Community Development Committee

Meeting date: December 6, 2021

Environment Committee

Meeting date: December 14, 2021

For the Metropolitan Council meeting of December 22, 2021

Subject: City of Shoreview 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22168-1

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:	Eric Wojchik, Planning Analyst (651-602-1330) Angela R. Torres, Local Planning Assistance 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	

Proposed Action

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

Recommendations of the Community Development Committee

- 1. Authorize the City of Shoreview to place its 2040 Comprehensive Plan into effect.
- 2. Advise the City to implement the advisory comments in the Review Record for forecasts.

Recommendation of the Environment Committee

- 1. Approve the City of Shoreview's Comprehensive Sewer Plan.
- Require the City to include a reference to the City ordinance that prohibits the discharge of any roof drainage, storm water, surface water or groundwater into the municipal sewer system in the final City adopted Plan submitted to the Council. The City may also include a copy of the applicable ordinance(s) in the final adopted Plan to satisfy this requirement.



Advisory Comments

The following Advisory Comments are part of the Council action authorizing the City of Shoreview 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. § 473.864, subd. 1)
- 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 Shoreview is located in the northern part of Ramsey County. It is surrounded by the communities of North Oaks, Vadnais Heights, Little Canada, Roseville, Arden Hills, Mounds View, Blaine, Circle Pines, and Lino Lakes.

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

Review Authority & Rationale

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

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

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

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

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

Review Standard	Review Area	Plan Status
Conformance	Regional system plan for Parks	Conforms
Conformance	Regional system plan for Transportation, including Aviation	Conforms
Conformance	Water Resources (Wastewater Services and Surface Water Management)	Conforms
Consistency with Council Policy	Thrive MSP 2040 and Land Use	Consistent
Consistency with Council Policy	Forecasts	Consistent
Consistency with Council Policy	2040 Housing Policy Plan	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

None.

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

REVIEW RECORD

City of Shoreview 2040 Comprehensive Plan

Review File No. 22168-1, Business Item No. 2021-340 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). Ramsey County is the Park Implementing Agency for Regional Parks System components in the City of Shoreview, for which the Plan accurately describes the Regional Parks System components. Regional Parks, Park Reserves, or Special Recreation Features located within the City include Vadnais-Snail Lake Regional Park. Regional Trails located within the City include the Highway 96 and Rice Creek North regional trails, and the Lexington Avenue/Parkway Regional Trail Search Corridor. 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). It accurately reflects transportation system components of the TPP and is 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 highway system element of the TPP. The Plan accurately reflects I-35W and I-694, which are the metropolitan highways within the City's boundaries. It 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 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. There is also a section analyzing roadway safety. Forecasting was done consistent with regional methodology. The Plan also includes guidelines on how access will be managed for principal and A-minor arterials.

The Plan identifies several transportation corridor studies that include recommendations regarding capacity and transit improvements, changes in access, and/or changes in land use. These studies include the I-35W expansion plan, which is a capacity expansion project involving MNPass lanes. Another project is the Rice Street/I-694 Interchange reconstruction. The Plan accurately describes the status of these facilities, including the likelihood and timing of funding and construction.



Transit

The Plan shows the location of existing transit routes and facilities within the City limits and acknowledges the City is within Transit Market Areas III and IV. The Plan does reflect a park-and-ride on Map 5.6. The Plan text acknowledges the uncertainty of transitway extensions.

Aviation

The Plan conforms to the Aviation system element of the TPP. The closest airport is Anoka-Blaine Airport and has minimal impact on the City. The city acknowledges the airport and the airspace around the airport. The City has a height ordinance in effect to protect the airspace against obstructions.

Bicycling and Walking

The Plan is consistent with the Bicycling and Pedestrian chapter of the TPP. Plan Figure 5.7 identifies city, county, and private pathways within the City as well as existing and planned regional trails. The Plan also identifies these pathways as well as existing and future segments of and connections to the Regional Bicycle Transportation Network (RBTN). The Plan also acknowledges preferred alignments for two RBTN corridors on Figure 5.7.

Frieght

The Plan is consistent with Freight policies of the TPP. The Plan includes heavy commercial vehicle traffic counts and references the Regional Truck Highway Corridor Study completed by the Metropolitan Council in 2017 and the study's findings as they relate to the City. It identifies railroads and the needs of freight movement in and through the community, including locations of light industrial land uses that generate 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 and applicable TPP policies for transit station areas.

