

## Community Development Committee

Meeting date: September 16, 2019

## Environment Committee

Meeting date: September 24, 2019

For the Metropolitan Council meeting of October 9, 2019

**Subject:** City of Greenfield 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 21991-1

**District(s), Member(s):** District 1, Judy Johnson

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

**Staff Prepared/Presented:** Freya Thamman, Sector Representative (651-602-1750)  
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 Greenfield to place its 2040 Comprehensive Plan into effect.
2. Revise the City's employment forecasts upward as shown in Table 1 of the attached Review Record.
3. Advise the City to implement the advisory comments in the Review Record for surface water management, forecasts, land use, and water supply.

#### Recommendation of the Environment Committee

1. Approve the City of Greenfield's Comprehensive Sewer Plan.

### Summary of Committee Discussion/Questions

#### *Community Development Committee*

Planning Analyst Freya Thamman presented the staff's report to the Committee. The City's consulting planning staff was in attendance. Ms. Thamman thanked the City's consulting planning staff Brad Scheib and Rita Trapp for their coordination on the City's Plan. The Community Development Committee unanimously recommended approval of the proposed action with no questions or discussion at its meeting on September 16, 2019.

#### *Environment Committee*

The proposed action was approved on the consent agenda at the Environment Committee's September 24, 2019 meeting.

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## Advisory Comments

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

### Community Development Committee

1. As stated in the *Local Planning Handbook*, the City of Greenfield 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 Greenfield is located on the western border of Hennepin County. It is surrounded by the communities of Corcoran, Medina, and Independence, as well as Hanover, Rockford, Rockford Township and Franklin Townships in Wright County (Figure 1).

The City of Greenfield 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, with proposed changes |
| Consistency with Council Policy | <i>Thrive MSP 2040</i> and Land Use                                       | 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**

The Metropolitan Council awarded the City a Planning Assistance Grant of \$10,000 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 submittal of the City's final plan, including surface water management capital improvement plan, and final grant reporting requirements.

## **Known Support / Opposition**

There is no known opposition to the City's 2040 comprehensive plan.

# REVIEW RECORD

## City of Greenfield 2040 Comprehensive Plan

### Review File No. 21991-1, Business Item No. 2019-254 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. Three Rivers Park District is the park implementing agency for Regional Parks System components in Greenfield, for which the Plan accurately describes the Regional Parks System components.

Regional Parks, Park Reserves, or Special Recreation Features located within the City include Lake Sarah Regional Park and Lake Rebecca Park Reserve. Regional Trails located within the City include the planned Crow River Regional Trail (Figure 1). The Plan also appropriately acknowledges State recreation lands within the City, including the Schendel Wildlife Management Area.

#### *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 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.

The Plan identifies roadway and corridor studies that include recommendations regarding alignments, changes in access, and/or changes in land use, including the Highway 55 long-term improvement plan.

## **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 V. The Plan is consistent with the policies of the Transit system element of the TPP. The Plan addresses community roles related to its Community Designations of Emerging Suburban Edge and Diversified Rural, as well as the opportunities and challenges related to Transit Market Area V. The Plan acknowledges that the only transit services provided in this type of community are Transit Link dial-a-ride service and various ridesharing services.

## **Aviation**

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

## **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 regional trails, regional job concentrations and other regional destinations.

## **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 accommodating freight movement on Trunk Highway 55 and the Canadian Pacific Railway.

## **Transportation Analysis Zones (TAZ)**

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

## *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 agreed to forecasts for population, households, and employment.

The majority of wastewater treatment services are provided by the City via a wastewater treatment plant (WWTP) owned and operated by the City. The Plan indicates that the City's WWTP has sufficient capacity to accommodate the projected growth through 2040. The Plan does not suggest that the City will request the Council to acquire the WWTP.

A small area of the City is provided service by the Metropolitan Council Environmental Services (MCES) through an intercommunity agreement with the City of Medina. Increases in the number of connections within this service area will require the City to modify its agreement with Medina. Wastewater generated within this small area is conveyed to and treated at the Metropolitan Council's Blue Lake Wastewater Treatment Plant located in Shakopee. The Plan projects it will have 60 sewer households and no sewer employees by 2040 within the area served by the Metropolitan Disposal System (MDS), which reflects little to no growth in the next 20 years. The MDS has adequate capacity to serve the City's service level needs for the area served by the MDS through 2040.

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 for local services.

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

The Plan defines the City's goals, policies, and strategies for preventing and reducing excessive I/I in both the local municipal (city) and private property sanitary sewer systems. The City's I/I reduction strategies include system rehabilitation of sanitary sewers, as part of their street reconstruction program, that are susceptible to I/I. The City has a public education program regarding I/I aimed at private property owners that supports the elimination of illegal connections to the sanitary sewer system and encourages owners to televise private service laterals when performing home improvements.

