Metropolitan Open Space and Parks Committee
Meeting date: July 9, 2019
For the Community Development Committee meeting of August 5, 2019
For the Metropolitan Council meeting of August 14, 2019

Subject: CP Rail Regional Trail Master Plan, Three Rivers Park District
MPOSC District, Member: C – Margie Andreason
Council District, Member: 5 – Molly Cummings
Policy/Legal Reference: Minn. Stat. § 473.313; 2040 Regional Parks Policy Plan Chapter 5, Planning Policy – Strategy 1
Staff Prepared/Presented: Tracey Kinney, Planner (651-602-1029), Regional Parks and Natural Resources
Division/Department: Community Development / Regional Planning

Proposed Action
That the Metropolitan Council:

1. Approve the CP Rail Regional Trail Master Plan for Segment A.
2. Notify Three Rivers Park District that a Council approved master plan for the CP Rail Regional Trail Search Corridor Segments B-F is required prior to future funding requests.
3. Require that Three Rivers Park District, prior to initiating development of the regional trail, send preliminary plans to the Engineering Services Assistant Manager at the Metropolitan Council’s Environmental Services Division, for review in order to assess the potential impacts to the regional interceptor system.

Background
The 2040 Regional Parks Policy Plan includes the CP Regional Trail Search Corridor, located in the central part of the Regional Parks System and in the southeastern part of Hennepin County. When completed the regional trail will total 21 miles and connect the communities of Bloomington, Edina, St. Louis Park, Golden Valley, New Hope and Crystal. In addition, this north-south corridor will connect the planned Minnesota River Valley State Trail to six regional trails including Nine Mile Creek Regional Trail, Cedar Lake LRT Regional Trail, North Cedar Lake Regional Trail, Luce Line Regional Trail, Bassett Creek Regional Trail, and Crystal Lake Regional Trail, as well as three regional trail search corridors (Figure 2).

Three Rivers Park District is requesting approval of the CP Rail Regional Trail Master Plan for Segment A spanning from the Minnesota River to Nine Mile Creek Regional Trail. The remaining segments will continue as a search corridor.

Rationale
The CP Rail Regional Trail Master Plan is consistent with the requirements of the 2040 Regional Parks Policy Plan including Chapter 5, Planning Policy -- Strategy 1, Master plan requirements.

Thrive Lens Analysis
The CP Rail Regional Trail Master Plan advances the Thrive outcome of livability by enhancing the quality of life in the region through increasing access to nature
and outdoor recreation. The partnership between Three Rivers Park District, the City of Bloomington, and the City of Edina in the planning, ownership, and management of the CP Rail Regional Trail demonstrates the Thrive principle of collaboration to effectively deliver a seamless user experience.

**Funding**
The estimated cost to implement Segment A of the master plan is $3,260,000 which includes $105,000 for land acquisition and $3,155,000 for development. Approval of this master plan makes the acquisition and development costs of Segment A eligible for Regional Parks System funding, but does not commit the Council to any funding.

**Known Support / Opposition**
Three Rivers Park District Board approved the release of the master plan for public and governmental review and approval at their March 21, 2019 meeting. The City of Bloomington adopted a resolution in support of Three Rivers Park District CP Rail Regional Trail Master Plan on May 20, 2019.

**Analysis**
Planning Strategy 1 of the 2040 Regional Parks Policy Plan requires that master plans for linking trails address 11 items: boundaries and acquisition costs, demand forecast, development concept, conflicts, public services, operations, partner engagement, public engagement and participation, public awareness, accessibility, and Mississippi River Corridor Critical Area. The following analyzes the master plan against those requirements

**Boundaries and Acquisition Costs**
The CP Regional Trail Search Corridor is located in the central part of the Regional Parks System (Figure 1).

**Figure 1: Location of the CP Regional Trail Search Corridor within the Regional Park System**
The CP Rail Regional Trail Search Corridor is located in the southeastern part of Hennepin County. When completed, the linking regional trail will total 21 miles and connect the communities of Bloomington, Edina, St. Louis Park, Golden Valley, New Hope, and Crystal. This north-south corridor will connect six regional trails including Nine Mile Creek Regional Trail, Cedar Lake LRT Regional Trail, North Cedar Lake Regional Trail, Luce Line Regional Trail, Bassett Creek Regional Trails, and Crystal Lake Regional Trail and three regional trail search corridors (Figure 2).

