years or to year 2030. It includes growth forecasts that are consistent with the Council's expectations for total population, households, and employment.

The majority of wastewater treatment services are provided by the City at a wastewater treatment plant (WWTP) owned and operated by the City. At this time, the City is not requesting the Council to acquire the WWTP. The Update indicates that the City's WWTP has sufficient capacity to accommodate the growth forecasts through 2030.

A small area of the city is provided service by the Metropolitan Council Environmental Services (MCES) through an intercommunity agreement with the City of Medina. Increases in the number of connections within this service area will require the City to modify its agreement with Medina. Wastewater generated within this small area is conveyed to and treated at the Metropolitan Council's Blue Lake Wastewater Treatment Plant located in Shakopee. The Update projects it will have 57 sewer households and no sewer employees by 2030 within the area served by the Metropolitan Disposal System (MDS). The MDS with its scheduled improvements has, or will have, adequate capacity to serve the City's growth needs.

The Update provides sanitary flow projections in 5-year increments. The rationale for the projections is given in the Update and determined appropriate for planning for local services.

For the area provided regional sewer service by MCES, the City is part of a Tri-City Agreement, whereby Medina is the immediate wastewater service provider for the areas of Greenfield and Independence. The Update identifies a program of Inflow/Infiltration (I/I) abatement activities including televised inspection of the system and smoke testing of the sewer along North Shore Drive. The City will continue to work with Medina and Independence on I/I reduction.

Tier II Comments

The Tier II Sewer Element of the Update has been reviewed against the requirements for Tier II Comprehensive Sewer Plans for Diversified Rural/Developing communities. It was found to be complete and consistent with Council policies. Upon adoption of the Update by the City, the action of the Council to approve the Tier II 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 Tier II 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 Assessment, (651-602-1156)

The Update conforms to the *WRMPP* for local surface water management. A small portion of Greenfield lies hydrologically within the Elm Creek Watershed, but all surface water management issues in the city are overseen by the Pioneer Sarah Creek Watershed Management Commission (Commission). The Commission's watershed management plan was approved by the Board of Water and Soil Resources in 2004.

Greenfield's Surface Water Management Plan (SWMP) was included as Chapter 5 in the revised Update. The revised SWMP was found to be consistent with the Council's *WRMPP*.

Advisory Comments

A final copy of the SWMP including the date of adoption by the City needs to be forwarded to the Council along with the date it was approved by the watershed management commission.

CONSISTENCY WITH COUNCIL POLICY

Forecasts

Reviewer: Dennis Farmer, CD - Research, (651-602-1552)

The Update is consistent with regional policy forecast-related material. The Update proposes reduced total household, population and employment forecasts (shown in the "City Requested Forecasts" column below). Compared to Council forecasts, the City's revised forecasts also change the distribution of growth among households on the regional wastewater system, municipal wastewater system, and private systems.

Table 1.
Metropolitan Council Forecast Totals

	Census	Previous Council Forecasts			<u>City Requested Forecasts</u>		
		2000	2010	2020	2030	2010	2020
Population	2,544	3,190	4,050	4,300	2,780	3,150	4,140
Households	817	1,000	1,300	1,600	970	1,080	1,370
Employment	337	1,240	2,000	2,700	610	720	830

The Update's Table 3-4 "Housing Units/Total Actual Households" is being used as the City's requested revised forecasts. The City of Greenfield's forecasts will be revised to reflect Table 2 below upon Council action of Greenfield's Update.

With the forecast revision listed in Table 2, Greenfield's affordable housing need number changes from 25 to 15.

Table 2. Metropolitan Council Forecasts

	2010	2020	2030
Population	2,780	3,150	4,140
Unsewered	2,510	2,610	2,630
Metro Sewered	130	140	140
Municipal	130	400	1,370
Households	970	1,080	1,370
Unsewered	847	883	923
Metro Sewered	53	57	57
Municipal	70	140	390
Employment	610	720	830
Unsewered	0	0	0
Metro Sewered	0	0	0
Municipal	610	720	830

2030 Regional Development Framework and Land Use

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

The *2030 Regional Development Framework (RDF)* identified Greenfield as a Diversified Rural community. The *RDF* directs Diversified Rural communities to plan for overall densities no greater than one housing unit per 10 acres. Typically, these communities include a mix of a limited amount of large-lot residential with agricultural and other uses. The revised Update, with supplemental materials, is generally consistent with the *RDF* Diversified Rural planning area designation.

