Community Development Committee

Meeting date: March 2, 2020

Environment Committee

Meeting date: March 10, 2020

For the Metropolitan Council meeting of March 25, 2020

Subject: White Bear Township 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22083-1

District(s), Member(s): District 11, Susan Vento

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 White Bear Township to place its 2040 Comprehensive Plan into effect.
- 2. Revise the Township's forecasts downward as shown in Table 1 of the attached Review Record.
- 3. Advise the Township to implement the advisory comments in the Review Record for Housing and Surface Water Management.

Recommendation of the Environment Committee

1. Approve White Bear Township's Comprehensive Sewer Plan.



Advisory Comments

The following Advisory Comments are part of the Council action authorizing White Bear Township to implement its 2040 Comprehensive Plan (Plan).

Community Development Committee

- 1. As stated in the *Local Planning Handbook*, the Township 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 Town Board 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 Township and the Comprehensive Sewer Plan becomes effective, the Township 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 Town Board resolution adopting its 2040 comprehensive plan, including its Comprehensive Sewer Plan, must be submitted to the Council.

Background

White Bear Township is located in northeastern Ramsey County. It is surrounded by the communities of Lino Lakes, Hugo, Grant, Dellwood, Birchwood Village, White Bear Lake, Gem Lake, Maplewood, Vadnais Heights, Shoreview, and North Oaks.

The Township submitted its 2040 Comprehensive Plan (Plan) to the Council for review to meet the Metropolitan Land Planning Act requirements (Minn. Stat. §§ 473.851 to 473.871) and the Council's 2015 System Statement requirements.

Review Authority & Rationale

Minn. Stat. § 473.175 directs the Metropolitan Council to review a local government's comprehensive plan and provide a written statement to the local government regarding the Plan's:

- **Conformance** with metropolitan system plans
- Consistency with the adopted plans and policies of the Council
- **Compatibility** with the plans of adjacent governmental units and plans of affected special districts and school districts

By resolution, the Council may require a local government to modify its comprehensive plan if the Council determines that "the plan is more likely than not to have a substantial impact on or contain a substantial departure from metropolitan system plans" (Minn. Stat. § 473.175, subd. 1).

Each local government unit shall adopt a policy plan for the collection, treatment, and disposal of sewage for which the local government unit is responsible, coordinated with the Metropolitan Council's plan, and may revise the same as often as it deems necessary (Minn. Stat. § 473.513).

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

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

Thrive Lens Analysis

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

Funding None.

Known Support / Opposition There is no known local opposition to the 2040 comprehensive plan.

REVIEW RECORD

White Bear Township 2040 Comprehensive Plan

Review File No. 22083-1, Business Item No. 2020-53 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 Township'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). Ramsey County is the Park implementing agency for Regional Parks System components in White Bear Township, for which the Plan accurately describes the Regional Parks System components. Regional Parks, Park Reserves, or Special Recreation Features located within the Township include Bald Eagle-Otter Lake Regional Park. Regional Trails located within the Township include the Birch Lake, Highway 96, Bruce Vento, and Lake Links regional trails, and the St. Anthony Railroad Spur Regional Trail Search Corridor. There are no State or Federal recreation lands within the Township (Figure 1).

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. 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.

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 Township'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 Township is within Transit Market Areas III and IV. The Plan is consistent with the policies of the Transit system element of the TPP. The Plan addresses community roles related to its Community Designation of Suburban, as well as the opportunities and challenges related to its Transit Market Areas.

Aviation

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



at White Bear Lake and Bald Eagle Lake, and describes how off-site air navigation aids will be protected. The Plan identifies the Benson Private 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.

Bicycling and Walking

The Plan is consistent with the Bicycle 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 Township, including accessibility to freight terminals and facilities.

Transportation Analysis Zones (TAZs)

The Plan conforms to the TPP regarding TAZ allocations. The Township's TAZ allocations for employment, households, and population appropriately sum to the Council's community-wide forecast totals for all forecast years. The Township'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 Township's Thrive community designation.

