Environment Committee

Meeting date: June 9, 2020

Community Development Committee

Meeting date: June 15, 2020

For the Metropolitan Council meeting of June 24, 2020

Subject: City of St. Paul Park 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22308-1

District(s), Member(s): District 13, Chai Lee

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

Staff Prepared/Presented:		Patrick Boylan, AICP, Planning Analyst (651-602-1438) 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 St. Paul Park to place its 2040 Comprehensive Plan into effect.
- 2. Advise the City to:
 - a. Provide to the Council the date the City adopted the final LWMP, and a copy of the final adopted LWMP that will be included in the Plan document that the City adopts, if it differs from the draft January 2018 version contained in the last Plan submittal.
 - b. Implement the advisory comments in surface water management
 - c. Advise the City to adopt the MRCCA Plan within 60 days after receiving final DNR approval and submit a copy of the final adopted plan and evidence of adoption to the DNR, Council, and National Park Service within 10 days after the adoption.

Recommendation of the Environment Committee

1. Approve the City of St. Paul Park's Comprehensive Sewer Plan.



Advisory Comments

The following Advisory Comments are part of the Council action authorizing the City of St. Paul Park to implement its 2040 Comprehensive Plan (Plan).

Community Development Committee

- 1. As stated in the Local Planning Handbook, the City must take the following steps:
 - a. Adopt the Plan in final form after considering the Council's review recommendations as contained in the body of this report.
 - b. Submit one hard copy and one electronic copy of the Plan to the Council. The electronic copy must be submitted as one unified file.
 - c. Submit to the Council a copy of the City Council resolution evidencing final adoption of the Plan.
- 2. The *Local Planning Handbook* also states that local governments must formally adopt their comprehensive plans within nine months after the Council's final action. If the Council has recommended changes to the Plan, local governments should incorporate those recommended changes into the Plan or respond to the Council before "final adoption" of the comprehensive plan by the governing body of the local governmental unit. (Minn. Stat. § 473.858, subd. 3)
- 3. Local governments must adopt official controls as identified in their 2040 comprehensive plans and must submit copies of the official controls to the Council within 30 days after the official controls are adopted. (Minn. Stat. § 473.865, subd. 1)
- 4. Local governmental units cannot adopt any official controls or fiscal devices that conflict with their comprehensive plans or which permit activities in conflict with the Council's metropolitan system plans (Minn. Stat. §§ 473.864, subd. 2; 473.865, subd. 2). If official controls conflict with comprehensive plans, the official controls must be amended within 9 months following amendments to comprehensive plans (Minn. Stat. § 473.865, subd. 3).

Environment Committee

- 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 St. Paul Park is located in southwestern Washington County. It is surrounded by the communities of Newport, Cottage Grove, Grey Cloud Island Township, and Inver Grove Heights.

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).

Review Standard	Review Area	Plan Status
Conformance	Regional system plan for Parks	Conforms
Conformance	Regional system plan for Transportation, including Aviation	Conforms
	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

The attached Review Record details the Council's assessment of the Plan's conformance, consistency, and compatibility, and is summarized below.

Thrive Lens Analysis

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

Funding

The Metropolitan Council awarded the City a Planning Assistance Grant of \$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 local opposition to the 2040 comprehensive plan.

REVIEW RECORD

City of St. Paul Park 2040 Comprehensive Plan

Review File No. 22308-1, Business Item No. 2020-150 JT

The following Review Record documents how the proposed Plan meets the requirements of the Metropolitan Land Planning Act and conforms to regional system plans, is consistent with regional policies, and is compatible with the plans of adjacent and affected jurisdictions.

Conformance with Regional Systems

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

Regional Parks and Trails

Reviewer: Colin Kelly, Community Development (CD) - Regional Parks (651-602-1361) The Plan conforms to the *2040 Regional Parks Policy Plan* (RPPP) for the Regional Parks System element. Washington County is the Park implementing agency for Regional Parks System components in St. Paul Park, for which the Plan accurately describes the Regional Parks System components. Regional Trails located within the City include the Mississippi River and Prairie View regional trail search corridors (Figure 1). There are no federal or state recreation 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) adopted in 2015. The Plan 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.