The Plan describes the requirements and standards for minimizing I/I and references City Code (Section 50.074, Part B, and Section 50.123 Part M) that prohibits the discharge of stormwater or groundwater to any sanitary sewer through the connection of roof downspouts, foundation drains, area drains, sump pumps or other sources. The City does not have any resolutions or ordinances that require disconnections of such discharges when identified.

The Plan describes the sources, extent, and significance of existing I/I within the entire wastewater collection system. The City has estimated the amount of I/I in the collection system by reviewing wastewater flow data and comparing annual and peak month flows to average daily flow. This analysis suggests that wet weather I/I represents approximately 14% of average annual flow and 33% during peak month flow.

### ***Sewer Element Comments***

The City has two *Thrive MSP 2040* community designations: Diversified Rural and Emerging Suburban Edge. That portion of the City that is serviced through the MDS is identified in the Emerging Suburban Edge area; therefore, 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 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 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 conforms to the 2040 WRPP for local surface water management, with the understanding that the City will be creating a detailed Capital Improvement Plan (CIP), including Local Water Management Plan (LWMP) CIP by the end of 2019 that will need to be included in the City's Final Plan submittal.

The Plan satisfies the requirements for 2040 comprehensive plans. Greenfield lies within the oversight boundaries of the Pioneer – Sarah Creek Watershed Management Commission (Watershed). Greenfield submitted a draft Local Water Management Plan (LWMP) to the Council in June 2018. Council Water Resources staff reviewed and commented on the draft LWMP to the City and Watershed in a letter dated August 7, 2018. The Plan incorporates the City's LWMP as Plan Chapter 7 that was reviewed by the Watershed and Council.

### ***Advisory Comments***

The Plan incorporates the draft LWMP as a free-standing chapter in the body of the Plan. The final LWMP will need to include an updated CIP (due by the end of 2019 and required to be included in the City's Final Plan submittal), which will need to extend to 2028, and must describe nonstructural, programmatic, and structural solutions to water quality issues identified in the LWMP. The implementation program must include:



1. A table that describes each component of the implementation program and clearly details the schedule, estimated cost, and funding sources for each component, including annual budget totals.
2. A table for a capital improvement program (CIP) that sets forth, by year, details of each contemplated capital improvement that includes the schedule, estimate cost, and funding source.

Since the LWMP identified water quality issues and impairments for several waterbodies in the City, the CIP should include projects and/or programs to put in place as required by the Total Maximum Daily Load (TMDL) and watershed restoration and protections strategy (WRAPS) completed for that waterbody. This associated work, projects, and programs should be included in the CIP and reflect the funding source.

## 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 revised forecast for the City (Tables 3.3, 4.1, 7). Council and the City staff have agreed upon an upward revision to the employment forecast, consistent with the commercial uses envisioned for southwest Greenfield, proximate to Highway 55. The revised forecasted are shown below in Table 1 with proposed revisions underlined.

**Table 1. City of Greenfield Forecasts**

|                   | Census | 2018  | System Statement |       |       | Revised Forecast |            |            |
|-------------------|--------|-------|------------------|-------|-------|------------------|------------|------------|
|                   | 2010   |       | 2020             | 2030  | 2040  | 2020             | 2030       | 2040       |
| <b>Population</b> | 2,777  | 2,904 | 3,030            | 3,460 | 3,880 | 3,030            | 3,460      | 3,880      |
| <b>Households</b> | 936    | 983   | 1,100            | 1,360 | 1,600 | 1,100            | 1,360      | 1,600      |
| <b>Employment</b> | 613    | 628   | 750              | 780   | 800   | 750              | <u>820</u> | <u>900</u> |

The Council will approve the forecast revision simultaneous with action on the Plan.

Chapter 4 of the Plan describes land supply for future growth. The land supply has a housing capacity of 876 (minimum) to 2,110 (maximum) additional housing units (Plan Table 4.7- Projected Land Use Staging in Net Acres). The Plan discusses that this land supply will continue to be developed and absorbed after 2040.

### Advisory Comments

The City may wish to reconsider the Traffic Analysis Zone (TAZ) allocation of the forecast. This can be revised at a later date through correspondence with Council staff. Chapter 4 describes a mixed use plan for the Village Center, including new housing in the 2020-2030 decade. However, the TAZ allocation describes minimal households growth (10 households) for the Village Center and TAZ #903. Instead, household growth has been allocated to other zones in the City. Please contact Council staff for assistance.

## Thrive MSP 2040 and Land Use

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

The Plan is consistent with *Thrive MSP 2040* (Thrive) and its land use policies. Thrive designates the City in two community designations: Emerging Suburban Edge and Diversified Rural. There is a small portion of the City, generally in the southwest, which is identified as Emerging Suburban Edge, with the rest of the City in the Diversified Rural designation (Figure 2).

The existing land uses in Greenfield are predominately agricultural and rural (78%). There is an abundance of natural resources, including lakes and parks (14.8%), which are central to Greenfield’s identity. There is limited (1.6%) locally-sewered commercial, institutional, and industrial in the southwest part of the City and along Highway 55. There is also a small amount of multifamily residential (0.15%) near Rockford and a small area of sewerred residential (0.4%) (Figure 3).

