

Committee Report

Community Development Committee



Committee Meeting Date: June 6, 2022

For the Metropolitan Council: June 22, 2022

Environment Committee Date: June 14, 2022

Business Item: 2022-156 JT

City of Bethel 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22307-1

Proposed Action

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

Recommendations of the Community Development Committee

1. Authorize the City of Bethel to place its 2040 Comprehensive Plan into effect.
2. Require the City provide to the Council the date the City adopted the final Local Water Management Plan, and a send a copy of the final Local Water Management Plan if it differs from the draft version, dated September 2019.
3. Advise the City to implement the advisory comments in the Review Record for forecasts, housing, and water supply.

Summary of Community Development Committee Discussion/Questions

Planner Analyst Eric Wojchik presented the staff's report to the committee. The Community Development Committee unanimously recommended approval of the proposed action with no questions or discussion at its meeting on June 6, 2022.

Business Item

Community Development Committee



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City of Bethel 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22307-1

District(s), Member(s):	District 9, Raymond Zeran
Policy/Legal Reference:	Metropolitan Land Planning Act (Minn. Stat. § 473.175), Minn. Stat. § 473.513
Staff Prepared/Presented:	Eric Wojchik, Planning Analyst (651-602-1330) Angela R. Torres, Local Planning Assistance Senior Manager (651-602-1566) Kyle Colvin, Wastewater Planning and Community Programs Manager (651-602-1151)
Division/Department:	Community Development / Regional Planning Environmental Services / Technical Services

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3. Advise the City to implement the advisory comments in the Review Record for forecasts, housing, and water supply.

Recommendation of the Environment Committee

1. Approve the City of Bethel's Comprehensive Sewer Plan.
2. The Plan indicates that the City will evaluate future options to ensure adequate capacity at the facility to accommodate future growth and will begin the process of developing a Facility Plan for the potential capacity improvements within the 20-year planning period. When the Facility Plan is completed and approved by the City, a copy shall be submitted to the Metropolitan Council as an amendment to its comprehensive sewer plan.

Advisory Comments

The following Advisory Comments are part of the Council action authorizing the City of Bethel 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:
2. Adopt the Plan in final form after considering the Council's review recommendations as contained in the body of this report.
3. Submit one hard copy and one electronic copy of the Plan to the Council. The electronic copy must be submitted as one unified file.
4. Submit to the Council a copy of the City Council resolution evidencing final adoption of the Plan.
5. 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. § 473.864, subd. 1)
6. 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)
7. 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

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 Bethel is located in the northern part of Anoka County. It is surrounded by the communities of Saint Francis and East Bethel.

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

Review Authority & Rationale

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

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

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

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

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

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

Thrive Lens Analysis

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

Funding

The Metropolitan Council awarded the City a Planning Assistance Grant of \$32,000 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 opposition.



REVIEW RECORD

City of Bethel 2040 Comprehensive Plan

Review File No. 22307-1, Business Item No. 2022-156 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. Anoka County would be the Park implementing agency for Regional Parks System components in the City of Bethel; however, there are no Regional Parks System components in the City. The Plan appropriately acknowledges State recreation lands within the City, including the Bethel Wildlife Management Area (Minnesota Department of Natural Resources) (Figure 1).

Regional Transportation, Transit, and Aviation

Reviewer: Russ Owen, Metropolitan Transportation Services (MTS) (651-602-1724)

The Plan conforms to the *2040 Transportation Policy Plan (TPP)*. 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 of which there are none (TH 65 is approximately 1.5 miles east) in the City and including planned additions and improvements identified in the Current Revenue Scenario, and any right-of-way preservation needs.

The Plan identifies all the required characteristics of the community'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 was done 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 V. Bethel is not within the Transit Capital Levy District.

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.

Aviation

The Plan conforms to Aviation system element of the TPP. The Plan includes policies that protect regional airspace from obstructions.



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 are no Tier 1 or 2 corridor/alignments in the City.

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.

Freight

The Plan is consistent with Freight policies of the TPP. The Plan identifies that there is little freight movement through the City. There is one active rail line (BNSF) and no specific needs for Freight.

