Subject: City of Circle Pines 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22394-1

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 Circle Pines to place its 2040 Comprehensive Plan into effect.
2. Revise the City’s forecasts as shown in Table 1 of the attached Review Record.
3. Revise the affordable housing need allocation for the City to 12 units.
4. Strongly encourage the City to address all widely known tools in order to be fully consistent with Council housing policy. The City should consider addressing the following tool in the Plan before final adoption:
   a. Identify the preservation of projects that used the Low Income Housing Tax Credit (LIHTC).
5. Advise the City to implement the advisory comments in the Review Record for Housing and Water Supply.

Recommendation of the Environment Committee
1. Approve the City of Circle Pines Comprehensive Sewer Plan.
2. Require the City to submit to the Council a copy of the revised Ordinance requiring the disconnection of non-compliant connections of sump pumps, foundation drains, and roof leaders from the sanitary sewer system, and the resolution adopting the Ordinance.

Summary of Committee Discussion/Questions
Community Development Committee
Planning Analyst Michael Larson presented the staff’s report to the Committee. Council Member Lindstrom inquired whether the Plan addressed the missing link in the Rice Creek North Regional Trail Corridor. Mr. Larson stated he would need to follow up with committee members to report on how the Plan addresses this. The Community Development Committee unanimously recommended approval of the proposed action at its meeting on November 16, 2020.

Environment Committee
No comments or questions. The proposed action was approved on consent agenda at the Environment Committee’s Tuesday, December 8, 2020 meeting.
Community Development Committee
Meeting date: November 16, 2020

Environment Committee
Meeting date: December 8, 2020

For the Metropolitan Council meeting of December 23, 2020

Subject: City of Circle Pines 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22394-1

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: Michael Larson, Planning Analyst (651-602-1407)
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:

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5. Advise the City to implement the advisory comments in the Review Record for Housing and Water Supply.

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1. Approve the City of Circle Pines Comprehensive Sewer Plan.
2. Require the City to submit to the Council a copy of the revised Ordinance requiring the disconnection of non-compliant connections of sump pumps, foundation drains, and roof leaders from the sanitary sewer system, and the resolution adopting the Ordinance.
Advisory Comments
The following Advisory Comments are part of the Council action authorizing the City of Circle Pines 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 Circle Pines is located in southern Anoka County. It is surrounded by the communities of Lino Lakes, Shoreview, Blaine, and Lexington.

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.

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

**Thrive Lens Analysis**
The proposed 2040 comprehensive plan is reviewed against the land use policies in *Thrive MSP 2040*. To achieve the outcomes identified in Thrive, the metropolitan development guide defines the Land Use Policy for the region and includes strategies for local governments and the Council to implement. These policies and strategies are interrelated and, taken together, serve to achieve the outcomes identified in Thrive.
**Funding**
The Metropolitan Council awarded the City a Planning Assistance Grant of $10,000 to complete its 2040 comprehensive plan. The first half of this grant was paid to initiate the local planning process. The second half of the grant will be paid after Council authorization of the City’s plan, local adoption, and the City’s submittal of final reporting requirements.

**Known Support / Opposition**
There is no known local opposition to the 2040 comprehensive plan.
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). Anoka County is the Park Implementing Agency for Regional Parks System components in Circle Pines, for which the Plan accurately describes the Regional Parks System components (Figure 1). Regional Trails located within the City include the East Anoka County and Rice Creek North regional trails. There are no State or Federal recreation lands in 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. The Plan is compatible with the plans of adjacent and affected governmental units.

Roadways
The Plan conforms to the Highways system element of the TPP. The Plan accurately accounts for the metropolitan highway system of principal arterials of which there are none. The closest principal arterial is Interstate 35W, which is approximately one half mile to the north. There are no right-of-way preservation needs.

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, and existing and forecasted traffic volumes for principal and A-minor arterials. Forecasting is consistent with regional methodology. The Plan also includes guidelines on how access will be managed for principal and A-minor arterials.

The Plan identifies roadway and corridor studies that include recommendations regarding alignments, changes in access, and/or changes in land use. They include the I-35W MnPass study that occurred in 2017. The Plan accurately describes the status of such facilities, including needs for right-of-way and the likelihood and timing of funding.
**Transit**
The Plan conforms to the Transit system element of the TPP. It shows the location of existing transit routes and facilities and acknowledges that the City is within Transit Market Area III.

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, as well as the opportunities and challenges related to its Transit Market Areas.

**Aviation**
The Plan conforms to Aviation system element of the TPP. The Plan includes policies that protect regional airspace from obstructions 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. There is one Tier 2 corridor in the community.

The Plan is also consistent with Bicycle and Pedestrian policies of the TPP by planning for local pedestrian and bicycle connections to regional trails, 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 community, including accessibility to freight terminals and facilities. There are a few known freight issues in the community.

