

Community Development Committee

Meeting date: October 19, 2020

Environment Committee

Meeting date: October 27, 2020

For the Metropolitan Council meeting of November 4, 2020

Subject: City of Saint Paul 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 21918-1

District(s), Member(s): District 13, Chai Lee; District 14, Kris Fredson

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

Staff Prepared/Presented: Michael Larson, Planning Analyst (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 Saint Paul to place its 2040 Comprehensive Plan into effect.
2. Revise the sewer-serviced forecasts for the City to show that the entire population and household forecasts will be sewer-serviced in 2030 and 2040, as shown in Table 2 of the Review Record.
3. Prior to final plan adoption, advise the City to implement the following advisory comments in the Review Record:
 - a. Revise Appendix B to remove the reference to Robert Street as a project identified in the 2040 TPP list of transitways.
 - b. Correct the designations of two Regional Bicycle Transportation Network (RBTN) corridors.
 - c. Address comments regarding the mapping of freight information on Map T-15.
 - d. Address comments regarding the modification of Transportation Analysis Zone (TAZ) employment allocations.
 - e. Incorporate the Department of Public Works Five Year Capital Plan summary in the Implementation Chapter.
4. Advise the City to:
 - a. Once completed, submit to the Council a copy of the revised Chapter 50 of the Saint Paul Legislative Code regarding standards and specifications for SSTS accompanied by a copy of the Resolution adopting the new Rule.
 - b. Within 60 days after receiving DNR final approval, the City must adopt the Mississippi River Critical Corridor Plan, 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.

- c. Implement the advisory comments in the Review Record regarding employment and household forecasts during future comprehensive amendments.

Recommendation of the Environment Committee

1. Approve the City of Saint Paul's Comprehensive Sewer Plan.
2. Prior to final plan adoption, advise the City to:
 - a. Implement the advisory comments in the Review Record to correct the summary of Chapter 41 of the City's Legislative Code that pertains to the separation of stormwater and sanitary sewer systems.
 - b. Include a copy of Chapter 41 in its final submitted version to the Council.
3. Require the City to submit GIS datasets related to the local wastewater system when it becomes available.

Advisory Comments

The following Advisory Comments are part of the Council action authorizing the City of Saint Paul 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

1. The Council-approved Comprehensive Sewer Plan becomes effective only after the Plan receives final approval from the local governmental unit's governing body. After the Plan receives final approval from the City and the Comprehensive Sewer Plan becomes effective, the City may implement its Plan to alter, expand, or improve its sewage disposal system consistent with the Council-approved Comprehensive Sewer Plan.
2. A copy of the City Council resolution adopting its 2040 comprehensive plan, including its Comprehensive Sewer Plan, must be submitted to the Council.

Background

The City of Saint Paul is located in southern Ramsey County. It is surrounded by the communities of Lauderdale, Falcon Heights, Roseville, Maplewood, Newport, South Saint Paul, West Saint Paul, Lilydale, Mendota, Mendota Heights, Fort Snelling, and Minneapolis.

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

Review Authority & Rationale

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

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

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

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

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

Review Standard	Review Area	Plan Status
Conformance	Regional system plan for Parks	Conforms
Conformance	Regional system plan for Transportation, including Aviation	Conforms
Conformance	Water Resources (Wastewater Services and Surface Water Management)	Conforms
Consistency with Council Policy	<i>Thrive MSP 2040</i> and Land Use	Consistent
Consistency with Council Policy	Forecasts	Consistent
Consistency with Council Policy	<i>2040 Housing Policy Plan</i>	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

City of Saint Paul 2040 Comprehensive Plan

Review File No. 21918-1, Business Item No. 2020-264 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)*. The City of Saint Paul is the Park Implementing Agency for Regional Parks System components in Saint Paul, for which the Plan accurately describes the Regional Parks System components.

Regional Parks, Park Reserves, or Special Recreation Features

- Battle Creek and Indian Mounds Regional Park
- Como Regional Park
- Hidden Falls-Crosby Farm Regional Park
- Lilydale-Harriet Island and Cherokee Heights Regional Park
- Mississippi Gorge Regional Park
- Phalen-Keller Regional Park
- Como Conservatory Special Recreation Feature
- Como Zoo Special Recreation Feature

Regional Trails

- Samuel Morgan Regional Trail
- Bruce Vento Regional Trail
- Trout Brook Regional Trail
- Lexington Avenue/Parkway Regional Trail Search Corridor
- Afton Bluffs Regional Trail Search Corridor
- Point Douglas (Bruce Vento-Washington County) Regional Trail Search Corridor
- Como-Phalen (Wheelock Parkway) Regional Trail Search Corridor
- Johnson Parkway Regional Trail Search Corridor
- Mississippi River (Harriet Island-South Saint Paul) Regional Trail Search Corridor
- Mississippi-Como Regional Trail Search Corridor
- Summit Regional Trail Search Corridor

The Plan also appropriately acknowledges State recreation lands within the City, including the Gateway State Trail and Pig's Eye Island Heron Rookery Scientific and Natural Area (Minnesota Department of Natural Resources) (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). The Plan reflects transportation system components of the TPP and is consistent with Council policies regarding transit market roles, the needs of non-automobile transportation, access to job concentrations, and the needs of freight. The Plan is compatible with the transportation plans of adjacent and affected governmental units.

Roadways

The Plan conforms to the highway system element of the TPP. The Plan reflects I-94, I-35E, TH 280, US 61/10, US 52, Shepard Road east of I-35E, and Warner Road, which are the metropolitan highways within the City's boundaries. Figure T-16 of the Plan identifies the planned mobility improvements identified for these roads in the Current Revenue Scenario of the TPP adopted in 2018.

The Plan accurately reflects the regional functional classification map of A-minor arterials and has delineated major collectors. The City does not appear to have any minor collectors as none are shown on the map. The Plan identifies the required characteristics of the City's roadways, including existing and forecasted traffic volumes for principal and A-minor arterials. Forecasting is consistent with regional methodology. However, future forecasts are mapped in six categories of at least 10,000 vehicle increments which are very broad ranges that do not provide very useful guidance for understanding the City's street needs in the future. Figure T-2 of the Plan shows existing number of lanes on roads within the City. The legend also states there will be no additional lanes added to any roads in the future. While the Plan states that undivided roads with 4 or more lanes may be reduced to 2 or 3 lanes, the Plan does not differentiate between divided and undivided roads, making it difficult to discern which roads may be affected.

