Community Development Committee
Meeting date: August 19, 2019

Environment Committee
Meeting date: August 27, 2019

For the Metropolitan Council meeting of September 25, 2019

**Subject:** City of Richfield 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 21949-1

**District(s), Member(s):** District 5, Molly Cummings

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

**Staff Prepared/Presented:** Michael Larson, Senior Planner (651-602-1407)  
Angela R. Torres, Local Planning Assistance Manager (651-602-1566)  
Kyle Colvin, Engineering Programs, Manager (651-602-1151)

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

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

**Recommendations of the Community Development Committee**
1. Authorize the City of Richfield to place its 2040 Comprehensive Plan into effect.
2. Advise the City to implement the advisory comments in the Review Record for Surface Water Management and Water Supply.

**Recommendation of the Environment Committee**
1. Approve the City of Richfield’s Comprehensive Sewer Plan.
2. Upon approval, the City shall submit to the Council a copy of the revised Ordinance regarding illicit clear water connections to require disconnection once they are identified.
Advisory Comments
The following Advisory Comments are part of the Council action authorizing the City of Richfield to implement its 2040 Comprehensive Plan (Plan).

Community Development Committee
1. As stated in the Local Planning Handbook, the City of Richfield must take the following steps:
   a. Adopt the Plan in final form after considering the Council’s review recommendations as contained in the body of this report.
   b. Submit one hard copy and one electronic copy of the Plan to the Council. The electronic copy must be submitted as one unified file.
   c. Submit to the Council a copy of the City Council resolution evidencing final adoption of the Plan.
2. The Local Planning Handbook also states that local governments must formally adopt their comprehensive plans within nine months after the Council’s final action. If the Council has recommended changes to the Plan, local governments should incorporate those recommended changes into the Plan or respond to the Council before “final adoption” of the comprehensive plan by the governing body of the local governmental unit. (Minn. Stat. § 473.858, subd. 3)
3. Local governments must adopt official controls as identified in their 2040 comprehensive plans and must submit copies of the official controls to the Council within 30 days after the official controls are adopted. (Minn. Stat. § 473.865, subd. 1)
4. Local governmental units cannot adopt any official controls or fiscal devices that conflict with their comprehensive plans or which permit activities in conflict with the Council’s metropolitan system plans (Minn. Stats. §§ 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 of Richfield and the Comprehensive Sewer Plan becomes effective, the City of Richfield 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 Richfield is located in the southeastern portion of Hennepin County. It is surround by Minneapolis, Fort Snelling, Bloomington, and Edina.

The City of Richfield submitted its 2040 Comprehensive Plan (Plan) to the Council for review to meet the Metropolitan Land Planning Act requirements (Minn. Stats. §§ 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>
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<tbody>
<tr>
<td>Conformance</td>
<td>Regional system plan for Parks</td>
<td>Conforms</td>
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<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</td>
</tr>
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<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>
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</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). Three Rivers Park District is the park implementing agency for Regional Parks System components in Richfield, for which the Plan accurately describes the Regional Parks System components. Regional Trails located within the City include the Nine Mile Creek and Nokomis-Minnesota River (formerly known as Intercity) regional trails, and the Canadian Pacific Rail (formerly known as South Hennepin East Regional) Trail Search Corridor (Figure 1). There are no state or federal lands within the City.

**Regional Transportation, Transit, and Aviation**
*Reviewer: Russ Owen, Metropolitan Transportation Services (MTS) (651-602-1724)*
The Plan conforms to the 2040 Transportation Policy Plan (TPP). It accurately reflects transportation system components of the TPP as well as applicable land use policies for regional transitways. The Plan is also consistent with Council policies regarding community roles, the needs of non-automobile transportation, access to job concentrations, and the needs of freight. The Plan is compatible with the plans of adjacent and affected governmental units.

**Roadways**
The Plan conforms to the roadways system element of the TPP. The Plan accurately accounts for the metropolitan highway system of principal arterials, which includes I-35W, I-494 TH 77, and TH 62. The Plan identifies potential future improvements to the principal arterial system, such as MnPASS Express Lanes on I-494 and interchange improvements at the I-494/I-35W interchange. The Plan further acknowledges the significant impact of congestion on principal arterials within the City of Richfield, and how this is anticipated to continue to be a matter of concern in the future.

