

C Community Development Committee
Meeting date: May 18, 2009

E Environment Committee
Meeting date: May 26, 2009

ADVISORY INFORMATION

Subject: City of Fridley 2030 Comprehensive Plan Update
Tier II Comprehensive Sewer Plan
Review File No. 20387-1

District(s), Member(s): District 2, Councilmember Tony Pistilli

Policy/Legal Reference: Minnesota Statutes Section §473.175

Staff Prepared/Presented: Victoria Dupre, Principal Reviewer (651-602-1621)
Phyllis Hanson, Local Planning Assistance Manager (651 602-1566)
Kyle Colvin, Engineering Services Asst. Manager (651-602-1151)

Division/Department: Community Development / Planning and Growth Management
Environmental Services/ Engineering Services

Proposed Action

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

Recommendations of the Community Development Committee:

1. Authorize the City of Fridley to put its 2030 Comprehensive Plan Update into effect;
2. Advise the City to:
 - a) Adopt the revised employment forecasts.
 - b) Implement the advisory comments noted in the Review Record for Parks and Transportation.
 - c) Participate in Council activities to monitor redevelopment and infill in developed communities.

Recommendation of the Environment Committee:

Approve the City of Fridley's Tier II Comprehensive Sewer Plan.

ADVISORY COMMENTS

City of Fridley 2030 Comprehensive Plan Update and Tier II Comprehensive Sewer Plan

Review File No. 20387-1– Council Business Item No. 2009-133

The following Advisory Comments are part of the Council action authorizing the City to implement its 2030 Comprehensive Plan Update (“Update”) and approving the City’s Tier II Comprehensive Sewer Plan:

Community Development Committee

1. The Council-adopted *Local Planning Handbook* states that the City must take the following steps:
 - (a) Adopt the Update in final form after considering the Council’s review recommendations; and
 - (b) Submit one electronic copy and one hard copy of the Update to the Council. The electronic copy must be organized as one unified document.A copy of the City Council resolution evidencing final approval of the Update should be submitted to the Council.
2. The Council’s *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, local governments should incorporate those recommended changes into the plan or respond to the Council before “final approval” of the comprehensive plan by the governing body of the local governmental unit. (Minn. Stat. § 473.858, subd. 3)
3. Local governmental units must adopt official controls as described in their adopted comprehensive plans and must submit copies of the official controls to the Council within 30 days after 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 nine months following amendments to comprehensive plans. (Minn. Stat. § 473.865, subd. 3)

Environment Committee

1. The Council-approved Tier II Comprehensive Sewer Plan becomes effective only after the Update also receives final approval by the City’s governing body. After the Update receives final approval by the City and the Tier II Sewer Plan becomes effective, the City may implement its Update to alter, expand or improve its sewage disposal system consistent with the Council-approved Tier II Sewer Plan.
2. A copy of the City Council Resolution adopting its Update, including the Tier II Sewer Plan, must be submitted to the Council.

Background

The City of Fridley (City) is located in Anoka County, bordered by the cities of Spring Lake Park to the north, Mounds View and New Brighton to the east, Columbia Heights to the south, and Minneapolis, Brooklyn Center and Brooklyn Park to the west (Figure 1).

The *2030 Regional Development Framework* (RDF), as adopted by the Metropolitan Council (Council) in January 2004, identified Fridley within the “Developed Community” geographic planning area (Figure 2).

The City submitted its 2030 Comprehensive Plan (Update) to the Council for review to meet the Metropolitan Land Planning Act requirements (Minn. Stat. §473.175) and the Council’s 2005 Systems Statement requirements.

Rationale – Standard of Review & Findings

1. Does the Update conform to Regional Systems Plans?
2. Is the Update consistent with Metropolitan Council policies?
3. Is the Update compatible with plans of adjacent governmental units and plans of affected special districts and school districts?

Conformance with Regional Systems Plans:

- | | |
|---|-----|
| 1. Regional Parks | Yes |
| 2. Transportation including Aviation | Yes |
| 3. Water Resources Management
(Wastewater Services and Surface Water Management) | Yes |

Consistent with Council Policy Requirements:

- | | |
|---|-----|
| 1. Forecasts | Yes |
| 2. Housing | Yes |
| 3. 2030 Regional Development Framework and Land Use | Yes |
| 4. Individual Sewage Treatment Systems (ISTS) Program | Yes |
| 5. Water Supply | Yes |

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

- | | |
|--------------------------------|-----|
| 1. Compatible with other plans | Yes |
|--------------------------------|-----|

Known Support / Opposition

There is no known opposition.