The City's existing land use is shown on Figure 3. Most of the city is rural and substantial part of the city is in Agricultural Preserves or Green Acres. Metropolitan Council parcel mapping shows that more than 60% of the city is parcels are 10 or more acres. Greenfield has some urban land uses near its border with Rockford. This area includes commercial, industrial, and medium density residential uses, which are served by the City's wastewater treatment plant.

The future land use map (Figure 4) shows expanded commercial development near Rockford and as well as a new locally Sewered Residential area that is approximately 200 acres with a minimum density of at least 3 units per acre. Given the existing and future development in this location, the Council's *RDF* map planning designation should be changed to from "Diversified Rural" to "Developing" for this area.

The City can accommodate forecasted growth through the year 2030. As shown in Table 2, "Metropolitan Council Forecasts", above, Greenfield is forecast to grow 400 households by 2030. Almost all of Greenfield's future household growth (320 households) is forecast in the locally-sewered "Sewered Residential" area. Although most of the rural area of the City is guided Rural Residential at 1 unit per 5 acres, the unsewered household growth to 2030 (76 households) would keep the overall rural density at no more than 1 unit per 10 acres. The Update indicates that clustering of development is encouraged to preserve existing natural resources, such as wetlands, prairie, woodlands and wildlife corridors in the rural area.

The Update indicates that properties in the Agricultural Preserve program are guided at 1 unit per 40 acres, which is consistent with Minnesota Statute §473.H.02 subdivision 7. The Update identifies the proposed land use, if a property were to expire from Agricultural Preserves Program, and no longer be guided at 1 unit per 40 acres. The proposed change would be to Rural Residential. In addition, there is an area north of Highway 55 that would be guided General Business. The change from 1 unit per 40 to another use would require a comprehensive plan amendment; however the amendment would likely be administratively waived if the City remains consistent with current Council policies.

Advisory Comments

When parcels in the Agricultural Preserve Program expire and are no longer guided at 1 unit per 40 acres, a comprehensive plan amendment will be required.

Given the existing and future development in this location, the Council's *RDF* map planning designation should be changed to from "Diversified Rural" to "Developing" for this area.

Housing

Reviewer: Linda Milashius, CD – Livable Communities, (651-602-1541)

The Update is consistent with housing policy. The housing element fulfills the affordable housing planning requirements of the MLPA. The City's affordable housing need number is 15 units. To provide opportunities to meet this need, the Update indicates that approximately 38 acres of higher density townhome development at 6+ units per acre is available for development between now and 2020. The Update also provides the City's housing implementation tools and strategies it will use to address affordable and lifecycle housing in the community.

Subsurface Sewage Treatment Systems

Reviewer: Jim Larsen, CD – Local Planning Assistance, (651-602-1159)

The Update is consistent with the *2030 WRMP* for Subsurface Sewage Treatment Systems (SSTS). The Update indicates that there are approximately 810 SSTS in the city. Appendices B and C provide the City's SSTS Ordinances 50.076 and 50.077 dealing with installation, operation, maintenance, and repair of systems. The ordinances are generally consistent with Minnesota Pollution Control Agency (MPCA) Rules and Council requirements. However, the City's SSTS ordinance will need to be updated within one year of Hennepin County adopting its updated SSTS ordinance. The County is currently expected to update its ordinance by February 2014.

To be consistent with Metropolitan Council SSTS management program requirements (2005 System Statement and *WRMP*), the City's future updated ordinance will need to revise the time window allowed for replacement of failing systems from ten years (current ordinance 50.077 Section B.4.a.) to five years. The City indicated that they intend to leave the replacement time window in the ordinance at 10 years. New MPCA 7082 Rules, however, no longer recommend 10 years, but indicate that a failing system needs to be upgraded, replaced, repaired or discontinued "within a specified time period". The Metropolitan Council determined in 2005 that five years is the maximum time a failing system should be allowed to continue in operation before it would be required to be repaired or replaced. For consistency with the *WRMP*, the City needs to incorporate this change in its updated ordinance.