The Plan identifies all the required characteristics of the City’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 system element of the TPP. It shows the location of existing transit routes and facilities and acknowledges the City is within Transit Market Area II.
The Plan incorporates existing and future transitways that are part of the Current Revenue Scenario of the TPP. These include the Orange Line, D-Line, and planned transit advantages within the City.

The Plan also incorporates transitways that are part of the Increased Revenue Scenario of the TPP. The Plan’s maps and narrative acknowledge the uncertainty of these transitways. These include the Nicollet Avenue and American Boulevard Arterial BRTs.

**Aviation**

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

The Plan also identifies the MSP International Airport and addresses elements of its long-term comprehensive plan. The Plan addresses issues including land use compatibility, noise sensitivity, and the protection of airspace from obstructions. This is critical due to Richfield’s proximity to MSP International Airport. The Plan addresses how MSP International Airport affects the development of new single-family housing and the affects of the runway safety zones on the eastern half of the City of Richfield.

**Bicycling and Walking**

The Plan is consistent with the Bicycling and Pedestrian chapter of the TPP. It identifies existing and future segments of and connections to the Regional Bicycle Transportation Network (RBTN) and regional trails. The Plan identifies key destinations and preferred routes for bicyclists and pedestrians, and outlines the vision of the Bicycle Master Plan adopted in 2012. The Plan proposes preferred alignments for RBTN corridors, including the Xerxes Avenue, Portland Avenue, Cedar Avenue, and 66th Street corridors. These are clearly identified as “proposed for the RBTN.”

The Plan is also consistent with Bicycle and Pedestrian policies of the TPP by planning for local pedestrian and bicycle connections to transit, regional trails, regional job concentrations, and other regional destinations as outlined on the RBTN map.

**Freight**

The Plan is consistent with Freight policies of the TPP. The Plan identifies the needs of freight movement in and through the City, including accessibility to freight terminals and facilities. Specific issues include the significant movement of freight along I-494 and I-35W, as well as TH 62 and TH 77. The Plan also discusses freight rail service within the City’s Pleasant Avenue corridor and acknowledges the importance of the City to work with the rail operator in a cooperative manner on any future planning issues.

**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 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 of Urban Center and applicable TPP policies for transit station areas.
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 forecasts for population, households, and employment.

Current wastewater treatment services are provided to the City by Metropolitan Council Environmental Services. All wastewater generated within the City is conveyed through Council Interceptors; 1-RF-490, 1-RF-491, 1-RF-491R, 1-RF-492, 1-RF-493, and 3-BN-497. All flow is treated at the Council’s Metropolitan Wastewater Treatment Plant in St. Paul. The Plan projects that the City will have 16,700 sewered households and 17,500 sewered employees by 2040. The Metropolitan Disposal System with its scheduled improvements has or will have adequate capacity to serve the City’s forecasted growth.

The Plan provides sanitary flow projections in 10-year increments. The rationale for the projections is given in the Plan and determined appropriate for planning local services. The 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 the local municipal (public) and private property sanitary sewer systems; including a summary of activities and programs intended to identify and mitigate I/I from both public and private property sources, an annual sewer pipe lining program as part of the City’s street reconstruction program, and a public outreach and educational program to encourage private property owners to proactively inspect and repair or replace defective services. The City also plans to explore grants and other financial assistance programs for property owners who pursue improvements to their services. Since 2016, the City has completed approximately $400,000 per year to address I/I issues which resulted in 10,000 to 20,000 feet of pipe lining annually. They plan to continue this level of effort into the foreseeable future.

The Plan describes the requirements and standards for minimizing I/I and references City Ordinance (Sections 700 & 705) that prohibit clear water discharges from illicit connections to the sanitary sewer system. The Plan states that the City will amend the Ordinance within twelve months of adoption of the Plan to include the required disconnection of existing clearwater sources once they are identified.

The Plan describes the sources, extent, and significance of existing I/I within the entire wastewater collection system and provides a description of an implementation plan for preventing and eliminating excessive I/I from entering both the municipal and private property sewer systems. The Plan states that 90% of the private service laterals within the City were built prior to 1970 where the use of clay tile pipe was prevalent. Over time, as this type of pipe ages, it can become more susceptible to I/I through open joints and cracked pipe if not maintained. By comparing wastewater flow generation during 2015 through 2017, with precipitation trends and events, the City has determined that the collection system is not significantly impacted by I/I. The City has not exceeded the Council assigned peak flow limit during its regional I/I program.