REVIEW RECORD

City of Fridley 2030 Comprehensive Plan Update

STATUTORY AUTHORITY

The Metropolitan Land Planning Act (MLPA) requires local units of government to submit comprehensive plans and plan amendments to the Council for review and comment (Minn. Stat. §473.864, Subd. 2). The Council reviews plans to determine:

- *Conformance with metropolitan system plans,*
- *Consistency with other adopted plans of the Council, and*
- *Compatibility with the Plans of other local jurisdictions in the Metropolitan Area.*

The Council may require a local governmental unit to modify any plan or part thereof if, upon the adoption of findings and a resolution, the Council concludes 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. Each plan shall be submitted to the Council for review and shall be subject to the approval of the Council as to those features affecting the Council's responsibilities as determined by the Council. Any such features disapproved by the Council shall be modified in accordance with the Council's recommendations (Minn. Stat. § 473.513).

CONFORMANCE WITH REGIONAL SYSTEMS

Regional Parks

Parks and Trails

Reviewer: Jan Youngquist, CD – Regional Parks System Planning (651-602-1029)

The Update is in conformance with the *Regional Park's Policy Plan (RPPP)*. The Update acknowledges the regional parks facilities that include Anoka County Riverfront Regional Park, Rice Creek West Regional Trail and Anoka County Mississippi River Regional Trail.

Supplemental information acknowledged the Islands of Peace portion of Anoka County Riverfront Regional Park on both the Future Land Use and the Parks and Trails maps. The revised 2030 Future Land Use Map guides the City-owned parcels in the Anoka County Riverfront Regional Park as "Parks and Recreation." Prior to the revision, the parcels were guided as "Redevelopment." The Economic and Redevelopment Plan also reflects the parks and recreation use. With the supplemental information, dated 3/26/09, the Update conforms to the *RPPP*.

Advisory comment:

- Revise the Update's Implementation Plan Action Steps to acknowledge the "Parks and Recreation" future land use in the statement, *turn back part of a park along the river to the City for the purpose of constructing a fine dining restaurant on the Mississippi River by 2012.*

Transportation

Roads and Transit

Reviewers: Karen Lyons (651-602-1703) and Bob Paddock (651-602-1340), MTS – Systems Planning, Cyndi Harper, Metro Transit (612-349-7723)

The Update is in conformance with the *Transportation Policy Plan (TPP)* requirements and is consistent with transportation policy. The City is served by two Principal Arterials, I-694 and TH 65 (north of I-694), and no major changes are anticipated to county or state roadways. The City expects transit to play a major role in helping to alleviate congestion.

The City is located within transit Market Area II where service options include regular-route locals, all-day expresses, small vehicle circulators, special needs paratransit (ADA, seniors), and ridesharing. Metro Transit provides both express and non-express bus service, and will provide Northstar Commuter Rail service in 2009. The Fridley station will be located near of 61st Avenue and 61st Way, accessed from both sides of the rail tracks at East River Road and University Avenue.

The Update was submitted to the Council for review prior to the Council's final plans that add the Fridley station to the Northstar Corridor. Therefore, the Update has technical data that needs to be updated in the transit section of the final Update.

Advisory comments:

- Indicate that Northstar Commuter Rail will have three Saturday and three Sunday round trips starting late 2009, rather than only occasional weekend service.
- Indicate that the Northstar maintenance and layover facility is at Big Lake, rather than at Elk River.
- Indicate that the Northstar funding is in place and the Fridley station is expected to open along with the rest of the commuter rail line in late 2009.

Aviation

Reviewer: Chauncey Case, MTS – Systems Planning (651-602-1724)

The Update is in conformance with the *Aviation* policies in the TPP. The nearest regional aviation facility is in Blaine.