Roadways

The Plan conforms to the Roadways system element of the TPP. The Plan accurately accounts for the metropolitan highway system of principal arterials. The Plan accurately reflects the regional functional classification map of A-minor arterials and has delineated major and minor collectors.

The Plan identifies all the required characteristics of the 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 is 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 IV. The Plan incorporates the Red Rock Corridor, a transitway that is part of the Increased Revenue Scenario in the TPP. The Plan's maps and narrative acknowledge the uncertainty of this transitway.

The Plan is consistent with the policies of the Transit system element of the TPP.

Aviation

The Plan conforms to Aviation system element of the TPP. The Plan references policies that protect regional airspace from obstructions and addresses seaplane use. The Plan



identifies the South St. Paul Airport and addresses elements of its long-term comprehensive plan. The Plan addresses issues including land use compatibility, lighting, and protection of radio/electronic communications. The City participates in a Joint Airport Zoning Board (JAZB).

Bicycling and Walking

The Plan is consistent with the Bicycling and Pedestrian chapter of the TPP. The Plan identifies existing and future segments of and connections to the Regional Bicycle Transportation Network (RBTN) and regional trails. 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 identified 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. These specific needs include four BNSF at-grade rail crossings and safety related to proximity to a major oil refinery.

Water Resources

Wastewater Service

Reviewer: Kyle Colvin, Environmental Services (ES) – Engineering Programs (651-602-1151) The Plan conforms with the *2040 Water Resources Policy Plan* (WRPP). It represents the City's guide for future growth and development through the year 2040. It includes growth forecasts that are consistent with the Council's assigned forecasts for population, households, and employment.

Current wastewater treatment services are provided to the City by the Metropolitan Council Environmental Services. All wastewater generated within the City is conveyed through Council Interceptor 7102-2. Flow is treated at the Council's Metropolitan Wastewater Treatment Plant in St. Paul. The Plan projects that the City will have 3,280 sewered households and 2,400 sewered employees by 2040. The Metropolitan Disposal System with its scheduled improvements has or will have adequate capacity to serve the City's growth forecasts.

The Andeavor Oil Refinery located in the northwest corner of the City owns and operates a private wastewater treatment facility. The facility has been issued a National Pollution Discharge Elimination System/State Disposal System (NPDES/SDS) permit. The permit allows for a discharge rate of up to 3.06 MGD and includes treatment of most of the runoff generated on the site.

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 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 Emerging Suburban Edge communities.

The Plan defines the City's goals, policies, and strategies for preventing and reducing excessive inflow and infiltration (I/I) primarily in the local municipal (city) with some activities related to private property source mitigation. The Plan includes a summary of activities and programs intended to investigate and mitigate I/I in the public collection system including inspection of pipes and manholes and follow-up rehabilitation or replacement, vented manhole cover replacement, and installing casting seals. Other activities include routine maintenance, flow monitoring, and smoke testing. The City also checks for non-compliant sump pump connections during water meter repair and replacement activities. The City's summary of its Capital Improvement Program does not have specific I/I related mitigation projects but identifies an ongoing Street and Utility Improvement program in which I/I mitigation efforts are included.

The Plan describes the requirements and standards for minimizing I/I and references City Ordinance (Section 70-82) that prohibits the discharge of any stormwater, surface water, groundwater, roof runoff, subsurface drainage, cooling water, or unpolluted industrial process water into the sanitary sewer system. The Ordinance does not state that such prohibited discharges are required to be disconnected upon discovery.

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 primarily the municipal sewer system. The Plan states that 55% of the homes within the City were built prior to 1970 when private service laterals were predominantly vitrified clay tile pipe. By comparing winter month water use data to annual average wastewater flow for the years 2012 through 2016, the Plan states that approximately 5% of base flow is from I/I. The Plan also indicates that peak monthly flow represents about 28% I/I.

Sewer Element Comments

The Sewer Element of the Plan has been reviewed against the requirements for Comprehensive Sewer Plans for Emerging Suburban Edge communities. It was found to be 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.

