

Community Development Committee

Meeting date: October 21, 2019

Environment Committee

Meeting date: October 22, 2019

For the Metropolitan Council meeting of November 13, 2019

Subject: City of Arden Hills 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 21914-1

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 Arden Hills to place its 2040 Comprehensive Plan into effect.
2. Advise the City to implement the advisory comments in the Review Record for Transportation, Forecasts, Housing, and Water Supply.

Recommendation of the Environment Committee

1. Approve the City of Arden Hills' Comprehensive Sewer Plan.

Summary of Community Development Committee Discussion/Questions

Senior Planner Raya Esmaeili presented the staff's report to the Committee. No representatives from the City of Arden Hills were in attendance.

Councilmember Atlas-Ingebretson inquired about the concerns raised publicly about the inadequate number of affordable housing units within the City and what the role of the Council is in ensuring affordable and attainable housing. Community Development Director LisaBeth Barajas responded that the role of the Council is to review the comprehensive plan and ensure conformance with the regional systems and consistency with Council policies. There are currently disagreements between the City and the property owner about the development of the TCAAP site that is going through a legal process, and that is an avenue available to property owners. Moreover, future actions that a City might take are reviewed by the Council as they relate to regional system's underutilization or potential negative system impact.

Councilmember Atlas-Ingebretson asked about Figure 6 of the staff report and whether there were insufficient units in the City. Director Barajas responded that Figure 6 indicates that based on guided land uses, there would be a surplus of possible units within the City. Councilmember Atlas-Ingebretson inquired about the Council's authority in reviewing information related to affordable housing in Plans. Director Barajas responded that the requirements and policies are outlined in the Housing Policy Plan and include addressing existing and projected housing needs, facilitating land use planning in support of affordable housing, and including an implementation plan. If a Plan does not include any of the requirements, it is determined to be incomplete. If the Plan does not address policies within the Housing Policy Plan, it is considered inconsistent. Councilmember Atlas-Ingebretson asked, given all the concerns raised around the affordability in this Plan, if this is a situation to determine that the Plan is incomplete. Director Barajas responded that the Council defines bands of affordability and the

requirement is for the community to acknowledge them and to associate their implementation plan with them. In terms of whether a development plan carries out the comprehensive plan, it is not the Council's authority to enforce the comprehensive plan. That authority lies with local residents and property owners.

Russ Adams, Executive Director at the Alliance for Metropolitan Stability addressed the Committee. He raised the concern of the City taking advantage of the Council's process in meeting affordable housing goals and stated that they are currently in mediation with Ramsey County.

The Community Development Committee recommended approval of the proposed actions with a unanimous vote and two abstentions at its meeting on October 21, 2019.

Summary of Environment Committee Discussion/Questions

No comments or questions. The Environment Committee approved the proposed action on consent agenda at its meeting on October 22, 2019.

Community Development Committee

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Subject: City of Arden Hills 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 21914-1

District(s), Member(s): District 10, Peter Lindstrom

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

Staff Prepared/Presented: Raya Esmaeili, Senior Planner (651-602-1616)
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

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1. Authorize the City of Arden Hills to place its 2040 Comprehensive Plan into effect.
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Recommendation of the Environment Committee

1. Approve the City of Arden Hills' Comprehensive Sewer Plan.

Advisory Comments

The following Advisory Comments are part of the Council action authorizing the City of Arden Hills 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 Arden Hills is located in northwestern Ramsey County. It is surrounded by the communities of Shoreview, Roseville, New Brighton, and Mounds View.

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

The Alliance for Metropolitan Stability and the Housing Justice Center have contacted the Council to request information and express their viewpoints regarding the City's intent to follow through with their stated plans in the housing section of the Plan.

REVIEW RECORD

City of Arden Hills 2040 Comprehensive Plan

Review File No. 21914-1, Business Item No. 2019-296 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). Ramsey County is the Park implementing agency for the Regional Parks System components in the City of Arden Hills, for which the Plan accurately describes the Regional Parks System components.

Regional Parks, Park Reserves, or Special Recreation Features located within the City include Tony Schmidt Regional Park. Regional Trails located within the City include the Highway 96 and Rice Creek North regional trails, and the Lexington Avenue/Parkway Regional Trail Search Corridor. There are no State or Federal recreation lands within the City (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, except a few transit facilities in Fig. 11-4, as discussed below, and is consistent with Council policies regarding community roles, the needs of non-automobile transportation, access to job concentrations, and the needs of freight. The Plan is compatible with the plans of adjacent and affected governmental units.

Roadways

The Plan conforms to the highway system element of the TPP. The Plan accurately reflects I-35W and I-694, which are the metropolitan highways within the City's boundaries. Planned highway additions and improvements identified in the Current Revenue Scenario of the 2015 TPP included an additional lane of I-694 between Lexington and Rice, which has been completed, and the addition of a MnPASS lane along I-35W, which is reflected in the Plan. Construction of this MnPASS lane began this summer.

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. There is also a section analyzing roadway safety. Forecasting is consistent with regional methodology. The Plan also includes guidelines on how access will be managed for principal and A-minor arterials. Appendices B and C include some of this detailed information.

