

Community Development Committee

For the Metropolitan Council meeting of October 15, 2020

Subject: City of Forest Lake MN Lakes Storage Facility Comprehensive Plan Amendment, Review File 22270-2

Proposed Action

That the Metropolitan Council adopt the attached Advisory Comments and Review Record and take the following actions:

1. Authorize the City of Forest Lake to place its comprehensive plan amendment into effect.
2. Find that the amendment does not change the City's forecasts.
3. Find that the amendment renders the City's comprehensive plan inconsistent with the Council's housing policy and that the City is therefore ineligible to participate in Livable Communities Act programs.
4. Advise the City:
 - a. That to be consistent with Council housing policy, the City needs to increase the inventory of land guided to support the development of low- and moderate-income housing for the 2021-2030 decade by at least 225 units by guiding enough residential acres with sufficient minimum densities.
 - b. To implement the advisory comments in the Review Record for land use, water supply, and natural resources.

Summary of Committee Discussion/Questions

Senior Planner Jerome Benner II presented the staff's report to the Committee. The City's Zoning Administrator, Donovan Hart, was present. Council member Chamblis asked if communities provide a response to the Council when they are found to be inconsistent with housing policies. Director Barajas responded that Council staff work collaboratively with community staff through the amendment process and discuss various options to rectify the inconsistency, which is generally resolved by communities proposing a future amendment. Benner reiterated that Council staff have been in conversations with the City regarding different options that could result in the Plan's consistency with housing policy. Director Barajas further clarified the Council's role in comprehensive amendments, the City's choice in policy consistency, the resulting actions in the staff report, and findings regarding the Livable Communities Act programs.

The Community Development Committee unanimously recommended approval of the proposed actions at its meeting on October 5, 2020.

Community Development Committee

Meeting date: October 5, 2020

For the Metropolitan Council meeting of October 14, 2020

Subject: City of Forest Lake MN Lakes Storage Facility Comprehensive Plan Amendment, Review File 22270-2

District(s), Member(s): District 12, Francisco Gonzalez

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

Staff Prepared/Presented: Jerome Benner II, Senior Planner (651-602-1494); Angela R. Torres, Local Planning Assistance Manager, 651-602-1566

Division/Department: Community Development / Regional Planning

Proposed Action

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1. Authorize the City of Forest Lake to place its comprehensive plan amendment into effect.
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 - a. That to be consistent with Council housing policy, the City needs to increase the inventory of land guided to support the development of low- and moderate-income housing for the 2021-2030 decade by at least 225 units by guiding enough residential acres with sufficient minimum densities.
 - b. To implement the advisory comments in the Review Record for land use, water supply, and natural resources.

Background

The City submitted the MN Lakes Storage Facility comprehensive plan amendment on August 13, 2020. The amendment proposes to re-guide 15 acres from High Density Residential (HDR) to Highway Commercial (HC) to accommodate a 324-unit self-storage facility. The property is located on the western edge of the City at 4470 220th Street. This is the City's first amendment to their 2040 Comprehensive Plan.

Rationale

The proposed amendment conforms to regional system plans, is consistent with Council policies with the exception of housing policies, and is compatible with the plans of other local communities and school districts.

Thrive Lens Analysis

The proposed amendment 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 opposition.

REVIEW RECORD

City of Forest Lake

MN Lakes Self Storage Comprehensive Plan Amendment

Review File No. 22270-2, Business Item No. 2020-257

BACKGROUND

The City of Forest Lake (City) is located in northwestern Washington County, bordered by Wyoming and Chisago City to the north, Columbus to the west, Lino Lakes to the southwest, Hugo to the south, May Township to the southeast, Scandia to the east, and Chisago Lake Township to the northeast.

Thrive MSP 2040 (Thrive) designates Forest Lake with “Emerging Suburban Edge” and “Diversified Rural” community designations. The Council forecasts from 2017 to 2040 that the City will grow from 20,497 to 28,900 population and 7,687 to 12,300 households. The Council also forecasts that between 2010 and 2040, the City’s employment will increase from 6,449 to 9,200 jobs.