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 *2040 Water Resources Policy Plan* for local surface water management. The Plan satisfies the local surface water management plan requirements for 2040 comprehensive plans. St. Paul Park lies within the oversight boundaries of the South Washington Watershed District. The City submitted a draft Local Water Management Plan (LWMP) update to the Council in January 2018. Council Water Resources staff reviewed and commented on the LWMP to the City and Watershed in a letter dated February 19, 2018. The LWMP was approved by the Watershed on September 11, 2018. The Plan incorporates the LWMP in Appendix B.

Advisory Comments

When available, we request that the City provide to the Council the date the City adopted the final LWMP, and a copy of the final adopted LWMP that will be included in the Plan document that the City adopts, if it differs from the draft January 2018 version contained in the last Plan submittal.

Consistency with Council Policies

The Council reviews plans to evaluate their apparent consistency with the adopted plans of the Council. Council staff have reviewed the City's Plan and find that it is consistent with the Council's policies, as detailed below.

Forecasts

Reviewer: Todd Graham, CD – Research (651-602-1322)

The Plan includes the Metropolitan Council forecasts for St. Paul Park (table 1 on p. 15) as shown in Table 1 below for reference.

Table 1. City of St. Paul Park Forecasts

	Census	Estimated	stimated Counc		cil Forecasts	
	2010	2018	2020	2030	2040	
Population	5,273	5,581	6,000	7,000	7,900	
Households	1,967	2,062	2,300	2,810	3,300	

Employment	1,515	1,227	2,000	2,200	2,400
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Council staff find that growth has significantly lagged behind what was previously expected: employment has declined in the city. Council staff recommend that forecasts be reduced by -500 jobs and -200 households and -300 population in each of 2020, 2030, and 2040. The City is not requesting a forecast change at this time.

Thrive MSP 2040 and Land Use

Reviewer: Patrick Boylan, CD – Local Planning Assistance (651-602-1438)

The Plan is consistent with *Thrive MSP 2040* (Thrive) and its land use policies. The Plan acknowledges the Thrive community designation of Emerging Suburban Edge (Figure 2). Thrive describes Emerging Suburban Edge communities as those that are in the early stages of transitioning into urbanized levels of development. Emerging Suburban Edge communities offer both connections to urban amenities and the proximity to open spaces that characterizes a rural lifestyle. Communities in the Emerging Suburban Edge have a mix of residential, rural, and agricultural areas, often including lower-density single-family neighborhoods and small downtown service centers.

Communities in the Emerging Suburban Edge designation have a mix of residential, rural, and agricultural areas, often including lower-density single-family neighborhoods and small downtown service centers. This is true of St. Paul Park which has an established downtown area and a charming small-town feel.

Emerging Suburban Edge communities are expected to plan and stage development for forecasted growth through 2040 and beyond at overall average net residential densities of at least 3-5 units per acre in areas of new development and redevelopment.

The City plans to accommodate forecasted growth through a variety of land use categories, both within the historic center of town through a variety of mixed-use categories, as well as through greenfield development on the south end of town. The Plan details downtown commercial development and focuses uses along Hastings Avenue and areas along side the west side of US Highway 61. The Plan identifies new growth areas at densities that exceed Thrive density policy minimums including area for redevelopment around the Rush Line Station. The expected overall density of the new residential growth is 4.2 units per acre as shown in Table 2 below.

Table 2. Planned Residential Density, City of St. Paul Park

	2020-2040 Change				
Category	Den Min	isity Max	Net Acres	Min Units	Max Units
Critical Area Residential	2	6	127.7	255	766
Low Density Residential	3	5	71.2	214	356
Medium Density Residential	5	10	50.4	252	504
High Density Residential	10	25	29.7	297	743
Mixed Use *	10	30	7	35	105
Mixed Use (Transit) *	10	30	7.9	40	119
Mixed Use (Marina) **	10	30	44.8	314	941
Downtown Commercial *	10	30	7.00	35	105
	TOTAL	.S	345.7	1,441	3,638
Overall Planned Density				4.2	10.5
* Mixed Llos and Mixed Llos Transit allow up to 50% residential					