Water Resources

Wastewater Service

Reviewer: Kyle Colvin, Environmental Services (ES) – Wastewater Planning and Community 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 assigned forecasts for population, households, and employment.

Current wastewater treatment services are provided to the City by the Metropolitan Council Environmental Services (MCES). Most of the wastewater generated within the City is conveyed by Council Interceptors 1-SV-436A, 7132, and 4-NS-523. Smaller portions of the City are served through interceptors 1-RV-433, and 1-RV-433A. All wastewater generated within the City is conveyed to and treated at the Metropolitan Treatment Plant in St. Paul. The Plan projects that the city will have 12,100 sewered households and 14,700 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 for the 20-year planning horizon. It states that based on future land, the moderate increase in the projected number of households and population, and the trend of decreasing household size, future sewage flow is expected to increase minimally

between 2020 and 2040. 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 community's goals, policies, and strategies for preventing and reducing excessive inflow and infiltration (I/I) in mostly the local municipal (city) sanitary sewer system. The Plan provides a description of projects including system inspection, evaluation, and rehabilitation, mostly using pipe relining, where I/I issues have been identified. The Plan states that much of this work is included in the City's road reconstruction program. The Plan also states that an average of \$570,000 per year will be spent between 2019-2025 on infrastructure replacement and rehabilitation identified as being highly susceptible to I/I. The City is currently evaluating potential cost-share programs and funding sources to address I/I mitigation on private service laterals.

The Plan states that the City prohibits the discharge of any roof drainage, storm water, surface water, or groundwater into the municipal sewer system. However, it does not include a citation of the Ordinance or City Code where this prohibition is described, nor does it include a copy of the Ordinance within the Plan. The Plan does state however that in 2009, as part of a City-wide water meter replacement program, I/I inspections were performed and any connections to the sanitary sewer system "not allowed by code" were required to be removed, and that follow-up inspections were performed to verify conformance.

The Plan describes the sources, extent, and significance of existing I/I within the entire public and private wastewater collection system and provides a description of an implementation plan for preventing and eliminating excessive I/I from entering the public collection systems. The Plan indicates that approximately 22% of the homes within the City were built before 1970 when services were predominately made of clay tile pipe. The significance of clay tile pipe is that as it ages it can become more susceptible to I/I. The Plan states that the City has had no formal program to evaluate all pre-1970 homes for I/I susceptibility. However, as stated earlier, a city-wide sump pump inspection program was completed in 2009. Using wastewater flow data between 2014 through 2018 to determine base dry weather, average daily, and peak monthly flow, the Plan states that the City's annual I/I averages 31% and 41% for annual peak month I/I.

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 polices. 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

A reference to the City ordinance that prohibits the discharge of any roof drainage, storm water, surface water or groundwater into the municipal sewer system shall be included in the final City adopted Plan submitted to the Council. The City may also include a copy of the applicable ordinance(s) in the final adopted Plan to satisfy this requirement.

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* for local surface water management. The Plan satisfies the surface water management requirements for 2040 comprehensive plans.

Shoreview lies within the oversight boundaries of the Rice Creek and Ramsey-Washington Metro Watershed Districts. The City submitted a draft Local Water Management Plan (LWMP) in January 2018. Council Water Resources staff reviewed and commented on the draft LWMP to the City and Watershed Districts in a letter dated February 2, 2018. The LWMP was approved by the Rice Creek WD on August 8, 2018 and by the Ramsey-Washington Metro WD August 1, 2018. The City adopted the final LWMP on October 1, 2018. The Plan incorporates the final LWMP in Appendix III.

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)

The Plan presents the communitywide forecast in Table 7.14 and Figures 3.6 and 9.2 in the Plan. For reference, the forecast is shown below in Table 1.

	Census	Estimated	Council Forecasts		
	2010	2017	2020	2030	2040
Population	25,043	26,447	27,400	27,400	27,400
Households	10,402	11,004	11,800	12,000	12,100
Employment	11,665	11,894	13,200	14,100	14,700

Table 1. City of Shoreview Forecasts

The City provides land supply expectations (Plan Table 4.4) and potential residential phasing (Plan Table 4.5). The land supply is expected to accommodate 362 to 827 residential units during 2021 to 2040. Considered together with several hundred units already under construction, this is sufficient to accommodate the Council's households forecast.