Transportation Analysis Zones (TAZs)

The Plan conforms to the TPP regarding TAZ allocations. The City's TAZ allocations for employment, households and population appropriately sum to the Metropolitan 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.

Water Resources

Wastewater Services

Reviewer: Kyle Colvin, Environmental Services (ES) – Wastewater Planning and Community Programs (651-602-1151)

The Plan is in conformance with 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 assigned forecasts for population, households, and employment.

Current wastewater treatment services are provided by a wastewater treatment facility owned and operated by the City. The Plan projects that the City will have 229 sewer households and 180 sewer employees by 2040.

The City's wastewater treatment facility currently provides service to only the City of Bethel. The Plan indicates that the facility is currently operating near capacity and would need to be expanded to accommodate any significant growth. However, the Plan projects little growth (40 households and 50 employees) between 2020 and 2040, and states that the City will evaluate future options to ensure adequate capacity at the facility to accommodate future growth. The Plan states that the City will begin the process of developing a facility plan for the potential capacity improvements within the 20-year planning period.

In 2017, the City investigated potential wastewater treatment alternatives for accommodating its short-, and long-term service needs. Regionalization of service by the Metropolitan Council was one alternative considered. However, that alternative was not the most cost effective. The Plan does not state that the city is considering a request to connect to the Metropolitan Disposal System by 2040, nor does it request that the City's wastewater treatment works be acquired by the Metropolitan Council.

The Plan indicates that there are requirements and standards for minimizing I/I through City Ordinance 196-3 that prohibits the connection of sump pumps or other sources of Inflow and Infiltration into the sanitary sewer collection system.

Comprehensive Sewer Plan Comments

The Sewer Element of the Plan has been reviewed against the requirements for Comprehensive Sewer Plans for Rural Center 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 indicates that the City will evaluate future options to ensure adequate capacity at the facility to accommodate future growth and will begin the process of developing a Facility Plan for the potential capacity improvements within the 20-year planning period. When the Facility Plan is completed and approved by the City, a copy shall be submitted to the Metropolitan Council as an amendment to its comprehensive sewer plan.

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 2040 Water Resources Policy Plan (WRPP) for local surface water management. The Plan satisfies the requirements for 2040 comprehensive plans.

Bethel is located within the oversight boundaries of the Upper Rum River Watershed Management Organization (WMO). The City submitted draft language in the Plan that was reviewed by Council staff as the required update to the Local Water Management Plan (LWMP) on July 22, 2019. Council Water Resources staff reviewed and commented on the draft language for the LWMP to the City and WMO in a letter dated August 13, 2019. That review found that the language in the Plan did not meet the requirements for local water plans and that it was inconsistent with Council policy. Bethel sent in a revised LWMP for review on October 26, 2021. Council staff reviewed the new LWMP and sent a separate letter on the new language for the LWMP on November 24, 2021. The new LWMP fulfills the requirement for a local water management plan and is generally consistent with Council policies and the Council’s Water Resources Policy. The Plan incorporates the City’s draft LWMP as an Attachment.

Advisory Comments

When available, we request that the City provide to the Council the date the City adopted the final LWMP, and a send us a copy of the final LWMP if it differs from the draft version, dated September 2019, contained in the current Plan submittal.

Consistency with Council Policies

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

Forecasts

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

The Plan includes the Metropolitan Council forecasts for the city in Table 2.1 (as well as Local Surface Water Plan table 3). For reference, Metropolitan Council forecasts are shown below in Table 1.

Table 1. City of Bethel Forecasts

	Census 2010	Census 2020	Council Forecasts		
			2020	2030	2040
Population	466	476	480	520	550
Households	174	186	190	220	230
Employment	86	215	130	150	180

The Council requires a description and inventory of land supply for future development and redevelopment. Tables 2.4 and 2.5 describe a sufficient land supply for future housing.

The Council requires cities to include a sewer-service forecast table. This is found on page 77 (of



chapter 6). All but one household is sewer-serviced in 2020 and future years.

Advisory Comments

The Council prepared the system statement forecast in 2015. Since then, employment growth has outpaced the City’s expectations (described on page 107). Employment at Bethel workplaces now exceeds the 2040 forecast. This is an advisory comment; no forecast change is needed with the present Plan review. Council staff advise that an employment forecast revision may be needed with the City’s next Plan amendment or Plan update.