* Mixed Use and Mixed-Use Transit allow up to 50% residential

Station Area Planning

The 2040 Transportation Policy Plan (TPP) directs Emerging Suburban Edge communities, with planned highway bus rapid transit (BRT), to guide a minimum of 8 residential units per acre and target 20-40+ units per acre within the BRT transitway station area (area within 10-minute walk or 1/2 mile). St. Paul Park has a planned Bus Rapid Transit station along the Red Rock BRT. The "Mixed Use Transit" and "Mixed Use Marina" are the dominant guided land uses near the Red Rock station of 10 units per acre and a maximum of 30 units per acre.

Housing

Reviewer: Hilary Lovelace, CD – Housing (651-602-1555)

The Plan is consistent with the *2040 Housing Policy Plan*. As of 2016, the City has more than 2,100 homes including just over 200 multifamily units, nearly 1,800 single-family homes, and more than 100 manufactured homes. Roughly 460 homes are rented. More than 2,000 housing units are currently affordable to households earning under 80% of Area Median Income (AMI), however, about 480 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. Notably, there are 145 units affordable to households with income at or below 30% AMI and still, nearly 120 cost burdened households with incomes at or below 30% AMI.

The Plan identifies existing housing needs including maintenance and reinvestment in existing housing stock, meet local and regional needs for affordable housing, provide access to funding sources, and encourage the development of new housing. The City has 60 units of publicly subsidized housing, none of which are age-restricted or specifically designated for people with disabilities.

The Plan acknowledges the 2021-2030 affordable housing need allocation of 119 units; 64 of which are needed at prices affordable to households earning 30% of AMI or less, 35 of which are needed at prices affordable to households earning between 31 and 50% of AMI, and 20 of which are needed at prices affordable to households earning between 51 and 80% of AMI. As shown in Figure 6, 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 235 new housing units.

The housing implementation plan component of the Plan describes that the City will consider TIF, housing bonds, and tax abatement for projects that help meet community housing goals. The Plan also indicates that the City will continue strong partnership with the Washington County CDA to meet their housing needs. The City states that they are actively considering the adoption of a rental housing license policy, and support infrastructure needs and conversions to cooperatives for manufactured home communities.

Water Supply

Reviewer: Brian Davis, ES – Water Supply Planning (651-602-1519)

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 (LWSP) that was submitted to both the MN Department of Natural Resources (DNR) and Metropolitan Council and reviewed under separate cover. The LWSP is considered complete by the Council, and a review letter was sent to the DNR on September 8, 2017.

Community and Subsurface Sewage Treatment Systems (SSTS)

Reviewer: Kyle Colvin, ES – Engineering Programs (651-602-1151) The Plan indicates that there are 55 SSTS and no public or privately-owned Community Wastewater Treatment Systems in operation in the City. Washington County administers the SSTS program and oversees the installation, operation, and maintenance management of SSTS within the City. Washington County Ordinance #206 is consistent with Minnesota Pollution Control Agency Chapter 7080-7083 Rules and Council WRPP requirements.

Special Resource Protection

Mississippi River Corridor Critical Area (MRCCA)

Reviewer: Raya Esmaeili, CD – Local Planning Assistance (651-602-1159)

The Plan includes a Mississippi River Corridor Critical Area (MRCCA) Plan component that was reviewed by Minnesota Department of Natural Resources (DNR) staff and found to be substantially consistent with Minnesota Statutes 116G and Minnesota Rules Chapter 6106. Council staff also find the MRCCA Plan component to be consistent with *Thrive MSP 2040* land use policies, and *Minnesota Rules Chapter 6106*. The DNR's September 30, 2019, conditional approval letter is attached to the staff report (Figure 5). Final DNR approval of the MRCCA Plan will be sent to the City after the Council authorizes local adoption of the Plan.

Advisory Comment

The City needs to adopt the MRCCA Plan within 60 days after receiving final DNR approval and submit a copy of the final adopted plan and evidence of adoption to the DNR, Council, and National Park Service within 10 days after the adoption.

