Business Item No. 2020-93JT

Community Development Committee

Meeting date: April 6, 2020

Environment Committee

Meeting date: April 14, 2020

For the Metropolitan Council meeting of April 22, 2020

Subject: City of Deephaven 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22160-1

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 Deephaven to place its 2040 Comprehensive Plan into effect.
- 2. Revise the City's forecasts for population, households, and employment as shown in Table 1 of the attached Review Record.
- 3. Revise the City's affordable housing need allocation for 2021-2030 to 5 units.
- 4. Strongly encourage the City to guide property at densities sufficient to support the development of housing to meets its affordable housing need allocation.
- 5. Advise the City:
 - a. Prior to final Plan adoption, the Plan must be revised to acknowledge the City's affordable housing allocation need.
 - b. To be consistent with Council housing policy, the Plan should consider all widely available housing tools including CDBG and HOME funds through Hennepin County and Hennepin County AHIF funds.
 - c. To implement the advisory comments in the Review Record for land use.

Recommendation of the Environment Committee

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

Community Development Committee Summary of Committee Discussion/Questions

Senior Planner Jake Reilly presented the staff's report to the Community Development Committee. There was no discussion. The Community Development Committee unanimously recommended approval of the proposed action at its meeting on April 6, 2020.

Environment Committee Summary of Committee Discussion/Questions

No comments or questions. The proposed action was approved on the consent agenda of the Environment Committee April 14, 2020 meeting.



Community Development Committee

Meeting date: April 6, 2020

Environment Committee

Meeting date: April 14, 2020

For the Metropolitan Council meeting of April 22, 2020

Subject: City of Deephaven 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22160-1

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

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 - c. To implement the advisory comments in the Review Record for land use.

Recommendation of the Environment Committee

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

Advisory Comments

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

- 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 Deephaven is located in central Hennepin County. It is surrounded by the communities of Wayzata, Woodland, Minnetonka, Shorewood, Greenwood, and Orono.

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	Thrive MSP 2040 and Land Use	Inconsistent
Consistency with Council Policy	Forecasts	Consistent, with proposed changes
Consistency with Council Policy	2040 Housing Policy Plan	Inconsistent
Consistency with Council Policy	Water Supply	Consistent
Consistency with Council Policy	Community and Subsurface Sewage Treatment Systems (SSTS)	Consistent
Compatibility	Compatible with the plans of adjacent and affected governmental districts	Compatible

Thrive Lens Analysis

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

Funding

None.

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

REVIEW RECORD

City of Deephaven 2040 Comprehensive Plan

Review File No. 22160-1, Business Item No. 2020-93 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 Deephaven, 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 (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. 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 Highways system element of the TPP. The Plan accurately accounts for the metropolitan highway system of principal arterials, which includes MN Highway 7.

The Plan accurately reflects the regional functional classification map of A-minor arterials and has delineated major and minor collectors; most of the streets in Deephaven are classified as local streets.

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.

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.

The Plan is consistent with the policies of the Transit system element of the TPP. The Plan addresses community roles related to its Community Designation of Suburban.



Aviation

The Plan conforms to the 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 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. There is a Tier 1 alignment in the City. The Plan is also consistent with Bicycle and Pedestrian policies of the TPP.

Freight

The Plan is consistent with Freight policies of the TPP. There is one principal arterial and no A-Minor arterials, so there is little freight that travels through Deephaven.

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 community's Thrive designation of Suburban.

Water Resources

Wastewater Service

Reviewer: Kyle Colvin, Environmental Services (ES) – Engineering Programs (651-602-1151) The Plan is in conformance with 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 accepted forecasts for population, households, and employment.

Current wastewater treatment services are provided to the City by the Metropolitan Council Environmental Services. All wastewater generated within the City is conveyed through Council Interceptors 7073-1 and 6-DH-645. All flow is treated at the Council's Blue Lake Wastewater Treatment Plant in Shakopee. The Plan projects that the City will have 1,440 sewered households and 1,100 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 Metropolitan Council is committing to provide the level of wastewater service based on the sewered forecasts as stated in the sewer element of the Plan.

The Land Use Plan reflects an overall minimum residential sewered density that is inconsistent with Council policy for future sewered residential growth for Suburban communities. Given the consideration that the City's household growth is forecasted to remain at or below 20, Council staff find that this is not an underutilization of the wastewater system. Given this, the Plan is not more likely than not to have a substantial impact on or contain a substantial departure from metropolitan system plans.