**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 Metropolitan Council’s citywide forecast totals for all forecast years.

**Water Resources**

**Wastewater Service**
*Reviewer: Kyle Colvin, Environmental Services (ES) – Engineering Programs (651-602-1151)*
The Plan conforms to the [2040 Water Resources Policy Plan](#)(WRPP). It represents the City’s guide for future growth and development through the year 2040. It includes growth forecasts that are consistent with the Council’s accepted forecasts for population, households, and employment.

Current wastewater treatment services are provided to the City by the Metropolitan Council Environmental Services (MCES). Wastewater generated within the City is conveyed by Council Interceptor 4-NS-523 with treatment at the Metropolitan Council’s Metropolitan Wastewater Treatment Plant in St. Paul. The Plan projects that the City will have 2,180 sewered households and 800 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 does not provide sanitary flow projections. It does however acknowledge that very little growth is expected to occur within the City in the next 20 years and sanitary flow is not expected to change much by 2040. The Plan did provide wastewater generation rate assumptions for analyzing local system capacity that appeared appropriate for local planning purposes. 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 consistent with Council policy for future sewered residential growth for Suburban 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) sanitary sewer system. The Plan includes a summary of activities and programs intended to mitigate I/I in the public collection system including inspection, evaluation, and mitigation. It states that approximately 10% of the entire sanitary sewer system is visually inspected by televising each year and that any section of pipe that shows excessive I/I or requires repair is included in the City’s alternating year Street and Utility Improvement Program project list. Most of the I/I related work includes pipe and manhole structure replacement or sealing, lining, and casting adjustments. The Plan describes an I/I reduction work plan that reflects having spent approximately $3.2 million between 2008 and 2018, and an on-going annual program of approximately $300,000. The Plan suggests that the City will explore additional activities related to I/I reduction from private sources such as sump pump inspections, smoke testing, and private service televising.

The Plan describes the requirements and standards for minimizing I/I and references City Code (620.03) that prohibits the discharge, directly or indirectly, to any sanitary sewer any of the following: storm water, surface water, groundwater, roof runoff, subsurface drainage, cooling water, or unpolluted industrial process waters. The Plan states that the City will pursue an ordinance requiring the disconnection of existing foundation drains, sump pumps, and roof leaders from the sanitary sewer system within six months of the adoption of the Plan.

The Plan describes the sources, extent, and significance of existing I/I within the entire City wastewater collection system and provides a description of an implementation plan for preventing and eliminating excessive I/I from entering both the public and private collection systems. The Plan states that approximately 40% of the total residential households within the City were built prior to 1970 when the use of clay tile services was prevalent. The significance of clay tile pipe is that as it ages, it can become more susceptible to I/I. The Plan states that the only portion of private services that have been inspected are at those points where it connects to the public lateral. These connections are noted during televised inspections of the public lines. Using wastewater flow data between 2014 and 2018 to estimate average base flow and peak monthly flow, the Plan suggests that the City’s average annual I/I was 45%, and peak month I/I was approximately 55%. The Plan points out however that much of the City’s I/I mitigation efforts occurred during this time period and that these percentages may not be reflective of the I/I levels that exist today.

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. 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 Metropolitan Council for its records.

Advisory Comments
The Plan states that within six months after adoption of their Plan, the City will pursue an Ordinance requiring the disconnection of non-compliant connections of sump pumps, foundation drains, and roof leaders from the sanitary sewer system. The City shall submit a copy of the revised Ordinance and Resolution adopting the Ordinance to the Council for its files.

Surface Water Management
Reviewer: Judy Sventek, ES – Water Resources (651-602-1156)
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.
Circle Pines lies within the oversight boundaries of the Rice Creek Watershed District (District). The City submitted a draft Local Water Management Plan (LWMP) update to the Council in January 2018. Council Water Resources staff reviewed and commented on the draft LWMP to the City and District in a letter dated March 5, 2018. The LWMP was approved by the District on July 25, 2018. The Plan incorporates the City’s LWMP in Water Resources Chapter 4.

**Consistency with Council Policies**

The Council reviews plans to evaluate their apparent consistency with the adopted plans of the Council. Council staff have reviewed the City’s Plan and find that it is consistent with the Council’s policies, as detailed below.

**Forecasts**

**Reviewer: Todd Graham, CD – Research (651-602-1322)**

City and Council staff have agreed on forecast revisions reflecting the fact that Circle Pines is fully-developed and has limited potential for additional households and jobs. The Plan includes the proposed forecast revisions on page 7 of Chapter 2 (Land Use) and in Table 1 of Chapter 4 (Water Resources – Sanitary Sewer). The forecast revision is shown in Table 1 below (changes underlined) and will be approved simultaneous with Council action on the Plan.