Solar Access Protection

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

Aggregate Resource Protection

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

The Plan identifies, consistent with the Council's aggregate resources inventory information contained in *Minnesota Geological Survey Information Circular 46*, the presence of viable aggregate resource deposits in the City – primarily dolostone bedrock within the southern portion of the City. If determined to be feasible, future mining operations would be approached as an interim use subject to compatibility with adjacent land uses, ability to follow strict environmental and nuisance standards, and the ability to meet specific reclamation standards.

Historic Preservation

Reviewer: Patrick Boylan, CD – Local Planning Assistance (651-602-1438)

Consistent with the Metropolitan Land Planning Act, the Plan contains a section on Historical Resources. St. Paul Park's heritage extends from the period shortly after the Civil War when it was settled as an industrial river town. Historical records attest to the architectural resources from the City's early years, as do photographs and paintings that line the walls of City Hall; unfortunately, most of these early architectural examples have lost much of their historic integrity.

Plan Implementation

Reviewer: Patrick Boylan, CD – Local Planning Assistance (651-602-1438)

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

The Plan, with supplemental materials, describes the official controls and fiscal devices that the City will employ to implement the Plan. Specific implementation strategies are contained in individual chapters of the Plan, with capital improvements planning detailed in the appendix.

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:

- July 3, 2019: St. Paul Park 2040 Comprehensive Plan
- September 18, 2019: Revised MRCCA Plan
- January 15, 2020: Revised Comprehensive Plan Responding to Council Incomplete Items for Transportation, Parks, Forecasts, Land Use, Housing, Water Supply, Environment, and Implementation.
- March 27, 2020: Revised Comprehensive Plan Responding to Council Incomplete Items for Transportation, Housing, and Forecasts.

Attachments

- Figure 1: Location Map with Regional Systems
- Figure 2: Thrive MSP 2040 Community Designations
- Figure 3: Existing Land Use
- Figure 4: 2040 Future Land Use
- Figure 5: Mississippi River Corridor Critical Area Conditional Approval Letter
- Figure 6: Land Guided for Affordable Housing

