Joint Business Item No. 2019-198 JT

Community Development Committee

Meeting date: July 15, 2019

Environment Committee

Meeting date: July 23, 2019

For the Metropolitan Council meeting of August 14, 2019

Subject: City of Excelsior 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22016-1

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 Excelsior to place its 2040 Comprehensive Plan into effect.
- 2. Revise the City's forecasts upward as shown in Table 1 of the attached Review Record.
- 3. Revise the City's affordable housing allocation to 12 units, as described in Review Record
- 4. Advise the City to implement the advisory comments in the Review Record for Surface Water Management and Water Supply.

Recommendation of the Environment Committee

Approve the City of Excelsior's Comprehensive Sewer Plan.

Community Development Committee Summary of Committee Discussion/Questions

Senior Planner Jake Reilly presented the staff's report to the Committee. The Community Development Committee unanimously recommended approval of the proposed action at its meeting on July 15, 2019.

Environment Committee Summary of Committee Discussion/Questions

No comments or questions. The Environment Committee approved the proposed action on consent agenda at its meeting on July 23, 2019.



Community Development Committee

Meeting date: July 15, 2019

Environment Committee

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For the Metropolitan Council meeting of August 14, 2019

Subject: City of Excelsior 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22016-1

District(s), Member(s): District 3, Christopher Ferguson

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

Staff Prepared/Presented: Jake Reilly, Senior Planner (651-602-1822)

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

- 5. Authorize the City of Excelsior to place its 2040 Comprehensive Plan into effect.
- 6. Revise the City's forecasts upward as shown in Table 1 of the attached Review Record.
- 7. Revise the City's affordable housing allocation to 12 units, as described in Review Record
- 8. Advise the City to implement the advisory comments in the Review Record for Surface Water Management and Water Supply.

Recommendation of the Environment Committee

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



Advisory Comments

The following Advisory Comments are part of the Council action authorizing the City of Excelsior 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. Stats. §§ 473.864, subd. 2; 473.865, subd. 2). If official controls conflict with comprehensive plans, the official controls must be amended within 9 months following amendments to comprehensive plans (Minn. Stat. § 473.865, subd. 3).

Environment Committee

- The Council-approved Comprehensive Sewer Plan becomes effective only after the Plan receives final approval from the local governmental unit's governing body. After the Plan receives final approval from the City and the Comprehensive Sewer Plan becomes effective, the City may implement its Plan to alter, expand, or improve its sewage disposal system consistent with the Council-approved Comprehensive Sewer Plan.
- 2. A copy of the City Council resolution adopting its 2040 comprehensive plan, including its Comprehensive Sewer Plan, must be submitted to the Council.
- 3. If DNR requires changes, other than those addressed by the Council above, to approve the LWSP, the community must update the LWSP to meet DNRs requirements. Once the LWSP is approved by DNR, the community must include the approved LWSP in the final Comprehensive Plan.

Background

The City of Excelsior is located on Lake Minnetonka in Hennepin County, surrounded by Greenwood, and Shorewood (Figure 1).

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

Review Authority & Rationale

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

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

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

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

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

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

Thrive Lens Analysis

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

Funding

None.

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

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REVIEW RECORD

City of Orono 2040 Comprehensive Plan

Review File No. 22016-1, Business Item No. 2019-198 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* for the Regional Parks System element. Three Rivers Park District is the park implementing agency for Regional Parks System components in Excelsior, for which the Plan accurately describes the Regional Parks System components. Regional Trails located within the City include the Lake Minnetonka LRT Regional Trail (Figure 1). There are no state or federal recreation lands within the City.

Regional Transportation, Transit, and Aviation

Reviewer: Russ Owen, Metropolitan Transportation Services (651-602-1724) The Plan conforms to the *2040 Transportation Policy Plan* (TPP) adopted in 2015. The Plan accurately reflects transportation system components of the TPP. 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, which includes State Highway 7, and County State Aid Highways (CSAH) 19 and 82 in Excelsior. 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. The Plan's forecasting approach is consistent with regional methodology. The Plan also includes guidelines on how access will be managed for principal and A-minor arterials.