Thrive MSP 2040 and Land Use

Reviewer: Eric Wojchik, CD – Local Planning Assistance (651-602-1330)

The Plan is consistent with *Thrive MSP 2040* and its land use policies. The Plan acknowledges the Thrive community designation of Rural Center (Figure 2). Thrive describes Rural Center communities as local commercial, employment, and residential activity centers serving rural areas in the region. These small towns are surrounded by agricultural lands and serve as centers of commerce to those surrounding farmlands and the accompanying population.

Rural Center communities are expected to plan for forecasted population and household growth at average densities of at least 3-5 units per acre for new development and redevelopment. In addition, Rural Center communities should strive for higher-density commercial uses and compatible higher-density residential land uses in the commercial core of the community to ensure efficient uses of existing infrastructure investments.

The existing land uses in the City are predominately residential (70%), most of the existing commercial/office (1%) and industrial areas (3%) are along Main Street and University Avenue. Approximately 19% of the City is parks/open space (Figure 3).

The Plan introduces a Downtown Mixed Use land use category with an 8-12 residential units per acre density range, with 50% residential expectation. The Plan also introduces goals and related policies to preserve and enhance the historic character of the downtown area.

The Plan shows 13.9 acres of land guided at a minimum of 3.7 and a maximum of 5.5 units per acre through 2040 as shown in Table 2 below. This planned residential density is consistent with the land use policies for Rural Center communities.

Table 2. Planned Residential Density, City of Bethel

Category	2018-2040 Change				
	Density		Net Acres	Min Units	Max Units
Min	Max				
Single Family Residential	2	3	10	20	30
Multi-family Residential	8	12	2	16	24
Downtown Mixed Use*	8	12	3.8	15	23
TOTALS			13.9	51	77
Overall Density			3.7	5.5	

*50% residential

Housing

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

The Plan is consistent with the *2040 Housing Policy Plan (HPP)*. As of 2016, the City has 192 homes including 10 multifamily units and nearly more than 180 single-family homes. Approximately 30 homes are rented. Virtually all housing units are currently affordable to households earning under 80% of Area Median Income (AMI); however, nearly 80 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. There are about 10 units affordable to households with income at or below 30% AMI and 20 cost burdened households with incomes at or below 30% AMI.

The Plan identifies existing housing needs including maintenance and reinvestment in existing housing stock, promoting development of new housing, and housing that is affordable to meet local and regional needs. The City does not currently have any publicly subsidized housing.



The Plan acknowledges the 2021-2030 affordable housing need allocation of 6 (six) units; 3 of which are needed at prices affordable to households earning 30% of AMI or less, none 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 26 new housing units.

The housing implementation plan component of the Plan describes that the City will consider TIF, to support development of new housing. The Plan also indicates that the City will consider the creation of local inspection and code enforcement policies. The City states that they will partner with Anoka County to meet many of their housing needs.

Advisory Comments

On page 92, the Plan incorrectly describes the use of a tool. The City has directly issued housing revenue bonds in the past. However, the Plan states that the City will work with Anoka County to do this in the future. The City may want to correct this minor error in the Plan.

Water Supply

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

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.

Bethel relies primarily on private wells and does not own/operate a municipal community public water supply system (PWS). Therefore, no local water supply plan is required.

Advisory Comments

While a local water supply plan is not required, the Council encourages the City's to strengthen its plan by including information about water sources, including plans to protect private water supplies, in appropriate sections of the Plan.

Community and Subsurface Sewage Treatment Systems (SSTS)

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

The Plan is consistent with the Council's *2040 Water Resources Policy Plan*. The Plan indicates that there is one SSTS in use within the current City boundaries and there are no other identified private Community Wastewater Treatment Systems in the City. All other residences and businesses in the City are served by the local sanitary sewer collection system and municipal wastewater treatment facility. The Plan refers to a City Ordinance that adopts by reference the Minnesota Pollution Control Agency Chapter 7080-7083 Rules. The Ordinance places the responsibility of system operation, maintenance, and replacement on the property owner, with the City being responsible for information collection through a biannual survey, periodic monitoring, and investigation of complaints. Future consideration for private community treatment systems may be considered by the City on a case-by-case basis. The Plan is consistent with the Council's WRPP.