The Metropolitan Council reviewed the City of Forest Lake’s 2040 Comprehensive Plan ([Business Item 2020-60 JT](#), Review File No. 22270-1) on March 25, 2020. This is the first comprehensive plan amendment since the 2040 Plan was reviewed.

REQUEST SUMMARY

The amendment re-guides 15 acres from High Density Residential to Highway Commercial to accommodate a 324-unit self-storage facility.

OVERVIEW

Conformance with Regional Systems	The amendment conforms to the Regional System Plans for Parks, Transportation (including Aviation), and Wastewater, with no substantial impact on, or departure from, these plans.
Consistency with Council Policies	The amendment is consistent with <i>Thrive MSP 2040, water resources management</i> , and is consistent with Council forecasts. The amendment is not consistent with the <i>2040 Housing Policy Plan</i> .
Compatibility with Plans of Adjacent Jurisdictions	The amendment will not have an impact on adjacent communities, school districts, or watershed districts, and is compatible with the plans of those districts.

PREVIOUS COUNCIL ACTIONS

- The Council acted on the City’s Update on March 25, 2020 (Business Item 2020-60 JT, Review File No. 22270-1).

ISSUES

- I. Does the amendment conform to the regional system plans?
- II. Is the amendment consistent with *Thrive MSP 2040* and other Council policies?
- III. Does the amendment change the City’s forecasts?

- IV. Is the amendment compatible with the plans of adjacent local governmental units and affected jurisdictions?

ISSUES ANALYSIS AND FINDINGS

Conformance with Regional Systems

The amendment conforms to the regional system plan for Regional Parks, Transportation, and Wastewater, with no substantial impact on, or departure from, these system plans. Additional review comments are included below.

Regional Parks

Reviewer: Colin Kelly (651-602-1361)

The amendment conforms to the *2040 Regional Parks Policy Plan*. There are no existing or planned Regional Park System units in the vicinity of the site. The nearest existing or planned unit of the Regional Park System – the existing Hardwood Creek Regional Trail – is approximately 1.3 miles to the east of the proposed change.

Wastewater

Reviewer: Roger Janzig (roger.janzig@metc.state.mn.us)

The amendment conforms to the *2040 Water Resources Policy Plan (WRPP)*. The amendment is being driven by the re-guiding of 15 acres from High Density Residential to Highway Commercial for a proposed 324-unit self-storage facility. The regional system has adequate capacity to serve the proposed development associated with this amendment.

Transportation

Reviewer: Russ Owen (651-602-1724)

The proposed amendment conforms to the *2040 Transportation Policy Plan (TPP)*. The amendment accurately responds to updates to the TPP.

Transit

Reviewer: Patrick Haney (612-349-7775)

The amendment is consistent with transit policies of the TPP. Because the City does have transit service, there are no bus stops within walking distance of the site. Forest Lake is in Transit Market Area IV and V, and Emerging Transit Market Area III. These designations suggest commuter express service may be appropriate, but the area does not have the land use to support a higher level of service.

While Emerging Transit Market Area III is designated as an area where increased density may one day allow it to support local fixed-route service to other areas, the City is so remote from other Transit Market Area III locations that it is unlikely that the area can support local fixed-route service in the near future. Allowing a self-storage facility to replace high density housing goes against the goals of Emerging Transit Market Area III, but the distance from any other transit supportive areas and unlikelihood of local-fixed route service being implemented indicates the impact of this project is low.

Consistency with Council Policy

The amendment is consistent with Council policies for forecasts, land use, sub-surface sewage treatment systems, and water supply. However, the amendment is inconsistent with Council's *2040 Housing Policy Plan*. Additional review comments regarding policy consistency are detailed below.

Forecasts

Reviewer: Todd Graham (651-602-1322)

The City indicates that the amendment does not affect the community-wide forecast, and Council staff agree with that determination. The amendment changes the guidance on the specific site, but the Plan

still accommodates the community-wide 2030 and 2040 growth forecasts for population, households, and employment.