Transit

The Plan conforms to the Transit system element of the TPP. It shows the location of existing transit routes and facilities and acknowledges the City is within Transit Market Area IV and Emerging Market Areas I and II.

The Plan is consistent with the policies of the Transit system element of the TPP. The Plan addresses community roles related to its Community Designation(s), as well as the opportunities and challenges related to its Transit Market Area.



Aviation

The Plan conforms to the Aviation system element of the TPP. The Plan includes policies that protect regional airspace from obstructions, addresses seaplane use, and describes how off-site air navigation aids will be protected.

Bicycling and Walking

The Plan is consistent with the Bicycling and Pedestrian chapter of the TPP. The Plan identifies existing and future segments of and connections to the Regional Bicycle Transportation Network (RBTN) and regional trails. The Plan identifies the existing Tier 1 alignment for an RBTN corridor and a Tier 2 future alignment.

The Plan is also consistent with Bicycle and Pedestrian policies of the TPP by planning for local pedestrian and bicycle connections to transit, regional trails, regional job concentrations, and other regional destinations as identified on the RBTN map.

Freight

The Plan is consistent with Freight policies of the TPP. The Plan identifies the needs of freight movement in and through the City by MN State Highway 7.

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 Thrive community designation of Suburban.

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). The Plan 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 the following Council Interceptors; 7017, 80285-A&B and, 6-TB-661. All flow is treated at the Council's Blue Lake Wastewater Treatment Plant in Shakopee. The Plan projects that the City will have 1,300 sewered households and 2,400 sewered employees by 2040. The Metropolitan Disposal System with its scheduled improvements has or will have adequate capacity to serve the City's growth forecasts.

The 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 guiding of 8 units per acre, thus satisfying the Council's policy for future sewered residential densities for Suburban communities.

The Plan defines the community's goals, policies, and strategies for preventing and reducing excessive inflow and infiltration (I/I) in the local municipal (city) and private (private property) sanitary sewer systems; including a summary of activities and programs intended to mitigate I/I from both public and private property sources.

The Plan describes the requirements and standards for minimizing I/I and references City Ordinance (Section 34-35) that prohibits clear water discharges from sump pumps, foundation drains, rain leaders, cistern overflows, and swimming pools to the sanitary sewer system and requires the disconnection of such connections if discovered. The City routinely inspects its collection system during its street and utility improvement program and notes potential locations where clear water connections occur. It then follows up with property owners, and if a prohibited connection is verified, works with the property owner to disconnect the connection.

The Plan describes the sources, extent, and significance of existing inflow and infiltration within the entire wastewater collection system and provided a description of an implementation plan for preventing and eliminating excessive inflow and infiltration from entering both the municipal and private property sewer systems. Approximately 88% of the homes within the City were built prior to 1970 where clay tile services were standard. In 2007, the City completed an I/I study which included the evaluation of all pre-1970 services. The Plan identifies a planned \$120,000 per year spending in its City's Capital Improvement Plan through 2028 for pipe lining.

Sewer Element Comments

The Sewer Element of the Plan has been reviewed against the requirements for Comprehensive Sewer Plans for Suburban communities. It was found to be complete and consistent with Council polices. Upon adoption of the Plan by the 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, Community Development (CD) – Local Planning Assistance (651-602-1159) The Plan is consistent with Council policy requirements and in conformance with the 2040 WRPP for local surface water management. The Plan satisfies the requirements for 2040 comprehensive plans. Excelsior lies fully within the oversight boundaries of the Minnehaha Creek Watershed District. The City submitted a draft Local Water Management Plan (LWMP) to the Council in January 2018. Council Water Resources staff reviewed and commented on the draft LWMP to the City and Watershed District in a letter dated February 23, 2018.

The Minnehaha Creek Watershed District approved the LWMP on July 26, 2018. The Plan incorporates the City's final LWMP in Appendix D.

Advisory Comment

The City should provide to the Council the date the City adopted the final LWMP when it is available.

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, Community Development (CD) – Research (651-602-1322) Council staff and City staff have discussed revision of near-term forecast numbers, to reflect a housing project now under construction. The Waters of Excelsior Senior Living will add 115 units in the community. The City agrees, but also maintains that 1,300 households is the build-out capacity of the community. Council staff and City staff have agreed to the following revisions of households, population, and employment, included in the Excelsior Plan, and shown in Table 1 below.