The Plan identifies several transportation corridor studies that include recommendations regarding road capacity and transit improvements, changes in access, and/or changes in land use. These studies include the Twin Cities Army Ammunition Plant (TCAAP) Alternative Urban Areawide Review (including a separate traffic study that resulted in several road improvements), the I-35W North reconstruction project (which recommended construction of a MnPASS lane), US 10 auxiliary lane project and studies of improvements to both County Road F and Lexington Avenue. The Plan accurately describes the status of recommended changes in these studies, including the likelihood and timing of funding and construction.

Transit

The Plan shows the location of existing transit routes and facilities within the City and acknowledges that the City is within Transit Market Areas III and IV.

The Plan discusses the 2016 feasibility study to extend the A Line BRT transitway that currently ends at Rosedale. This transitway extension was not part of the Current or Increased Revenue Scenarios in the 2040 TPP adopted in 2015. However, the 2040 TPP update adopted in 2018 does include this transitway in the Increased Revenue scenario.

Aviation

The Plan conforms to the Aviation system element of the TPP. There is no airport within Arden Hills, but the Plan acknowledges the proximity of the Anoka Blaine airport and includes policies that protect regional airspace from obstructions.

Bicycling and Walking

The Plan is consistent with the Bicycling and Pedestrian chapter of the TPP. Figure 9-1 identifies city, county, and private pathways within the City, as well as existing and planned regional trails. It also identifies existing and future segments of and connections to the Regional Bicycle Transportation Network (RBTN) and regional trails, on Figure 11-9. The Plan proposes preferred alignments for three RBTN corridors on Figure 11-9.

Freight

The Plan is consistent with the Freight policies of the TPP. The Plan includes heavy commercial vehicle traffic counts (Figure 11.5) and references the Regional Truck Highway Corridor Study completed by the Council in 2017, including the study's findings as they relate to the City. The Plan identifies railroads and the needs of freight movement in and through the City, including locations of light industrial land uses that generate freight.

Transportation Analysis Zones (TAZs)

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

The City's planned land uses and areas identified for development and redevelopment can accommodate the TAZ forecasted allocations in the Plan, and at densities consistent with the City's Thrive designation of Suburban and applicable TPP policies for transit station areas.

Advisory Comments

The Plan needs revised text and a revised Figure 11-4, regarding the park-and-ride at Highway 10 and County Road H in the adjacent City of Mounds View. The Plan text acknowledges the uncertainty of the A Line BRT extension on page 11-4 and reflects the study recommendations to support a future extension. However, Figure 11.4 shows this extension without any qualification. Therefore, the map needs to be modified to make it consistent with the Plan's text and the TPP.

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 forecasts for population, households, and employment.

Current wastewater treatment services are provided to the City by Metropolitan Council Environmental Services. All wastewater generated within the City is conveyed through Council Interceptors; 1-RV-431, 1-RV-432, 8451, and 4-NS-524. All flow is treated at the Council's Metropolitan Wastewater Treatment Plant in St. Paul. The Plan projects that the City will have 4,600 sewered households and 17,500 sewered employees by 2040. The Metropolitan Disposal System with its scheduled improvements has or will have adequate capacity to serve the City's 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 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 identifies development and associated growth to occur in the northern area of the City on a portion of the former Twin City Army Ammunition Property (TCAAP) by 2040. All development within the area of TCAAP was originally programmed to be served via interceptor 4-NS-524, which is correctly reflected in the Plan. The Plan identifies a total of 427 acres of net developable land area within the TCAAP for regional wastewater service. Council policy requires a minimum of 1,000 acres of developable land area be available for direct regional interceptor service. Therefore, wastewater service for the TCAAP area will need to be provided through an inter-community agreement with Mounds View, to utilize an existing 18-inch sanitary sewer owned and maintained by Mounds View. The City of Mounds View owns an existing sanitary sewer flow meter that was used to bill Arden Hills for wastewater service when portions of the TCAAP remained in use. The Council has agreed to acquire the existing meter facility from Mounds View when flow from TCAAP reaches a level where metering it is feasible, and use it to allocate flow between the two communities.

The Plan defines the City's goals, policies, and strategies for preventing and reducing excessive inflow and infiltration (I/I) in the local municipal (city) and private sanitary sewer systems. The Plan includes a summary of activities and programs intended to mitigate I/I in both the public and private property systems including; system flow monitoring, smoke testing, an annual sewer pipe inspection and lining program on the municipal system, and sump pump inspections on the private system. Also included as part of the City's annual street improvement program is the televising of service wye connections to the city system during system inspection. Much of this work was funded through the I/I State Bond Grant Program administered by the Council, and the Plan states that the City will continue to apply for future financial assistance as it becomes available. The City has programmed approximately \$800,000 between 2019 and 2021 for sewer lining and rehabilitation.

The Plan describes the requirements and standards for minimizing I/I and references City Code (Subdivisions 8 and 10) that prohibit storm and ground water discharges from sump pumps, roof drains, and area drains into the sanitary sewer system. The Code also requires disconnection of such connections if discovered.

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 City estimates that approximately 38% of the private service laterals within the City are vitrified clay tile pipe and built prior to 1970. By comparing recent wastewater flow generation with precipitation trends and events, the City has determined that approximately 60% of the City’s annual wastewater is from I/I and that peak month I/I within the system is approximately 70%.