Water Resources Management

Wastewater Service

Reviewer: Roger Janzig, ES – Engineering Services, (651-602-1119)

The Update is in conformance with the *Water Resources Management Policy Plan (WRMPP)*. The Update summarizes the City's vision for the next 20 years, or to year 2030, and includes growth forecasts that are consistent with the Council's forecasts for population, households, and employment.

The Metropolitan Council Environmental Services currently provides wastewater treatment services to the City. All wastewater generated within the City is conveyed to and treated at the Metropolitan Council's Metropolitan Wastewater Treatment Plant in St. Paul. The City is served by interceptors 7126, 4-FR-440, 4-NS-521, 4-NS-523. The Update forecasts 12,300 sewer households and 26,600 sewer employees by 2030, and provides sanitary flow projections in 10-year increments. It also

provides the rationale for the flow projections and Council staff finds them appropriate for planning for local services. The Metropolitan Disposal System with its planned scheduled improvements has or will have adequate capacity to serve these needs.

Fridley is not currently a community that has been identified as a community impacted by wet weather occurrences. The Update however does include an I/I reduction plan which includes regular televised inspections and maintenance of its sewer mains, and establishing a sump pump inspection program, to minimize clear water entry into the sanitary sewer system.

Tier II Comments

The Update's Tier II Sewer Element is consistent with the Council's requirements for Tier II Comprehensive Sewer Plans for developed communities. The Council's approval of the Tier II Plan becomes effective upon the City's adoption of the Update. At that time, the City may alter, expand or improve its sewage disposal system consistent with the approved Tier II Sewer Plan. The City needs to submit a copy of the City Council Resolution adopting the final Update to the Metropolitan Council for its records.

Surface Water Management

Reviewer: Judy Sventek, ES – Water Resources Assessment (651-602-1156)

The Update is in conformance with the *WRMPP* for local surface water management. Fridley is located in the Rice Creek and Six Cities watersheds. The Board of Water and Soil Resources (BWSR) approved both the Rice Creek Watershed District's and Six Cities Watershed Management Organization's watershed plans in 1997. The City in turn prepared a local surface water management plan (LSWMP) in 2001.

The Update's Surface Water Management Plan is an addendum to the 2001 LSWMP. Council staff reviewed the addendum separate from the Update review process. The Council's review was based on the fact that the City will need to update the entire LSWMP within two years from the dates the Rice Creek Watershed District and Six Cities Watershed Management Organizations adopt their new Watershed Management Plans, scheduled for completion in 2009. Council staff found that the City's addendum to the LSWMP adequately fulfilled the requirements for local surface water management plans.

CONSISTENCY WITH COUNCIL POLICY

Forecasts

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

The Update's forecasts are consistent with the Council's expectations and regional policy. In the Update, the City requests an employment forecast revision based on the assessment that the City's commercial and industrial-guided land will experience only modest employment growth.

The 2000 Census data showed that the City has 26,763 jobs provided by primarily manufacturing. Medtronic, Inc. (over 3,000 employees) and Onan Corp Cummins Power Generation (1,700 employees) are the City's largest employers.

The Council's September 2005 System Statement forecast 30,200 jobs in 2010 and 35,300 jobs by 2030, an increase of 5,100 jobs. On March 6, 2007, the City requested a reduction in job growth by 2030 because of job losses, limitations on redevelopment and other factors. The Council staff agreed to include the following forecast revisions in the Council's review report and proposed action.

Therefore, the Metropolitan Council will officially revise the City’s forecasts, as shown in Table 1, effective on its final action on the Update.

The Council staff advises the City that while the Update includes Council households and population forecasts for systems planning, questions remain as to the market viability of reaching 12,300 households in 2030. Therefore, the Metropolitan Council would consider a forecast revision through a future comprehensive plan amendment. The Council staff estimated 11,200 households in Fridley in 2008.

Table 1: Recommended Forecasts

Forecasts	2000		2010		2020		2030		2010-2030 Chg
	Met Council	City	Met Council	City	Met Council	City	Met Council ¹	City ²	
Population	27,449	27,449	27,000	27,000	26,900	26,900	27,500	27,500	500
Households	11,328	11,328	11,600	11,600	11,900	11,900	12,300	12,300	700
Employment	25,957	25,957	30,200	24,500	33,000	26,000	35,300	26,600	2,100
<i>1 - Council forecasts per 2005 System Statement</i> <i>2 - City forecasts requested in Update</i>									

2030 Regional Development Framework and Land Use

Reviewer: Tori Dupre, CD – Local Planning Assistance (651-602-1621)

The Update is consistent with the 2030 *Regional Development Framework (RDF)* policies for “Developed” communities. The *RDF* states that developed communities need to accommodate growth forecasts through reinvestment at appropriate densities (5-plus units per acre), and target higher density in locations with convenient access to transportation corridors and with adequate sanitary sewer capacity.