The Plan’s vision and goals include protecting and enhancing Greenfield’s significant natural resources and open spaces and promoting its rural character. The Plan states that the overriding goal of this Plan is to preserve the community’s rural character while protecting the long-term ability for the City to emerge as a strong, thriving community on the edge of a growing metropolitan region.

### Emerging Suburban Edge

The Plan is consistent with Thrive for land use and residential density policies for its area designated as Emerging Suburban Edge. Thrive calls for Emerging Suburban Edge communities to plan for forecasted population and household growth at overall average densities of at least 3 to 5 units per acre. Emerging Suburban Edge communities should target higher-intensity developments in areas with better access to regional sewer and transportation infrastructure, connections to local commercial activity centers, transit facilities, and recreational amenities.

The Plan includes a new area guided as Village Center to create a core downtown and destination area that could serve the community with a walkable center and mix of uses including life cycle housing. The Plan states that this area would create opportunities to strengthen Greenfield’s identity and contain a mix of uses, including new retail and housing uses. The Plan identifies locally-sewered residential growth in the areas guided Low Density Residential (135 acres), Medium Density Residential (90 acres), and Village Center (11 acres, 50% residential) (Figure 4). As shown below in Table 2, the minimum planned net residential density for new sewerred residential development is 3.8 units per acre.

**Table 2. Planned Residential Density, City of Greenfield**

| Category  | Density                |     |           |            |             |
|---|------------------------|-----|-----------|------------|-------------|
|   | Min                    | Max | Net Acres | Min Units  | Max Units   |
| Low Density Residential   | 2                      | 6   | 135       | 270        | 810         |
| Medium Density Residential  | 6                      | 12  | 90        | 540        | 1080        |
| Village Center*   | 12                     | 40  | 5.5       | 66         | 220         |
|   | <b>TOTALS</b>          |     |           | <b>876</b> | <b>2110</b> |
|   | <b>Overall Density</b> |     |           | <b>3.8</b> | <b>9.2</b>  |
| <i>Based on Table 4-7 Projected Land Use Staging in Net Acres. * 50% residential applied to 11 net acres.</i> |                        |     |           |            |             |

### Diversified Rural

Diversified Rural areas have a variety of farm and non-farm land uses including very large-lot residential, clustered housing, hobby farms and agricultural uses. Thrive encourages Diversified Rural communities to plan for growth not to exceed forecasts and in patterns that do not exceed 4 units per 40 acres. Diversified Rural areas are expected to accommodate rural forecasted growth without requiring the provision of regional urban services. In addition, these communities are also expected to

protect natural resources and to adopt conservation subdivision, cluster, or other environmental protection provisions.

The Plan identifies natural resources in the City, along with goals and policies for the protection of these resources. It also indicates that the use of conservation design is strongly encouraged in rural areas with significant natural habitat and resources.

Based on the City's historic development pattern and previous comprehensive plan approvals, the Plan is consistent with Council land use policies. No additional regional wastewater service is contemplated for Greenfield in this planning period. The Plan indicates that the Rural Residential land use category is intended to maintain the existing pattern rural development established in previous comprehensive planning efforts. The Rural Residential area has a maximum density of one unit per five gross acres; however, properties are required to maintain enough buildable land to accommodate the construction of permitted structures, including primary and secondary septic systems or community systems in the case of cluster housing.

The Plan discusses the Council's Flexible Development Guidelines and indicates that clustering of development is encouraged to preserve existing natural resources, including wetlands, prairie, woodlands, habitat corridors, and viewsheds. The City's rural densities would not represent a system departure as these areas are not considered part of the Council's Long Term Service Area for the regional wastewater system. The Council is not planning for any additional regional wastewater services in Greenfield and the City's policies are otherwise consistent with those identified for Diversified Rural communities.

### **Agricultural Preserves**

The Plan identifies lands that are enrolled in the Agricultural Preserves Program on the future land use map. The Plan indicates that this designation is intended to maintain productive farm operations at a maximum residential density of 1 unit per 40 gross acres consistent with the intent of and rules outlined in the Metropolitan Agricultural Preserves Act (Minnesota Statute Chapter 473H).

The Plan states that this designation is made available to property owners that are currently enrolled in the Agricultural Preserves Program and committed to preserving their property's long-term agricultural use. The Plan also states that when parcels expire from the program, the Plan will be amended to no longer show them as Agricultural Preserve parcels. The Plan also indicates that there will be no expansion of the Agricultural Preserve land use category beyond properties that are currently enrolled.

### **Advisory Comments**

To support the intent of the Agricultural Preserves Program, the City is encouraged to consider allowing eligible agricultural parcels to enroll and re-enroll in the Agricultural Preserves Program in the remainder of the community where urban services are not planned to be provided.