Map T-14 shows future rights-of-way (ROW) to be preserved. The Plan also contains a map of pavement conditions and a section about roadway safety. Appendix C of the Plan states that guidelines on how access will be managed is provided by the City's Street Design Manual. Finally, Appendix B of the Transportation Chapter lists several potential roadway, transit, and bikeway projects that "are representative of those that could be considered for implementation of this chapter."

Transit

The Plan conforms to the transit system element of the TPP. Figure T-7 shows the location of existing transit routes and facilities within the city limits and acknowledges that the City is primarily within Transit Market Areas I and II, with very small portions of Areas III and IV in the southeast portion of the City. Figure T-8 correctly reflects planned and potential transitways as shown in the 2040 TPP adopted in 2018, as well as additional transitways labeled as "City-Proposed Transitways (not in 2040 TPP Current Revenue Scenario)."

The Plan also maps the relationship of transit routes to job concentrations and households without vehicles. Appendix C lists transit providers serving the City and describes the available demand responsive transit services of Transit Link and Metro Mobility.

Advisory Comments

Appendix B of the Plan lists several potential transit projects including "New Transitways such as Gold Line, Riverview, Rush Line and Robert Street" with the source of these projects listed as the 2040 TPP (2018, amended). Robert Street should not be listed in this "New Transitway" table, however, because the 2018 version of the 2040 TPP does not show Robert Street as a currently funded transitway project. The Robert Street corridor is correctly shown on Figure T-8 as a "City-Proposed Transitway". Prior to final adoption, the Plan should be revised to remove references to Robert Street from the 2040 TPP list of transitways in Appendix B.

Aviation

The Plan conforms to Aviation system element of the TPP. The Downtown Saint Paul airport is within the city limits while the southwest section of the City is also affected by Minneapolis-St. Paul International Airport. Figure T-17 shows noise contours and safety zones for these airports. The Plan also discusses protection of regional airspace from future obstructions in Policy T-18 and Appendix C, consistent with Council policy.

Bicycling and Walking

The Plan is consistent with the Bicycling and Pedestrian policies of the TPP. The Plan includes a number of policies that support non-motorized modes. Figure T-1 identifies missing sidewalks and Figure T-3 identifies existing and planned on and off road bikeways within the City. The Plan also identifies existing and future alignments and corridors of the Regional Bicycle Transportation Network (RBTN) as well as Regional Trails on Figure T-4. The City has also recently adopted specific bicycle and pedestrian plans which will be amended into this Plan after they have undergone the required review by neighboring jurisdictions. Appendix B also lists several potential bikeway projects.

Advisory Comments

Figure T-4 incorrectly identifies the RBTN corridors on Annapolis Street and between Harriet island and Kaposia Park as Tier 1 corridors. Prior to final adoption, the Plan should be corrected by identifying them as Tier 2.

Freight

The Plan is consistent with the Freight policies of the TPP. The Plan includes a number of policies supporting access to economic opportunity that addresses freight needs and acknowledges the importance of river transport. Figure T-15 identifies Commercial Truck Routes as well as the locations of railroad and barge facilities. Figure T-13 identifies heavy commercial vehicle traffic counts. Appendix B also lists potential projects which could benefit freight including West Midway trucking improvements.

Advisory Comments

Figure T- 15 is titled “Commercial Truck Routes” although it also identifies the locations of railroad and barge facilities within the City. Council staff recommend a title that is more encompassing of what is shown on the map.

Transportation Analysis Zones (TAZs)

The Plan generally conforms to the TPP regarding TAZ allocations. The City’s TAZ allocations for households and population appropriately sum to the Metropolitan Council’s city-wide forecast totals for all forecast years. Prior to adoption, the Plan requires a small modification to employment allocations that is addressed under the Forecasts advisory comment below.

The planned land uses and areas identified for development and redevelopment can accommodate the TAZ forecasted allocations in the Plan, and at densities consistent with the community’s Thrive designation and applicable TPP policies for transit station areas. (See also Land Use section of this Review Record.)

Water Resources

Wastewater Service

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 City’s guide for future growth and development through the year 2040. It includes growth forecasts that are consistent with the Council’s 2040 assigned forecast for population, households, and employment.

Current wastewater treatment services are provided to the City by the Metropolitan Council Environmental Services (MCES). Wastewater generated within the City is conveyed by multiple Council

Interceptors, including 1-MS-100, with treatment at the Council's Metropolitan Wastewater Treatment Plant in Saint Paul. The Plan projects that the City will have 137,400 sewer households and 213,500 sewer employees by 2040. The Metropolitan Disposal System with its scheduled improvements has or will have adequate capacity to serve these growth forecasts.

References to the West Side Flats development area are made throughout the Plan and represents one of several redevelopment areas within the City. The City and Council are currently working together to determine additional wastewater service needs that the West Side Flats development may require from the regional wastewater system. System capacity and operational practices are currently being evaluated to ensure that there is adequate capacity in both the local and regional wastewater systems to ensure long term capacity for the development. The Plan references under its Implementation Chapter (page 302) wastewater infrastructure improvements to facilitate crossing under the Mississippi River to support additional development.

The Plan provides a 2040 sanitary flow projection for each interceptor providing service to the City. The basis 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 sewer forecasts as stated in the sewer element of the Plan.

The Land Use Plan reflects an overall minimum residential sewer density that is consistent with Council policy for future sewer residential growth for Urban Center communities.

The Plan defines the City's goals, policies, and strategies for preventing and reducing excessive inflow and infiltration (I/I) in both the local municipal (city) sanitary sewer systems and private property sources. The Plan includes a summary of activities and programs intended to mitigate I/I in both the public and private property collection systems including inspection, evaluation, and mitigation. The Plan references a flow monitoring program that started in 2008 whereby flow meters were systematically installed throughout the City to identify those areas susceptible to excessive I/I. This data was also used in system modeling efforts to evaluate capacity of the City's system. Televised inspection and system smoke testing have been performed in many areas of the City to identify potential sources of I/I, and program rehabilitation projects including pipe lining and maintenance hole sealing have been completed. Much of this work has been completed under, and coordinated with, its Street Rehabilitation Program. The City has performed numerous I/I reduction improvements within the City and continues to monitor I/I levels.