Figure 2: Location of the CP Regional Trail Search Corridor within the Three Rivers Park System
The trail alignment generally parallels the CP Rail line, which stretches south to north from the planned Minnesota River Valley State Trail to Crystal Lake Regional Trail. The CP Rail Regional Trail is divided into six planning segments with each segment representing a connection between existing regional trails. Segment A from Minnesota River to Nine Mile Creek Regional Trail, labeled as A in Figure 3, is the focus of this master plan. The remaining 5 segments will continue as part of the CP Rail Regional Trail Search Corridor until master planning has been completed.

Figure 3. CP Rail Regional Trail Segments
**Segment A**

The 7-mile trail, Segment A, begins at the planned Minnesota River Valley State Trail on the south end of Bloomington, travels north through Hyland-Bush-Anderson Lakes Park Reserve to Nine Mile Creek Regional Trail in the southern portion of Edina (Figure 4).

Segment A has 4 subsegments that are comprised of both existing and planned sections. Subsegments A1-A3 are mostly existing and within the City of Bloomington (both Implementing Agencies are eligible to request funding). Subsegment A4 is located within Edina and is undeveloped.

Three Rivers Park District and the City of Bloomington are partnering on the implementation of Subsegments A1-A3. Three Rivers Park District is leading the master plan, trail design, construction, easement acquisition, and public awareness. The City of Bloomington will own, operate, and maintain the trail segments (A1-A3) that are within Bloomington except for the trail within Hyland-Bush-Anderson Lakes Park Reserve including an underpass at East Bush Lake Road.

For Subsegment A4, in Edina, Three Rivers Park District will own, operate and maintain the trail. The costs for acquisition, construction, and operations and maintenance are detailed in Table 1.

<table>
<thead>
<tr>
<th>Subsegments</th>
<th>Implementing Agency</th>
<th>Status and Trail Length</th>
<th>Location</th>
<th>Acquisition and Construction</th>
<th>Operations and Maintenance</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1</td>
<td>Bloomington</td>
<td>Existing 0.75-mile</td>
<td>Minnesota River to Old Shakopee Road</td>
<td>$90,000</td>
<td>$13,350</td>
</tr>
<tr>
<td>A2</td>
<td>Bloomington</td>
<td>Existing 1.47-mile</td>
<td>Old Shakopee Road to Highland-Bush-Anderson Park Reserve</td>
<td>$210,000</td>
<td>$26,150</td>
</tr>
<tr>
<td>A2</td>
<td>Three Rivers Park District</td>
<td>Existing 2.88-mile</td>
<td>Highland- Bush-Anderson Park Reserve</td>
<td>$53,130</td>
<td></td>
</tr>
<tr>
<td>A3</td>
<td>Bloomington</td>
<td>0.64-mile (Existing 0.52-mile and Planned 0.12-mile)</td>
<td>Trail connection over I-494 to 78th Street</td>
<td>$245,000</td>
<td>$11,400</td>
</tr>
<tr>
<td>A4</td>
<td>Three Rivers Park District</td>
<td>Planned 1.28-mile</td>
<td>78th Street to Nine Mile Creek Regional Trail</td>
<td>$2,715,000</td>
<td>$22,800</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>7.02-miles</strong></td>
<td></td>
<td><strong>$3,260,000</strong></td>
<td><strong>$126,830</strong></td>
</tr>
<tr>
<td>#</td>
<td>Status</td>
<td>Length</td>
<td>Notes</td>
<td>Acquisition &amp; Compensation</td>
<td>Operation &amp; Maintenance</td>
</tr>
<tr>
<td>---</td>
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<td>----------------------------------------------------------------------</td>
<td>-----------------------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>A1</td>
<td>Existing (Blaine) Responsibility</td>
<td>0.73 mi</td>
<td>Connects Minnesota River to Old Shakopee Rd</td>
<td>$190,000</td>
<td>$113,350</td>
</tr>
<tr>
<td>A2</td>
<td>Existing (Bloomington Responsibility)</td>
<td>0.47 mi</td>
<td>Old Shakopee road to Hyland Pk, East Bush Lake Road to 84th</td>
<td>$210,000</td>
<td>$26,150</td>
</tr>
<tr>
<td>A3</td>
<td>Existing (Transit Responsibility)</td>
<td>0.88 mi</td>
<td>Trail through Hyland Park Reserve</td>
<td>$51,300</td>
<td></td>
</tr>
<tr>
<td>A4</td>
<td>Planned (TRPD) Responsibility</td>
<td>0.52 mi existing, 0.12 mi planned</td>
<td>Trail connection over I-494 to 78th</td>
<td>$249,000</td>
<td>$11,460</td>
</tr>
<tr>
<td>A4</td>
<td>Planned (TRPD) Responsibility</td>
<td>1.28 mi</td>
<td>May require easement along Cahill Road, new traffic signal at Bush Lake Industrial Boulevard and retaining wall along 70th Street</td>
<td>$2,711,000</td>
<td>$22,300</td>
</tr>
</tbody>
</table>