### **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 1,000 homes including 66 multifamily units and more than 800 inhabited single-family homes. More than 90 homes are rented. More than 630 housing units are currently affordable to households earning under 80% of Area Median Income (AMI). However, nearly 400 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. Notably, there is one unit affordable to households with income at or below 30% AMI and 30 cost burdened households with incomes at or below 30% AMI.

The Plan identifies existing housing needs including housing that is affordable to low-income households and a variety of housing types for all stages of life. The City does not currently have any publicly subsidized housing.

The Plan acknowledges the 2021-2030 affordable housing need allocation of 31 units; 19 of which are needed at prices affordable to households earning 30% of AMI or less, 3 of which are needed at prices affordable to households earning between 31 and 50% of AMI, and 9 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 six units per acre to allow for development of 180 housing units to meet the need for units between 51 and 80% of AMI and 12 units per acre to allow for development of at least 36 new housing units to meet the need for units affordable to households earning 50% of AMI or less.

The housing implementation plan component of the Plan describes that the City will consider TIF, housing bonds, and tax abatement for projects that provide affordable housing units. The Plan also indicates that the City will explore Hennepin County's Affordable Housing Incentive Fund and regularly review zoning and subdivision ordinances to identify any regulations that inhibit housing priorities. The City states that they will conduct a Small Area Master Plan to create a vision for certain areas in the City that may be home to new affordable housing units.

## **Water Supply**

*Reviewer: John Clark, ES – Water Supply Planning (651-602-1452)*

The Plan is consistent with 2040 WRPP policies related to water supply, including the policies on sustainable water supplies, assessing and protecting regional water resources, and water conservation and reuse. The City prepared a Local Water Supply Plan (LWSP) in 2019 that was submitted to both the Minnesota Department of Natural Resources (DNR) and Council.

## **Advisory Comments**

The LWSP does not acknowledge Rockford's drinking water supply management area that extends into Greenfield. It is advised that Greenfield coordinate wellhead protection planning efforts with the City of Rockford and consider any potential impacts of development on the water supplies of both communities.

The Council's review of water supply-related content reflects the expectations shared with communities in their system statements and the water supply-related policies in the WRPP. If changes are made to the LWSP resulting from DNR's review or from changes during the comprehensive plan review process, such as changes to forecasts, the City will need to provide the Council and DNR with the updated information.

## **Community and Subsurface Sewage Treatment Systems (SSTS)**

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

The Plan is consistent with the policies of the 2040 WRPP for community and subsurface sewage treatment systems (SSTS). The Plan indicates that there is one municipally owned and operated wastewater collection and treatment system in the City and one private Community Wastewater Treatment System serving approximately 40 homes in the "Meadows of Whisper Creek" development. Additionally, the North Shore Drive wastewater collection system serves homes around Lake Sarah within MCES Metershed 434 through an intercity agreement between Greenfield, Medina, and Independence which discharges flow into the MCES interceptor system in the Maple Plain vicinity. There are approximately 912 SSTS serving single-family residences in the City. The City has delegated the responsibility of permitting, inspection, maintenance management, and enforcement of SSTS in the City to Hennepin County, as detailed in Hennepin County Ordinance 19.

## **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 identifies, consistent with the Council's aggregate resources inventory information presented in *Minnesota Geological Survey Information Circular 46*, the presence of natural aggregate resources within the community boundaries. Mineral extraction is allowed within the Rural area of the City through the conditional use permit process. The Plan states that there is one active aggregate extraction facility in operation in the City. Remaining resource areas have largely been mined, restored, and developed into rural residential land uses.

### **Historic Preservation**

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

The Plan addresses historic and cultural resources as required by the Metropolitan Land Planning Act. The Plan discusses sites having important historical significance in Greenfield. The Plan includes policies for historic/cultural resource preservation. It also recognizes the importance of safeguarding the heritage of the City and promoting the continued use of historic sites and structures. There are no sites within Greenfield that are maintained on either the national or state register of historic places.

### **Plan Implementation**

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

The Plan includes a description of the zoning, subdivision, SSTS codes, and the housing implementation program. The Plan describes official controls and fiscal devices that the City will employ to implement the Plan. The Plan fulfills the requirements of a Capital Improvement Plan (CIP) and indicates that the City does not have any capital improvement projects that would have potential to impact regional transportation systems, sewers, parks, water supply, and open space facilities. The Plan also states that City will be creating detailed CIP within nine months of Plan adoption and will update the CIP annually.