The Plan also references efforts to mitigate I/I in the private property collection system including noting potential sources in private services during televised inspections of the public system. The City offers property owners one of two options: 1) hire their own contractor and have the costs of the private service repair paid for by the City and have those costs, plus interest, assessed on the property taxes over 20 years; or 2) the property owner can join with other property owners who are impacted by the same City project, commonly a Street Rehabilitation Project, to have their services repaired under the same contractor. Costs are paid by the City and again assessed on the property over 20 years. The benefit of this latter program is that the uniform unit cost of the service repair for all properties involved are lower due to including all multiple property improvements under one project.

The Plan describes the requirements and standards for minimizing I/I and references Chapter 41 of the City Legislative Code stating that it requires the separation of stormwater drainage and sanitary sewer connections for all buildings (except for one- and two-family dwellings) and that it requires the disconnection of existing rain leaders and other stormwater or clearwater connections from the sanitary sewer system.

The Plan describes the sources, extent, and significance of existing I/I within the entire City wastewater collection system and provides a description of an implementation plan for preventing and eliminating excessive I/I from entering both the public and private collection systems. The Plan provides

information that suggests that 77% 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. Using MCES wastewater flow data between 2011 and 2017 to estimate average and base flow levels and peak month wastewater flow, the Plan suggests that the City's average annual I/I is approximately 11%, and peak month (2014) was approximately 52% I/I.

Comprehensive Sewer Plan 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 policies. 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 City has not yet submitted the GIS datasets that are required under the WRPP. However, it is the Council's understanding that the City is working on updating its GIS datasets and has committed to submitting this information to the Council when it becomes available.

The Plan summarizes Chapter 41 of the City's Legislative Code (page 215) that pertains to the separation of stormwater and sanitary sewer systems and notes an exemption for separation for one- and two-family dwellings. However, the Council has been informed that this exemption was eliminated under a revision in 1987. The City shall revise this summary to reflect the elimination of the exemption consistent with the current Code, and include a copy of Chapter 41, in its final submitted Plan to the Council.

The Plan describes and references the City capital improvement planning and budgeting process, including links to the City's web site. However, the Plan does not incorporate or link directly to the Department of Public Works Five Year Capital Plan summary. This summary should be incorporated as an Appendix of the Implementation Chapter prior to Plan adoption.

Surface Water Management

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

The Plan is consistent with Council policy requirements and conforms to the Council's 2040 WRPP for local surface water management. The Plan satisfies the requirements for 2040 comprehensive plans. Saint Paul lies within the oversight boundaries of the Capitol Region and Ramsey-Washington Metro Watershed Districts (WDs), and the Lower Mississippi River and Mississippi (River) Watershed Management Organizations (WMOs).

The City submitted a draft Local Water Management Plan (LWMP) update to the Council in August 2017. Council staff reviewed and commented on the LWMP to the City and Watersheds in a letter dated September 29, 2017. The LWMP was approved by the Lower Mississippi River WMO on May 9, 2018, the Mississippi (River) WMO on November 13, 2018, the Capitol Region WD on June 19, 2019, and by the Ramsey-Washington Metro WD by default. Saint Paul adopted the LWMP on June 19, 2019. The Plan incorporates the City's July 2018 Final Draft LWMP in Appendix B.

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 Council forecasts for Saint Paul (Plan figures 1.1, 1.3, and 1.4). For reference, Metropolitan Council’s forecasts are shown below in Table 1.

Table 1. City of Saint Paul Forecasts

	Census 2010	Estimated 2019	2020	Council Forecasts	
				2030	2040
Population	285,068	315,925	315,000	329,200	344,100
Households	111,001	119,113	124,700	131,400	137,400
Employment	175,933	184,063	194,700	204,100	213,500

Water Resources Appendix D, Table WR1 in the Plan describes that there are 79 households and 199 population not served by sewer-service in 2020. In 2030 and 2040, the households and population will be fully sewer-serviced. Metropolitan Council will revise its own sewer-service forecast, simultaneous with Council action on the Plan, as shown below in Table 2.

Table 2. City of Saint Paul Sewer-Serviced Forecasts

	Census 2010	Council Forecasts		
		2020	2030	2040
Population	284,869	314,800	329,200	344,100
Households	110,922	124,620	131,400	137,400
Employment	175,933	194,700	204,100	213,500

The Land Use Chapter discusses housing capacity and timing. Most of the future housing capacity is in mixed-use guided sites throughout the City. If this land supply is fully developed and absorbed, these redevelopment opportunity sites would yield approximately 12,400 to 46,100 housing units, at the minimum and maximum allowed densities (Table LU6). This is sufficient to accommodate forecasted growth in Saint Paul.

Advisory Comments

Council staff find that recent employment and households growth have lagged behind what was previously expected. In a future comprehensive plan amendment, the City can request that these numbers be revised downward for employment and households. In staff communications, the City has noted the advice.

The Council requires 2020, 2030, and 2040 forecasts assigned to transportation analysis zones (TAZs). The Plan includes this information in Transportation Appendix D, Table T1. The 2020 employment column assigns 275 more jobs than are forecasted. In July 2020 supplemental information submitted by the City, the City asks Council staff to adjust the allocations as needed. Council staff will provide a revised table to the City in October 2020. Prior to formal adoption by the City, the Plan should be revised accordingly.

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.

As illustrated in Figure 3, the City is a fully developed community with only 4% identified as undeveloped or agricultural. Approximately 45% of the City is residential. Another 15% of the community is comprised of parks and recreational uses. The next largest use of land is industrial, comprising 9% of the City. The City is home to the State Capitol and a variety of regional cultural institutions, entertainment venues, and professional sports venues. Regional concentrations of industry include the West Midway area (including the BNSF Intermodal Terminal) and the area along the Mississippi River southeast of downtown (including the Downtown St. Paul Airport and various barge terminals).

The Plan identifies development and redevelopment areas at densities that exceed the Urban Center density policy requirement. 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. As shown in Table 2 below, the expected overall density of planned residential growth is a minimum of 34.3 units per acre.

The City’s approach to guiding land use policy includes two geographically based designations: Future Land Use and Neighborhood Node (Figure 4). Future Land Use relates to the use of land (individual uses or a mix of uses) while the Neighborhood Node designation identifies 35 locations in the City where there is policy support for greater concentration and intensity of use as clarified in small area plans.