Subtotals | 7.02 mi | $3,260,000 | $125,000 |
Acquisitions
Subsegments A3 and A4 have planned portions of trail that require easement acquisitions.

Segment A3 along East Bush Lake Road will require an easement for an additional right-of-way to expand the existing 6’ sidewalk to a 10’ trail north of the interchange. The parcel numbers are: 1711621110014 and 1711621110008.

For segment A4 easements are needed along East Bush Lake along Cahill Road. The parcel numbers are: 0811621140002, 0811621140001, 0811621110023, 0811621110022, 0811621110020, 0811621110019, 0811621110010, 0811621110024, 0811621110005, and 0811621110009.

Three Rivers has a variety of approaches for acquisitions. For land in the public-right-of-way or for public property, Three Rivers Park District uses trailway cooperative agreements or development projects. For private property, Three Rivers Park District uses a willing seller approach that occurs when landowners are ready and interested in selling their property or are considering development of their property.

Demand Forecast
When fully constructed, the CP Rail Regional Trail is projected to generate 305,000 annual visits based on comparable data from the Metropolitan Council’s 2017 Parks Use Estimates and population data from the Census Bureau’s 2010 Census and the 2016 American Community Survey.

CP Rail Regional Trail, Segment A will pass through Hyland-Bush-Anderson Lakes Park Reserve, the second most visited Three Rivers Park District regional park unit with 913,792 visitors in 2018 according to Metropolitan Council’s 2018 Parks Use Estimates. Elm Creek Park Reserve ranked first with 1,365,242 visitors in 2018.

Segment A is a 7-mile trail comprised of 5.74-miles of existing and 1.28-mile of undeveloped trail. Since the existing trail segment is consistent with the City of Bloomington’s plans, the master plan focused on the undeveloped trail search corridor service area. An analysis of the service area identified target populations from residents, businesses, and employees (Figure 10). This targeted approach builds off of previous engagement efforts including the City of Bloomington’s Parks and Trails Plan and comprehensive plan, and the Hennepin County Bicycle Plan. The remaining 14-mile length of the CP Rail Regional Trail Search Corridor will provide a vital north/south connection to the cities of Hopkins and Richfield, whose populations are more racially diverse, income limited, and have older residents.

The CP Rail Regional Trail will cross 6 regional trails with significant visitor counts according to Metropolitan Council’s 2018 Parks Use Estimates. See Table 2 for a summary of the 2018 count totals.

Table 2: Estimated Annual Regional Visits, Metropolitan Council (2018)

<table>
<thead>
<tr>
<th>Regional Trail Unit</th>
<th>Est. Visits, 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bassett Creek Regional Trail</td>
<td>134,525</td>
</tr>
<tr>
<td>Cedar Lake LRT Regional Trail</td>
<td>584,279</td>
</tr>
<tr>
<td>Crystal Lake Regional Trail</td>
<td>248,341</td>
</tr>
<tr>
<td>Hyland Bush-Anderson Lakes Park Reserve</td>
<td>913,792</td>
</tr>
<tr>
<td>Luce Line Regional Trail</td>
<td>491,216</td>
</tr>
<tr>
<td>Nine Mile Creek Regional Trail</td>
<td>255,077</td>
</tr>
<tr>
<td>North Cedar Lake Regional Trail</td>
<td>471,151</td>
</tr>
</tbody>
</table>
Development Concept
When completely built, the 21-mile CP Rail Regional Trail will be designed as an off-road 10-foot-wide, non-motorized, paved, multi-use trail. The regional trail is anticipated to be a mostly independent trail corridor separate from roadways, including urban, curbed rural and park sections (Figure 5).