Special Resource Protection

Solar Access Protection

Reviewer: Eric Wojchik, CD – Local Planning Assistance (651-602-1330)

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: Eric Wojchik, CD – Local Planning Assistance (651-602-1330)

The Plan identifies, consistent with *Minnesota Geological Survey Information Circular 46* information, that there are no known deposits of viable aggregate resources within the community.

Historic Preservation

Reviewer: Eric Wojchik, CD – Local Planning Assistance (651-602-1330)

The Plan includes a policy to “promote private rehabilitation of buildings in a manner that follows the historical character of the downtown.”

Within the Cultural Resources section of the Plan, the City acknowledges the safeguarding of the historic, traditional character of the downtown area. The Plan includes the commitment to evaluate potential downtown design guidelines to ensure that design reflects the historic character of the downtown.

Plan Implementation

Reviewer: Eric Wojchik, CD – Local Planning Assistance (651-602-1330)

The Plan includes implementation items throughout, and it also includes a standalone Implementation Chapter. The Plan includes a description of and schedule for any necessary changes to the capital improvement program, the zoning 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.

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:

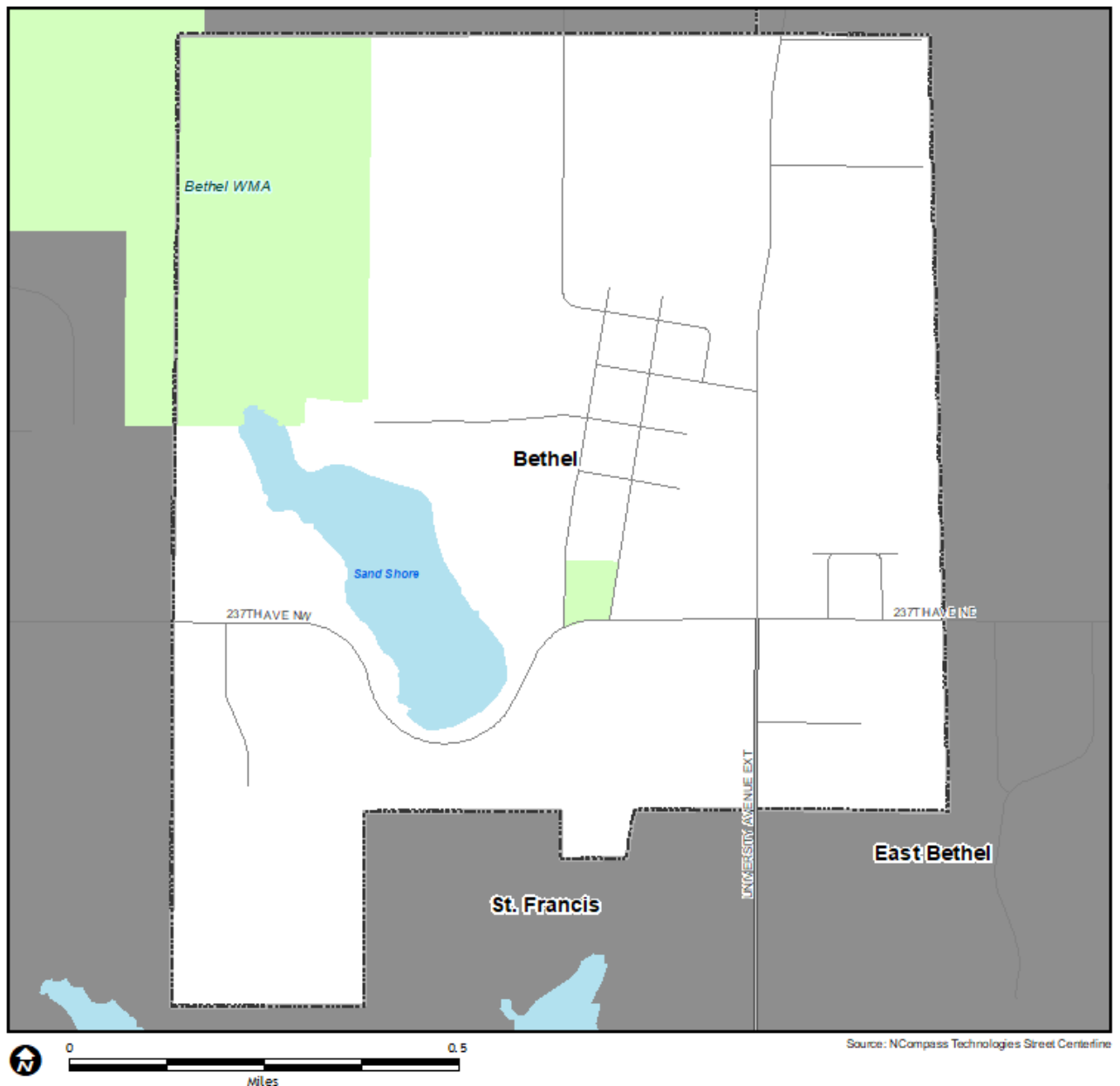
- July 3, 2019: Bethel 2040 Comprehensive Plan and Local Water Management Plan
- September 16, 2021: Revised Bethel 2040 Comprehensive Plan
- October 26, 2021: Revised Local Water Management Plan
- March 3, 2022: Revised Bethel 2040 Comprehensive Plan