The Update indicates that the 53 households on North Shore Drive (Lake Sarah) that are connected to MCES sewer continue to utilize septic tanks. The City needs to substantiate that these homeowners are in the SSTS maintenance management program and are

being notified that their tanks need to be inspected/pumped at least once every three years, in accordance with MPCA Rules. Septic tanks do not provide a flow equalization tank function, but operate solely as flow-thru tanks where settleable solids and floatable scum accumulate. The lack of maintenance to these tanks could create leaks or could cause an accumulation of solids to plug the undersized (six-inch diameter) collection lines. Therefore, the City is also advised that its updated ordinance needs to incorporate language and a schedule to facilitate abandonment/removal of these remaining septic tanks.

Advisory Comments

The City is advised that it will need to update its future SSTS ordinance within one year of Hennepin County adopting its updated SSTS ordinance. The City's future updated SSTS ordinance (2015) will need to be consistent with MPCA 7080-7082 Rules and Metropolitan Council SSTS management program requirements. In addition, the City's updated ordinance should include a schedule for removing the septic tanks for the 53 sewer households on North Shore Drive

Water Supply

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

The Update is consistent with the *WRMPP* for water supply. The Council encourages the City to continue to implement conservation programs and measures in an effort to promote the efficient use of water.

Resource Protection

Historic Preservation

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

The Update addresses historic preservation in the community as required by the MLPA.

Solar Access Protection

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

The Update addresses the protection of access to solar energy as required by the MLPA.

Aggregate Resources Protection

Reviewer: Jim Larsen, CD – Local Planning Assistance, (651-602-1159)

The Council's aggregate resources inventory, as presented in *Minnesota Geological Survey Information Circular 46*, indicates the presence of natural aggregate resources within the community.

The Update states that there is one active aggregate production facility in operation in the city. However, there are few large contiguous acres of aggregate that remain. The remaining resource areas are guided for agricultural land use which should ensure their availability for extraction for the foreseeable future. Mining regulations are contained in City Code Title 11, Chapter 113, available on the City's website

PLAN IMPLEMENTATION

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

The Update includes a description of:

- Capital Improvement Program Yes
- Zoning Code Yes
- Subdivision Code Yes

- SSTS Code Yes
- Housing Implementation Program Yes

COMPATIBILITY WITH PLANS OF ADJACENT GOVERNMENTAL UNITS AND PLANS OF AFFECTED SPECIAL DISTRICTS AND SCHOOL DISTRICTS

The City submitted its *revised* Update to the adjacent communities, affected school districts, affected watershed districts, and other special districts for comment in January 2012. There do not appear to be any conflicts with the plans of adjacent and affected jurisdictions.

DOCUMENTS SUBMITTED FOR REVIEW

- City of Greenfield 2030 Comprehensive Plan and Transmittal Form (May 29, 2009)
- Future Land Use Figure (February 8, 2010)
- City of Greenfield Revised 2030 Comprehensive Plan addressing Aviation, Forecasts, Housing, SSTS, Land Use, Parks, Resource Protection, Surface Water Management, Transportation, Wastewater, and Water Supply (March 29, 2010)
- Agriculture Preserve Text and Revised Future Land Use Map (June 29, 2010)
- City of Greenfield Revised 2030 Comprehensive Plan with revised info for Forecasts/Staging, Housing, Land Use, Parks, Wastewater, SSTS, (January 19, 2011)
- Revised Table 3-4 Population, Households, and Employment (February 3, 2011)
- Revisions to the 2030 Update (December 7, 2011)
- Change to address completeness comments (June 13, 2012)
- Chapter 5 –Surface Water Management Plan and Chapter 6 Sanitary Sewer Plan (June 14, 2012)
- Land Use Map (June 19, 2012)
- Submittal of entire Comprehensive Plan (August 28, 2012)
- Wastewater Table (September 13, 2012)
- Text revisions to update land use description, revised water supply table to match forecasts in rest of Update, housing table (September 21, 2012)

ATTACHMENTS

- Figure 1: Location Map with Regional Systems
- Figure 2: 2030 Regional Development Framework Planning Areas
- Figure 3: Existing Land Use
- Figure 4: Future Land Use