Comprehensive Sewer Plan 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 policies and the regional wastewater system plan. Upon adoption of the Plan by the City, the action of the Council to approve the Comprehensive 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 Comprehensive 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 in conformance with the Council’s WRPP for local surface water management. The Plan satisfies the requirements for 2040 comprehensive plans. Arden Hills lies within the oversight boundaries of the Rice Creek Watershed District. The City submitted a draft LWMP update in January 2018. Council Water Resources staff reviewed and commented on the draft LWMP to the City and Watershed District in a letter dated March 7, 2018. The Watershed District approved, and the City adopted the final LWMP on September 26, 2018. The Plan incorporates the final LWMP in an Appendix.

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: Paul Hanson, CD – Research (651-602-1642)

The Plan includes the Council forecast for the City (Table 2.1 on page 2-2). For reference, the Council forecasts are shown in Table 1 below.

Table 1. City of Arden Hills Forecasts

	Census 2010	Estimated 2017	Council Forecasts		
			2020	2030	2040
Population	9,552	9,969	10,000	12,000	13,500
Households	2,957	3,211	3,200	4,100	4,600
Employment	12,402	11,275	15,000	16,300	17,500

All forecasts tables throughout the Plan are consistent and the City appears to have enough land guided to accommodate future household growth.

Advisory Comment

Although section 6.4.10 suggests that at maximum build out TCAAP will accommodate 1,460 new residential units (slightly less than the City’s household growth by 2040), it is possible that TCAAP development could be more conservative (1,265 new units at mid-point density). To ensure that the City can meet its 2040 household growth, Council staff recommends that the City encourage further development of the TCAAP site or encourage redevelopment within the planned Community Mixed Use area (Figure 5) to supplement TCAAP development.

Thrive MSP 2040 and Land Use

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

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 having experienced continued growth and expansion during the 1980s and early 1990s, and as typically having automobile-oriented development patterns at significantly lower densities than in previous eras.

Suburban communities are expected to plan for forecasted population and household growth at overall average densities of at least 5 units per acre, and target opportunities for more intensive development near regional transit investments at densities and in a manner articulated in the 2040 TPP.

The existing and mostly developed land uses in Arden Hills are predominately residential (over 20%), with just 7% commercial/office and industrial areas near transportation corridors (south of I-694 and east of Highway 51, as well as north of I-694, east of I-35W, and south of Highway 10). Institutional land use that includes Bethel University by Valentine Lake makes up 8% of the existing land uses. Over 35% of the City is Undeveloped representing the TCAAP area of 427 acres (Figure 3). The TCAAP site was used by the federal government in 1940s to manufacture and test munitions for World War II.

The Plan is consistent with Thrive for land use and residential density policies for a Suburban community designation. Thrive calls for Suburban communities to plan for forecasted population and household growth at overall average densities of at least five units per acre. As shown below in Table 2 below, the City’s plan for development and redevelopment results in the overall density of development of 5.0 units per acre. Several land use categories where growth is not anticipated within this planning period, including Very Low Density Residential, Low Density Residential, High Density Residential, and Neighborhood Business (0-50% residential), are not included in the table below.

Table 2. Planned Residential Density, City of Arden Hills

Category	2018-2040 Change				
	Min	Max	Net Acres	Min Units	Max Units
Medium Density Residential (MDR)	6	9	7.0	42	63
Neighborhood Residential (NR-1)	1.5	2.5	42.9	64	107
Neighborhood Residential (NR-2)	2.5	4	51.5	129	206
Neighborhood Residential (NR-3&4)	4	8	51.9	208	415
Town Center (TC)	21	67	15.9	334	1065
Community Mixed Use (CMU)*	12	20	10.0	120	200
	TOTALS		179	897	2057
			Overall Density	5.00	11.48

*10-50% residential

Arden Hills is a fully developed community and the growth accommodation is through redevelopment. Figure 5 illustrates areas of interest that are identified for potential redevelopment in the future land use plan. These areas include the B2 District, Red Fox/Grey Fox/Lexington Business Area, TCAAP Redevelopment, and Gateway Business.

Bus Rapid Transit (BRT)

The Plan identifies the Arterial BRT of A Line Extension. This alignment is identified in the updated TPP Increased Revenue Scenario. If additional revenues are made available, the build out of the arterial BRT system will be accelerated. The METRO A Line is a bus rapid transit (BRT) corridor that connects

south Minneapolis to Rosedale Center in Roseville and opened in June 2016. Metro Transit conducted the A Line Corridor Extension Evaluation study to Rice Creek Commons in Arden Hills in September 2016. The study concluded that availability of resources and ridership is unlikely to support the immediate extension of the line. While the land use expectations for Current Revenue scenario transitways (land use densities, walkability, total activity levels) are not required at this stage, a shared implementation vision to support pedestrian-friendly developments would immensely increase the project readiness. The Plan does acknowledge the study's recommendations of including transit ready infrastructure and amenities in road reconstruction plans and pedestrian friendly street designs.

The Plan also acknowledges the I-35W North corridor. This corridor links downtown Minneapolis with communities along I-35W north of downtown to Blaine. The corridor was studied in the I-35W North Managed Lanes Corridor Arterial Transitway Corridor Study completed in 2013. The study focused primarily on the highway MnPASS vision, but also included an analysis of highway BRT to the 95th Avenue Park-and-Ride in Blaine that could potentially be coordinated with the MnPASS vision. The MnPASS design work on the corridor is ongoing and the expected construction of MnPASS lanes in this corridor will not preclude the potential for future highway BRT.