Advisory Comments

The Plan states: "This employment growth will be challenging to achieve since Shoreview is a fully developed community" (page 16). In response, Council staff offered an employment forecast reduction for each of the 2020, 2030, and 2040 employment levels. The City acknowledges the advice, but has not agreed to the offered forecast revision. The forecast can be reconsidered in the 2050 planning cycle.

Thrive MSP 2040 and Land Use

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

The Plan is consistent with *Thrive MSP 2040* (Thrive) and its land use policies. The Plan acknowledges the Thrive community designation of Suburban (Figure 2). Thrive describes Suburban communities as 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 eras.

Suburban communities are expected to plan for forecasted population and household growth at overall average densities of at least 5 units per acre, and to target opportunities for more intensive development near regional transit investments at densities and in a manner articulated in the 2040 TPP.

The existing land uses in the City are predominately residential (39%). The second largest land use in the City is parks/open space (20.44%), followed by office land use (3%). The City has significant water

resources (10.5%), consisting of ten lakes, with several smaller, connected water resources, including Rice Creek (Figure 3).

In the 2040 Future Land Use Map (Figure 4), there are five residential categories: Low Density Residential, Medium Density Residential, High Density Residential, and Senior Residential. The Plan also includes a Mixed Use Residential land use category (60% residential) with a density range of between 20 and 45 residential units per acre. One significant change from the 2030 Plan to the 2040 Plan includes more specificity for the Policy Development Areas (PDAs) within the Plan. These areas are identified for future growth and include more site-specific policies to guide future development (Figure 5).

The Plan is consistent with Thrive for land use and residential density policies for an Suburban community designation. Thrive calls for Suburban communities to plan for forecasted population and household growth at overall average densities of 5 units per acre and target opportunities for more intensive development near regional transit investments at densities and in a manner articulated in the TPP. As shown in Table 2 below, the overall planned residential density in the City is between 7.4 and 17 units per acre, which is consistent with Thrive residential density policies.

		2018-2040 Change			
	D	Density			Мах
Category	Min	Мах	Net Acres	Min Units	Units
Low Density Residential	1	4	15.77	15	63
Medium Density Residential	4	8	17.97	71	143
High Density Residential	8	12	1.77	14	35
Mixed Use Residential*	20	45	12.99	259	584
		TOTALS	48.5	359	825
*60% residential		0	verall Density	7.4	17.0

Table 2. Planned Residential Density, City of Shoreview

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 more than 11,000 homes including nearly 1,900 multifamily units and more than 9,000 single-family homes. Approximately 2,200 homes are rented. More than 6,100 housing units are currently affordable to households earning under 80% of Area Median Income (AMI); however, nearly 1,800 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. There are about 550 units affordable to households with income at or below 30% AMI and more than 720 cost burdened households with incomes at or below 30% AMI.

The Plan identifies existing housing needs including maintenance and reinvestment in existing housing stock, variety of housing types for all stages of life especially safe options to age in place, and housing that is affordable to a range of income levels, especially homeownership options for current renters. The City has more than 40 units of publicly subsidized housing, most of which are age-restricted for older adults.

The Plan acknowledges the 2021-2030 affordable housing need allocation of 69 units, 34 of which are needed at prices affordable to households earning 30% of AMI or less, 19 of which are needed at prices affordable to households earning between 31 and 50% of AMI, and 16 of which are needed at prices affordable to households earning between 51 and 80% of AMI. As shown in Figure 6, 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 184 new housing units.

The housing implementation plan component of the Plan describes that the City will consider TIF, municipal housing bonds, and tax abatement for developments that offer units affordable below 80% AMI. The Plan also indicates that the City will continue programs to help protect and support manufactured homes in the community, and explore local notice-of-sale. The City states that they will introduce an inclusionary zoning policy that will at a minimum require an affordable housing element for property developments receiving public funds.