Figure 1. Location Map with Regional Systems
 City of Greenfield

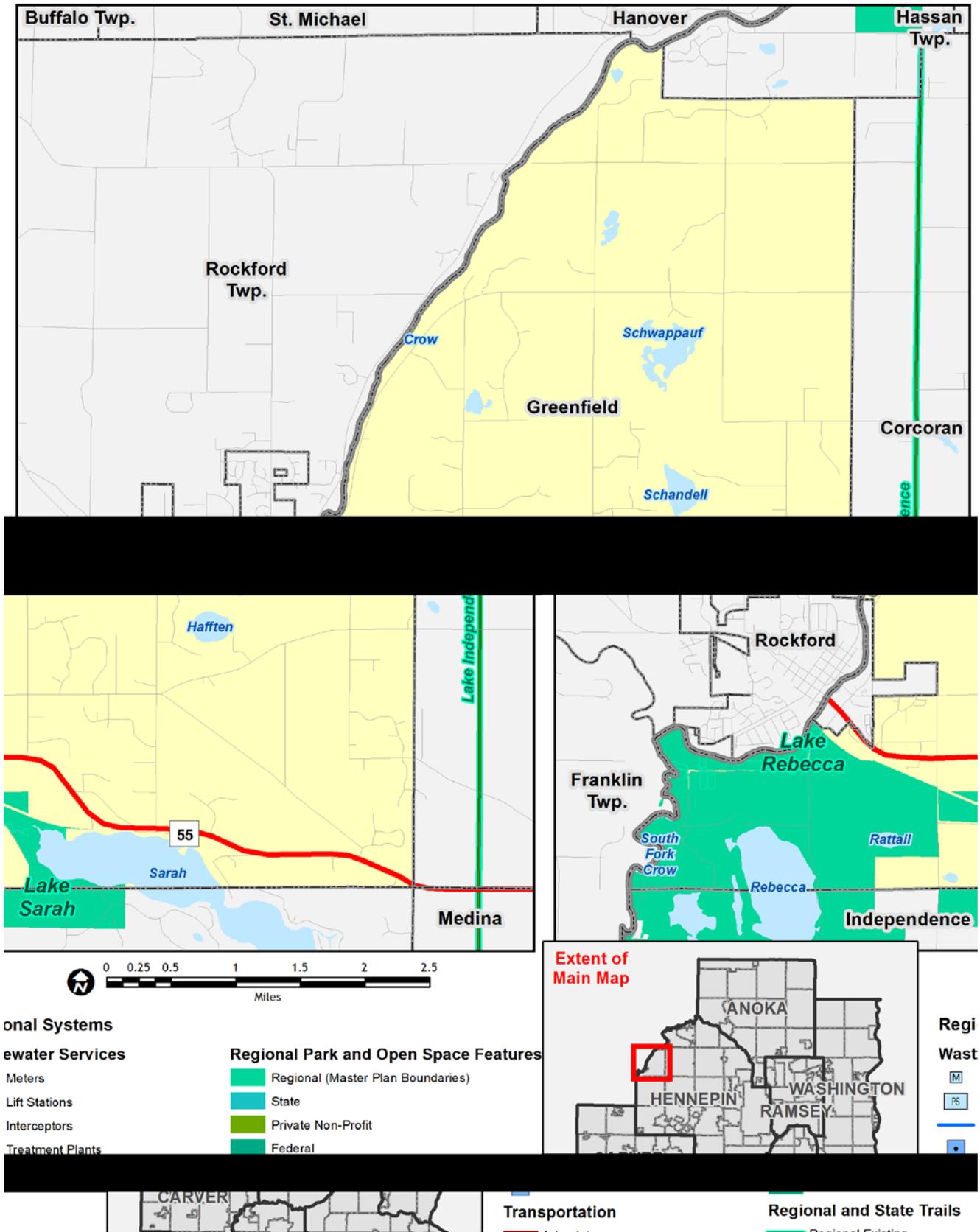