**Sewer Element Comments**

The Sewer Element of the Plan has been reviewed against the requirements for Comprehensive Sewer Plans for Urban Center communities. It was found to be complete and consistent with Council WRPP 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 states that within 12 months of final adoption, the City will amendment its Ordinance regarding illicit clear water connections to require disconnection once they are identified. The City shall submit to the Council a copy of the revised Ordinance upon approval.

Surface Water Management
Reviewer: Judy Sventek, ES – Water Resources (651-602-1156)
The Plan is consistent with Council policy requirements and in conformance with the Council’s WRPP for local surface water management. The Plan satisfies the requirements for 2040 comprehensive plans. Richfield lies within the oversight boundaries of the Nine Mile Creek and Minnehaha Creek Watershed Districts, and the Richfield Bloomington Watershed Management Organization.

Richfield submitted a draft Local Water Management Plan (LWMP) update for review in June 2018. Council Water Resources staff reviewed and commented on the draft LWMP to the City and Watersheds in a letter dated August 1, 2018. The LWMP was approved by the Nine Mile Creek Watershed District on August 15, 2018, by the Richfield Bloomington Watershed Management Organization on August 23, 2018, and by the Minnehaha Creek Watershed District on January 10, 2019. The Plan incorporates the LWMP as Appendix G.

Advisory Comments
When available, we request that the City provide to the Council the date it adopted the final LWMP, and a copy of the final adopted LWMP that will be included in the final Plan document that the City adopts, if it differs from the December 2018 version in the draft Plan reviewed by the Council.

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 consistently incorporates the Council forecasts for Richfield, as shown in Table 1.

<table>
<thead>
<tr>
<th></th>
<th>Census 2010</th>
<th>Estimated 2018</th>
<th>Council Forecasts</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Population</strong></td>
<td>35,228</td>
<td>36,436</td>
<td>37,100</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>37,300</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>37,700</td>
</tr>
<tr>
<td><strong>Households</strong></td>
<td>14,818</td>
<td>15,192</td>
<td>15,900</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>16,300</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>16,700</td>
</tr>
<tr>
<td><strong>Employment</strong></td>
<td>15,604</td>
<td>17,148</td>
<td>16,600</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>17,500</td>
</tr>
</tbody>
</table>

Council staff advised the City to request a higher employment forecast, in recognition that recent employment has exceeded expectations. Recent employment growth has pushed employment in 2018 to 17,148 jobs. The City chose to not request the forecast change.

Chapter 5 of the Plan describes how land supply and staging accommodate the forecasted households growth. Most of the new housing expected in the City will be added in areas guided for high-density or residential mixed use. The City estimates that at minimum allowed densities the full development of this land supply would add 2,274 housing units (Table 5-4), which more than accommodates the 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 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 TPP. Plans are also required to identify areas for redevelopment, particularly areas that are well-served by transportation options and nearby amenities and that contribute to better proximity between jobs and housing.

The City is a fully developed community with only 1% undeveloped land. Approximately 62% of the City is residential as illustrated in Figure 3. Another 15% of the community is comprised of public land in the form of public right-of-way, parks and open space, and other public spaces. The City includes an emerging higher density mixed-use district at “the Hub,” centered on 66th Street and Lyndale Avenue and extending eastward to Nicollet Avenue. Mixed use and commercial concentrations exist along Penn Avenue in the northwest portion of the City, along the Cedar Avenue/Richfield Parkway Corridor on the City’s eastern border, and along the I-494 frontage on the City’s southern border. The City is home to the major office headquarters of Best Buy northwest of the Interchange of I-35W and I-494.

The Plan identifies 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, and target opportunities for more intensive development near regional transit investments at densities and in a manner articulated in the TPP. As shown in Table 2 below, the expected overall density of planned residential growth is a minimum of 25.2 units per acre. Acreage identified for likely residential redevelopment are largely located in areas where the City has conducted more detailed planning, and has invested other public resources to support that redevelopment. These include 66th/Lyndale District, the Cedar Avenue/Richfield Parkway Corridor, and Penn Avenue.