Figure 5 (Opportunity Sites) identifies locations throughout the City where development opportunities are likely or possible, and are the basis for the acreage identified in Table 3. The majority of these sites are located in existing or emerging concentrations of employment/housing (e.g., METRO Green Line Corridor, Neighborhood Nodes, and Downtown). This potential land supply for redevelopment is more than sufficient to accommodate the City’s revised forecasts. Identification of this land does not guarantee that development will happen in these locations; and it is possible that development may happen in other locations based on the City’s guiding land use policy. The City’s official growth forecasts are allocated by both Transportation Analysis Zone (TAZ) and sewershed, which are used for regional system planning. This information reflects the patterns identified in the land supply.

The Plan identifies Areas of Concentrated Poverty where more than 50% of the population are persons of color (ACP50s). These include the City’s West Side, North End, and East Side. The Plan states an intention to use these geographies to guide approaches to equitable development, including investment, monitoring, and evaluation.

Table 3. Planned Residential Density, City of Saint Paul

Future Land Use / Built Form Categories	Density		% Resid.	Net Acres	2018-2040 Change	
	Min	Max			Min Units	Max Units
Downtown	50	300	30%	2.4	121	720
Mixed-Use (Neighborhood Node)	50	200	40%	170.2	8,510	34,040
Urban Neighborhood (Neighborhood Node)	20	60	90%	189.0	3,781	11,338
TOTALS				361.6	12,412	46,098
Overall Density					34.3	127.5

Station Area Planning

The Plan recognizes existing and planned transitways that are part of the Current Revenue Scenario of the TPP. The City has conducted station area planning for existing and future station areas. The TPP directs Urban Center communities with light rail transit (LRT) to guide an average minimum of 50 residential units per acre and target 75-150+ 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. The designations associated with station areas along the METRO Green Line include Downtown and Mixed Use (Neighborhood Node). They range from a minimum of 50 units per acre to a maximum of 300 units/acre. For Arterial Bus Rapid Transit (BRT) like the A Line Rapid Bus along Snelling Avenue, the TPP directs an average minimum of 15 units/acre (within 1/4 mile). The Plan guides these areas as Mixed Use (Neighborhood Node) or Urban Neighborhood (Neighborhood Node) at a minimum of 50 and 20 units/acre, respectively.

Housing

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

The Plan is consistent with the *2040 Housing Policy Plan (HPP)*. As of 2016, the City has more than 123,500 homes including 59,000 multifamily units and 64,000 single-family homes. Approximately 62,000 homes are rented. More than 100,000 housing units are currently affordable to households earning under 80% of Area Median Income (AMI); however, nearly 35,000 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. There are about 13,800 units affordable to households with income at or below 30% AMI, and more than 17,000 cost burdened households with incomes at or below 30% AMI.

The Plan identifies existing housing needs including ongoing maintenance and upkeep of aging housing stock, homeownership opportunities, affordable rental housing, decreasing homelessness, new market-rate housing development, and affirmatively furthering fair housing. The City has nearly 15,000 publicly subsidized housing units, including more than 1,800 age-restricted for seniors and at least 130 for people with disabilities.

The Plan acknowledges the 2021-2030 affordable housing need allocation of 1,973 units; 832 of which are needed at prices affordable to households earning 30% of AMI or less; 128 of which are needed at prices affordable to households earning between 31 and 50% of AMI; and 1,013 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 5,316 new housing units.

The housing implementation plan component of the Plan describes that the City will use many of their own and pass-through resources to support housing maintenance, including investigating culturally appropriate resources for all residents. The Plan also indicates that the City will work directly with affordable housing owners to extend affordability when the end of obligations to keep units affordable approaches. The City states that they will develop and implement an Emergency Housing Plan to support tenants who are displaced due to non-code compliance.

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 revised 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

on May 9, 2019. The revised LWSP was considered complete by the Council, and a review letter was sent to the DNR on June 4, 2019. The DNR approved the LWSP on July 9, 2019.

Community and Subsurface Sewage Treatment Systems (SSTS)

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

The Plan indicates that there are 79 SSTS in operation, primarily in the Highwood Area, and that there are no public or privately-owned Community Wastewater Treatment Systems in operation in the City. The Plan states that of the 79 total SSTS within the City, 20 are older systems of a type and design not adequate to protect groundwater. The forecasts indicate that all 79 SSTS will be phased out by 2030. All SSTS are required to be inspected and pumped biennially. The City's SSTS Ordinance is found under City Code Title VI – Building and Housing, Chapter 50.

Advisory Comments

The Plan states that Chapter 50 of the Saint Paul Legislative Code contains the standards and specifications for SSTS, and that the City is currently considering changes to Chapter 50 to better comply with MPCA 7080-7083 Rules. Once revised, a copy of the revised Chapter 50 shall be submitted to the Council along with a copy of the Resolution adopting the Rule.

Special Resource Protection

Mississippi River Corridor Critical Area (MRCCA)

Reviewer: Raya Esmaeili, CD – Local Planning Assistance (651-602-1616)

The Plan includes a Mississippi River Corridor Critical Area Plan (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 December 13, 2019, conditional approval letter is attached to the Council staff report as Figure 7. Final DNR approval of the MRCCA Plan will be sent to the City after the Council authorizes local adoption of the Plan.

Advisory Comments

Within 60 days after receiving DNR final approval, the City must adopt the MRCCA Plan, 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). The Plan includes the required solar planning elements.

Aggregate Resource Protection

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

The Plan does not address the presence of aggregate resources in the City. While the Council's aggregate resources inventory information contained in *Minnesota Geological Survey Information Circular 46* indicates the presence of aggregate resource deposits within the City, they are quite dispersed, and since the City is fully urbanized, the deposits are no longer considered available for extraction.

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 chapter entitled Heritage and Cultural Preservation, and the Plan acknowledges the participation of the Heritage and Cultural Preservation Working Group. The chapter identifies five goals and sets of policies under each goal. The chapter references Chapter 73 of the City's Legislative Code that governs the heritage preservation function of the City. Maps identify historic districts and sites.