Water Resources

Wastewater Service

Comprehensive Sewer Plan Comments

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

Current wastewater treatment services are provided to the Township by Metropolitan Council Environmental Services. All wastewater generated within the Township is conveyed through Council Interceptors 6901, 7122, and 1-WL-416. All flow is treated at the Council's Metropolitan Wastewater Treatment Plant in St. Paul. The Plan projects that the Township will have 4,650 sewered households and 3,200 sewered employees by 2040. The Metropolitan Disposal System with its scheduled improvements has or will have adequate capacity to serve the Township's growth forecasts.

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 Suburban communities.

The Plan defines the Township's goals, policies, and strategies for preventing and reducing excessive inflow and infiltration (I/I) in the local municipal (Township) and private property sanitary sewer systems. The Plan includes a summary of activities and programs intended to mitigate I/I in mostly the public collection system consisting of inspections, studies, and manhole and pipeline rehabilitation efforts. In 1996, a Township-wide sump pump inspection and disconnection program was performed in which 3,380 homes were inspected for illegal connections and non-compliant sump pump connections. The

Township conducts nighttime inspection of its system and notes the presence of potential private property I/I sources. The Township has included in its capital improvement program over \$50,000 annually for I/I projects and estimates that all inspections will be completed within the next 10 to 15 years.

The Plan describes the requirements and standards for minimizing I/I and includes Town Ordinance No. 18, (Section 13) that addresses illegal connections to the sanitary sewer system including sump pumps and foundation drains and prohibits the discharge of water from any roof, surface, ground, or natural precipitation to the sanitary sewer system. The Ordinance allows for such discharges only after a waiver is issued for hardship cases. Properties found to be non-compliant with the Ordinance are charged a \$100 per month surcharge until it is brought into compliance.

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 35% of the homes within the Town were built prior to 1970 when private service laterals were predominantly vitrified clay tile pipe. By comparing winter month wastewater flow generation to annual average flow, the Plan states that I/I contribute approximately 12% on average of the Township's base flow. The Plan also indicates that the peak monthly flow in 2013 represented about 45% I/I.

Sewer Element Comments

The Sewer Element of the Plan has been reviewed against the requirements for Comprehensive Sewer Plans for Suburban communities. It was found to be complete and consistent with Council polices. Upon adoption of the Plan by the Town Board, the action of the Council to approve the Sewer Plan becomes effective. At that time, the Township may implement its Plan to alter, expand, or improve its sewage disposal system consistent with the approved Sewer Plan. A copy of the Town Board Resolution adopting its Plan needs to be submitted to the Metropolitan Council for its records.

Surface Water Management

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

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. White Bear Township lies within the oversight boundaries of the Rice Creek Watershed District and the Vadnais Lake Area Watershed Management Organization (WMO). The Township submitted a draft Local Water Management Plan (LWMP) update to the Council in July 2018. Council staff reviewed and commented on the draft LWMP to the Township and Watersheds in a letter dated September 10, 2018. LWMP was approved by the Vadnais Lake Area WMO on August 22, 2018 and by the Rice Creek Watershed District on August 14, 2019. The Plan incorporates a December 2019 version of the LWMP.

Advisory Comments

Council staff request that the Township provide to the Council the date the Township adopted the final LWMP when available, and a copy of the final LWMP it adopts if it differs from the December 2019 version submitted to the Council on December 20, 2019.

Consistency with Council Policies

The Council reviews plans to evaluate their apparent consistency with the adopted plans of the Council. Council staff have reviewed the Township'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)

Council and Township staff have discussed and agreed on a forecast revision with reduced growth expectations, acknowledging the limited supply of both residential and employment-bearing land. The revised forecast is included in the Plan as Tables 2.1 and 8.6 and is shown below in Table 1. The Council's forecasts for White Bear Township will be revised simultaneous with Council action on the Plan.

	Census 2010	Estimated 2018	System Statement Forecast						vised Forecast		
			2020	2030	2040	2020	2030	2040			
Population	10,949	11,095	11,300	11,400	11,500	11,200	11,300	<u>11,300</u>			
Households	4,261	4,382	4,600	4,780	4,900	4,450	<u>4,600</u>	<u>4,650</u>			
Employment	2,309	2,662	3,200	3,640	4,100	<u>2,600</u>	<u>2,900</u>	<u>3,200</u>			

Table 1. White Bear Township Forecasts

The Township also requested a revision of the sewer-serviced forecast. All population, households, and employment are planned to be sewer-serviced by 2040. Table 5.7 in the Plan presents the proposed revision, which is shown below in Table 2. The Council will revise the sewer-serviced forecast simultaneous with action on the Plan.