Figure 2. 2030 Regional Development Framework Planning Area
 City of Greenfield

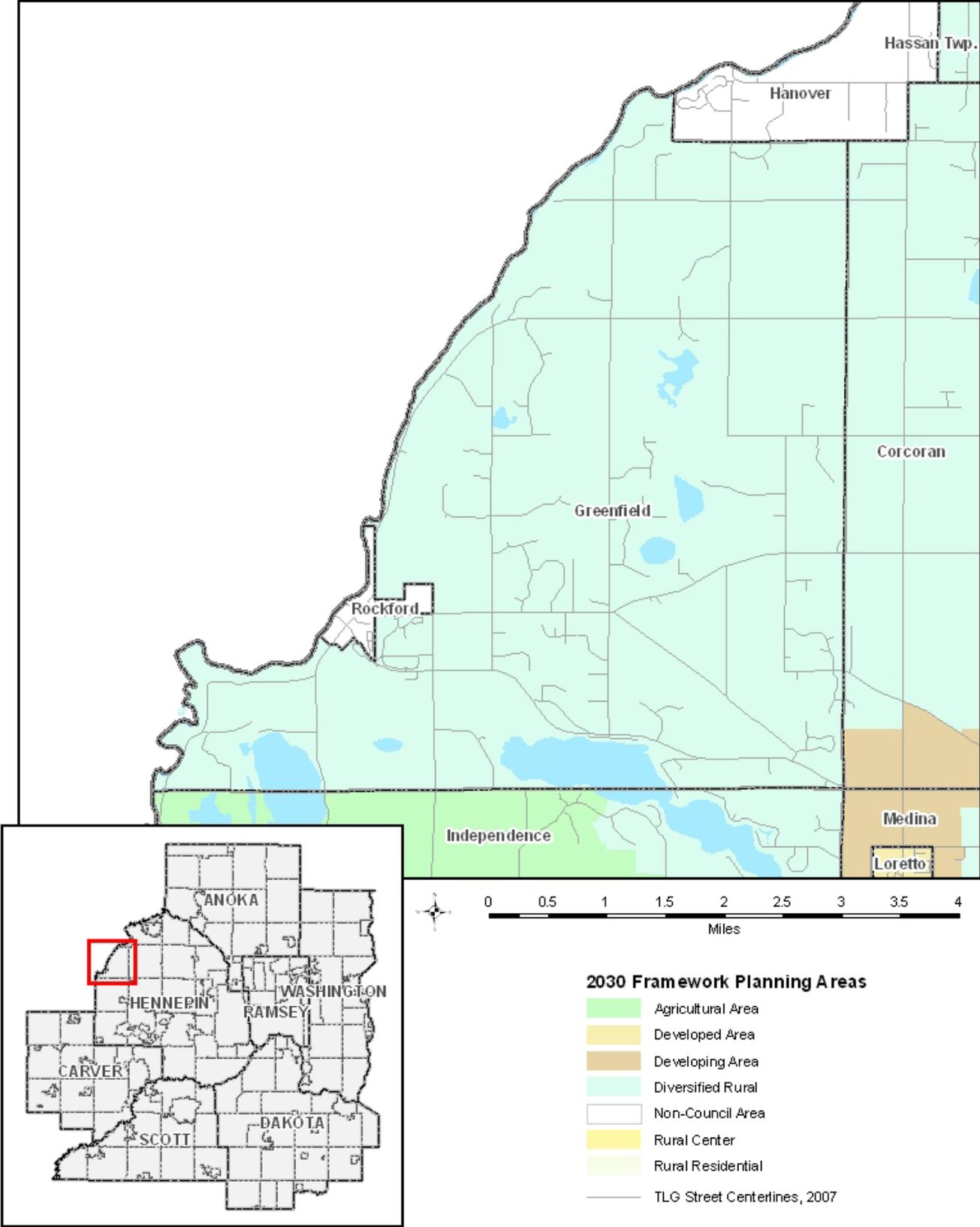