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, partnerships, and programs. In the form of tables, the Plan identifies implementation items by Plan chapter, including timeframes and funding sources. The Plan addresses official controls and the City's capital improvement planning process. Implementation is also addressed more specifically in the Local Water Supply Plan and Local Water Management Plan.

Advisory Comments

The Plan describes and references the City capital improvement planning and budgeting process, including links to the City's web site. However, the Plan does not incorporate or link directly to the [Department of Public Works Five Year Capital Plan](#) summary. This summary should be incorporated as an Appendix of the Implementation Chapter prior to Plan adoption.

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:

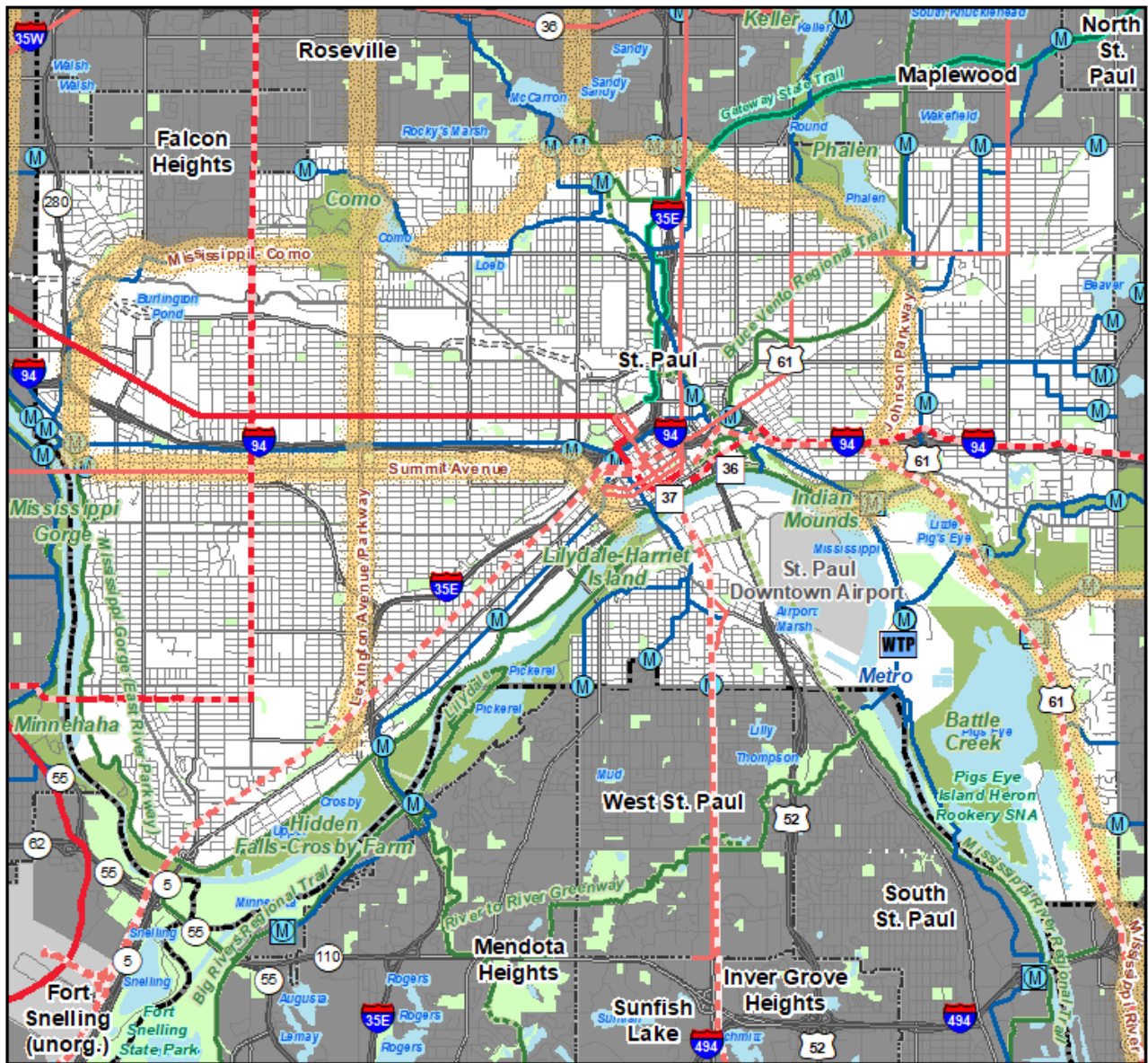
- March 30, 2018: Saint Paul Preliminary 2040 Comprehensive Plan
- July 2, 2019: Saint Paul 2040 Comprehensive Plan
- November 22, 2019: Revised Comprehensive Plan Responding to Council Incomplete Items for Parks, Transportation, Wastewater, Forecasts, Land Use, Housing, Water Supply, Implementation, Subsurface Sewage Treatment Systems (SSTS), and Mississippi River Corridor Critical Area (MRCCA).
- July 23, 2020: Revised Comprehensive Plan Responding to Council Incomplete Items for Transportation, Wastewater, and Implementation.
- August 12, 2020: Revised Transportation Chapter
- August 17, 2020: Revised Appendices
- August 31, 2020: Addendum to Saint Paul Comprehensive Plan on Intercommunity Treatment Charges
- September 2, 2020: Updated Future Land Use Map
- October 7, 2020: Updated Future Land Use Map

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: Opportunity Sites
- Figure 6: Land Guided for Affordable Housing
- Figure 7: Mississippi River Corridor Critical Area (MRCCA) DNR Conditional Approval

Figure 1. Location Map with Regional Systems



Source: NCompass Technologies Street Centerline



Regional Systems

Transportation

- Transitways**
2040 Transportation System Policy - adopted January 2015
- Existing
 - - - - Planned Current Revenue Scenario
 - - - - Planned Current Revenue Scenario - CTIB* Phase 1 Projects
 - - - - Potential Increased Revenue Scenario

Regional Highway System

- Existing Principal Arterials
- - - - Planned Principal Arterials
- Existing Minor Arterials
- - - - Planned Minor Arterials
- Existing Other Arterials
- - - - Planned Other Arterials

Recreation Open Space

- Regional Parks**
- Existing (Open to Public)
 - In Master Plan (Not Open to Public)
 - ▨ Planned Units
- Regional Trails**
- Existing (Open to Public)
 - - - - Existing (Not Open to Public)
 - - - - Planned