Table 2. White Bear Township Sewer-Serviced Forecasts

	Revised Forecast				
	2020	2030	2040		
Population	11,095	<u>11,185</u>	<u>11,300</u>		
Households	<u>4,382</u>	<u>4553</u>	<u>4650</u>		
Employment	2,662	<u>2867</u>	<u>3200</u>		

With these forecast revisions, 2021-2030 allocation of Affordable Housing Need for White Bear Township will be reduced. The new Affordable Housing Need numbers are: 31 units affordable at or below 30% AMI, 20 units affordable at 31-50% AMI, 4 units affordable at 51-80% AMI; 55 units total. The Township acknowledged this in Table 8.8 of the Plan.

The Plan addresses land supply for future development. As identified in Table 3.3 of the Plan, this includes land for low-density residential (55 acres), medium-density residential (2.5 acres), and high-density residential (7 acres). With this land guidance, and assuming full development and absorption at the upper end of allowed density ranges, the Township could add as many as 255 units. Additionally, there are 51 existing vacant lots in the Township. Total housing potential is sufficient to accommodate the revised 2040 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 Suburban (Figure 2). Thrive describes Suburban communities as those that saw their primary era of development during the 1980s and early 1990s as Baby Boomers formed families and entered their prime earning years.

Suburban communities are expected to plan for forecasted population and household growth at overall average densities of at least five units per acre, and target opportunities for more intensive development near regional transit investments. 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 Township is a fully developed community with only 9% undeveloped land. The Township is most notable for its natural resourcs including Bald Eagle-Otter Lake Regional Park and Tamarack Nature Center. The Township includes four noncontiguous pieces as a result of annexation and incorporation. As illustrated in Figure 3, 56% of the community is comprised of public land in the form of open water (33%), parks (21%) and major roadways (2%). Approximately 28% of the Township is residential.

The Plan is consistent with Thrive for land use and residential density policies for a Suburban community designation. The Plan identifies a 13.5-acre location that meets the Suburban density policy minimum (5 units per acre) for areas with new land use guidance. As shown in Figure 3, the development site is located along the east side of Centerville Road south of County Road H2. The entire site is guided as Residential PUD, with accompanying policy language that stipulates the expected breakdown by acreage and density range. This breakdown is shown in Table 2 below, with an overall minimum of 5.0 units per acre.

The Plan also identifies areas of infill development throughout the community with guiding land uses that were established in the Township's previous 2030 comprehensive plan. This includes 51.07 acres, all with a guiding land use of Residential – Low Density at minimum of 3 units per acre. Consistent with the Metropolitan Urban Service Area (MUSA) Implementation Guidelines as amended in April 2017 (*Business Item 2017-90*), the Council reviews planned densities in 2040 plans by reviewing any changes to land use within the 2030 MUSA and combining that with the additional guided land use through 2040.

Table 3. Planned Residential Density, White Bear Township

		2018-2040 Change			
	Dei	Density			
Category	Min	Max	Net Acres	Min Units	Max Units
Residential PUD Low Density	1	3	4	4	12
Residential PUD Medium Density	3	8	2.5	7	20
Residential PUD High Density	8	10	7	56	70
	TO	TALS	13.5	67	102
		Overall Density		5.0	7.6

Housing

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

The Plan is consistent with the *2040 Housing Policy Plan*. As of 2016, the Township had nearly 4,500 homes including nearly 270 multifamily units and nearly 4,200 single-family homes. Approximately 300 homes are rented. More than 2,350 housing units are currently affordable to households earning under 80% of Area Median Income (AMI). However, nearly 565 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. Notably, there are 32 units affordable to households with income at or below 30% AMI and more than 280 cost burdened households with incomes at or below 30% AMI.

The Plan identifies existing housing needs including life cycle housing, housing that is affordable, and upkeep of existing housing stock. The Township does not currently have any publicly subsidized housing.

The Plan acknowledges the 2021-2030 affordable housing need allocation of 55 units, 31 of which are needed at prices affordable to households earning 30% of AMI or less, 20 of which are needed at prices affordable to households earning between 31 and 50% of AMI, and 4 of which are needed at prices affordable to households earning between 51 and 80% of AMI.