### **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:

- June 25, 2018: Greenfield 2040 Preliminary Plan
- December 27, 2018: Greenfield 2040 Comprehensive Plan
- March 25, 2019: Revisions to the water supply plan
- July 1, 2019: Revisions to 2040 Comprehensive Plan
- July 2, 2019: Revisions to water supply plan Appendix 10
- July 22, 2019: Revisions to implementation chapter
- July 25, 2019: Revisions to wastewater plan

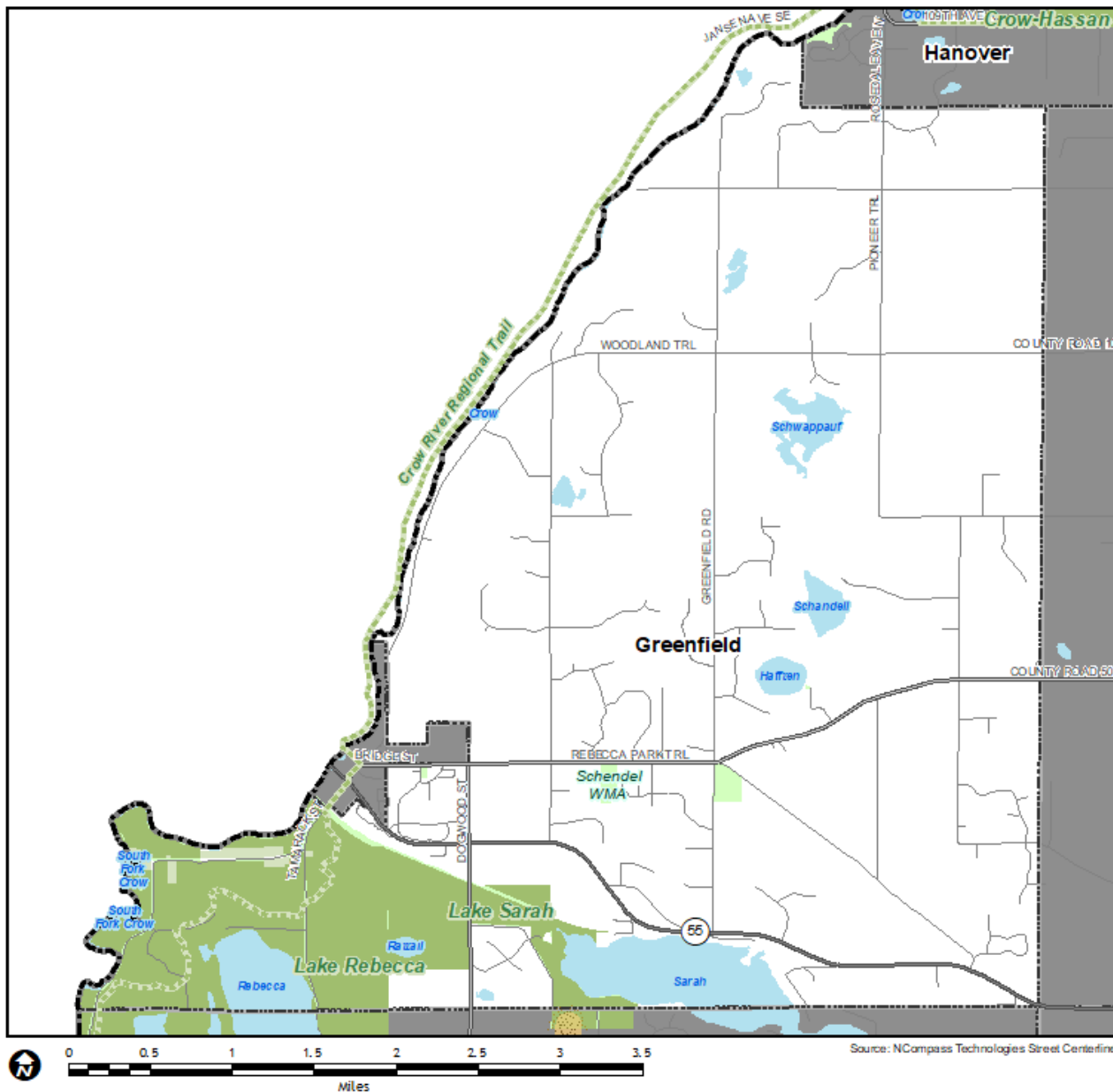
### **Attachments**

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



### 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

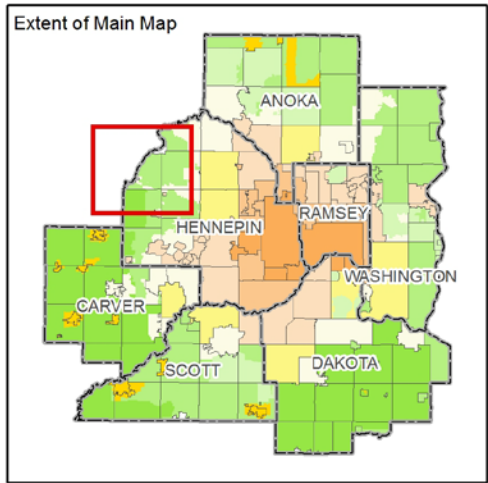
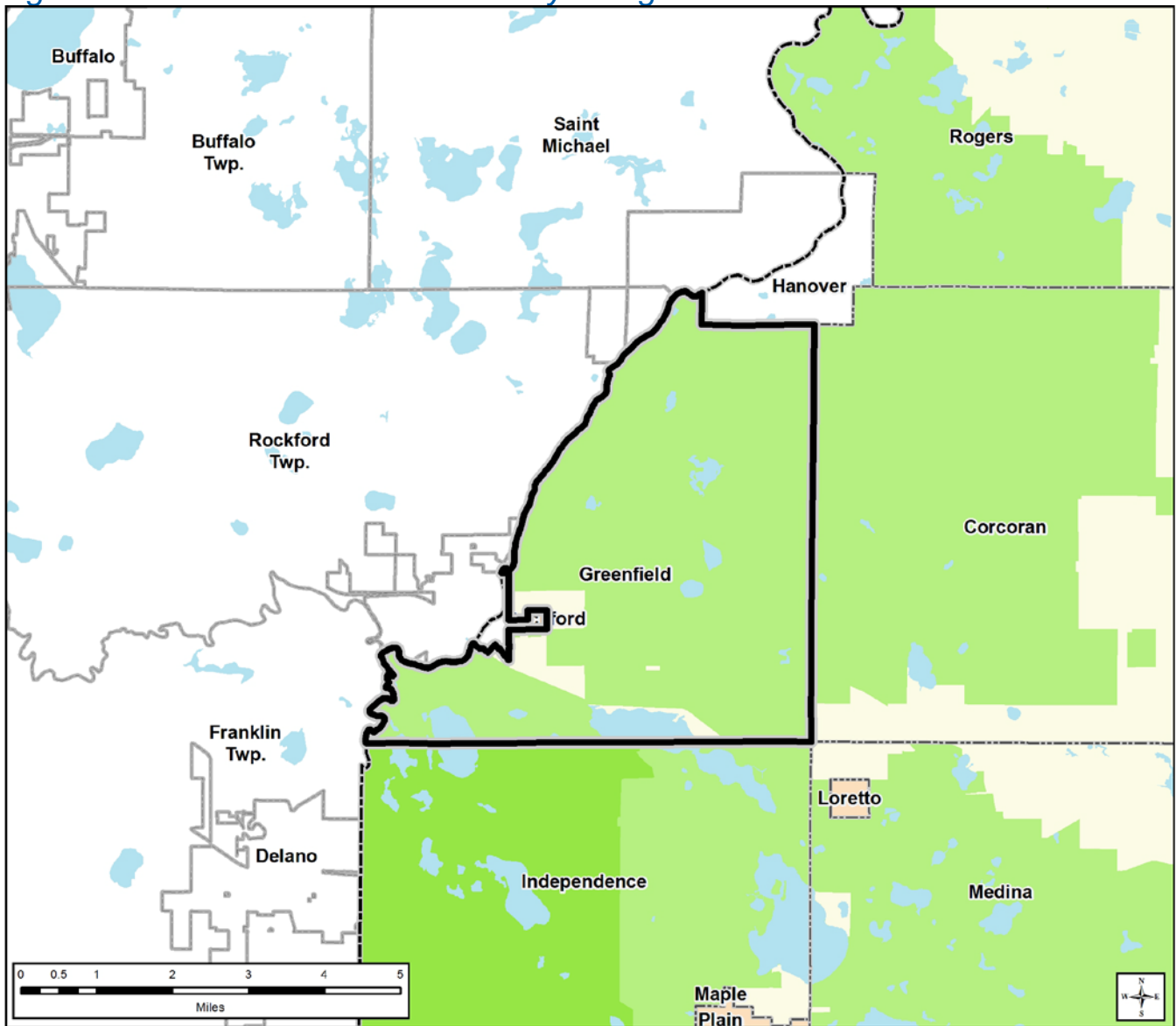
- Wastewater**
- Meters
  - Lift Stations
  - MCES Interceptors
  - MCES Treatment Plants