The Council will revise its published forecast simultaneous with action on the Plan.

With this revision, the Affordable Housing Need expectation in Excelsior will be revised to 5 units at <=30% AMI, 1 unit at 31-50% AMI; 6 units at 51-80% AMI; 12 units total. This is discussed in the Housing section of the Plan, page 34.

	Census	Estimated	Council Forecasts		ists
	2010	2017	2020	2030	2040
Population	2,188	2,352	2,500	2,550	<u>2,550</u>
Households	1,115	1,164	1,270	1,300	1,300
Employment	2,220	2,143	2,200	2,300	<u>2,400</u>

Table 1. Metropolitan Council Forecasts for the City of Excelsior

Thrive MSP 2040 and Land Use

Reviewer: Jake Reilly, CD – Local Planning Assistance (651-602-1822)

The 2040 comprehensive plan is consistent with *Thrive MSP 2040* and its land use policies. The Plan acknowledges the *Thrive* community designation of Suburban (Figure 2). *Thrive* describes Suburban communities as those that saw their primary era of development during the 1980s and early 1990s as Baby Boomers formed families and entered their prime earning years.

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

The existing land uses in Excelsior are predominantly residential, as shown in Figure 3. The residential areas surround the City's historic downtown and related commercial development. Lake Minnetonka represents a significant natural resource in the City. The Plan's vision and goals focus on promoting the existing character of the community, while ensuring economic prosperity. About 70% of the existing uses in the City are residential land uses and parks/open space, including the lake. Most of the existing commercial, industrial, and multi-family development is near State Highway 7. The City's future residential growth as well as commercial and business development is planned to remain in the existing developed areas (Figures 4 and 5) and focuses on adding mixed-use developments.

As shown in Table 2 below, the Plan is consistent with Thrive for land use and residential density policies for the Suburban community designation. Thrive calls for Suburban communities to plan for forecasted population and household growth at overall average densities of at least 5 units per acre. The Plan is supporting new growth at a minimum density of at least 8 units per acre.

	2018-2040 Change				
	Density				
Category	Min	Max	Net Acres	Min Units	Max Units
Medium Density Residential	8	18	1.53	12	28
Mixed Use*	8	18	8.95	72	161
	TO	TALS	10.48	84	189
	Overall Density		8.0	18.0	

* 50% residential

The pattern of future development in Excelsior is expected to happen primarily through redevelopment, including on vacant or underutilized properties. Growth within Excelsior is expected to take place primarily in the areas guided for Mixed Use, as shown in Figure 4.

Housing

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

The Plan is consistent with the 2040 Housing Policy Plan. Excelsior is a maturing suburb on Lake Minnetonka with a variety of housing types. The City's growth was initially concentrated around downtown as it was historically a summer vacation destination, but more suburban development eventually spread south of County Road 19 and Highway 7. Like most suburbs, early development was primarily single family, but housing stock has diversified over time; approximately 39% of its existing housing stock is single-family. The Plan notes that future growth will be primarily through infill and redevelopment and will likely continue to trend toward multi-family housing.

The Plan notes an estimated 1,259 housing units in 2016. While roughly 56% of those units are 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 10% for households earning 30% AMI or less (or \$27,100). Approximately 25% of the City's households earning 80% AMI or less are currently housing cost burdened. The Plan notes that attracting a younger population, residential modernization, and preserving naturally occurring affordable housing (NOAH) are existing needs the City is addressing.

The Plan acknowledges the City's share of the region's need for affordable housing in the 2021-2030 decade, which upon concurrent adoption of the forecast change in this report, is 12 units. With 5 acres of land guided for higher density residential development in that time period (see Figure 5), 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 includes the policies, programs, and other tools that the City could consider using to meet those needs. Of those tools the City will consider include working with Homes Within Reach to explore Community Land Trust units, applications to Hennepin County's Affordable Housing Incentive Fund, and applications to Minnesota Housing's Consolidated Request for Proposals. The City is unlikely to use tools such as Tax Increment Financing, Livable Communities Act participation, or to issue housing revenue bonds to address its housing needs.