Additional Unifying Trail Features
The CP Rail will incorporate a variety of unifying elements to provide a seamless user experience including trail identity, crossings, wayfinding, traffic signage and devices, rest stops, drainage, and trailheads that are located at the beginning, middle, and end of the trail corridor.

Wayfinding
The Park District employs three types of wayfinding signage structures: system kiosks, regional trail kiosks and directional signage (Figure 6). The wayfinding plan for the CP Rail Regional Trail includes
signage at strategic delineated points based on type of sign and information need. The exact location and content of wayfinding signage will be determined in conjunction with local community input and is often dictated by available public right-of-way. Further wayfinding details are included in the planning budget analysis.

Figure 6. Example of trail signage

Segment A
Segment A is divided into four subsegments - A1 through A4. Subsegments A, A2, and A3 are existing local trails that travel through the City of Bloomington from the planned Minnesota River Valley State Trail to the I-494 Highway interchange. Subsegment A4 is a new planned trail (Figure 4).

Subsegment A1
Subsegment A1 (0.75 mile) is an existing trail built by the City of Bloomington that connects the Minnesota River and planned Minnesota River Valley State Trail at Crest Avenue to Old Shakopee Road. The trail travels east on the north side of Crest Avenue. At Bloomington Ferry Road the trail travels north on the east side of the road to Old Shakopee Road.

The City of Bloomington owns, operates, and maintains this portion of the trail as the Hyland Trail. Three Rivers Park District and the City of Bloomington will work together to create and fund a wayfinding solution that seamlessly communicates both the regional trail and the local trail systems (Figure 7).
Figure 7. Subsegment A1
Subsegment A2
Subsegment A2 is an existing 4.35-mile City of Bloomington trail that connects the intersection of Bloomington Ferry Road and Old Shakopee Road to Hyland–Bush–Anderson Lakes Park Reserve.

The trail follows the west side of Bloomington Ferry Road from Old Shakopee Road to West 106th Street. The trail crosses 106th Street traveling west along the north side of the road to Bush Lake Road. On Bush Lake Road, the trail travels north on the west side of the road to Maryland Road where the trail crosses the street supported by a rectangular rapid flashing beacon to the east side of the road prior to accessing Hyland-Bush-Anderson Lakes Park Reserve. The trail continues traveling north through the west side of the park reserve until reaching the intersection of West 84th Street and Chalet Road.

The City of Bloomington owns, operates, and maintains the trail segments outside of Hyland–Bush–Anderson Lakes Park Reserve. Three Rivers Park District owns, operates, and maintains the trail segments and East Bush Lake Road underpass within the park reserve. Hennepin County owns and maintains the rectangular rapid flashing beacon at Maryland Road and Bush Lake Road (Figure 8).
Subsegment A3
The 0.64-mile Subsegment A3 crosses Highway I-494 with a combination of existing and new trail. From East Bush Lake Road and West 84th Street the trail travels 0.52 miles on the east side of East Bush Lake Road to the north side of the Highway I-494 overpass. North of the interchange, the 0.12-mile new trail will require additional right-of-way to expand the existing 6’ sidewalk to a 10’ trail. At the intersection of West 78th Street, the existing northbound right turn slip lane will be eliminated to provide sufficient space to add the wider trail, as well as reducing motor vehicle speeds to improve pedestrian and bicyclist safety (Figure 9).

Future operations, maintenance, and improvements of this subsegment will remain the responsibility of the City of Bloomington, with the exception of the infrastructure operations and maintenance of the MnDOT bridge over Highway I-494.
Figure 9. Subsegment A3
**Subsegment A4**
The 1.28-mile Subsegment A4 is a new trail that will connect from West 78th and Bush Lake Road to the Nine Mile Creek Regional Trail underpass of West 70th Street in Edina (Figure 10).

From West 78th Street to Dewey Hill Road, Subsegment A4 will follow the east side of Bush Lake Road and require a traffic signal or an all-way stop at the intersection of Edina Industrial Boulevard to facilitate a safe pedestrian and bicycle crossing.