Housing

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

The Plan is consistent with the 2040 *Housing Policy Plan*. Arden Hills is a suburban community with established residential neighborhoods, as well as a large redevelopment site that will create new residential neighborhoods. Most of the City's housing units were built between 1970 and 1989. Residential development has been primarily single family. As of 2016, approximately 78% of its existing housing stock is single-family. The Plan notes that future growth will be primarily through the development of the TCAAP site.

In 2016, the City had approximately 3,249 housing units. While about 43% of those units were affordable to households earning 80% of the Area Median Income (AMI) or less (or \$68,000 for a family of four), affordable options decrease to 9% for households earning 30% AMI or less (or \$27,100). However, 9% is a higher share of housing affordable at 30% AMI or less than the average metro community, due largely to the 270 manufactured homes in Arden Hills. About 16% of the City's households earning 80% AMI or less were housing cost burdened in 2016. The Plan identifies maintenance of aging housing units and housing options for an aging population as existing housing needs.

The Plan acknowledges the City's share of the region's need for affordable housing in the 2021-2030 decade, which is 373 units. With 116 acres of land guided for higher density residential development in that time period (Figure 6), the Plan sufficiently promotes the availability of land to support that share.

The Plan addresses its existing and future housing needs in its implementation plan, which thoroughly describes the policies, programs, and other tools that the City will consider. Tools discussed in the Plan include participation in Livable Communities Act programs, support for applications to Minnesota Housing's Consolidated Request for Proposals, and site assembly. The implementation plan also states that the City will consider use of a local 4d tax incentives to preserve naturally occurring affordable housing (NOAH), and actively support the creation of additional affordable housing units if manufactured housing units are lost.

Advisory Comments

While complete for review and consistent with Council's *Housing Policy Plan*, the following should be corrected in the final Plan:

- The Plan on page 7-9 correctly states that in broad terms the Council defines affordable housing as housing that doesn't exceed 30% of the gross income of a household earning 80% of the Area Median Income. However, in the same paragraph the Plan states that 80% of the Area

Median Income for a family of four is \$45,200. If the Plan is using 2017 data for AMI, noted as \$90,400 for a family of four in the Plan, 80% of that is \$72,320, not \$45,200. \$72,320 translates to \$6,027 per month gross income or approximately \$1,807 for housing costs to meet the 30% of gross income affordability threshold. The Plan should correct this information for consistency.

- Language in the Plan about the Rondo Community Land Trust (CLT) is inaccurate. The Rondo CLT can serve any community in Ramsey County. Council staff recommend replacing the first sentence in the Land Trust paragraph with this statement instead.

Water Supply

Reviewer: Lanya Ross, ES – Water Supply Planning (651-602-1803)

The Plan is consistent with the 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 has prepared a Local Water Supply Plan (LWSP) that was submitted to both the Minnesota Department of Natural Resources (DNR) and the Metropolitan Council and reviewed under separate cover in a letter dated February 6, 2019. The plan was approved by the DNR on March 14, 2019.

Advisory Comment

In a review letter to the City dated February 14, 2019, Council staff recommended adding more information about how the City intends to guide development in vulnerable Drinking Water Supply Management Areas, illustrated on Appendix A-Figure 9 of the Plan. For example, this effort is identified in Table 32 of the local water supply plan, but is not discussed in Chapters 5 or 6 of the 2040 Plan. As of materials submitted to the Council by July 2, 2019, the 2040 Plan does not address this comment. Council staff advise the City to implement this change prior to final adoption of the 2040 Plan.

Community and Subsurface Sewage Treatment Systems (SSTS)

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

The Plan indicates that there are only two individual SSTS and no public or privately-owned Community Wastewater Treatment Systems in operation in the City. The two SSTS serve State of Minnesota Department of Transportation properties located in the northwest corner of the City and are exempt from municipal oversight. The planned TCAAP development includes a proposed sanitary sewer extension which will allow collective sewer service to be provided to these two facilities, enabling the abandonment of their SSTS.

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 accessible aggregate resources available for extraction within the City. The Council's aggregate resources inventory information contained in *Minnesota Geological Survey Information Circular 46* identifies the presence of aggregate deposits within the City, but they are located within an area of the TCAAP site that has been set aside to become a natural resource preservation area.

Historic Preservation

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

The Plan includes goals to preserve and protect historic resources. The City encourages the identification and protection of historically significant structures. It acknowledges that the Minnesota Historical Society and Ramsey County Historical Society identified one potential structure to be placed on the National Register of Historic Places. A previous plan had also identified two additional buildings and one site. In total, these structures/sites include: the Charles Perry House, Farrell Homestead, Nazareth Hall on the Northwestern College Campus, and Round Lake Prehistoric Site.

Plan Implementation

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

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

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

Compatibility with Plans of Adjacent Governmental Units and Plans of Affected Special Districts and School Districts

The proposed Plan is compatible with the plans of adjacent jurisdictions. No compatibility issues with plans of adjacent governmental units and plans of affected special districts and school districts were identified.