Water Supply Planning

Reviewer: Dave Brown, ES – Water Supply Planning, 651-602-1072 The Plan is consistent with the 2040 WRPP and Council's policies for water supply, including the policies on sustainable water supplies, assessing and protecting regional water resources, and water conservation and reuse.

The Plan provides information on Public Water Supply in Chapter 10 – Sewer and Water Plans and in Appendix C – Comprehensive Water Plan. Additionally, Appendix C includes an updated version of the City's local water supply plan (LWSP) template. An updated version of the LWSP was submitted to the Department of Natural Resources (DNR) through DNR's MPARS system for separate review by DNR and the Council. The Council found the updated version of the LWSP complete in our review letter to the DNR on June 5, 2019.

Advisory Comments

If the DNR requires changes, other than those addressed by the Council above, to approve the LWSP, the City must update the LWSP to meet DNRs requirements. Once the LWSP is approved by DNR, the City must include the approved LWSP in the final Comprehensive Plan.

Community and Subsurface Sewage Treatment Systems (SSTS)

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

The Plan indicates the City is fully served by the local wastewater collection system, with flow ultimately being directed to the Blue Lake Wastewater Treatment Facility in Shakopee for treatment and discharge to the Minnesota River. There are no public or privately-owned Community Wastewater Treatment Systems or individual SSTS in operation in Excelsior.

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 four required solar planning elements.

Aggregate Resource Protection

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

The Plan is silent on the potential for aggregate mining in the City. The Council's aggregate resources inventory information contained in *Minnesota Geological Survey Information Circular 46* indicates there are no viable aggregate resource deposits available for extraction within the fully developed community.

Historic Preservation

Reviewer: Jake Reilly, CD – Local Planning Assistance (651-602-1822)

The Plan addresses historic and cultural resources as required by the Metropolitan Land Planning Act, in a section titled Historic Preservation. The City currently has 24 properties designated as historic landmarks and 78 properties in the City's Downtown Historic District. The Plan indicates that the City has an interest in preserving representative portions of its history through its Preservation Design Manual and existing partnerships with the State Historic Preservation Office (SHPO) to continue to preserve historically significant areas in the City, including by adding properties and sites to the local register.

Plan Implementation

Reviewer: Jake Reilly, CD – Local Planning Assistance (651-602-1822)

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 an Implementation Chapter of the Plan, with capital improvements planning detailed in Appendix E.

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

The City submitted its Plan to adjacent and affected jurisdictions and local school districts for six-month review on June 11, 2018. 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 of Excelsior submitted the following documents for review:

- June 12, 2018: Excelsior 2040 Preliminary Plan
- December 20, 2018: Excelsior 2040 Comprehensive Plan
- March 4, 2019: Revisions to the housing, land Use, solar access protection and development, and transportation sections of the Plan.
- March 21, 2019: Revisions to the housing and wastewater sections of the Plan.
- April 11, 22, and 29, 2019: Revisions to the housing and wastewater sections of the plan.
- May 6 and 13, 2019: Revisions to the housing 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