Figure 1. Location Map with Regional Systems

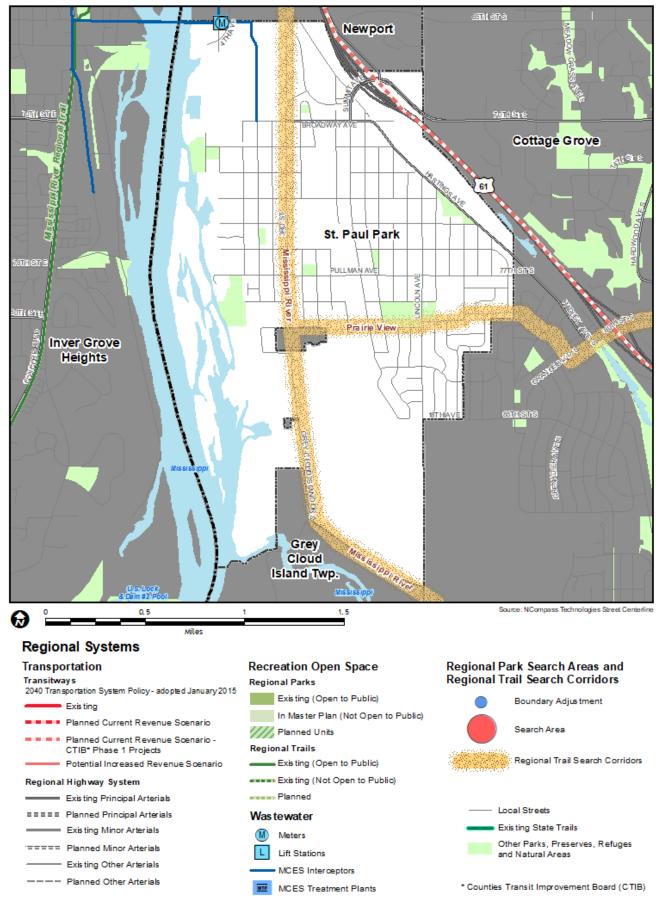


Figure 2. Thrive MSP 2040 Community Designations

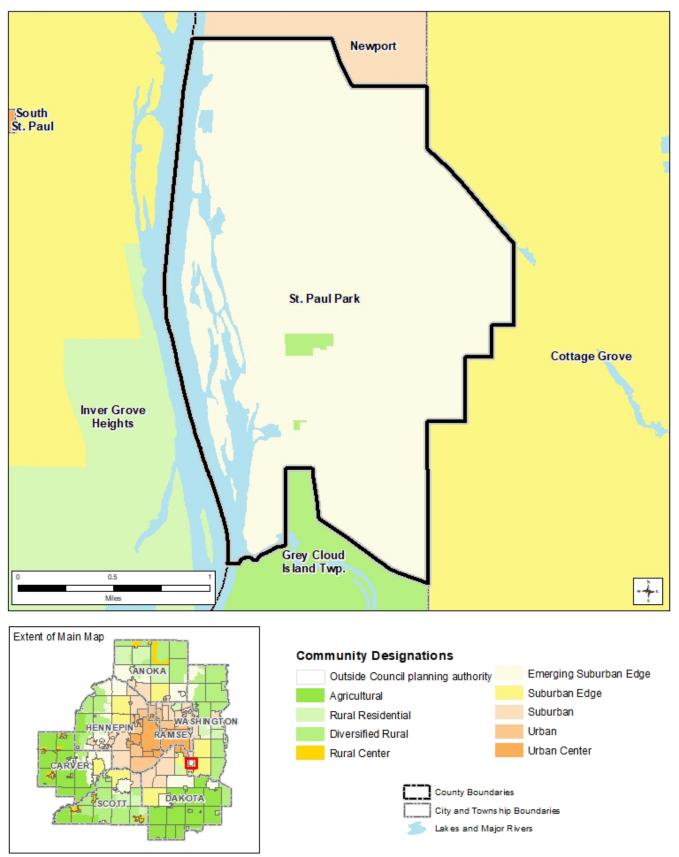


Figure 3. Existing Land Use

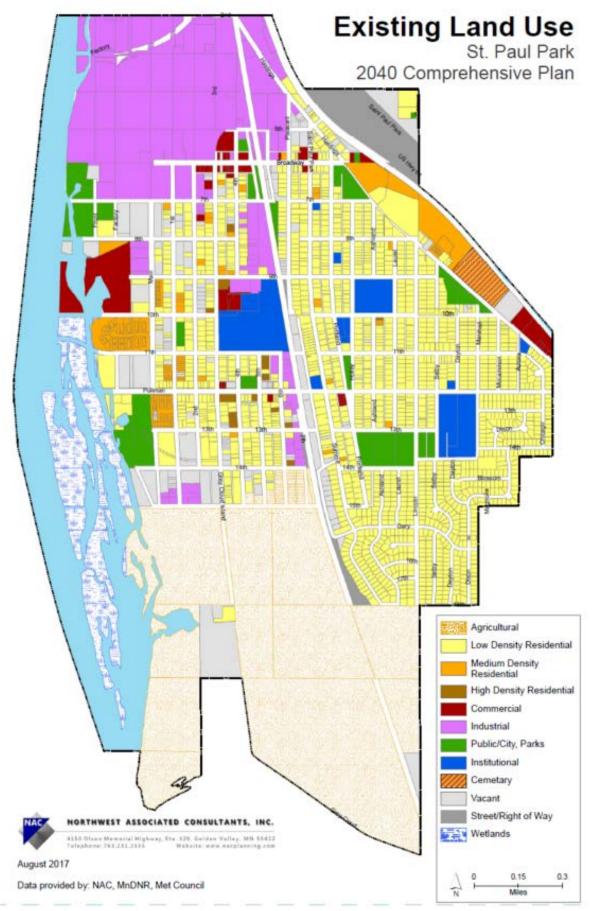


Figure 4. 2040 Future Land Use

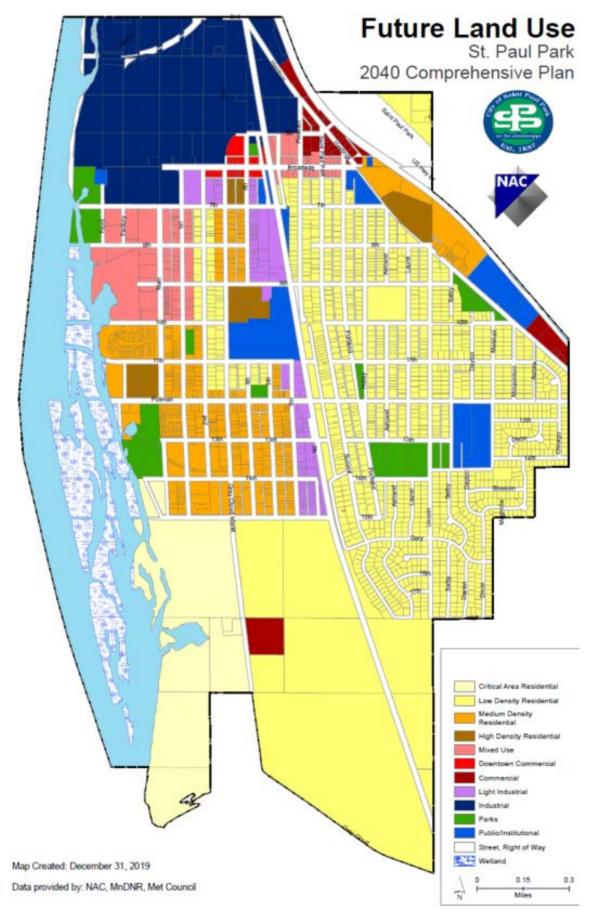


Figure 5. Mississippi River Corridor Critical Area Conditional Approval Letter

DEPARTMENT OF NATURAL RESOURCES

September 30, 2019

City of St. Paul Park Kevin Walsh, City Administrator 600 Portland Avenue Saint Paul Park, MN 55071

Re: Conditional Approval - City of Saint Paul Park MRCCA Plan

Dear Mr. Walsh:

I am pleased to inform you that the Minnesota Department of Natural Resources (DNR) conditionally approves the City of Saint Paul Park's Mississippi River Corridor Critical Area (MRCCA) plan.

We reviewed the MRCCA plan chapter of your 2040 Comprehensive Plan Update that was submitted to the Metropolitan Council on September 18, 2019. We have found that the MRCCA plan is substantially consistent with Minnesota Statutes, §116G and Minnesota Rules, chapter 6106.

We will send final approval of your MRCCA plan after the Metropolitan Council authorizes the city to put the comprehensive plan into effect. Within 60 days of receiving DNR final approval, the city must adopt the MRCCA plan. The city must then submit a copy of the final adopted plan, with evidence of adoption, to the DNR, the Metropolitan Council, and the National Park Service within ten days of the adoption.

Only MRCCA plans and plan amendments approved by the DNR have the force and effect of law. Once in effect, local governments must implement and enforce the DNR-approved plans.

We appreciate your efforts to develop and adopt the MRCCA plan, which provides a solid basis for future ordinance amendments and MRCCA management. Please contact Matt Bauman at 651-259-5710 or at <u>matthew.bauman@state.mn.us</u> if you have any questions about next steps.

Sincerely,

Jennifer Shillcox Land Use Unit Supervisor

c: Nate Sparks, Consulting Planner
 Raya Esmaeili, Metropolitan Council
 Alan Robbins-Fenger, National Park Service
 Jen Sorensen, DNR Region 3 Area Hydrologist
 Matt Bauman, DNR Land Use Unit

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Figure 6. Land Guided for Affordable Housing

 2021-2030 share of regional need for Affordable Housing:
 119 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
High Density	15.00	10	100%	150
Transit Mixed Use	1.90	10	50%	10
Marina Mixed Use	10.70	10	70%	75
Total	28			235

Sufficient/(insufficient) units possible against share of regional need: 116

Affordable units built since 2021: **0**

Sufficient/(insufficient) units possible adjusted for affordable units built: 116

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