At Dewey Hill Road, the trail travels west across the Canadian Pacific Railway tracks requiring the existing surface to be widened. The trail then continues west to connect to Cahill Road. On Cahill Road additional right-of-way is required to accommodate the proposed trail. The proposed trail continues north along Cahill Road to West 70th Street before turning east to connect to the existing Nine Mile Creek Regional Trail underpass.

Subsegment A4 will be owned, operated and maintained by the Three Rivers Park District. Three Rivers Park District is exploring a partnership with the City of Edina for certain trail segments that are identified in the City’s Pedestrian and Bicycle Master Plan.
Figure 10. Subsegment A4

Map showing the layout of Subsegment A4 with roads such as W 70th Street, Nine Mile Creek Regional Trail, Dewey Hill Road, Bush Lake Road, W 78th Street, and Edina Industrial Boulevard.
Conflicts
The Policy Plan requires the identification of conflicts with other existing or proposed projects or land uses affecting the trail unit, including steps necessary for their resolution.

The master plan addresses the specific subsegment trail crossing conflicts and Three River Park District’s “Share the Trail” safety campaign to build awareness of shared bicycle and pedestrian trail use.

Subsegment Conflicts
To ensure that the trail experience is safe and user-friendly, trail crossings will be designed to industry best standards. These type of design considerations and trail enhancements will be further refined during the trail design phase.

- Subsegment A2: On Bush Lake Road, the trail travels north on the west side of the road to Maryland Road where the trail crosses the street and is supported by a rectangular rapid flashing beacon to the east side of the road prior to accessing Hyland-Bush-Anderson Lakes Park Reserve.
- Subsegment A3: At the intersection of West 78th Street, the existing northbound right turn slip lane will be eliminated to provide sufficient space to add the wider trail, as well as reducing motor vehicle speeds to improve pedestrian and bicyclist safety.
- Subsegment A4: From West 78th Street to Dewey Hill Road, the trail will follow the east side of Bush Lake Road and require a traffic signal or an all-way stop at the intersection of Edina Industrial Boulevard, to facilitate a safe pedestrian and bicycle crossing. Additionally, at Dewey Hill Road, the trail travels west across the Canadian Pacific Railway tracks requiring the existing surface to be widened. The trail then continues to travel west to connect to Cahill Road.

Share the Trail Campaign
Three Rivers Park District encourages trail users to respect each other through a “Share the Trail” safety campaign. This campaign uses trail signage to build awareness that the trail is used by multiple modes of transportation and promote safe use.

Public Services
The Policy Plan requires a description of any non-recreational public services and facilities, such as roads or sewers, needed to accommodate the proposed trail, including the timing of these services and the arrangements necessary to provide them.

- Subsegment A2: A rectangular rapid flashing beacon owned and maintained by Hennepin County is needed to support crossing at Bush Lake Road.
- Subsegment A3: This subsegment crosses over Highway I-494 requiring MnDOT to operate and maintain the bridge over Highway I-494.
- Subsegment A4: A traffic signal or an all-way stop at the intersection of Edina Industrial Boulevard and Bush Lake Road is needed to facilitate a safe pedestrian and bicycle crossing. Additionally, the existing surface will need to be widened to cross the Canadian Pacific Railway.

Operations
The regional park implementing agencies will assume operation and maintenance responsibilities for the trail sections over which they have jurisdictional control or responsibility, to provide a seamless user experience. Operations and maintenance for the Segment A is $126,830 including $104,030 for the City of Bloomington (Subsegments A1-A3) and $22,800 for Three Rivers Park District (Subsegment A4).
When the 21-mile CP Rail Regional Trail corridor is fully realized, routine maintenance costs, including additional staffing, are estimated to increase by $52,500/year (2019 dollars). Additional costs for trail surface preservation and rehabilitation (trail surface repairs, striping requirements and pavement requirements) are anticipated to increase by $72,500/year assuming a 30-year pavement life. The combined annual maintenance estimated cost for both routine and trail surface preventative maintenance is $125,000/year for the entire trail. These costs will be incurred by the Park District and its partners for the segments they respectively manage.

**Partner Engagement**
Three Rivers Park District engaged the public and the Cities of Bloomington and Edina in the development of the masterplan.