Wastewater

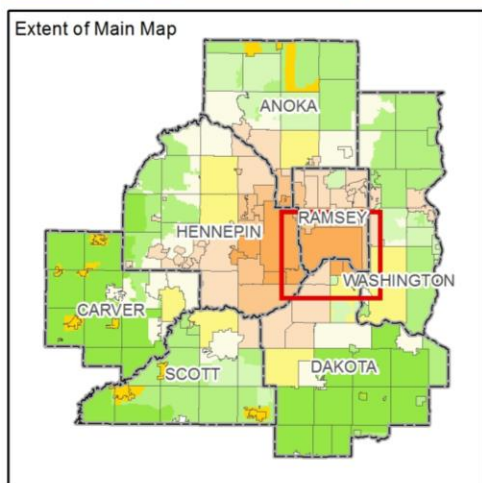
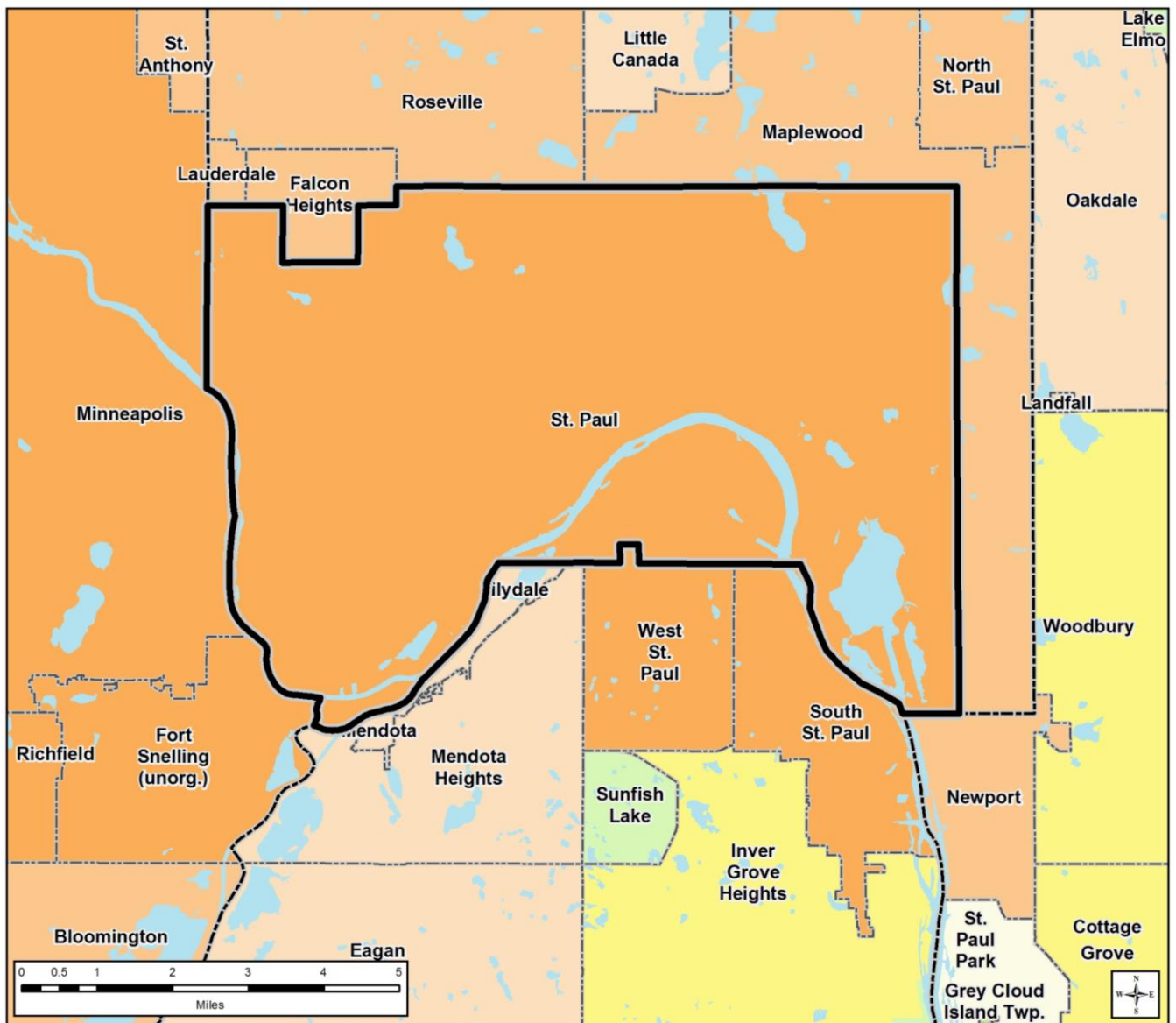
- M Meters
- L Lift Stations
- MCES Interceptors
- MCES Treatment Plants

Regional Park Search Areas and Regional Trail Search Corridors

- Boundary Adjustment
- Search Area
- ▨ Regional Trail Search Corridors
- Local Streets
- Existing State Trails
- Other Parks, Preserves, Refuges and Natural Areas

* Counties Transit Improvement Board (CTIB)

Figure 2. Thrive MSP 2040 Community Designations



Community Designations

- Outside Council planning authority
- Agricultural
- Rural Residential
- Diversified Rural
- Rural Center
- Emerging Suburban Edge
- Suburban Edge
- Suburban
- Urban
- Urban Center