As shown in Figure 5, the Plan guides sufficient land expected to develop in the 2021-2030 time period at a minimum of eight units per acre to allow for development of at least 56 new housing units. The Township's Plan guides 13.5 acres a Residential PUD. As identified in Table 2, the Plan states that seven acres of this area will be developed at a minimum of 8 dwelling units per acre.

The housing implementation plan component of the Plan describes that the Township will consider TIF to provide affordable housing at all income levels. The Plan also indicates that the Township will strongly consider the use of Consoidated RFP funds through Minnesota Housing for land at high densities with in the Residential PUD. The Township states that they will consider adoption of a fair housing policy by 2024, and are unlikely to consider the use of housing bonds or tax abatement to meet their housing needs.

Advisory Comments

The Township will need to submit a comprehensive plan amendment for any changes to the description of the Residential PUD land use, including number of acres guided to develop at a minimum of 8 dwelling units per acre.

Water Supply

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

White Bear Township's 2040 comprehensive plan (including the revised local water supply plan) is consistent with policies of the WRPP 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 Township prepared a local water supply plan (LWSP) that was submitted to both the Minnesota Department of Natural Resources (DNR) and Metropolitan Council. The Township subsequently revised their LWSP to address Council comments. The Council received the revised LWSP on July 17, 2019, which was subsequently approved by the DNR on November 4, 2019.

Community and Subsurface Sewage Treatment Systems (SSTS)

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

The Plan indicates that there are no public or privately-owned Community Wastewater Treatment Facilities within current Township boundaries, and 68 residences and businesses in the Township that continue to be served by individual SSTS. Township SSTS Ordinance No. 70, incorporated into Appendix D of the Plan, is consistent with Minnesota Pollution Control Agency Chapter 7080-7083 Rules and requirements of the WRPP.

Special Resource Protection

Solar Access Protection

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

The Plan is consistent with statutory requirements (Minn. Stat. § 473.859) and Council policy regarding planning for the protection and development of access to direct sunlight for solar energy systems as required by the Metropolitan Land Planning Act (MLPA). The Plan includes the required solar planning elements.

Aggregate Resource Protection

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

The Plan indicates that there are no viable aggregate resource deposits available for extraction within the Township. This is consistent with the Council's aggregate resources inventory information contained in *Minnesota Geological Survey Information Circular 46*.

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 Land Use Plan identifies local historic resources and sites of historic significance including the E.H. Hobe House (Solheim), the Historic Town Hall Building, and Benson Airport.

Plan Implementation

Reviewer: Michael Larson, CD – Local Planning Assistance (651-602-1407)

The Plan addresses implementation in Chapter 9. This includes the use of official controls and the Capital Improvement Plan. It also references how implementation is address in the Sanitary Sewer Plan, Surface Water Management Plan, and Parks and Recreation System Master Plan. The Chapter also discusses roles and responsibilities related to implementation, including various boards and commissions and coordination between them.

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

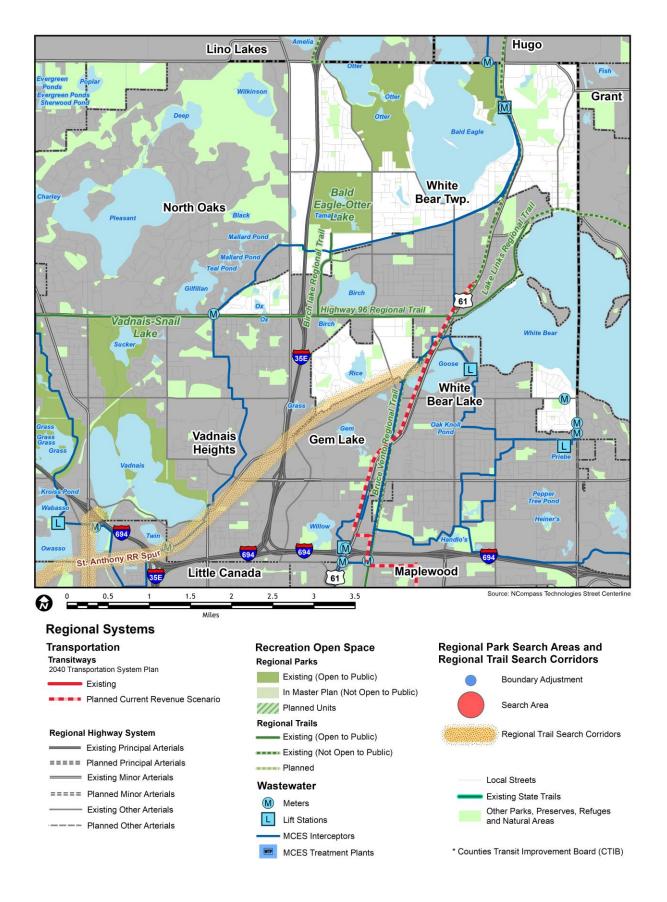
In response to the 2015 System Statement, the Township submitted the following documents for review:

- September 14, 2018: White Bear Township Preliminary 2040 Comprehensive Plan
- March 19, 2019: White Bear Township 2040 Comprehensive Plan
- July 17, 2019: Local Water Supply Plan
- July 22, 2019: Revised 2040 Comprehensive Plan Responding to Council Incomplete Items for Land Use, Wastewater, Housing, Transportation, Regional Parks, and Surface Water Management
- December 20, 2019: Revised 2040 Comprehensive Plan Responding to Council Incomplete Items for Wastewater and Housing

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



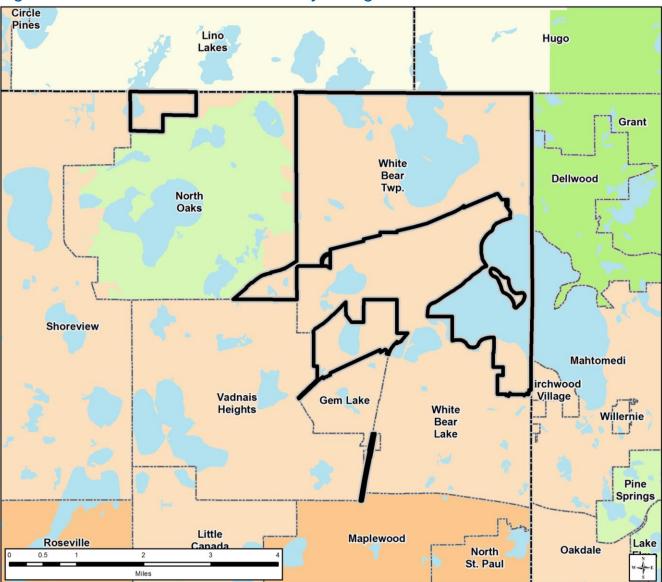
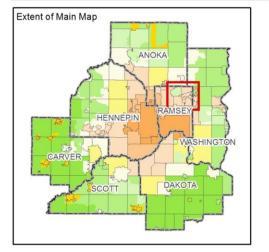