#### 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



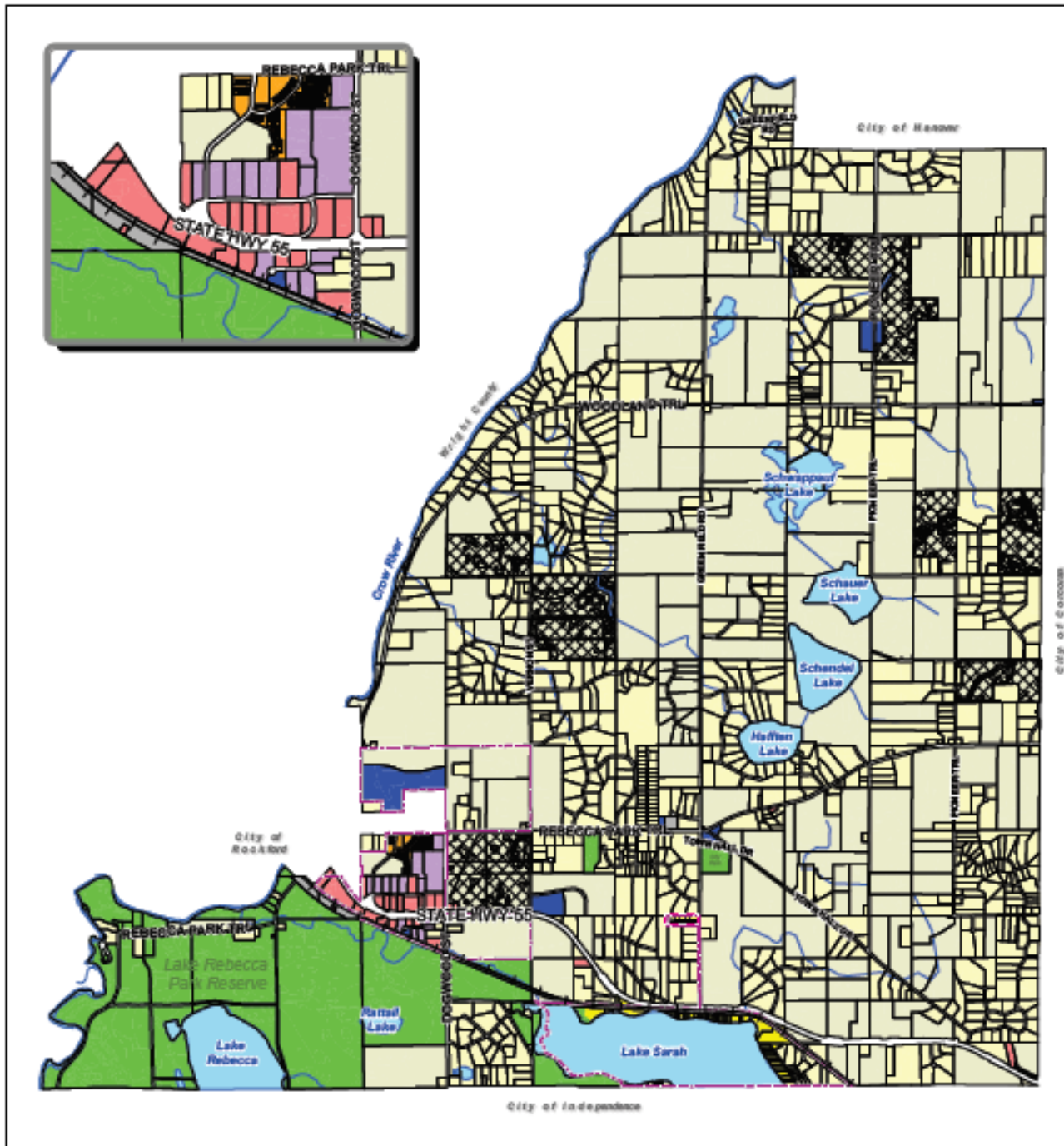
**Community Designations**

- 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



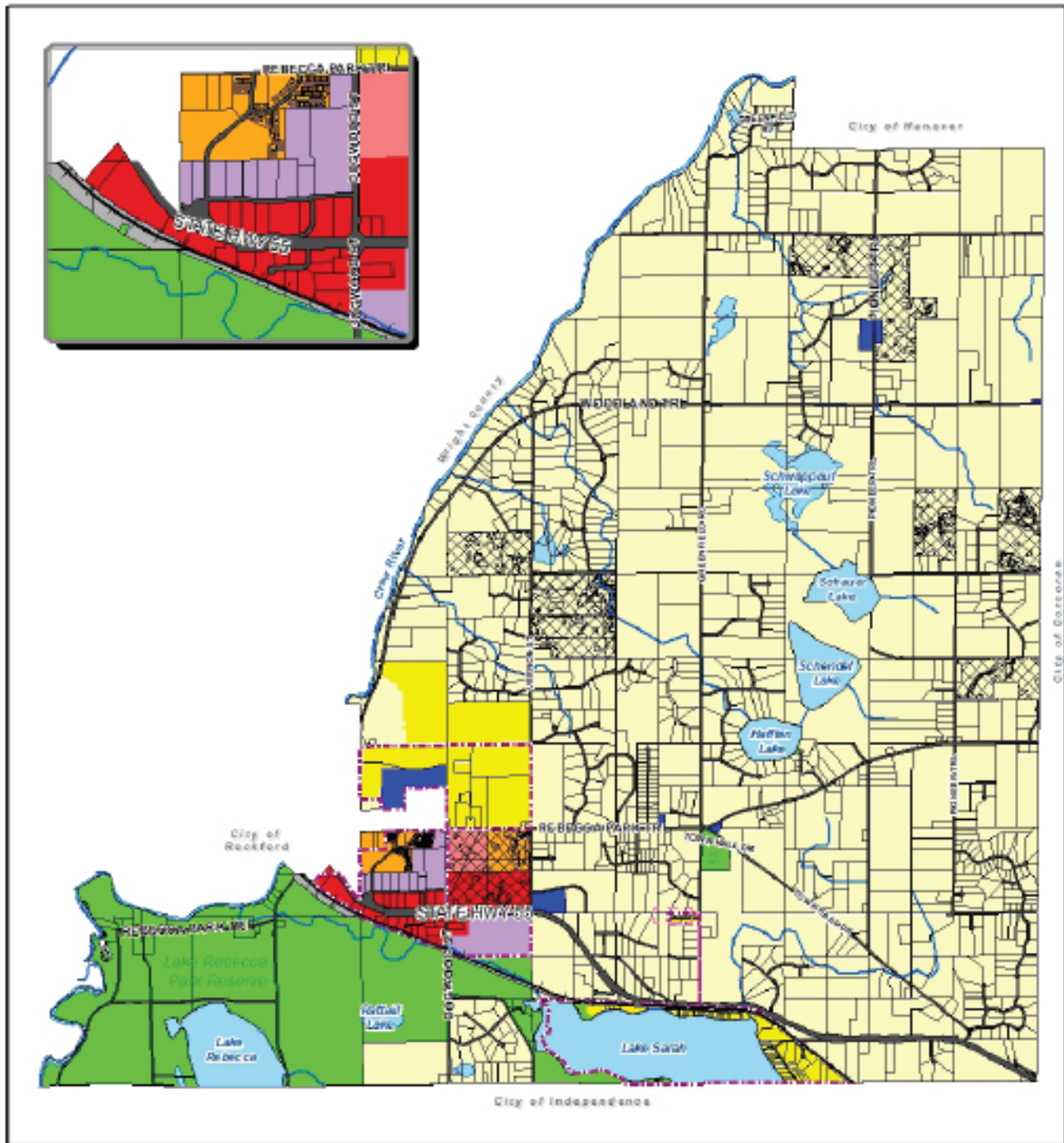
Source: Hennepin County Parcel Data, HKGI