- County Boundaries
- City and Township Boundaries
- Lakes and Major Rivers

Figure 3. Existing Land Use

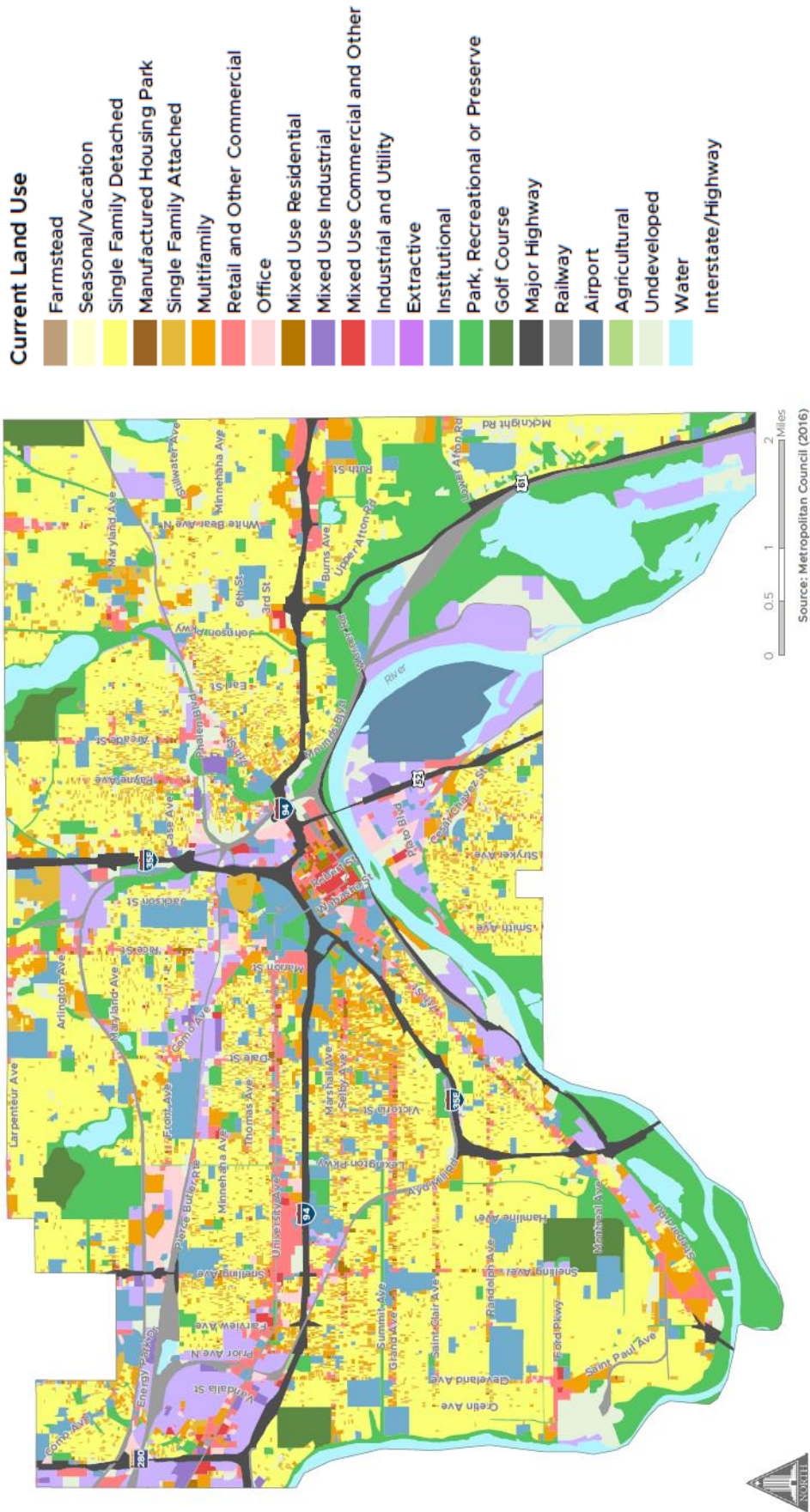


Figure 4. 2040 Future Land Use

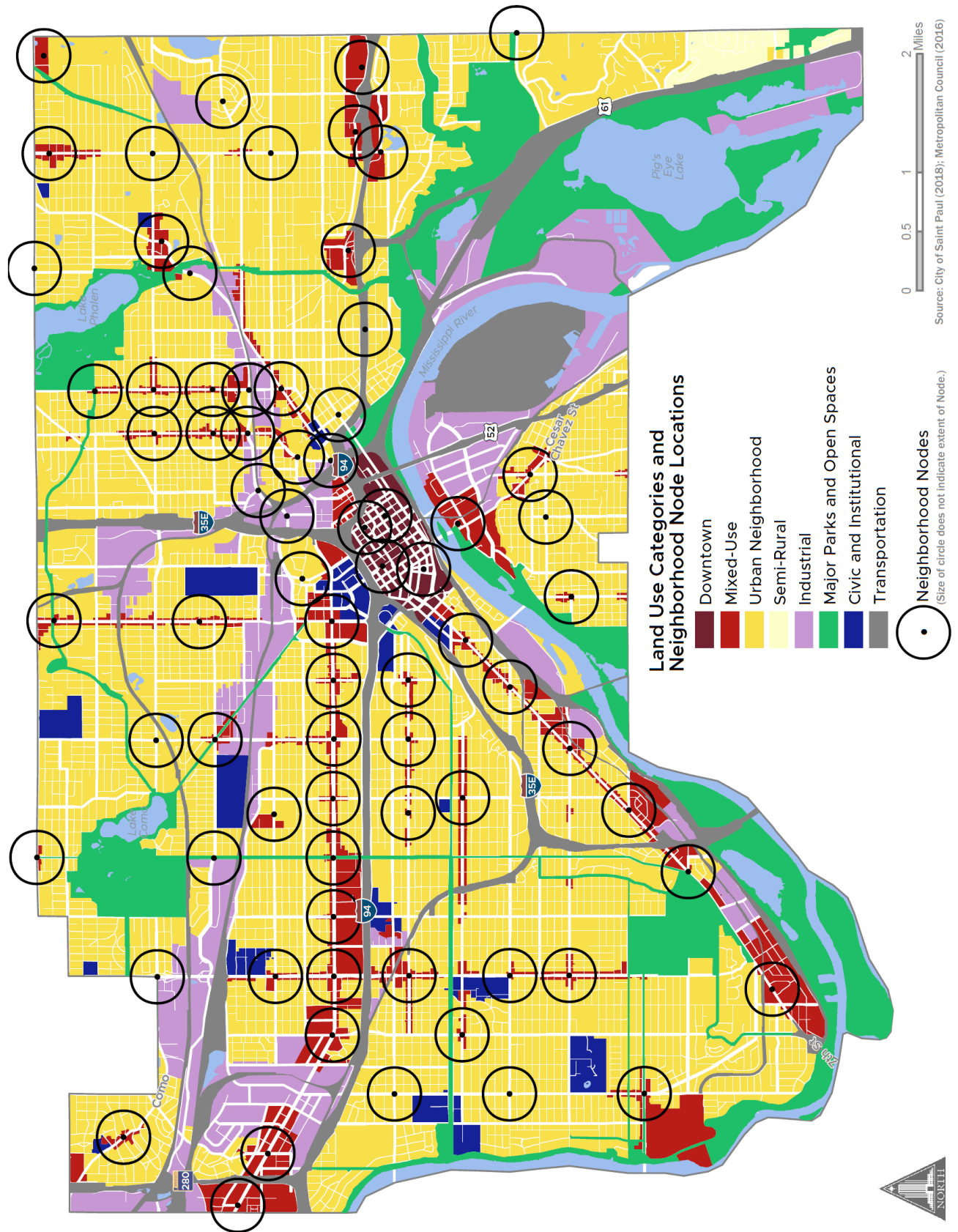
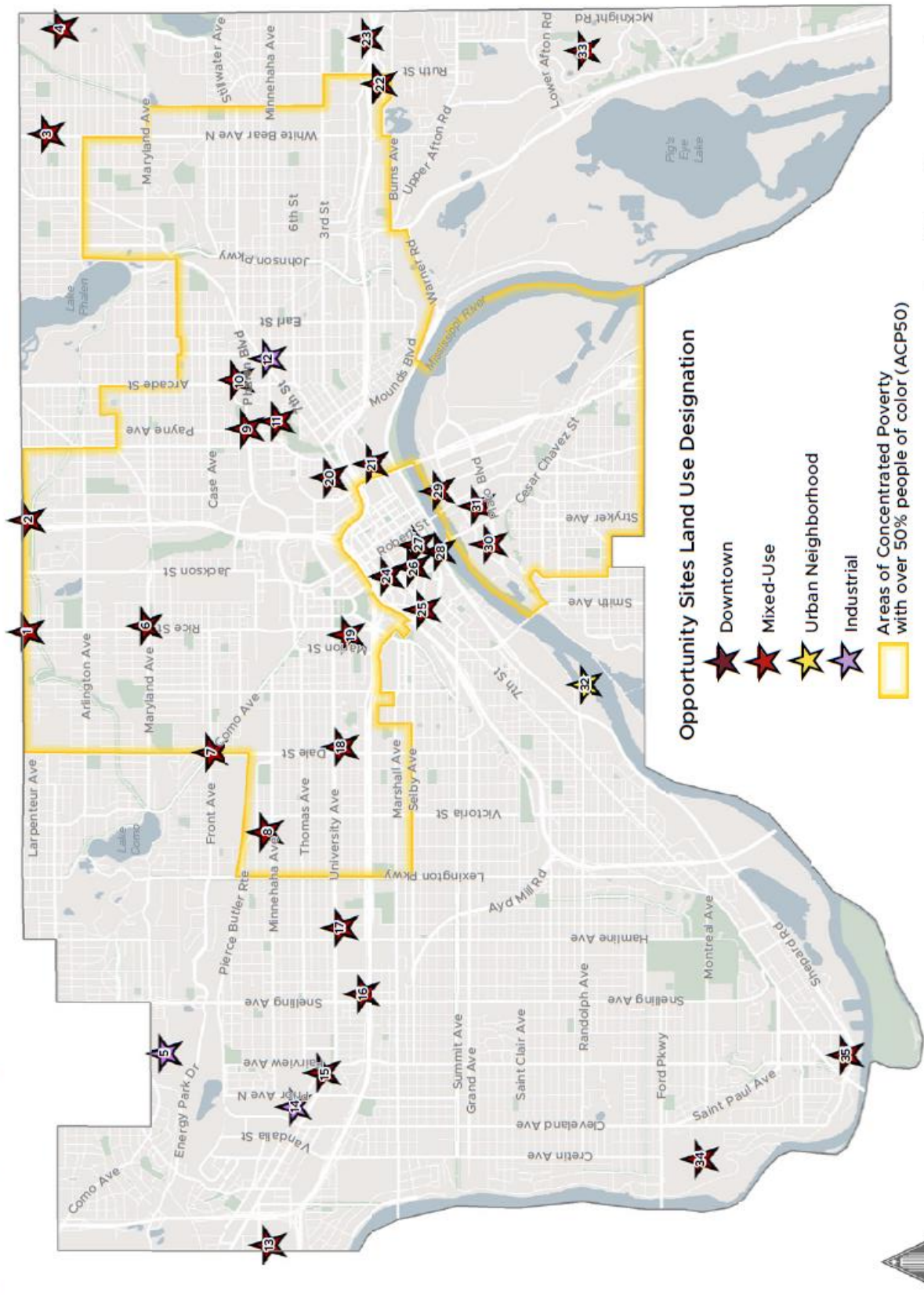


Figure 5. Opportunity Sites

Map LU-3: Opportunity Sites



Source: City of Saint Paul (2018); Minnesota DNR (2016)
Appendix A | LAND USE

Approved - June 19, 2019; REVISED July 21, 2020

Figure 6. Land Guided for Affordable Housing

2021-2030 share of regional need for Affordable Housing: **1973 units**
 2021-2030 total regional need for Affordable Housing: **37,900 units**

	Available Acres	×	Minimum Density <i>(units per acre)</i>	×	Expected % Residential <i>(if mixed use)</i>	=	Minimum Units Possible
Downtown	6.10		50		30%		92
Mixed-Use	193.60		50		40%		3,872
Urban Neighborhood	75.10		20		90%		1,352
Total	275						5,316

Sufficient/(insufficient) units possible against share of regional need: **3,343**

Affordable units built since 2021: **0**

Sufficient/(insufficient) units possible adjusted for affordable units built: **3,343**

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



Figure 7. Mississippi River Corridor Critical Area (MRCCA) DNR Conditional Approval



December 13, 2019

City of St. Paul
Josh Williams, Principal Planner
25 W. Fourth Street
Saint Paul, MN 55102

Re: Conditional Approval – City of Saint Paul MRCCA Plan

Dear Mr. Williams:

I am pleased to inform you that the Minnesota Department of Natural Resources (DNR) conditionally approves the City of Saint Paul'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 November 22, 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 matthew.bauman@state.mn.us if you have any questions about next steps.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jennifer Shillcox'.

Jennifer Shillcox
Land Use Unit Supervisor

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

Minnesota Department of Natural Resources • Division of Ecological and Water Resources
500 Lafayette Road, Box 25, Saint Paul, MN 55155-4025