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 property sanitary sewer systems. The Plan includes a summary of activities and programs focusing on I/I mitigation in the public collection system first, then transition to investigating private property sources. It continues pipeline lining and other system rehabilitation projects identified through its on-going Pavement Management Program. The City has included in its annual budget approximately \$50,000 for system cleaning, inspection, and system rehabilitation work.

The Plan describes the requirements and standards for minimizing I/I and references City Ordinance (Chapter 10, Section 1005.04, Subdivision 4) that prohibits the discharge of any storm water, ground water, roof runoff, surface water, unpolluted drainage, cooling water, or unpolluted process water to the sanitary sewer system. The Ordinance requires property owners to allow City Inspectors to inspect buildings to verify compliance with the ordinance. Failure to grant such an inspection or if the property is found to be in violation of the ordinance, the property owner will be subject to a \$75 per month surcharge to their sewer bill until the violation is rectified.

The Plan describes the sources, extent, and significance of existing I/I within the entire wastewater collection system and provides a description of an implementation plan for preventing and eliminating excessive I/I from entering both the municipal and private property sewer systems. The Plan states that approximately 60% of the homes within the City were built prior to 1970 when private service laterals were predominantly vitrified clay tile pipe. Using local lift station pumping records for 2018 and comparing Winter month usage against total flow, the Plan cites information that reflects that I/I contributes approximately 4% of the City's base flow. The Plan does not characterize its peak wastewater flow response to wet weather.

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 wastewater polices 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 Metropolitan Council for its records.

Surface Water Management

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

The Plan is consistent with Council policy requirements and conforms to the WRPP for local surface water management. The Plan satisfies the requirements for 2040 comprehensive plans. Deephaven lies within the oversight boundaries of the Minnehaha Creek Watershed District. Deephaven submitted a draft Local Water Management Plan (LWMP) to the Council in August 2018. Council Water Resources staff reviewed and commented on the draft LWMP to the City and Watershed Districts in a letter dated August 7, 2018. The Plan incorporates the City's most recent LWMP version in Appendix M, incorporating recommendations from both Watershed District reviews.

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 mostly consistent with the Council's policies detailed below.

Forecasts

Reviewer: Todd Graham, CD – Research (651-602-1622)

Council staff and City staff have agreed to the following revisions of households, population, and employment, included in the Plan and shown in Table 1 (changes underlined) of this staff report.

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

With this revision, the Affordable Housing Need allocation in Deephaven is: 3 units at <=30% AMI, 2 units at 31-50% AMI; no units at 51-80% AMI; 5 units total.

Table 1. City of Deephaven Forecasts

	Census 2010	Estimates 2018	Council's Current Forecast		Proposed Forecast (Rounded)		cast	
			2020	2030	2040	2020	2030	2040
Population	3,642	3,878	3,560	3,490	3,470	<u>3,870</u>	<u>3,780</u>	<u>3,820</u>
Households	1,337	1,416	1,360	1,380	1,400	<u>1,420</u>	<u>1,430</u>	<u>1,440</u>
Employment	688	1,087	830	880	900	<u>1,100</u>	<u>1,100</u>	<u>1,100</u>

All forecasts tables throughout the Plan are consistent and with little anticipated growth, the City appears to have enough land guided to accommodate future household growth. The population assumes Deephaven's 2020 household size stays the same as in 2017 and drops a few percentage points each decade.

With the revision of the households forecast, the 2021-2030 Affordable Housing Need for Deephaven is re-set to: 3 units at <=30% AMI, 2 units at 31-50% AMI; no units at 51-80% AMI; 5 units total.

Thrive MSP 2040 and Land Use

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

The Plan is consistent with *Thrive MSP 2040* (Thrive) 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. 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 Deephaven consist primarily of residential neighborhoods, which account for 88% of the area's land use. Commercial development exists at two locations and constitutes slightly more than 1% of the land area. (Figure 3)

The Plan's vision and goals focus on protecting natural and historic resources and maintaining the existing character of residential neighborhoods. Lake Minnetonka represents a significant natural resource in the City, and land use policies aim to protect the lakeshore. The Plan reflects limited household growth of 20 households between 2020 and 2040, as reflected in the revised forecast.

The City acknowledges the Council's community designation as Suburban and requirement to guide land for new development and redevelopment at a minimum density of 5 units per acre. The Plan describes the City as fully developed with limited land supply available for new construction and/or redevelopment. As shown in Table 2 below, that limited land supply results in 2.7 acres guided as Single Family Attached at 6-8 units per acre. Further, the Plan identifies approximately 45 acres of scattered parcels as potential redevelopment within existing neighborhoods at the existing densities. However, the Plan identifies that subdivision of lots between 20,000 and 40,000 square feet is possible but does not propose that this subdivision method as the means for accommodating forecasted growth.