The Update addresses these policies, indicating that the City will encourage compact mixed-use redevelopment projects that are linked to transportation systems. The City is about 12 miles from Minneapolis, fully developed and 6,603 acres in size. Existing land uses include residential (34 percent of the total), industrial (18 percent) and transportation right-of-way (15 percent). The right-of-way includes the Burlington Northern Santa Fe Railway in addition to city streets and state highways.

The City’s homes were built primarily between 1960 and 1970 on approximately 10,000 square foot lots. The City’s has approximately 7,000 single family units at 3.6 units per acre, 4,600 multifamily units at 15 units per acre, and an overall density of 5.1 units per acre.

The City forecasts 700 new households between 2010 and 2030. The 2030 Future Land Use assigns all land into one of 12 land use categories (Table 2). The City anticipates decreases in industrial land (-481 acres) and commercial (-135 acres), while increasing redevelopment (+942 acres) between 2010 and 2030.

Table 2. Existing and Future Land Uses

Land Use Category	2007		2030 Plan	
	Acres	Percent of Area	Acres	Percent of Area
Single-family residential	1,953	29.6	1,899	28.8
Multi-family residential	307	4.7	247	3.7
Commercial	362	5.5	227	3.4
Industrial	1,194	18.1	713	10.8
Public/Semi-public	450	6.8	439	6.6
Parks	506	7.7	498	7.5
Roadways (right-of-way)	864	13	801	12.1
Water Features	712	10.8	711	10.8
Railroad	128	1.9	76	1.2
Vacant Land	100	1.5	23	0.4
Vacated Right-of-Way	27	0.4	26	0.4
Redevelopment	N/A	N/A	942	14.3
Total Land Area	6,603	100%	6,603	100%

Source: 2007 GIS Data from GIS Rangers LLC

The City will be expected to meet densities of at least five units an acre through reinvestment, redevelopment, planning and zoning. The Council will be monitoring redevelopment to ensure the Council’s density policies for developed communities are being met and to assess regional development and residential growth goals. Once the method of monitoring is established, the City will be encouraged to participate by providing additional information on redevelopment activities. This program will be similar to the Council’s plat monitoring program for developing areas.

The City estimates that 8.3 acres of the 11-acre Columbia Arena site is developable for residential use. The Update guides redevelopment areas as S2, requiring mixed use and multi-family residential at densities of 5 to 25 units per acre. The Columbia Arena site has a potential for 40 to 200 units on 8.3 acres. The City anticipates that the residential density will be higher, at 10 to 26 units per acre for this site.

Residential Redevelopment	Net Acres	Min	Max	Min Units	Max Units
Columbia Arena	8.3	5	25	41.5	207.5
<i>(at anticipated density)</i>		10	26	83.0	215.8

While the City is developed, Table 3 provides a list of potential redevelopment areas, based on community input, intent to remove blighted or incompatible uses, and provide opportunities for efficient use. The Update emphasizes that when these sites are redeveloped, evaluating each one allows the City to focus limit resources on projects that meet the City’s goals and objectives through the redevelopment master plan process.

The City intends to accommodate its 2030 household forecast through redevelopment, as well as improve environmental and infrastructure problems.