Figure 2. Thrive MSP 2040 Community Designations



Community Designations

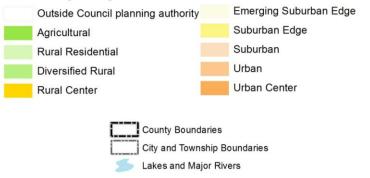


Figure 3. Existing Land Use

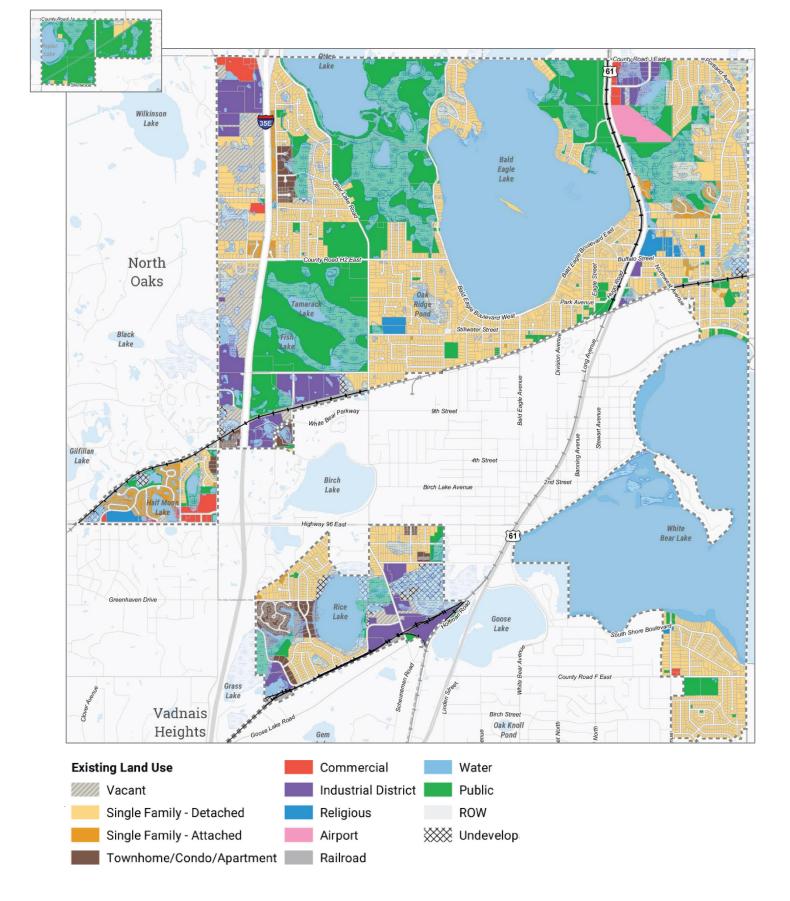


Figure 4. 2040 Planned Land Use

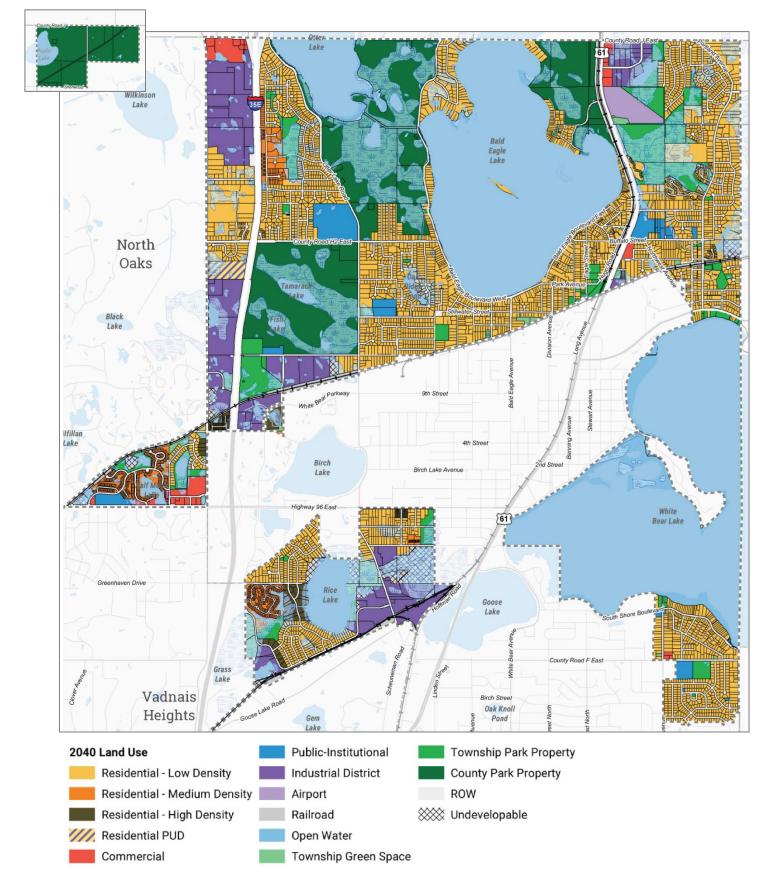


Figure 5. Land Guided for Affordable Housing

	2030 share of regional ner 21-2030 total regional ner	55 units 37,900 units		
	Available Acres	Minimum Density (units per acre)	Expected % Residential (if mixed use)	Minimum Units Possible
PUD High Density	7.00	8	100%	56
Total	7			56



- Sufficient/(insufficient) units possible against share of regional need: 1
 - Affordable units built since 2021: **0**
- Sufficient/(insufficient) units possible adjusted for affordable units built: 1
- Number of Comp Plan Amendments approved since Comp Plan Update: 0