Figure 3. Existing Land Use
City of Greenfield

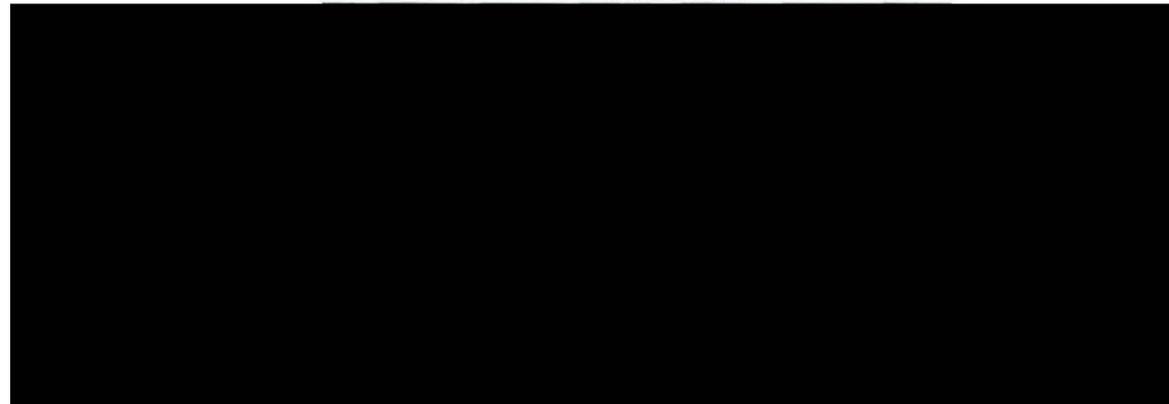
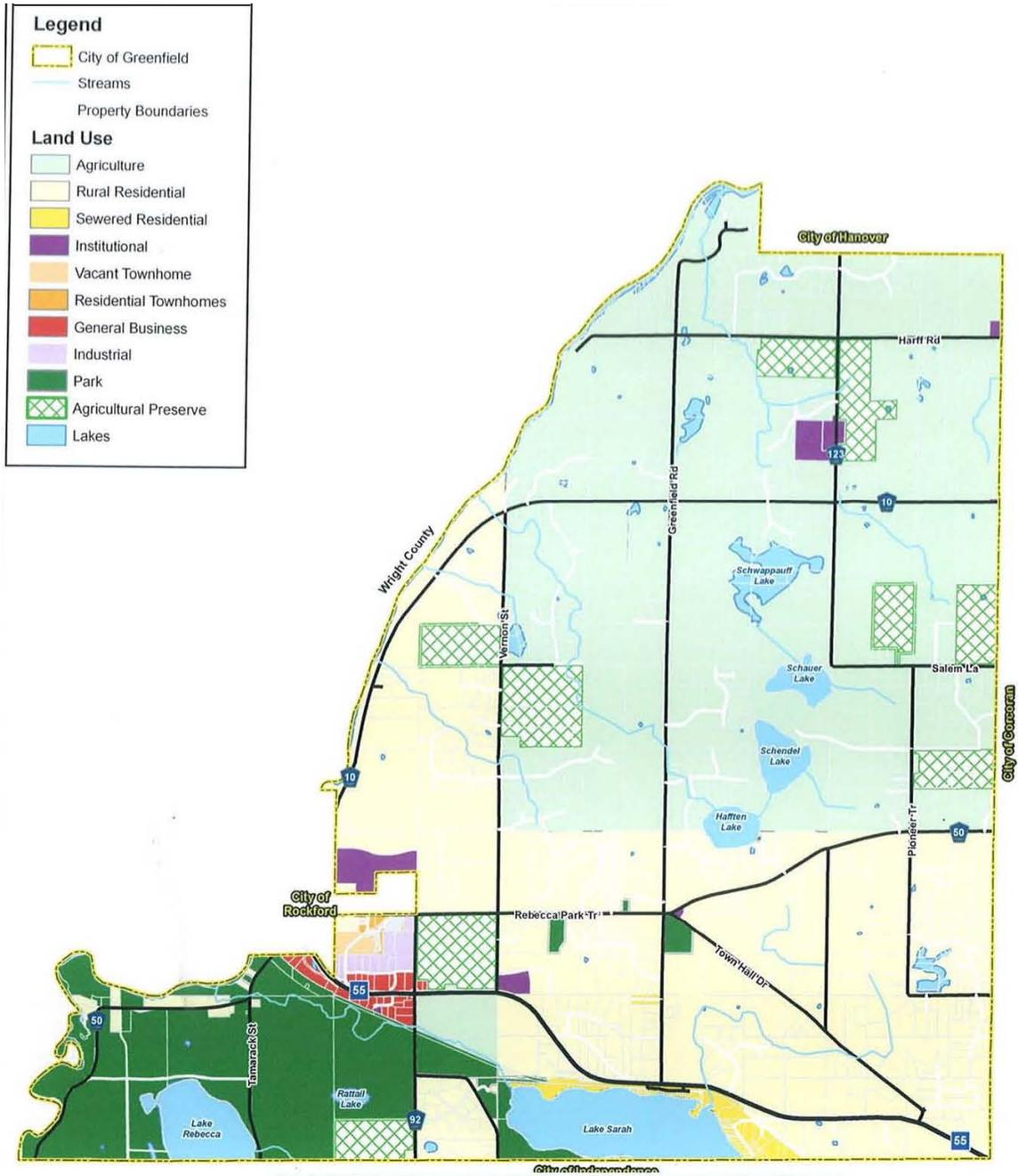