Land Use

Reviewer: Jerome Benner II (651-602-1494)

The amendment is consistent with land use policies in *Thrive MSP 2040*. *Thrive* identifies the City as an Emerging Suburban Edge and Diversified Rural Community. The amendment proposes to re-guide land designated as High Density Residential to Highway Commercial. The subject property is 15 acres in size and is located on the western edge of the City at 4470 220th Street (see Figure 2). The purpose of the amendment is to allow development of a 324-unit self-storage facility.

The Highway Commercial land use category allows for uses that provide a wide range of goods and services that serve the needs of people who live or work in and around the City. This category also provides for general and light industrial uses. The proposed project is consistent with the proposed land use guiding of this site.

As shown in Table 1 below, the proposed change (underlined) reduces the overall community-wide average net density of residential development in the City from 3.27 to 3.14 units per acre. Emerging Suburban Communities are expected to plan for overall minimum densities of 3-5 units per acre and the Plan, with the proposed amendment, continues to be consistent with the Council’s land use policies.

Table 1. Planned Residential Density, City of Forest Lake

Category	Density			Min Units	Max Units
	Min	Max	Net Acres		
Low Density Residential	1.5	4	295	442	1,180
Low/Medium Density Residential	3	6	968	2,904	5,808
Medium Density Residential	6	10	9	54	90
High Density Residential	15	20	<u>34.1</u>	<u>511</u>	<u>682</u>
Mixed Used*	10	15	24.8	248	372
Downtown Mixed Use*	20	30	1.2	24	37
TOTALS			1,332	4,183	8,169
			Overall Density	3.1	6.1

*50% residential

Advisory Comments

Additional reduction of residential acres or reduction in density will decrease the community-wide average net density, which currently stands at 3.1 units per acre, including this amendment. To conform to the *2040 Water Resources Policy Plan* and to be consistent with land use policies, the community-wide density must remain at least 3.0 units per acre. Please contact Council staff for assistance with future amendments.

Housing

Reviewer: Ashleigh Johnson (651-602-1106)

The amendment is inconsistent with the Council’s *2040 Housing Policy Plan (HPP)*. The proposed amendment decreases the City’s inventory of land guided to support the development of low- and moderate-income housing for the 2021-2030 decade and hinders the City’s ability to implement the housing element of the 2040 Comprehensive Plan, adopted by the City on April 13, 2020.

To address its share of the region’s 2021-2030 need for affordable housing, 648 units, Forest Lake needs to increase the minimum units possible by 225 units (see Figure 4). This can be accomplished by guiding enough residential acres with sufficient minimum densities. City staff and Council housing

staff have met and discussed policy consistency as well as several options which could resolve the inconsistency resulting from this amendment. City staff have indicated that they are considering a future amendment to meet the City's need for affordable housing. Council staff will continue to assist the City as they consider alternative land use and density scenarios for housing policy consistency.

Advisory Comments

Council staff strongly encourage the City to guide land at densities sufficient to support the development of housing to meet its affordable housing need allocation. To be consistent with Council housing policy, the City needs to increase the inventory of land guided to support the development of low- and moderate-income housing for the 2021-2030 decade by at least 225 units by guiding enough residential acres with sufficient minimum densities.

Please be advised that communities inconsistent with the Council's HPP are not eligible to participate in Livable Communities Act (LCA) grant programs. The City is currently enrolled in LCA and has been awarded funding for past projects. The City has received more than \$1.5 million dollars since they first applied for funding in 2004.

Water Supply

Reviewer: John Clark (651-602-1452)

The amendment does not impact the previous review of the City's Local Water Supply Plan, as a part of the 2040 Comprehensive Plan. The proposed changes are unlikely to cause significant impacts to drinking water resources including current and future water demand.

Advisory Comments

If the site's development contains any irrigated landscaping, we strongly recommend the installation of systems that include smart irrigation controllers. These controllers can help residents and commercial sites limit inefficient water use and lower water demand. Capturing rainwater for on-site application is another tool that requires minimum infrastructure, lessens water demand, and can lower water bills.