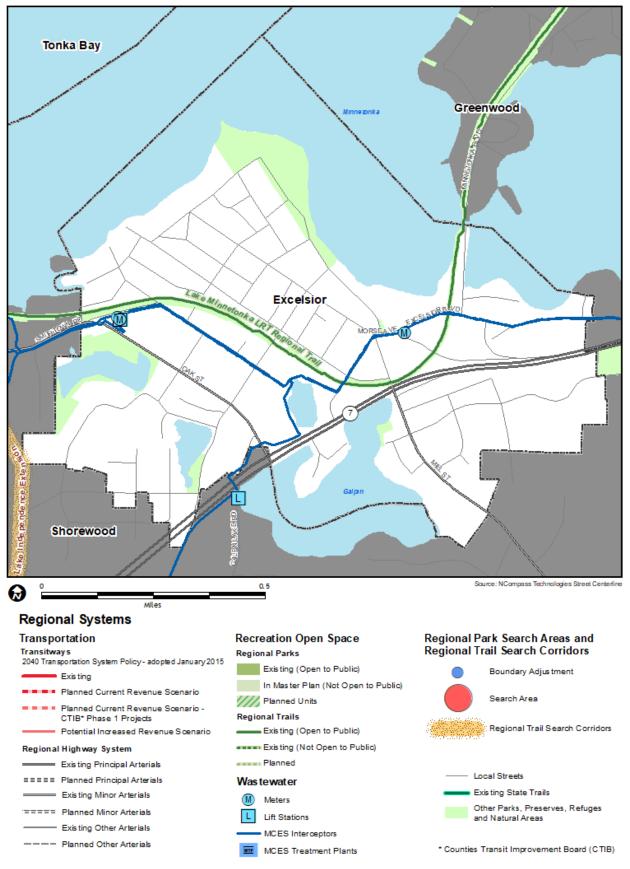
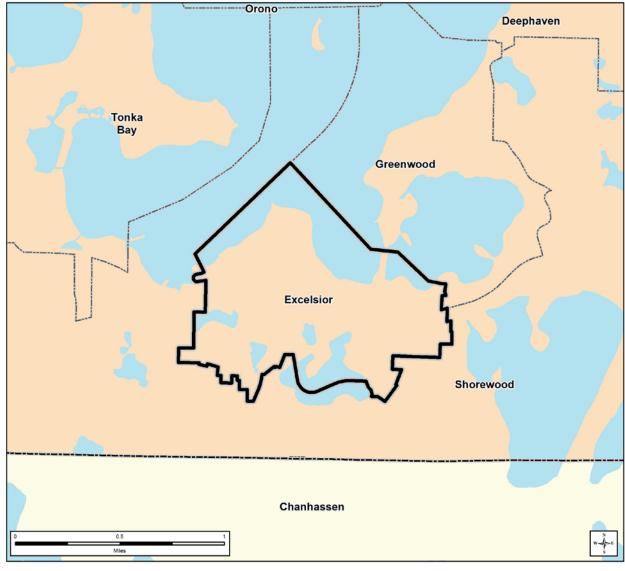
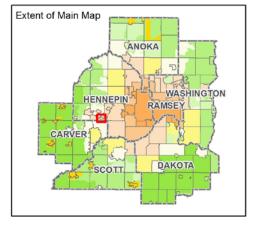


Figure 2. Thrive MSP 2040 Community Designations





Community Designations Outside Council planning authority Agricultural Agricultural Rural Residential Diversified Rural Rural Center County Boundaries City and Township Boundaries Lakes and Major Rivers

Figure 3. Existing Land Use



Existing Land Use - 2018

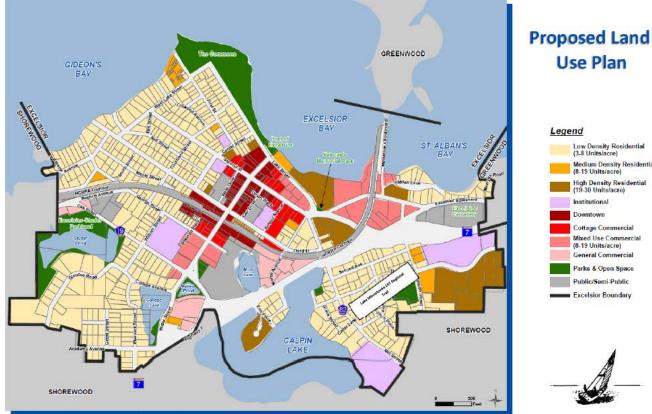


Excelsior Boundary



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Figure 4. 2040 Planned Land Use







Excelsior, MN Comprehensive Plan 2018

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Figure 5. Land Guided for Affordable Housing

2021-2030 share of regional need for Affordable Housing:	12 units
2021-2030 total regional need for Affordable Housing:	37,900 units

	Available Acres	Minim um Density (units per acre)	Expected % Residential (if m ixed use)	Minimum = Units Possible
High Density Residential	0.10	19	100%	2
Mixed Use Commercial	4.47	8	50%	18
Total	5			20

Sufficient/(insufficient) units possible againsts hare of regional need: 8

Affordable units built since 2021: 0

Sufficient/(insufficient) units possible adjusted for affordable units built 8

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