Documents Submitted for Review

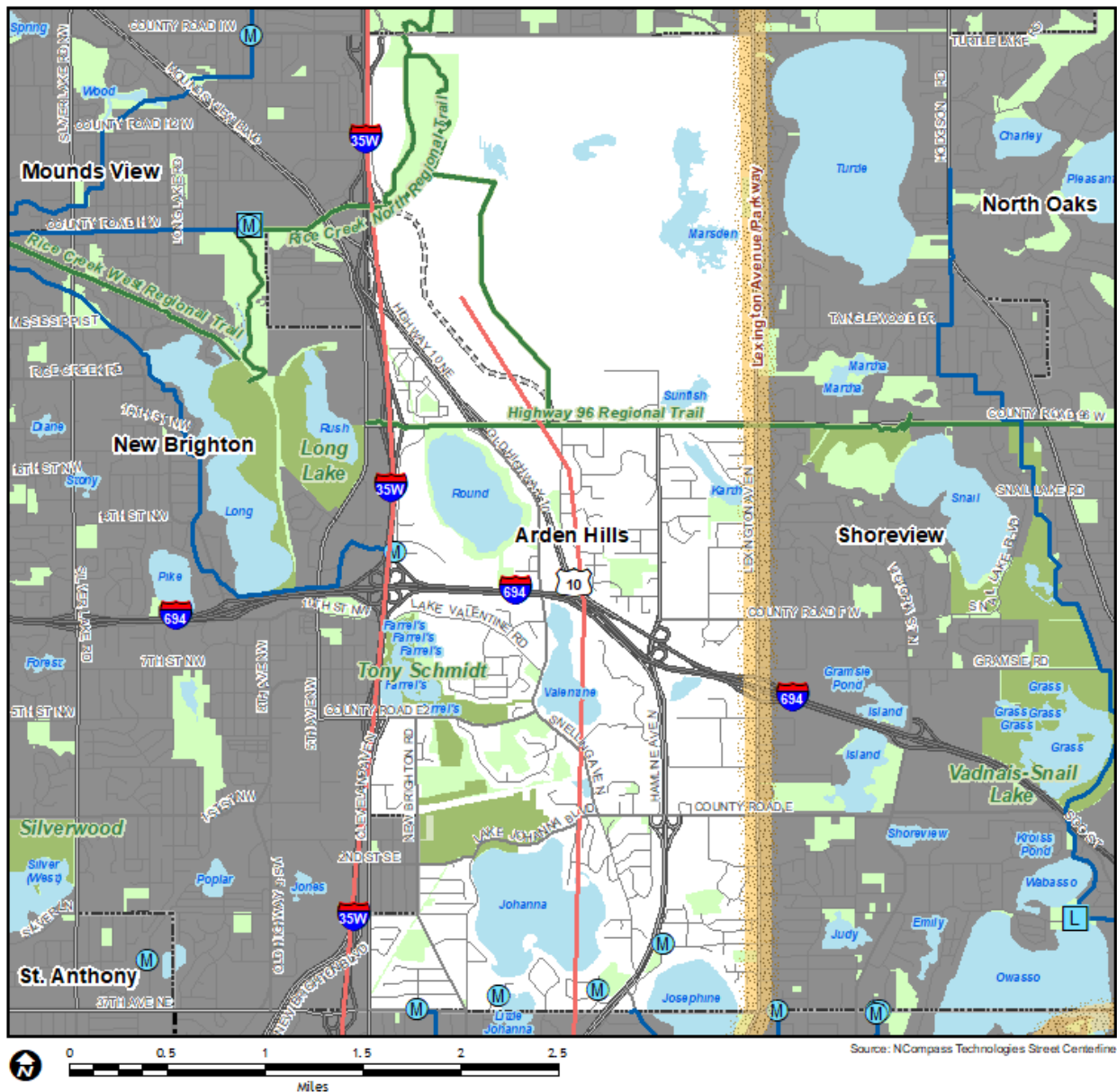
In response to the 2015 System Statement, the City submitted the following documents for review:

- March 27, 2019: Arden Hills 2040 Preliminary Plan
- January 23, 2019: Arden Hills 2040 Comprehensive Plan
- January 25, 2019: Sanitary GIS Data
- June 20, 2019: Revisions to housing, land use, and implementation sections
- July 16, 2019: Revisions to housing section
- August 22, 2019: Revisions to land use and housing sections

Attachments

- Figure 1: Location Map with Regional Systems
- Figure 2: *Thrive MSP 2040* Community Designations
- Figure 3: 2016 Generalized Land Use
- Figure 4: 2040 Future Land Use
- Figure 5: Areas of Interest
- Figure 6: 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