Given the site's conversion of natural area to impervious surface and proximity to wetland resources that may serve as important recharge sites for groundwater aquifers, we recommend that a plan for Smart Salt Use be developed. The Minnesota Pollution Control Agency (MPCA) offers Smart Salt Training for property managers and local government decision makers (<https://www.pca.state.mn.us/water/smart-salting-training>). Chloride contamination of groundwater and surface water resources is an emerging issue of concern in Minnesota and using less salt or salt alternatives is vital to ensure the sustainability of water resources.

Natural Resources

Reviewer: Cameran J. Bailey (651-602-1212)

The development proposes to remove nearly the entirety of the five acres of woods on the north end of the property, and one-third of an acre of wetlands. The developer has delineated the wetland edge and obtained approval from the Rice Creek Watershed District and U.S. Army Corps of Engineers for about one-third of an acre of wetland replacement with three on-site stormwater ponds. The site is neither considered a Regionally Significant Ecological Area nor a Regional Recreation Open Space Feature.

Advisory Comments

The site plan included in the amendment documents shows much of the existing trees to remain which will buffer the proposed commercial use from the residential use to the north. Council staff encourage the City to implement their local Woodland Preservation Plan and any other mitigation procedures necessary to ensure proper removal and replacement of any woodlands on the site.

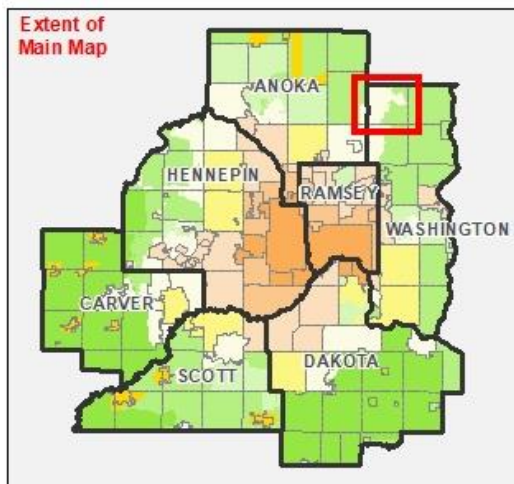
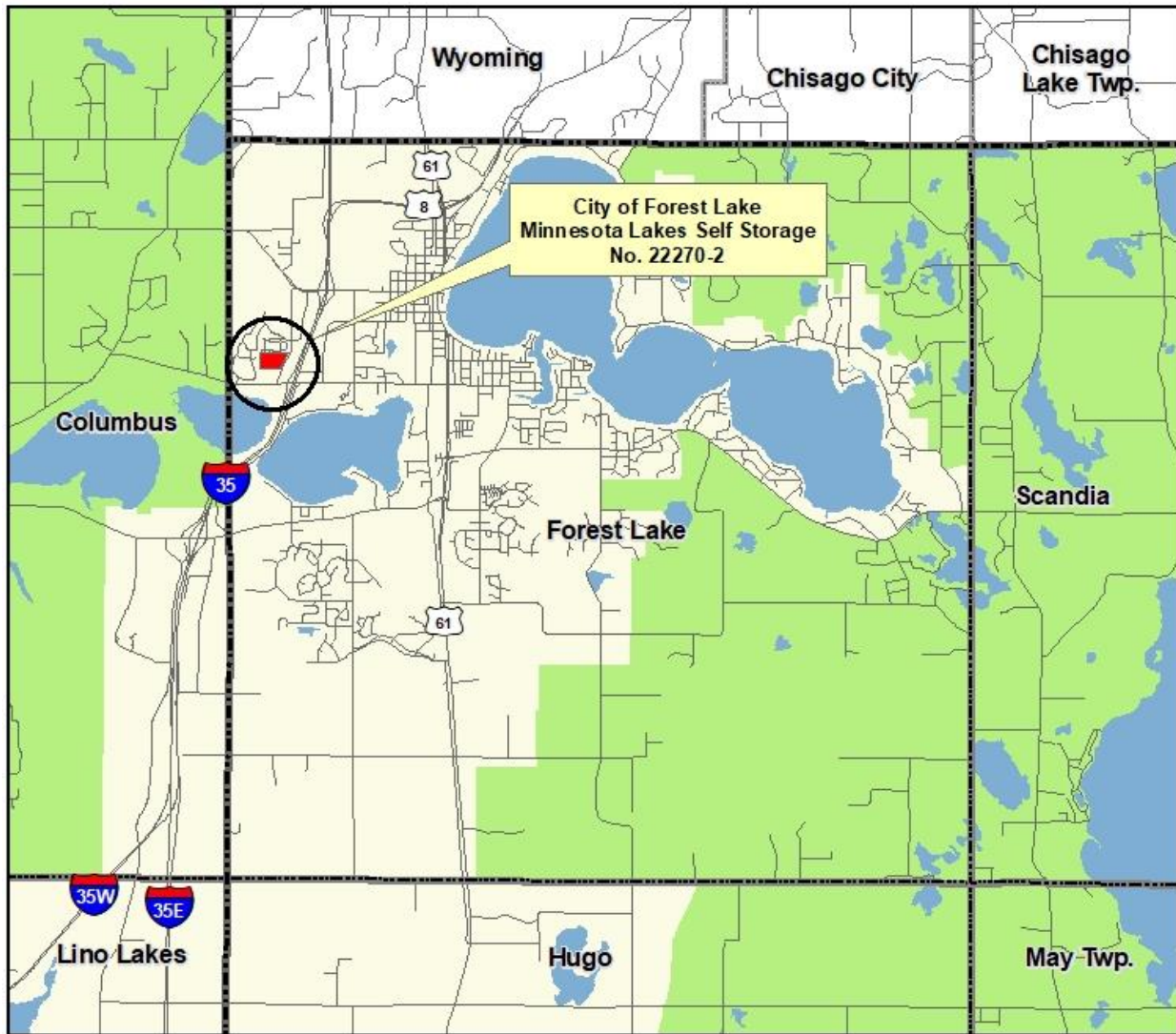
Compatibility with Plans of Adjacent Governmental Units and Plans of Affected Special Districts and School Districts