Figure 4. Future Land Use
City of Greenfield

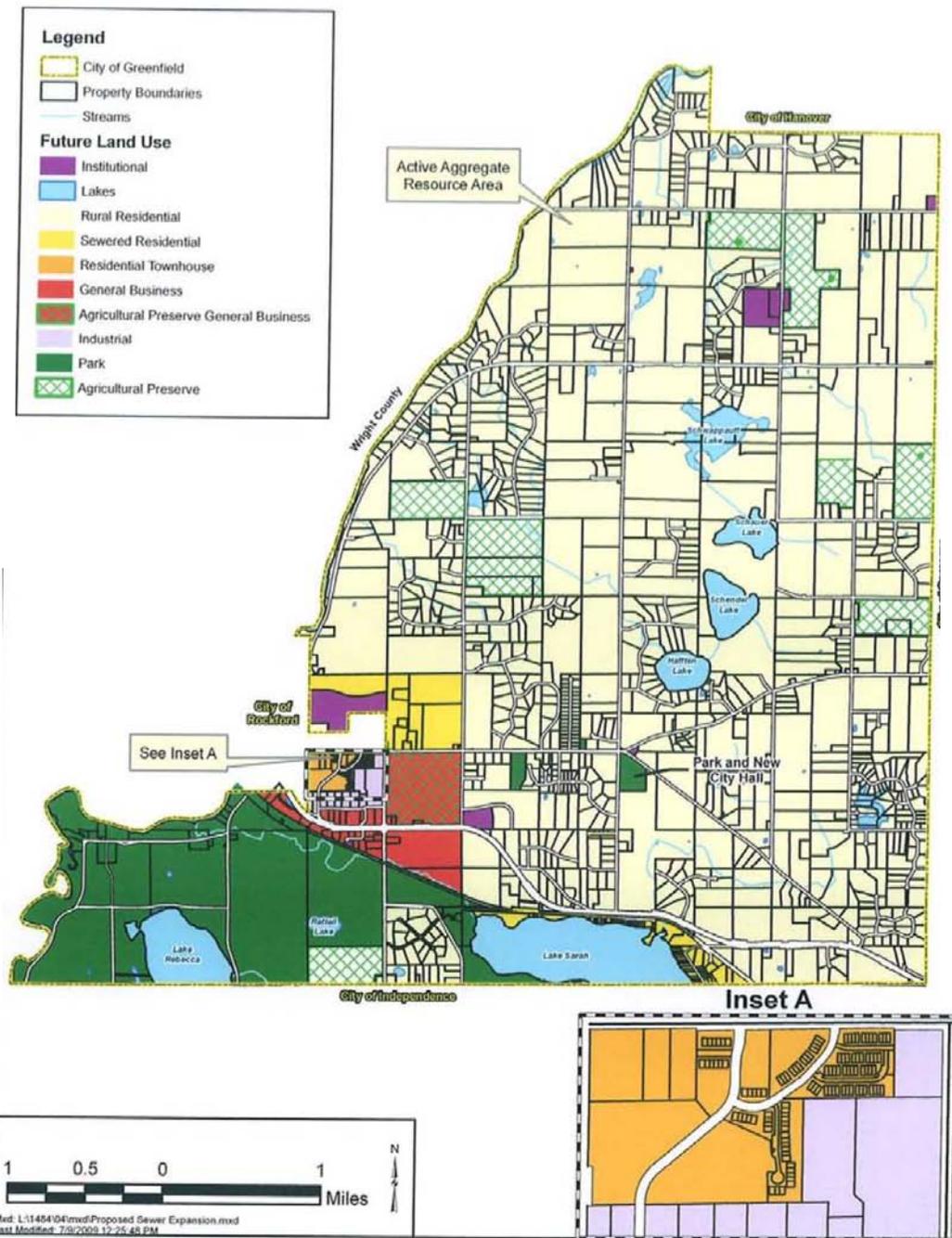


Table 3-3 Future Land Use	Acres
AGRICULTURAL PRESERVE/AGRICULTURAL PRESERVE GENERAL BUSINESS	764