Pursuant to the Council's <u>MUSA Implementation Guidelines</u>, Council staff reviewed the City's planned densities for areas within the 2030 MUSA that are proposed to be reguided along with land guided to support development in the 2031-2040 decade. The Plan does not propose any changes in planned land use for land within the current 2030 MUSA (i.e. approved as part of the City's 2030 comprehensive plan). As shown in Table 2 below, the Plan proposes an additional 2.7 acres of land guided as Single Family Attached (6-8 units per acre), resulting in a minimum overall density of 6 units per acre. This planned density is consistent with expectations for Suburban communities.

		2031-2040 Change			
	De	Density			
Category	Min	Max	Net Acres	Min Units	Max Units
Single Family Attached	6	8	2.7	16	21
	тс	DTALS	2.7	16	21
			Overall Density	6.0	8.0

Advisory Comments

Council staff advise the City that if redevelopment opportunities present themselves in areas of the City not identified as Single Family Attached, the City must meet the minimum density of 5 units per acre and submit a comprehensive plan amendment for review.

Housing

Reviewer: Hilary Lovelace, CD – Housing (651-602-1055)

The Plan is inconsistent with the *2040 Housing Policy Plan* (HPP). As of 2016, the City has more than 1,500 homes including nearly 80 multifamily units and roughly 1,430 single-family homes. About 80 homes are rented. More than 80 housing units are currently affordable to households earning under 80% of Area Median Income (AMI), however, nearly 150 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. There are two units affordable to households with income at or below 30% AMI and more than 50 cost burdened households with incomes at or below 30% AMI.

The Plan identifies existing housing needs including maintenance of existing housing, preservation of naturally occurring affordable housing, creation of new affordable housing, and creating opportunities for residents at all life stages. The City does not currently have any publicly subsidized housing.

The Plan fails to acknowledge the 2021-2030 affordable housing need allocation of 5 units; 3 of which are needed at prices affordable to households earning 30% of AMI or less, 2 of which are needed at prices affordable to households earning between 31 and 50% of AMI, and none of which are needed at prices affordable to households earning between 51 and 80% of AMI. The Plan does not guide any land uses at high enough densities to meet their affordable housing need allocation for 2021-2030, making them ineligible for participation in Livable Communities Grant programs.

The housing implementation plan component of the Plan describes that the City will consider partnership with Minnesota Housing, Twin Cities Habitat, and other similar programs for residential rehabilitation and down payment assistance. The Plan also indicates that the City will consider partnerships with local efforts to preserve unsubsidized affordable housing stock. The City states that they are unlikely to participate in site assembly, but will consider tax abatement, housing bond issuance, and local HRA powers to support new affordable units.

Advisory Comments

The Plan does not guide sufficient land to meet the City's affordable housing need allocation of 5 units or acknowledge the allocation of 5 units for the 2021-2030 decade. The Plan must include language that acknowledges the allocation of 5 units for the 2021-2030 decade in the final Plan submission.

While the Plan provides use for most tools, it would be fully consistent with Council housing policy if it considered all widely accepted tools to address the City's identified housing needs. The HPP requires that the Plan include consideration of all tools (HPP, p. 113) even if they are tools the City does not plan to use. The Plan fails to consider several widely available tools to meet their housing needs

including CDBG and HOME funds through Hennepin County and Hennepin County AHIF funds. These tools should be added to the Plan before final adoption.

Water Supply

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

The City's Plan is consistent with WRPP policies related to water supply, including the policy on sustainable water supplies, the policy on assessing and protecting regional water resources, and the policy on water conservation and reuse.

Because the community relies primarily on private wells and does not own or operate a municipal community public water supply system (PWS), no local water supply plan is required. Deephaven is encouraged to work with the cities of Minnetonka and Shorewood on water conservation and source water protection activities, as those communities serve small portions of Deephaven's population.

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

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

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, under the Protection section of the Plan. The Plan identifies the historic sites within the City limits and also identifies other sites that could be identified as being significant. The Plan indicates that the City has an interest in preserving representative portions of its history through appropriate steps, as needed.