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 1. Location Map with Regional Systems



Regional Systems

Transportation

Transitways
2040 Transportation System Policy - adopted January 2015

- Existing
- Planned Current Revenue Scenario
- Planned Current Revenue Scenario - CTIB* Phase 1 Projects
- Potential Increased Revenue Scenario

Regional Highway System

- Existing Principal Arterials
- Planned Principal Arterials
- Existing Minor Arterials
- Planned Minor Arterials
- Existing Other Arterials
- Planned Other Arterials

Recreation Open Space

Regional Parks

- Existing (Open to Public)
- In Master Plan (Not Open to Public)
- Planned Units

Regional Trails

- Existing (Open to Public)
- Existing (Not Open to Public)
- Planned

Wastewater

- Meters
- Lift Stations
- MCES Interceptors
- MCES Treatment Plants

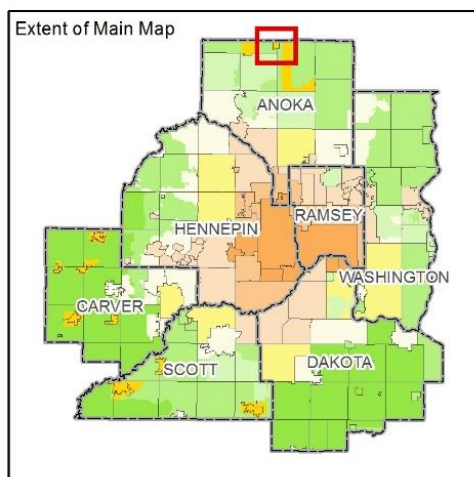
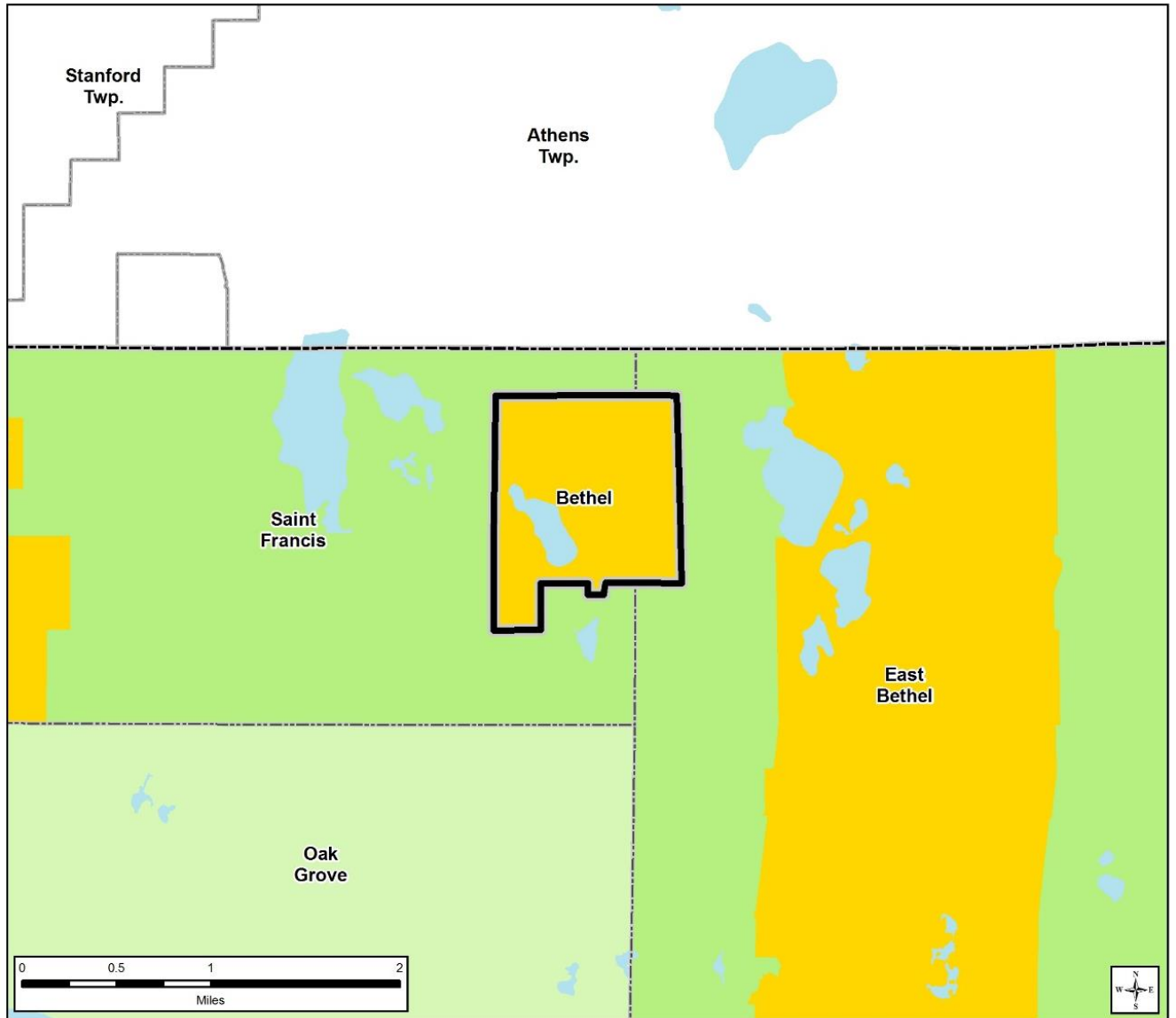
Regional Park Search Areas and Regional Trail Search Corridors

- Boundary Adjustment
- Search Area
- Regional Trail Search Corridors
- Local Streets
- Existing State Trails
- Other Parks, Preserves, Refuges and Natural Areas

* Counties Transit Improvement Board (CTIB)