Table 2. Planned Residential Density, City of Richfield

<table>
<thead>
<tr>
<th>Category</th>
<th>Density</th>
<th>% Resid.</th>
<th>Net Acres</th>
<th>Min Units</th>
<th>Max Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low Density Residential</td>
<td>1-7</td>
<td>100%</td>
<td>3.4</td>
<td>4</td>
<td>23</td>
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<tr>
<td>Medium Density Residential</td>
<td>8-34</td>
<td>100%</td>
<td>8.5</td>
<td>70</td>
<td>288</td>
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<tr>
<td>High Density Residential</td>
<td>35-100</td>
<td>100%</td>
<td>21.1</td>
<td>740</td>
<td>2112</td>
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<tr>
<td>Mixed Use – Cedar</td>
<td>25-75</td>
<td>40%</td>
<td>5.9</td>
<td>150</td>
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<tr>
<td>Mixed Use – Penn</td>
<td>25-100</td>
<td>60%</td>
<td>6.1</td>
<td>156</td>
<td>612</td>
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<tr>
<td>Mixed Use – Lyndale/66th</td>
<td>25-150</td>
<td>50%</td>
<td>15.2</td>
<td>382</td>
<td>2282</td>
</tr>
<tr>
<td>Mixed Use – I-494</td>
<td>50-150</td>
<td>30%</td>
<td>0.7</td>
<td>37</td>
<td>109</td>
</tr>
</tbody>
</table>

**TOTALS** | **61** | **1539** | **5869**

**Overall Density** | **25.2** | **96.2**
The City’s Plan acknowledges the southeast corner of Richfield as an Area of Concentrated Poverty where more than 50% of the population are people of color (ACP50). This part of the City includes a portion of the Cedar Avenue / Richfield Parkway Corridor. It is guided in a way that supports reinvestment in the form of higher density and mixed-use development. The City also seeks to improve access to and from this area with a planned underpass of Highway 77 along 77th Street.

**Station Area Planning**

The Plan recognizes existing and planned transitways that are part of the Current Revenue Scenario of the TPP. This includes future stations on the METRO Orange Line and the D-Line Arterial Bus Rapid Transit. The TPP directs Urban Center communities with planned Highway Bus Rapid Transit (BRT) at an average minimum of 25 residential units per acre and target 40-75+ units per acre within the station area (area within 10-minute walk or 1/2 mile). Planned densities for areas identified for redevelopment near station areas along transit routes are consistent with the minimum density required in the TPP. Part of the Lyndale/66th Street Mixed Use district is within the station area for the future METRO Orange Line station at I-35W & 66th Street. The guiding land use for this area is Mixed Use with a density range of 25 to 100 units per acre. The future station at Knox & 76th Street will serve an existing concentration of office and high density residential uses, and the D-Line serves a corridor of the City (Portland Avenue) that the Plan does not identify as a location for growth.

**Housing**

*Reviewer: Tara Beard, CD – Housing (651-602-1051)*

The Plan is consistent with the 2040 Housing Policy Plan. Richfield is a mature suburb with a wide variety of housing types. Significant growth was already occurring before World War II and continued to boom post-war, but since 1970, the City’s population has declined. Like many suburbs, early residential development was primarily single family, but housing stock has diversified over time; approximately 64% of its existing housing stock is single-family. The Plan notes that future growth will be primarily through redevelopment.

The Plan indicates that the City has more than 15,000 housing units. While roughly 86% of those units are affordable to households earning 80% of the Area Median Income (AMI) or less (or $68,000 for a family of four), affordable options decrease to just 5% for households earning 30% AMI or less (or $27,100). Roughly 28% of Richfield households earning 80% AMI or less are currently housing cost burdened. The Plan identifies existing needs that include rehabilitation and upkeep of its largely aging housing stock, preservation of naturally occurring affordable housing (NOAH), and housing with supporting services for seniors.

Looking forward, the Plan acknowledges the City’s share of the region’s need for affordable housing in the 2021-2030 decade, which is 121 units. With 41 acres of land guided for higher density residential development in that time period (Figure 5), the Plan sufficiently promotes the availability of land to support that share.

The Plan addresses its existing and future housing needs in its implementation plan, which thoroughly describes the policies, programs, and other tools that the City will consider. Tools discussed in the Plan to address future affordable housing needs include participation in Livable Communities Act programs, and applications to Minnesota Housing’s Consolidated Request for Proposals. While the plan states that Tax Increment Financing, a significant local finance tool, would be considered only for market-rate housing, other local tools, such as 4d tax incentive programs, Community Development Block Grant (CDBG) funds, and the issuance of housing revenue bonds will be considered to preserve naturally occurring affordable housing (NOAH).
**Water Supply**  
*Reviewer: Lanya Ross, ES – Water Supply Planning (651-602-1803)*  
The Plan is consistent with WRPP policies related to water supply, including the policy on sustainable water supplies, the policy on assessing and protecting regional water resources, and the policy on water conservation and reuse.