<table>
<thead>
<tr>
<th>Table 1. City of Circle Pines Forecasts</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Census</strong></td>
</tr>
<tr>
<td>2010</td>
</tr>
<tr>
<td>Population</td>
</tr>
<tr>
<td>Households</td>
</tr>
<tr>
<td>Employment</td>
</tr>
</tbody>
</table>

With this forecast revision, the 2021-2030 Affordable Housing Need for the City slightly decreases. On page 9 of Chapter 6 (Housing), the Plan acknowledges the reduced 2021-2030 affordable housing need allocation of 12 units, 7 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 3 of which are needed at prices affordable to households earning between 51 and 80% of AMI.

Chapter 2 describes development and redevelopment expectations during 2020-2040. At the midpoint of planned density ranges, the City has identified land supply to accommodate 63 housing units in the 2020-2030 decade and 92 units in the 2030-2040 decade (Chapter 2, page 8). This land supply accommodates the growth forecast.

**Thrive MSP 2040 and Land Use**

**Reviewer: Michael Larson, CD – Local Planning Assistance (651-602-1407)**

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 era.

Figure 3 illustrates the pattern of existing land uses in the City. The City is just under two square miles. Residential areas account for 49% of the land area. Park, open water, and recreational areas account for approximately 44% of the City’s land area including land that is part of the Rice Creek North Regional Trail Corridor in the southern and eastern parts of the City. Commercial uses constitute only 2% of the City.
The Plan is consistent with Thrive for land use and residential density policies for a community with a Suburban community designation. Figure 4 of this report identifies guiding land uses throughout the City, while Table 2 below identifies an inventory of land that the City has identified for future development and redevelopment. 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 Transportation Policy Plan. The Plan identifies candidate infill and redevelopment locations including parcels guided as Mixed Use along or near Lake Drive. As shown in Table 2 below, the overall minimum planned density for these locations is 6.4 units per acre.

Table 2. Planned Residential Density, City of Circle Pines

<table>
<thead>
<tr>
<th>Category</th>
<th>Density</th>
<th>Net Acres</th>
<th>Min Units</th>
<th>Max Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suburban Residential</td>
<td>2</td>
<td>3</td>
<td>4.5</td>
<td>9</td>
</tr>
<tr>
<td>Traditional Neighborhood Residential</td>
<td>3</td>
<td>6</td>
<td>1.9</td>
<td>6</td>
</tr>
<tr>
<td>Medium Density Residential</td>
<td>8</td>
<td>10</td>
<td>3.7</td>
<td>30</td>
</tr>
<tr>
<td>Mixed Use*</td>
<td>10</td>
<td>30</td>
<td>5.1</td>
<td>52</td>
</tr>
<tr>
<td><strong>TOTALS</strong></td>
<td><strong>15.2</strong></td>
<td></td>
<td><strong>97</strong></td>
<td><strong>214</strong></td>
</tr>
</tbody>
</table>

*50% residential

**Housing**

**Reviewer: Hilary Lovelace, CD – Housing (651-602-1555)**

The Plan is substantially consistent with the 2040 Housing Policy Plan. As of 2016, the City has more than 2,000 homes including 300 multifamily units and nearly 1,800 single-family homes. Approximately 460 homes are rented. More than 1,700 housing units are currently affordable to households earning under 80% of Area Median Income (AMI); however, nearly 300 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. There are 14 units affordable to households with income at or below 30% AMI and nearly 60 cost burdened households with incomes at or below 30% AMI.

The Plan identifies existing housing needs including maintenance and reinvestment in existing housing stock, meeting the needs of older residents, and providing more multifamily living options. The City currently has 47 publicly subsidized housing units.

The Plan acknowledges the 2021-2030 affordable housing need allocation of 12 units; 7 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 3 of which are needed at prices affordable to households earning between 51 and 80% of AMI. As shown in Figure 5, the Plan guides sufficient land expected to develop in the 2021-2030 time period at a minimum of eight units per acre to allow for development of at least 35 new housing units.

The housing implementation plan component of the Plan describes that the City will consider TIF, housing bonds, and site assembly for projects that offer affordable units. The Plan also indicates that the City will continue their rental licensing and inspection program and robust partnership with Anoka County Community Development office. The City states that they will consider stating their intent to support a 4d tax program.

**Advisory Comments**

Prior to formal adoption by the City, staff advise the City to make the following changes to the Housing Chapter for the Plan to be fully consistent with Council housing policy:
1. Identify the preservation of projects (likely in partnership with Anoka County) that used the Low Income Housing Tax Credit LIHTC. Two housing developments in Circle Pines are funded with Low-Income Housing Tax Credits (LIHTC) that may expire in the 2021-2030 time period. There are more than 90 units that are affordable to households earning 60% Area Median Income. Expiration of these tax credits without a preservation plan could result in eviction of these households.