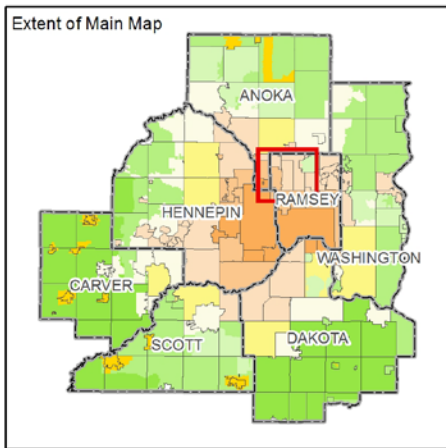
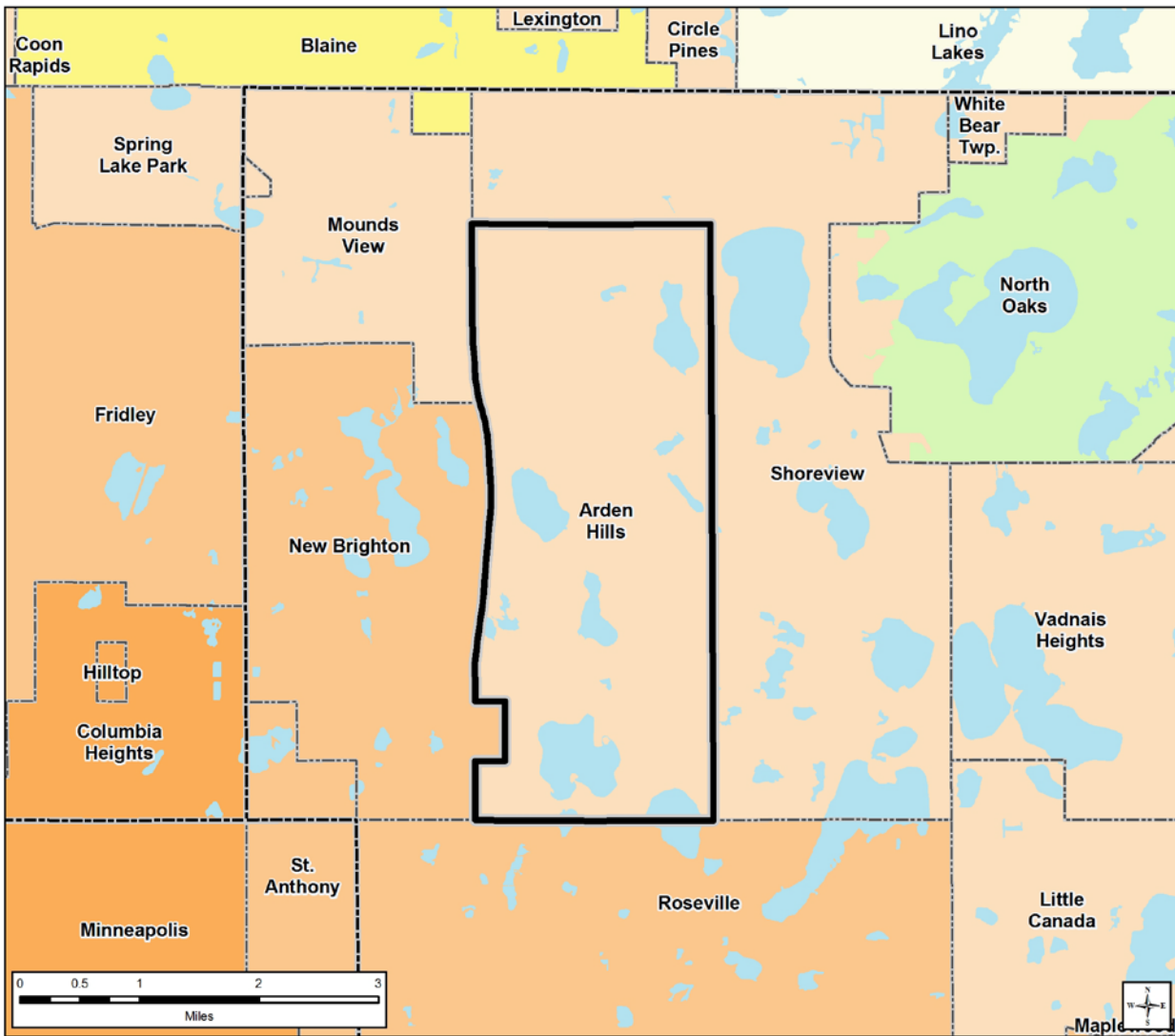
- (M) Meters
- (L) Lift Stations
- MCES Interceptors
- (M) MCES Treatment Plants

Regional Park Search Areas and Regional Trail Search Corridors

- (Blue circle) Boundary Adjustment
- (Red circle) Search Area
- (Yellow dotted line) 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. 2016 Generalized Land Use