The proposed amendment 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.

ATTACHMENTS

- Figure 1: Location Map Showing Community Designations
- Figure 2: Location Map showing Regional Systems
- Figure 3: Current and Proposed Land Use Guiding
- Figure 4: Land Guided for Affordable Housing

Figure 1. Location Map Showing Community Designations



ThriveMSP 2040 Community Designations

- Agricultural
- Rural Residential
- Diversified Rural
- Rural Center
- Emerging Suburban Edge
- Suburban Edge
- Suburban
- Urban
- Urban Center
- Ncompass Street Centerlines

Figure 2. Location Map Showing Regional Systems

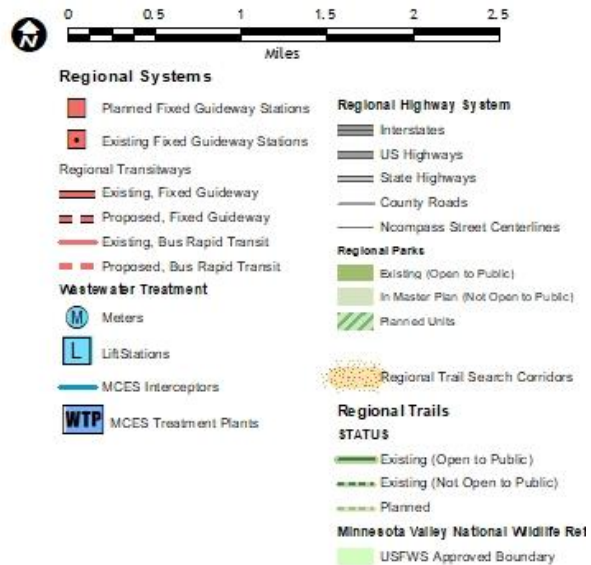
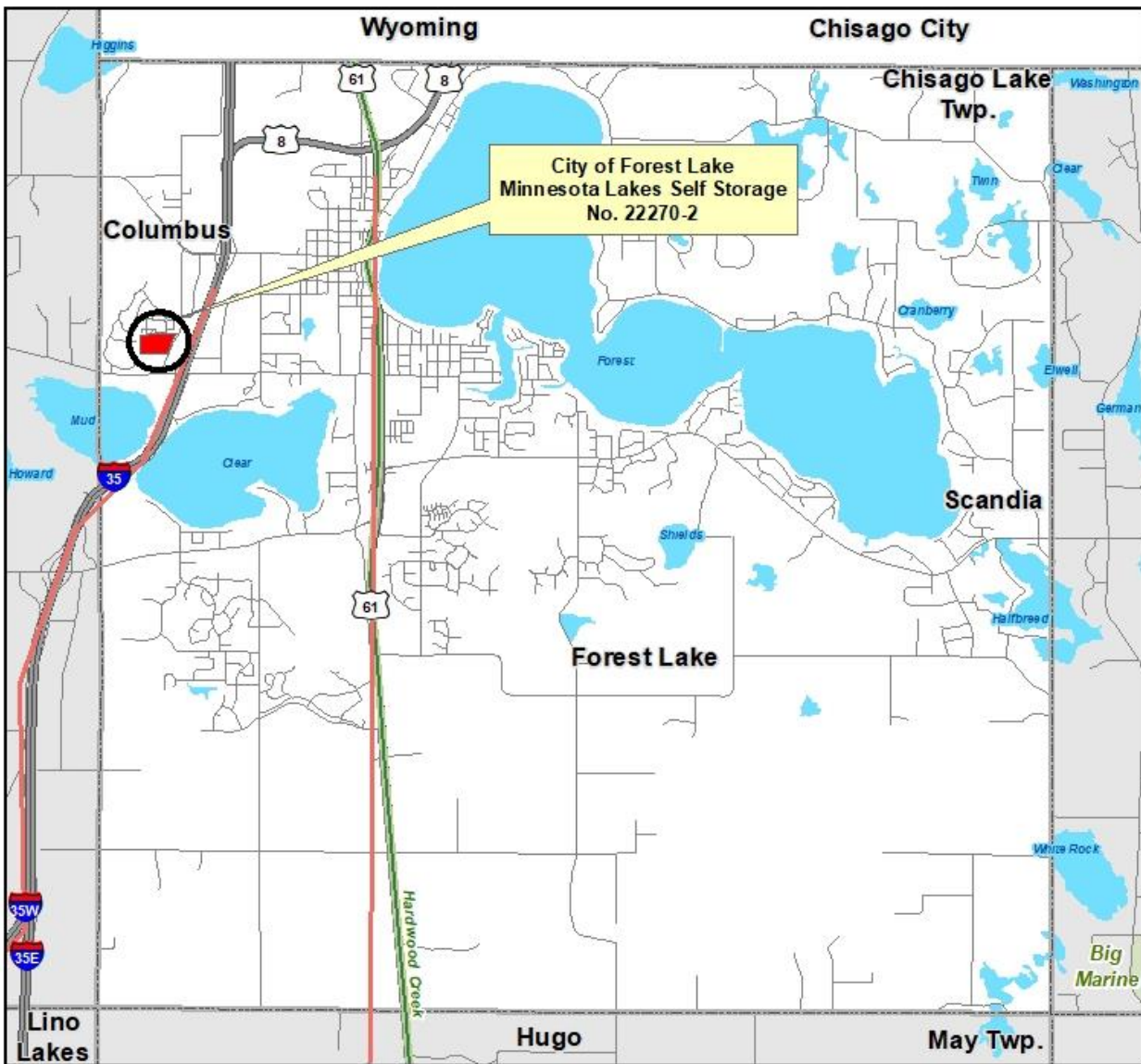


Figure 3. Current and Proposed Land Use Guiding

Current Land Use Guiding: High Density Residential



Proposed Land Use Guiding: Highway Commercial



Figure 4. Land Guided for Affordable Housing

2021-2030 share of regional need for Affordable Housing: **648 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
High Density Residential	9.10		15		100%		137
Mixed Use (only residential acres)	25.60		10		100%		256
Downtown Mixed Use (only residential acres)	1.50		20		100%		30
Total	36						423

Sufficient/*(insufficient)* units possible against share of regional need: **-225**

Affordable units built since 2021: **0**

Sufficient/*(insufficient)* units possible adjusted for affordable units built: **(225)**

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