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 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

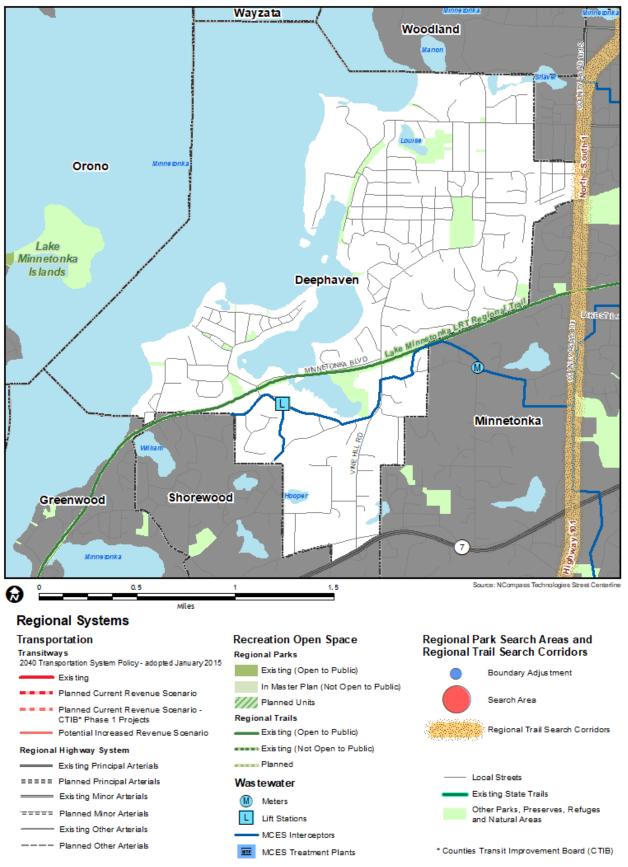
In response to the 2015 System Statement, the City submitted the following documents for review:

- December 24, 2018: Deephaven 2040 Comprehensive Plan
- January 8, 2019: Resolution Authorizing Submission to Council
- May 22, 2019: Revised Comprehensive Plan Responding to Council Incomplete Items for Forecasts, Housing, Land Use, Transportation, Implementation, Wastewater, Surface Water Management, Parks and Trails, and Special Resources Protection and Development.
- June 6, 2019: Resolution Approving Local Water Management Plan
- December 17, 2019: Revised Comprehensive Plan Responding to Council Incomplete Items for Wastewater, Land Use, Housing, and Forecasts.
- January 8, 2020: Request for Deadline Extension
- January 29, 2020: Revised Forecasts and Density Analysis
- February 6, 2020: Revised Comprehensive Plan with Updated TAZ Tables

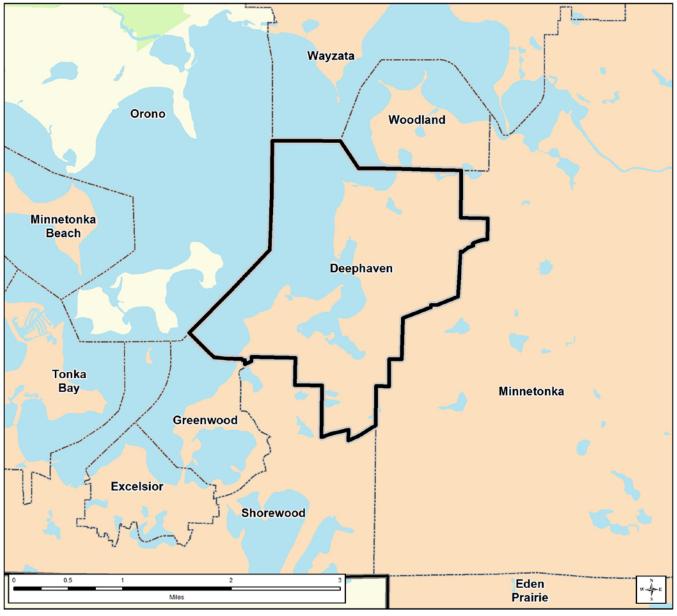
Attachments

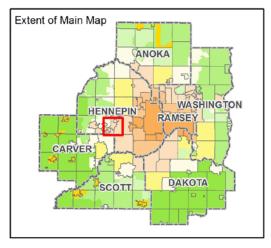
- Figure 1: Location Map with Regional Systems
- Figure 2: Thrive MSP 2040 Community Designations
- Figure 3: Existing Land Use
- Figure 4: 2040 Planned Land Use
- Figure 5: Land Guided for Affordable Housing