Figure 2. Thrive MSP 2040 Community Designations

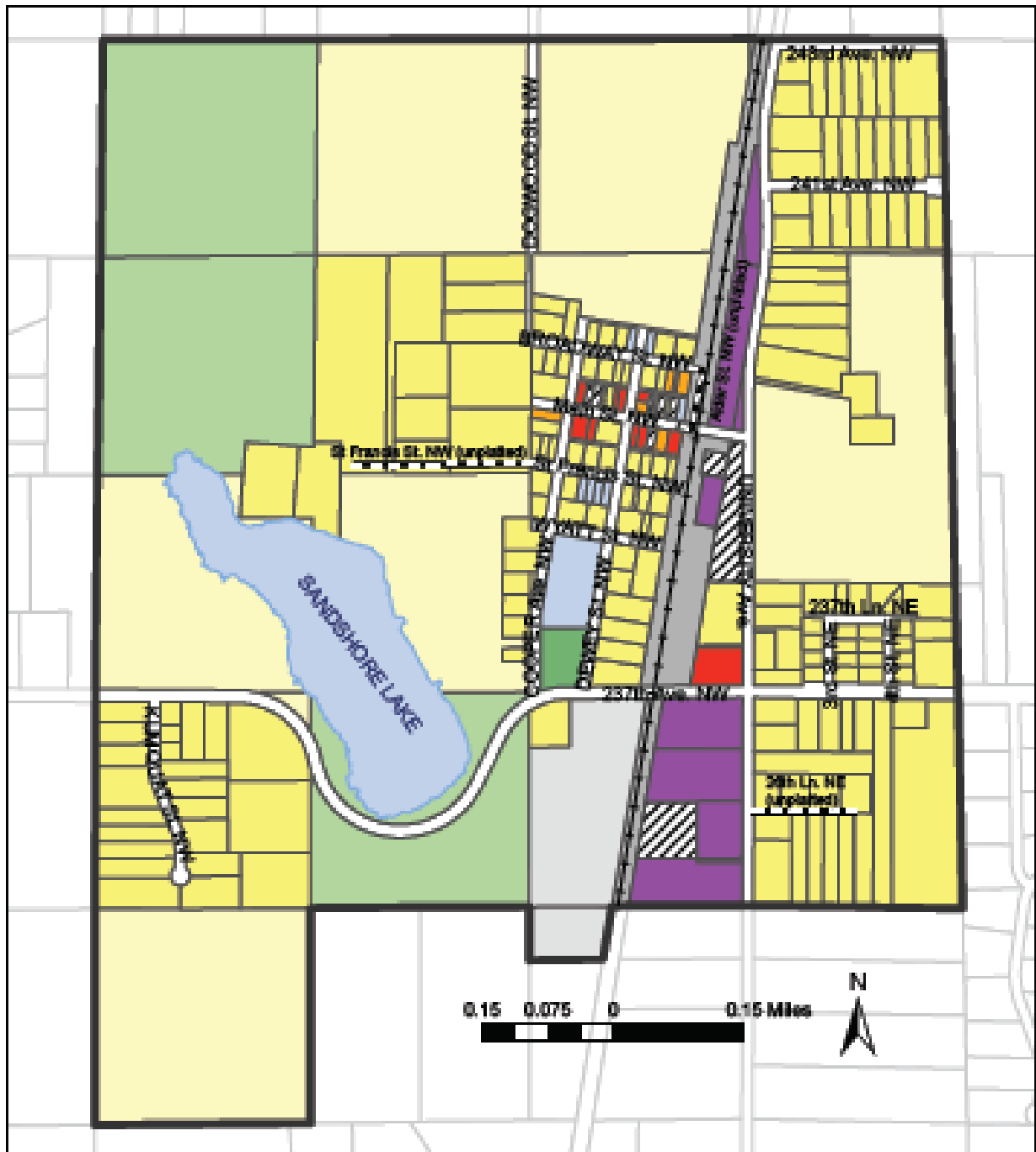


Community Designations












- Outside Council planning authority
- Agricultural
- Rural Residential
- Diversified Rural
- Rural Center
- Emerging Suburban Edge
- Suburban Edge
- Suburban
- Urban
- Urban Center