Subsegments A1-A3 are mostly existing trails, all located within the City of Bloomington. Three Rivers Park District worked with the City of Bloomington on partnership specifics (ownership, operations, maintenance, and regional trail recognition) and connecting the trail to Edina just north of the Highway I-494 interchange.

**Public Engagement and Participation**
The planning and public input process for the new Subsegment A4 trail alignment focused on gathering input from community members who live or work near the project area and with the City of Edina. The team developed tailored strategies for community members who may not have been able to attend a traditional project open house including: a project website, online survey, online interactive map, press release, Facebook page, Open Streets event and door-to-door engagement strategy that targeted residents, businesses and workers. The major themes gathered from the community input consisted of:

- Commuting opportunities (north-south direction especially)
- Safety at intersections
- Connections to residential areas
- Directness of route
- Connection to Hyland-Anderson-Bush Park Reserve
- Connection to Normandale Lakes area
- Lunch-time walking opportunities

The community input directly shaped the alignment for Subsegment A4 resulting in a fairly direct route that connects to a major job center for commuting and daytime walking opportunities and connects to low-to-medium density residential areas.

**Public Awareness**
Three Rivers Park District is leading the public awareness initiative for the CP Rail Regional Trail through a coordinated approach involving an online website, public relations, marketing, media relations, social media, brand management, event planning, and promotion.

Three Rivers Park District is working with the Cities of Bloomington and Edina to ensure shared messaging and cross marketing occurs.

Additionally, the Park District collaborates with a wide array of community, business, and government organizations to promote its facilities, programs, and services and to educate the public about its resources.
**Accessibility**
Segment A provides accessibility through the employment of physical design standards, raising awareness through outreach, neighborhood connections to the trail, not requiring a use fee, and nearby connections with transit.

- **Design standards:** All regional trail facilities, including associated trailheads and trail amenities, are designed to accommodate individuals with disabilities and developed in accordance with Americans with Disabilities Act standards and guidelines.
- **Outreach:** Three Rivers Park District pursues promotional outreach activities and works with special-interest organizations such as the Courage Kenny Rehabilitation Institute and Wilderness Inquiry to further encourage participation in activities and use of park facilities by persons with special needs. If arrangements are made in advance, interpreters and alternative forms of printed material are available at programmed events.
- **Neighborhood access:** The trail corridor passes through several Hennepin County cities with important local community destinations such as parks, commercial areas, community facilities, cultural destinations and transit facilities. To improve local access, neighborhood trail connections are anticipated at regular intervals.
- **No use fee:** The Park District does not charge entrance fees for its regional trails; therefore, the regional trail is available to all.
- **Transit options:** Segment A of the CP Rail Regional Trail is served by 4 Metro Transit routes including: 578, 540, 589, and 597.

**Mississippi River Corridor Critical Area**
The CP Rail Regional Trail is not located within the Mississippi River Corridor Critical Area.

**Review by Other Council Divisions**

**Community Development – Environment and Surface Water Management** (Jim Larsen 651-602-1159) – Consider evaluating for lighting via solar panels (with battery-based storage systems) in roof shades of trail wayfinding structures in locations where trail users might be most likely to benefit. In review of this particular master plan, it would be only the ‘Level A’ signage configuration sites (Page 17 of the master plan). Contact Council staff for further information.

**Community Development – Forecasts** (Todd Graham 651-602-1322) – No additional comments.

**Environmental Services – Sewer** (Roger Janzig 651-602-1119) – The CP Rail Regional Trail (Master Plan) extends 21-miles through the communities of Crystal, New Hope, Golden Valley, St. Louis Park, Edina, and Bloomington. The construction of any new or updating of existing trails may have an impact on multiple Council Interceptors in multiple locations. To assess the potential impacts to our interceptor system, prior to initiating any proposed project, preliminary plans should be sent to Tim Wedin, Engineering Services Assistant Manager (651-602-4571) at the Metropolitan Council Environmental Services for review and comment.

**Metro Transit** (Steve Mahowald 612-349-7775) – No additional comments.

**Transportation Planning** (Steve Elmer 651-602-1756) – No additional comments

**Local Planning Assistance – Land Use** (Michael Larsen 651-602-1407) – No additional comments.