Figure 1. Location Map with Regional Systems











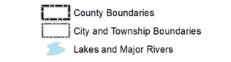


Figure 3. Existing Land Use

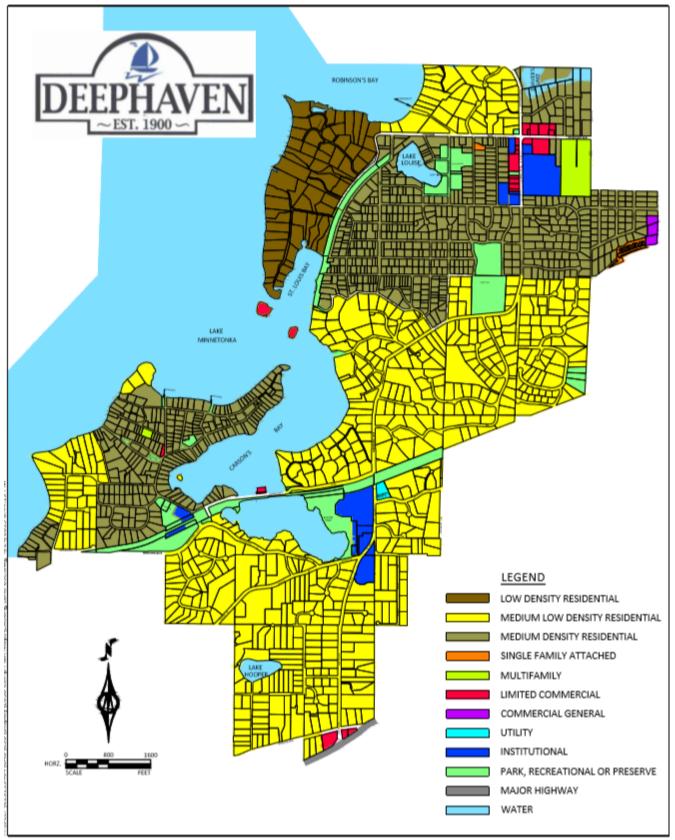


Figure 4. 2040 Planned Land Use

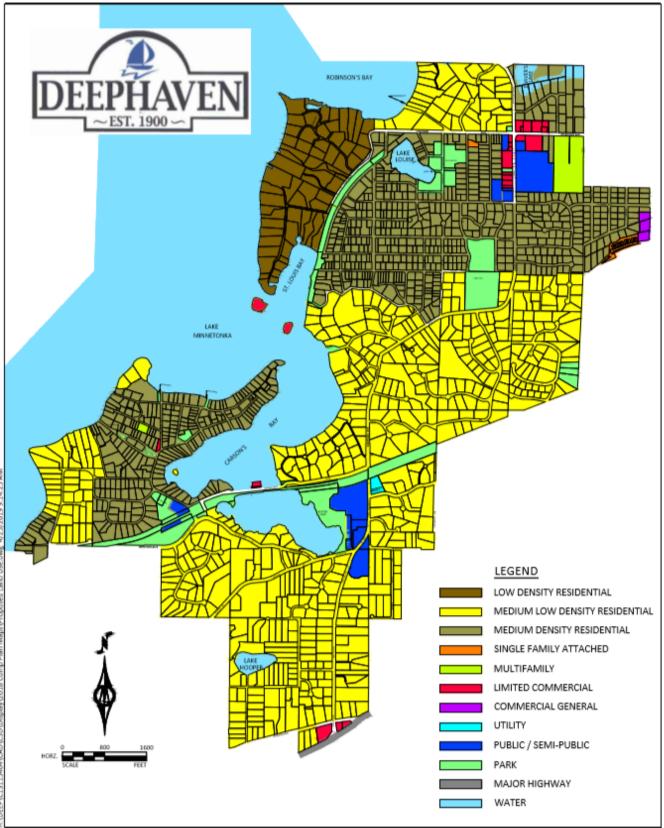


Figure 5. Land Guided for Affordable Housing

2021-2030 share of regional need for Affordable Housing:5 units2021-2030 total regional need for Affordable Housing:37,900 units						
	Available Acres	Minimum Density (units per acre)	Expected % Residential (if mixed use)			
No Land Use >6 units per acre	0.00	0	0%	0		
Total	0			0		
Sufficient/(insufficient) units possible against share of regional need: -5 Affordable units built since 2021: 0 Sufficient/(insufficient) units possible adjusted for affordable units built: (5) Number of Comp Plan Amendments approved since Comp Plan Update: 0						

Page - 12 | METROPOLITAN COUNCIL