Water Supply

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

The Plan is consistent with the 2040 Water Resources Policy Plan (WRPP) policies related to water supply, including the policy on sustainable water supplies, the policy on assessing and protecting regional water resources, and the policy on water conservation and reuse. Because the City has a municipal public water supply system, the Local Water Supply Plan (LWSP) must be – and is – included as part of the Plan. The Metropolitan Council's review of water supply-related contect reflects the expectations shared with communities in their system statements and the water supply-related policies in the WRPP.

Community and Subsurface Sewage Treatment Systems (SSTS)

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

The Plan indicates that there are 10 residential and 1 non-residential SSTS' remaining in operation in the City. The Plan infers that the connection of these properties to the public wastewater system will be completed by 2040. The City's ordinance generally requires existing structures with SSTSs to connect to the municipal sanitary sewer system within one year once sewer service becomes available. The Plan does not specifically identify any public or privately-owned Community Wastewater Treatment Systems in operation in the City. Shoreview's Development Ordinance regulates individual sewage treatment systems. The City monitors the condition of the existing SSTS. Maintenance pumping records are required to be submitted, and compliance inspections are performed every three years. The City's individual sewage treatment system ordinance is consistent with Minnesota Pollution Control Agency (MPCA) Rule 7080 requirements including inspection and service 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 Plan includes the required solar planning elements.

Aggregate Resource Protection

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

The Plan is silent on the presence of viable aggregate resources in the City. The Council's aggregate resources inventory information contained in *Minnesota Geological Survey Information Circular 46* indicates that there are no viable aggregate resources available for mining in the fully developed community.

Historic Preservation

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

The Plan addresses historic resources as required by the MLPA. The Plan has a Cultural and Historic Resources Chapter (Chapter 8). Heritage preservation efforts are undertaken by the Shoreview

Historical Society (SHS) and the City. A total of 21 properties are listed in Plan Map 8.1 – Historic Properties within the Plan. The Plan also includes Map 8.2, which details 19 Notable Properties. The Plan includes an overarching Historic Preservation goal, which is supported by five policies and eleven implementation actions. The Plan also includes an overarching Cultural Resources goal, along with four policies and ten implementation actions. A full listing and description of historic properties and cultural resources is included as an appendix to Chapter 8.

Plan Implementation

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

The Plan includes a specific Implementation Chapter (Chapter 13). This chapter includes official controls (including zoning code, zoning map, subdivision code, and other control measures). The Implementation Matrix includes a full listing of all implementation strategies across all chapters of the Plan and associated timelines and funding sources. The full capital improvement plan is included in Appendix II.

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

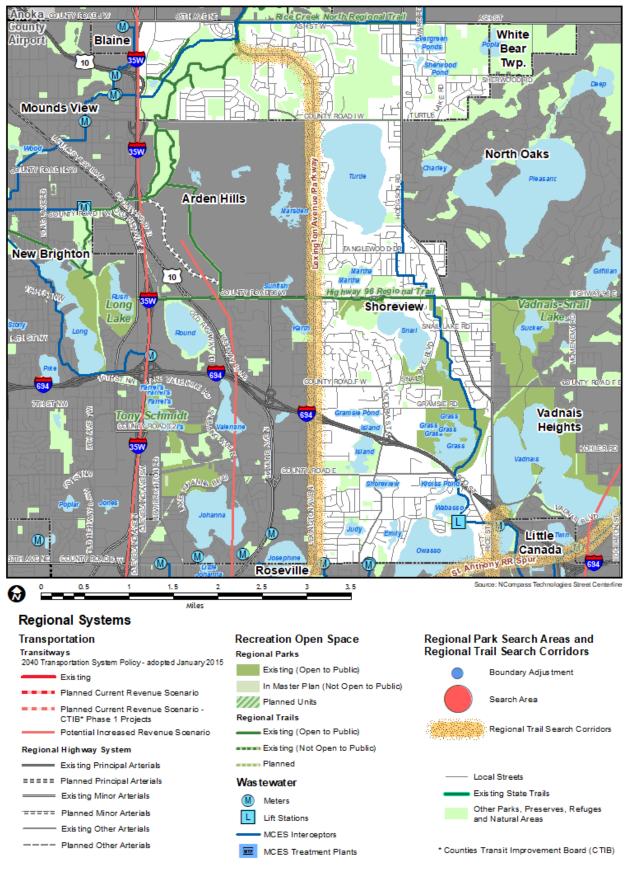
In response to the 2015 System Statement, the City submitted the following documents for review:

- December 28, 2018: Shoreview 2040 Comprehensive Plan
- November 16, 2020: Revisions to the Shoreview 2040 Comprehensive Plan
- October 7, 2021: Resubmittal of the Shoreview 2040 Comprehensive Plan

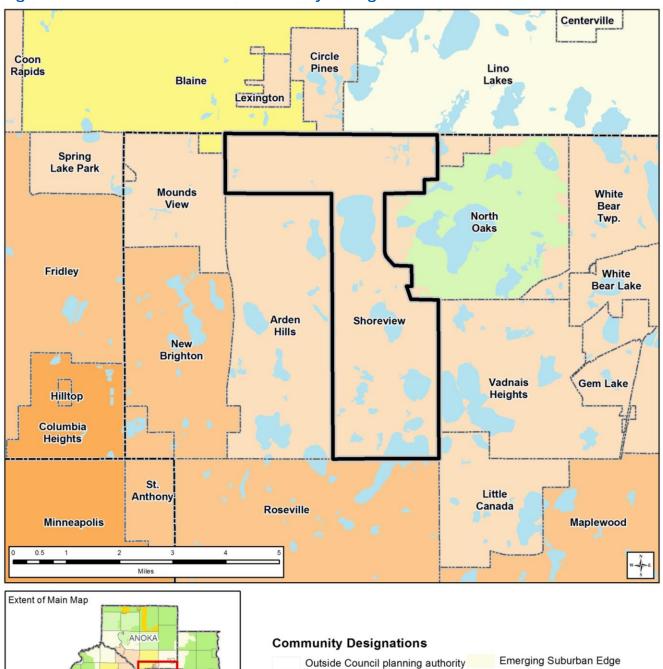
Attachments

- 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: Policy Development Areas (PDAs)
- Figure 6: Land Guided for Affordable Housing