Furthermore, staff advise the City to make the following corrections to the Housing Chapter prior to formal adoption:

1. Identify the number of households that are cost burdened at each income band. Currently, this is reflected in Figure 9 as percentages.
2. Verify and change, if necessary, the number of subsidized housing units that are identified in the Plan, which is different from the information available to the Council.
3. Correct the reference to the City of Savage on page 14.

**Water Supply**

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

The 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.

The City submitted a revised Local Water Supply Plan (LWSP) on August 24, 2020, incorporating a revised LWSP template as part of Chapter 4. In this document, the population projections are consistent with the revised forecasts agreed upon by the City and the Council.

**Advisory Comments**

The most recent and modified LWSP needs to be submitted to the Minnesota Department of Natural Resources (DNR) MPARS system, and the DNR will share the plan with the Council to be reviewed concurrently by both agencies. This ensures that both DNR and the Council have the current plans.

If changes are made to the LWSP resulting from DNR’s review or from changes during a future comprehensive plan amendment, the City will need to provide the Council and DNR with the updated information.

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

*Reviewer: Kyle Colvin, ES – Engineering Programs (651-602-1151)*

The Plan indicates that there is currently one existing residential SSTS within the City and that there are no public or privately-owned Community Wastewater Treatment Systems within the community. The City manages all permitting, inspection and maintenance records and references these activities as well as City Codes 610.10 and 610.02, which ensure compliance with Minnesota Pollution Control Agency Rule 7080 and the Council’s 2040 WRPP requirements.

**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 required solar planning elements are included in the Plan.
**Aggregate Resource Protection**  
**Reviewer:** Cameran Bailey, CD – Local Planning Assistance (651-602-1212)  
The Plan does not contain a section on aggregate resources. The Council’s aggregate resources inventory information contained in *Minnesota Geological Survey Information Circular 46* indicates that there are no known natural deposits within the fully urbanized City. No changes to the plan are necessary.

**Historic Preservation**  
**Reviewer:** Michael Larson, CD – Local Planning Assistance (651-602-1407)  
The Plan includes a brief section on historic preservation that notes that most of the City developed after 1950. It states a commitment to take actions to preserve structures that contribute to the history and heritage of the City.

**Plan Implementation**  
**Reviewer:** Michael Larson, CD – Local Planning Assistance (651-602-1407)  
The Plan addresses implementation in Chapter 9. This chapter addresses official controls, water resource management, the protection of natural resources, housing implementation program, and capital improvement program. Details and other information regarding implementation occur in the individual chapters related to Land Use (Chapter 2), Transportation (Chapter 3), Water Resources (including water supply, sanitary sewer, and surface water) (Chapter 4), Parks and Trails (Chapter 5), Housing (Chapter 6), Economic Competitiveness (Chapter 7), and Resilience (Chapter 8).

**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 17, 2019: Circle Pines 2040 Comprehensive Plan
- September 14, 2020: Deadline Extension Request
- September 17, 2020: Revised Water Resources Chapter

**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: Land Guided for Affordable Housing
Figure 1. Location Map with Regional Systems
Figure 2. Thrive MSP 2040 Community Designations
Figure 3. 2016 Generalized Land Use

2016 Generalized Land Use

- Farmstead
- Seasonal/Vacation
- Single Family Detached
- Manufactured Housing Park
- Single Family Attached
- Multifamily
- Retail and Other Commercial
- Office
- Mixed Use Residential
- Mixed Use Industrial
- Mixed Use Commercial and Other
- Industrial and Utility
- Extractive
- Institutional
- Park, Recreational or Preserve
- Golf Course
- Major Highway
- Railway
- Airport
- Agricultural
- Undeveloped
- Undeveloped
- Water

Legend:
- County Boundaries
- City and Township Boundaries
- NCompass Street Centerlines
Figure 4. 2040 Future Land Use
### Figure 5. Land Guided for Affordable Housing

<table>
<thead>
<tr>
<th></th>
<th>Available Acres</th>
<th>Minimum Density (units per acre)</th>
<th>Expected % Residential (if mixed use)</th>
<th>Minimum Units Possible</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medium Density Residential</td>
<td>3.70</td>
<td>8</td>
<td>100%</td>
<td>30</td>
</tr>
<tr>
<td>Mixed Use</td>
<td>1.00</td>
<td>10</td>
<td>50%</td>
<td>5</td>
</tr>
<tr>
<td>Total</td>
<td>4.70</td>
<td>4.70</td>
<td>4.70</td>
<td>35</td>
</tr>
</tbody>
</table>

- Sufficient/(insufficient) units possible against share of regional need: **23**
- Affordable units built since 2021: **0**
- Sufficient/(insufficient) units possible adjusted for affordable units built: **23**
- Number of Comp Plan Amendments approved since Comp Plan Update: **0**