- County Boundaries
- City and Township Boundaries
- Lakes and Major Rivers

Figure 3. Existing Land Use



Legend

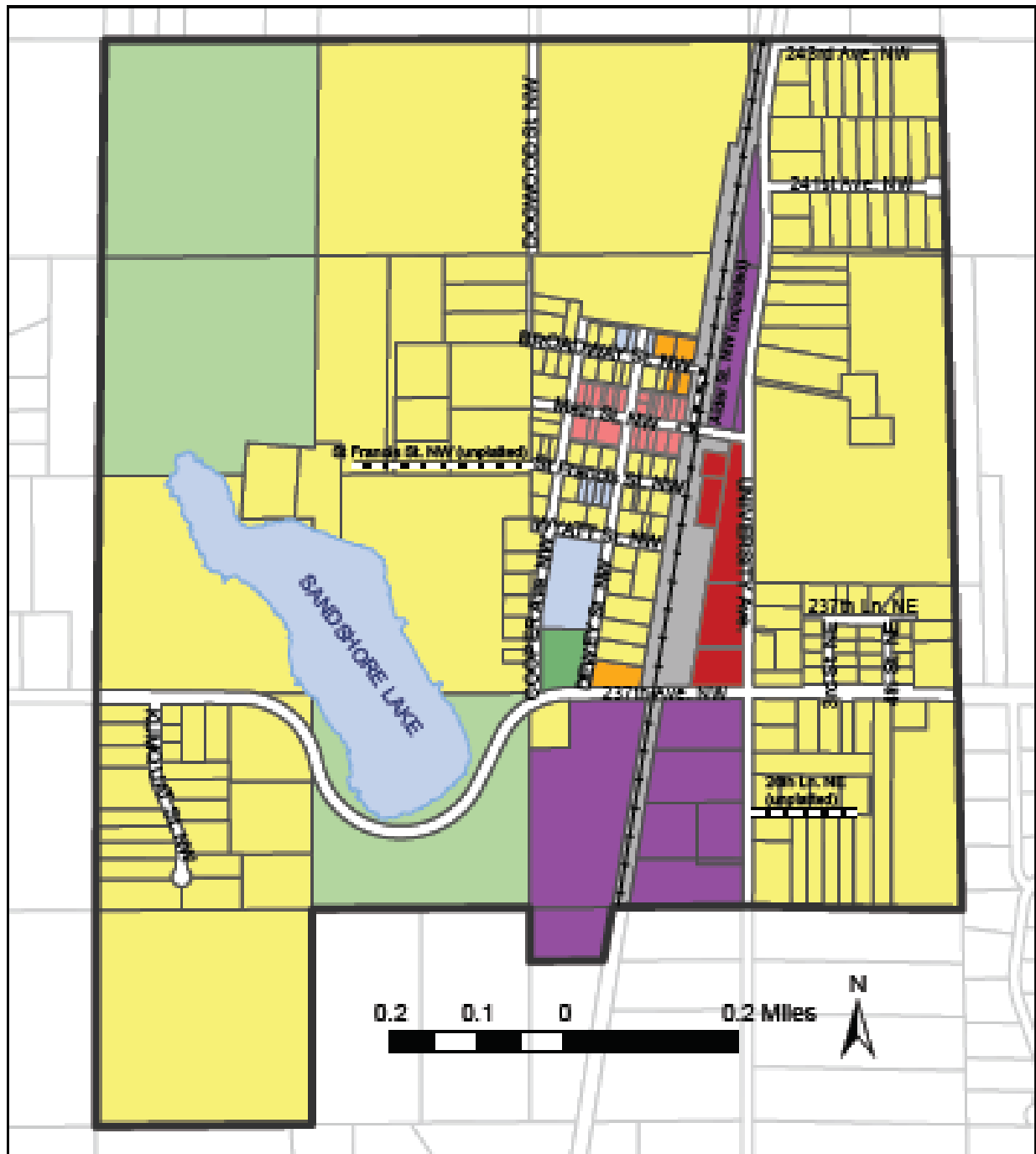
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|---|--|
|  Rural Residential |  City Park |
|  Single Family Residential |  Open Space |
|  Multi Family Residential |  Railway |
|  Commercial |  Utilities |
|  Industrial |  Vacant |
|  Institutional | |

Existing Land Use

Source: Anoka County, MNDNR & Northwest Associated Consultants



Figure 4. 2040 Planned Land Use



Legend

- | | |
|---|---|
|  Single Family Residential |  Institutional |
|  Multi Family Residential |  City Park |
|  Downtown Mixed Use |  Open Space |
|  Industrial |  Railway |

Future Land Use

Source: Anoka County, MnDNR & Northwest Associated Consultants



Figure 5. Land Guided for Affordable Housing

2021-2030 share of regional need for Affordable Housing: **6 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
Multi Fammily	2.00		8		100%		16
Downtown Mixed Use	1.15		8		100%		10
Total	3						26

Sufficient/*(insufficient)* units possible against share of regional need: **20**
 Affordable units built since 2021: **0**
 Sufficient/*(insufficient)* units possible adjusted for affordable units built: **20**
 Number of Comp Plan Amendments approved since Comp Plan Update: **0**