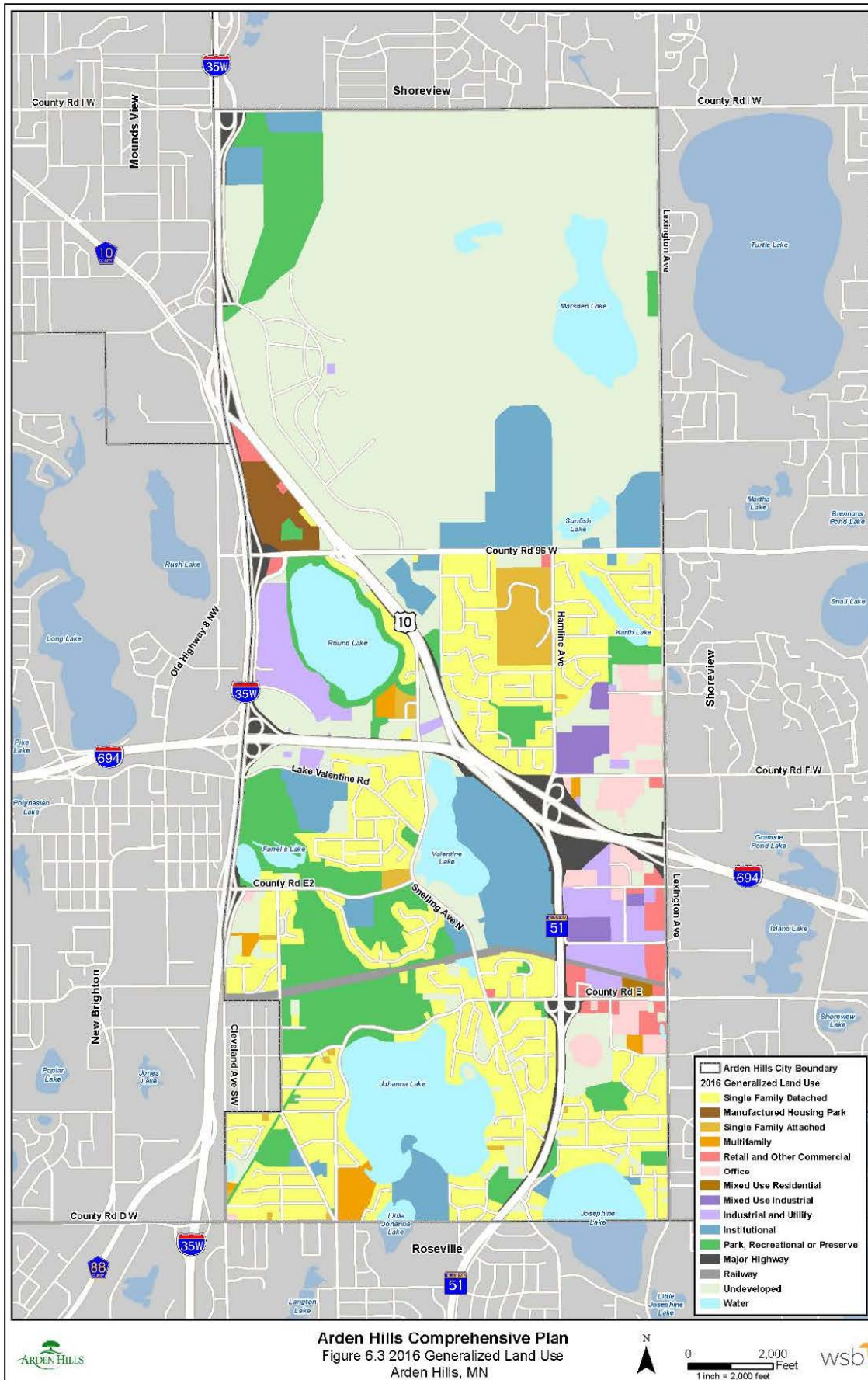


Figure 4. 2040 Future Land Use

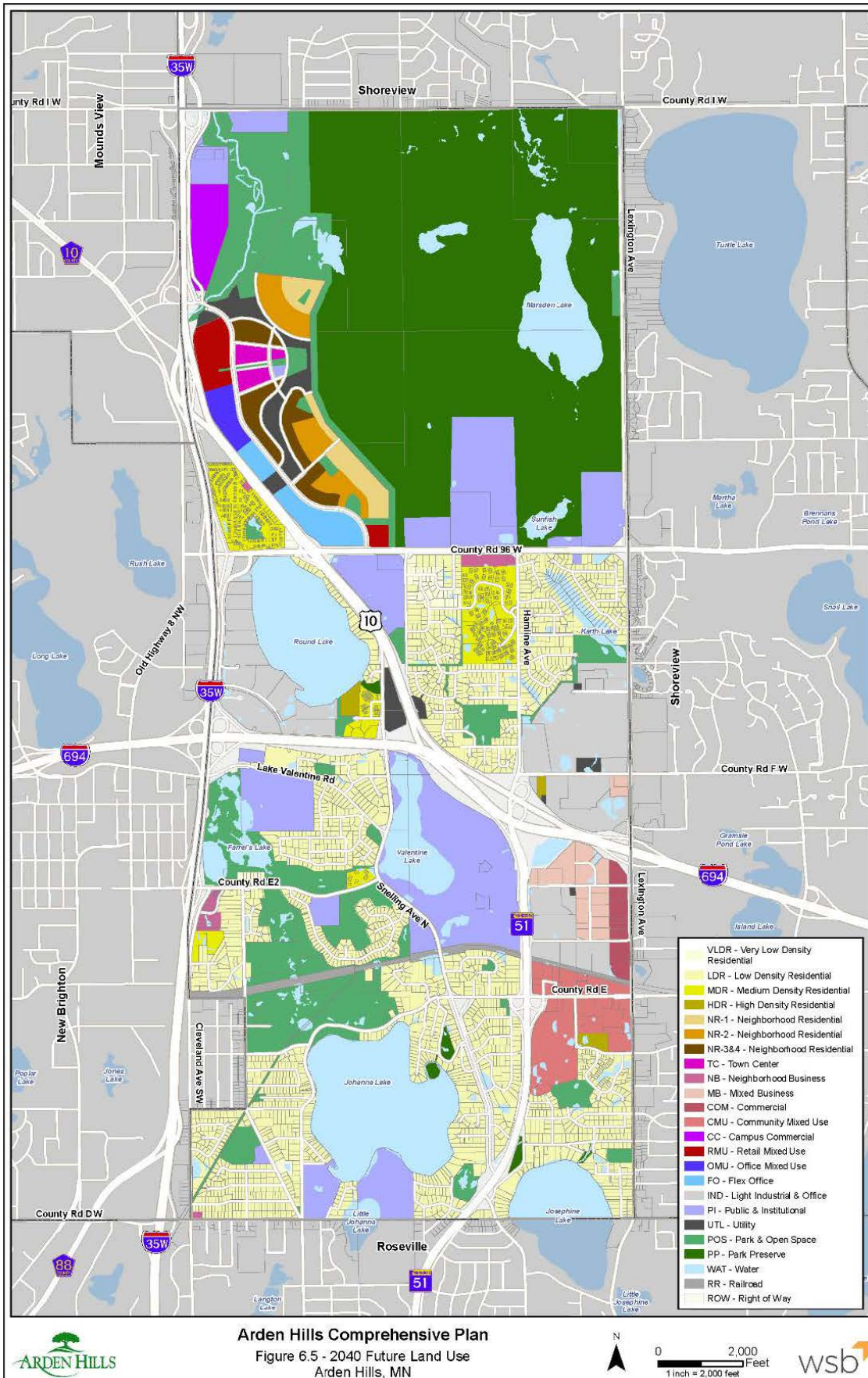


Figure 5. Areas of Interest

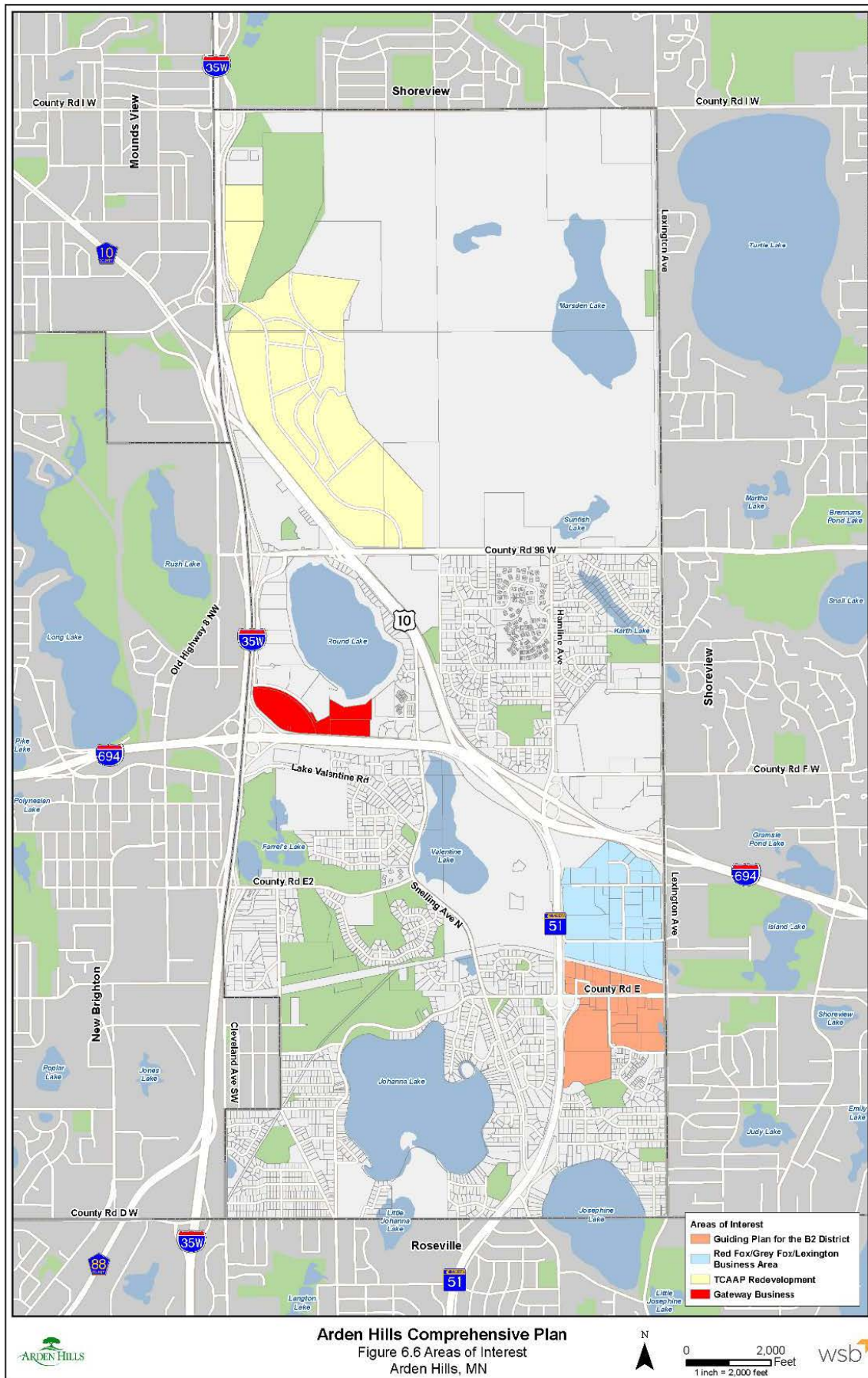


Figure 6. Land Guided for Affordable Housing

2021-2030 share of regional need for Affordable Housing: **373 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
Community Mixed Use	100.20		12		10%		121
Town Center	15.90		21		100%		334
Total	116						455

Sufficient/*(insufficient)* units possible against share of regional need: **82**

Affordable units built since 2021: **0**

Sufficient/*(insufficient)* units possible adjusted for affordable units built: **82**

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