The City prepared a Local Water Supply Plan in 2018 that was submitted to both the Minnesota Department of Natural Resources (DNR) and the Council and reviewed separately. Council comments were shared with the DNR on December, 2018.

**Advisory Comments**  
If changes are made to the LWSP resulting from DNR’s review of the Plan, the City will need to provide the Council and DNR with the updated information.

**Community and Subsurface Sewage Treatment Systems (SSTS)**  
*Reviewer: Jim Larsen, CD – Local Planning Assistance (651-602-1159)*  
The Plan indicates the City is fully served by the City’s local wastewater collection system that ultimately flows into the MCES system, and to the Metropolitan Wastewater Treatment Facility for treatment and discharge to the Mississippi River. There are no public or privately-owned Community Wastewater Treatment Systems or individual SSTS in operation in the City.

**Special Resource Protection**

**Solar Access Protection**  
*Reviewer: Cameren 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 planning elements.

**Aggregate Resource Protection**  
*Reviewer: Jim Larsen, CD – Local Planning Assistance (651-602-1159)*  
The Plan identifies, 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 community.

**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 a narrative of the City’s history; a policy to preserve historic, natural and cultural resources; and identifies the Bartholomew House (6901 Lyndale Avenue South), which is the one site in the City that is on the National Register of Historic Places. The Plan identifies the Richfield Historical Society, which was formed in 1967 in an effort to restore the home of General Riles Bartholomew.

**Plan Implementation**  
*Reviewer: Michael Larson, CD – Local Planning Assistance (651-602-1407)*  
The Plan includes an Implementation Chapter that discusses the implementation of the Plan through policy, regulation, processes, roles & responsibilities, and programs. Individual chapters of the Plan (Housing, Transportation, Parks, and Surface Water Management, and Utilities) include more detailed implementation discussion of timing and sequencing. The Plan also addresses official controls and includes a five-year Capital Improvement Program.
**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:

- May 9, 2018: City of Richfield Preliminary 2040 Comprehensive Plan
- December 18, 2018: City of Richfield 2040 Comprehensive Plan
- June 26, 2019: Supplemental and revised material related to Forecasts, Land Use, Housing, and Wastewater.

**Attachments**

- Figure 1: Location Map with Regional Systems
- Figure 2: *Thrive MSP 2040* Community Designations
- Figure 3: Existing Land Use
- Figure 4: 2040 Planned Land Use
- Figure 5: Land Guided for Affordable Housing
Figure 1. Location Map with Regional Systems
Community Designations
City of Richfield, Hennepin County

Figure 2. Thrive MSP 2040 Community Designations
Figure 3. Existing Land Use
Figure 4. 2040 Planned Land Use
## Land Guided for Affordable Housing 2021-2030

**Richfield**  
Hennepin County  
Council Member Molly Cummings, District 5

<table>
<thead>
<tr>
<th></th>
<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><strong>Medium Density Residential</strong></td>
<td>4.26</td>
<td>8</td>
<td>100%</td>
<td>35</td>
</tr>
<tr>
<td><strong>High Density Residential</strong></td>
<td>5.28</td>
<td>35</td>
<td>100%</td>
<td>185</td>
</tr>
<tr>
<td><strong>Lyndale/66th</strong></td>
<td>12.68</td>
<td>25</td>
<td>50%</td>
<td>159</td>
</tr>
<tr>
<td><strong>Penn Ave Corridor</strong></td>
<td>3.41</td>
<td>25</td>
<td>60%</td>
<td>52</td>
</tr>
<tr>
<td><strong>Cedar Ave. Corridor</strong></td>
<td>13.35</td>
<td>25</td>
<td>40%</td>
<td>134</td>
</tr>
<tr>
<td><strong>I-494 Corridor</strong></td>
<td>2.44</td>
<td>50</td>
<td>30%</td>
<td>37</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>41</td>
<td></td>
<td></td>
<td>602</td>
</tr>
</tbody>
</table>

- Sufficient/(insufficient) units possible against share of regional need: **481**
- Affordable units built since 2021: **0**
- Sufficient/(insufficient) units possible adjusted for affordable units built: **481**
- Number of Comp Plan Amendments approved since Comp Plan Update: **0**