Figure 1. Location Map with Regional Systems







Suburban Edge

Suburban

Urban Center

Urban

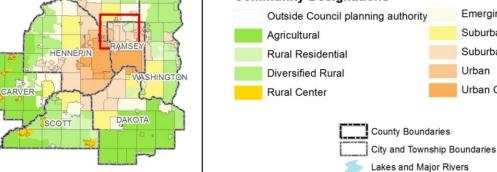


Figure 3. Existing Land Use

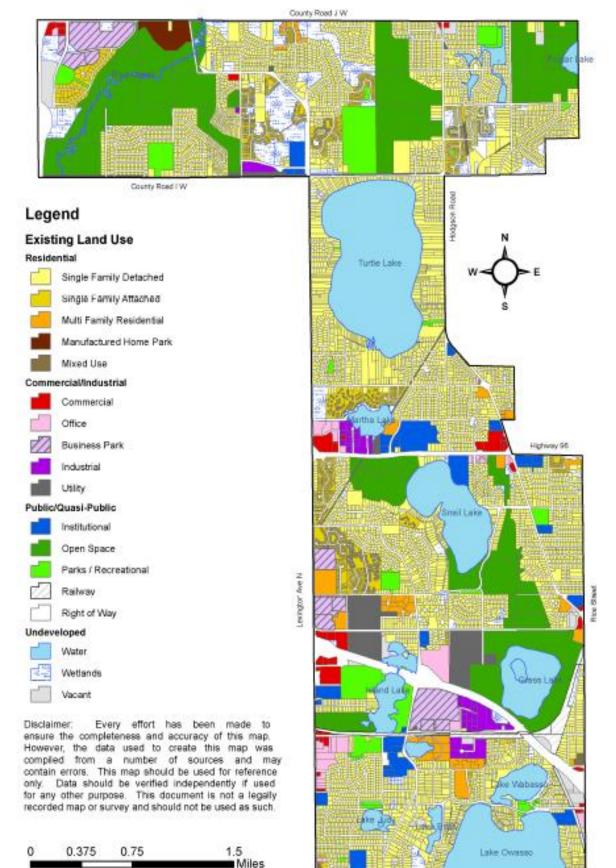


Figure 4. 2040 Planned Land Use

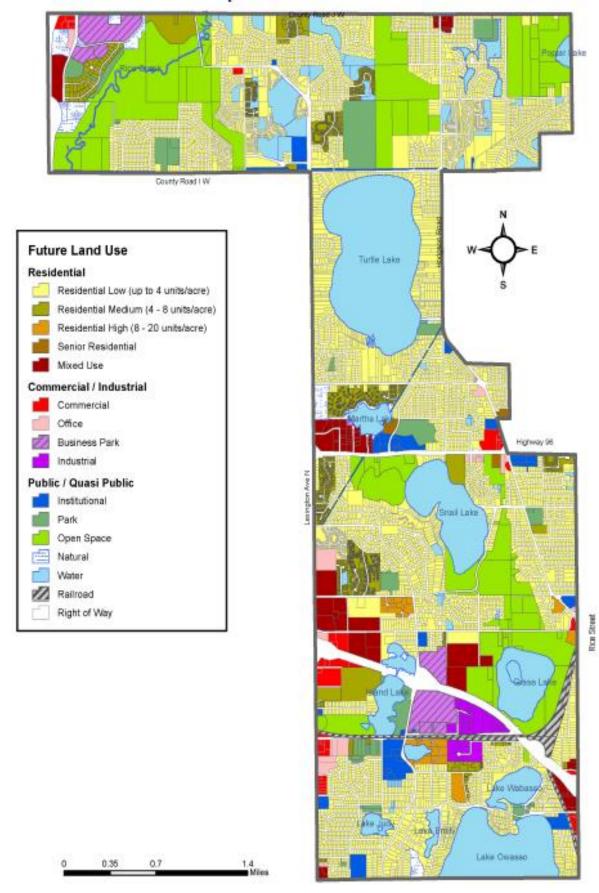
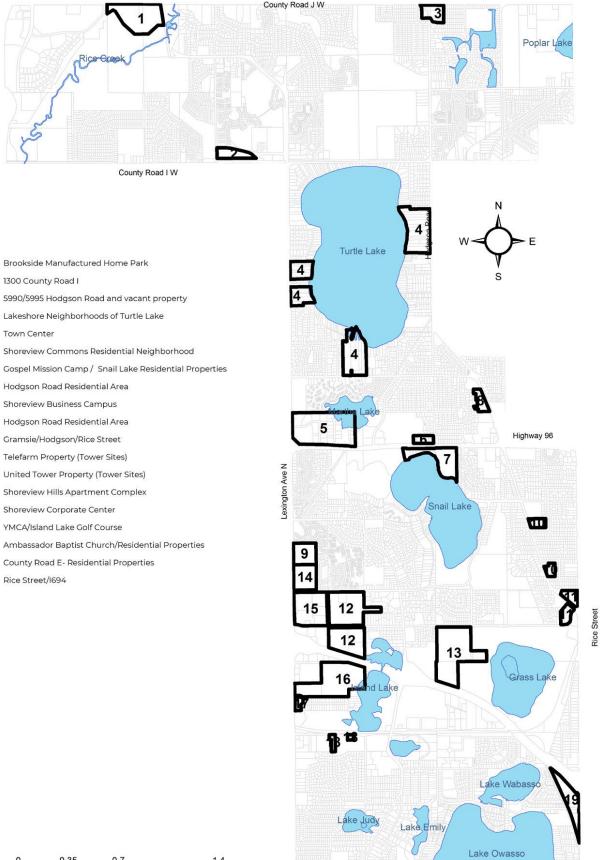


Figure 5. Policy Development Areas (PDAs)



0 0.35 0.7 1.4 Miles

14.

15.

Figure 6. Land Guided for Affordable Housing

69 units	2021-2030 share of regional need for Affordable Housing:
37,900 units	2021-2030 total regional need for Affordable Housing:

	Available Acres	Minimum C Density (units per acre)	Expected % Residential (if mixed use)	Minimum = Units Possible
Mixed Use	14.04	20	60%	169
High Density Residential	1.77	8	100%	15
Total	16			184

Affordable units built since 2021: 0

Sufficient/(insufficient) units possible against share of regional need: 115



- Sufficient/(insufficient) units possible adjusted for affordable units built: 115
- Number of Comp Plan Amendments approved since Comp Plan Update: 0