## Existing Land Use 2017



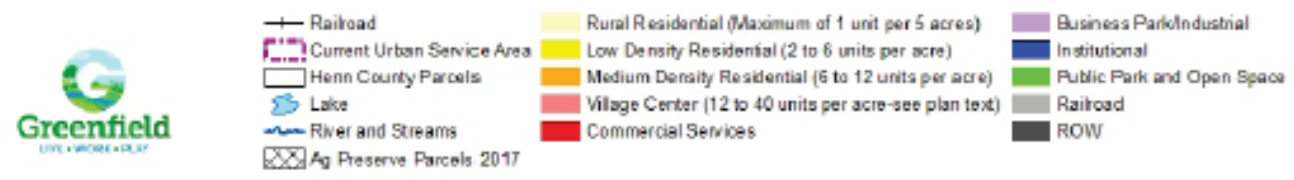
- |                            |                           |               |
|----------------------------|---------------------------|---------------|
| Railroad                   | Agricultural / Vacant     | Industrial    |
| Current Urban Service Area | Rural Estate              | Institutional |
| Henn County Parcels        | Residential Sewered       | Park          |
| Lake                       | Residential - Multifamily | Railroad      |
| River and Streams          | Commercial                | Utility       |
| Ag Preserve Parcels 2017   |                           |               |

Figure 4. 2040 Planned Land Use



0 0.5 1 Miles  
 Source: Hennepin County Parcel Data, HKGi

## Future Planned Land Use



### Figure 5. Land Guided for Affordable Housing

|  |                     |
|--|---------------------|
| 2021-2030 share of regional need for Affordable Housing at 50% AMI and Below:  | <b>22 units</b>     |
| 2021-2030 share of regional need for Affordable Housing between 51 to 80% AMI: | <b>9 units</b>      |
| TOTAL 2021-2030 share of regional need for Affordable Housing:                 | <b>31 units</b>     |
| 2021-2030 total regional need for Affordable Housing:                          | <b>37,900 units</b> |

|                                   | <b>Available Acres</b> | <b>×</b> | <b>Minimum Density</b><br><i>(units per acre)</i> | <b>×</b> | <b>Expected % Residential</b><br><i>(if mixed use)</i> | <b>=</b> | <b>Minimum Units Possible</b> |
|-----------------------------------|------------------------|----------|---|----------|--|----------|-------------------------------|
| <b>Medium Density Residential</b> | 30.0                   |          | 6   |          | 100%   |          | 180                           |
| <b>Village Center</b>             | 6.0                    |          | 12  |          | 50%  |          | 36                            |
| <b>Total</b>                      | <b>36.0</b>            |          |   |          |  |          | <b>216</b>                    |

Sufficient/(insufficient) units affordable at 50% AMI and below possible in areas with ≥12 units per acre minimum against share of regional need: **14**

Sufficient/(insufficient) total units affordable between 51 to 80% AMI possible in areas with ≥6 units per acre minimum possible against share of regional need: **171**

Sufficient/(insufficient) total units possible against share of regional need: **185**

Affordable units built since 2021: **0**

Sufficient/(insufficient) units possible adjusted for affordable units built: **185**

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