Table 3. Redevelopment Areas

Redevelopment Areas	Acres	Comm	Indus	Public	Residential	Min Units (5/ac)	Max Units (25/ac)
Riverboat	0.9	0.9					
Wy Ind	5.1		4.4		0.7	3.5	17.5
Osborne	9.2	9.2				0	0
Auto	86.9	25.7	59.7		1.5	7.5	37.5
Columbia Arena	11.0				11	55	275
Holly	8.3	8			0.3	1.5	7.5
Moon	3.3	3.3				0	0
Moore Lake	63.4	50.8			12.6	63	315
Northstar TOD	198.0	70.7	53.9	14.2	59.2	296	1480
Hwy 65	1.3	1.3				0	0
South Industrial area	389.5	2.3	358.9		28.3	141.5	707.5
<i>Subtotal (excludes ROW)</i>	<i>776.9</i>	<i>172.2</i>	<i>476.9</i>	<i>14.2</i>	113.6	568	2840
Total Redevelopment	943.0						

Housing

Reviewer: Linda Milashius, CD – Livable Communities (651-602-1541)

The Update is consistent with the Council’s housing policies, and fulfills the affordable housing planning requirements of the Metropolitan Land Planning Act. The Update acknowledges the city’s share of the region’s affordable housing need for 2011 to 2020 which is 116 units.

The City is fully developed with very little vacant developable land available, so opportunities to meet that need will be addressed primarily through redevelopment efforts. Approximately 114 acres of land within designated redevelopment areas have been identified for potential medium to high density housing development, with an anticipated density of 5 to 25 units per acre. The Update provides the implementation tools and programs the City will use to promote opportunities to address its share of the region’s housing need.

The Update provides a list of the programs and resources the City has used and will use to address affordable housing needs, including its continued participation with the Fridley HRA to preserve and maintain existing affordable housing, provide information to residents on local, state and federal resources, and develop new affordable housing units. The HRA has operated the Housing Replacement Program since 1995 for the purpose of revitalizing neighborhoods by removing older, substandard housing stock and replacing it with new housing. The City is a participant in the Livable Communities Local Housing Incentives Program.

Individual Sewage Treatment Systems (ISTS) Program

Reviewer: Jim Larsen, CD – Local Planning Assistance (651-602-1159)

The Update is consistent with the WRMPP for ISTS. The City is fully served by a local sanitary sewer system that ultimately flows into the MCES system. No ISTS remain in operation. City Code requires that all (future) properties be connected to the sanitary sewer system.

Water Supply

Reviewer: Sara Bertelsen Smith, ES – Water Supply Planning, (651-602-1035)

The Update is consistent with the *Water Resources Management Policy Plan* for water supply.

Advisory comment:

- That the City continue to implement conservation programs targeted at reducing residential water use.

Resource Protection

Historic Preservation

Reviewer: Tori Dupre, CD – Local Planning Assistance (651-602-1621)

The Update addresses Historic Preservation as required by the MLPA. Historically, the City originated along a fur trading route to the Red River Valley that became what is now East River Road, and has a number of historic properties that are owned and maintained by Anoka County.

Solar Access Protection

Reviewer: Tori Dupre, CD – Local Planning Assistance (651-602-1621)

The Update addresses Solar Access Protection as required by the MLPA.

Aggregate Resources Protection

Reviewer: Jim Larsen, CD – Local Planning Assistance (651-602-1159)

The Council's Aggregate Resources Inventory does not identify any aggregate resource deposits within the City that have not been either previously mined or fully urbanized.

Mississippi River Critical Area

Reviewer: Tori Dupre, CD – Local Planning Assistance (651-602-1621)

The City is located in three Mississippi River Critical Area corridor districts, but is primarily within the “*Urban Developed District*”. The southern part of the City includes the “*Urban Open Space District*” and small portions of the “*Urban Diversified District*.”

The City made no changes to the Critical Area Plan reviewed by the Metropolitan Council on June 13, 2001 (Business item 2001-259, Review No. 18202-1). This plan addressed both critical area requirements and Mississippi National River and Recreation Area (MNRRA) standards. The Council's 2001 action forwarded the Council's plan review findings and recommendations to the MN Department of Natural Resources for final plan approval, and to the National Park Service (NPS). The Council will forward this information to the MN Department of Natural Resources and NPS staff for their records.

PLAN IMPLEMENTATION

Reviewer: Tori Dupre, CD – Local Planning Assistance (651-602-1621)

The Update includes a description of:

- Capital Improvement Program Yes
- Zoning Code Yes
- Subdivision Code Yes
- ISTS Codes NA
- Housing Implementation Program Yes

The Update includes an implementation chapter, a copy of the City’s CIP, a zoning map and a summary of zoning districts.

COMPATIBILITY WITH PLANS OF ADJACENT GOVERNMENTAL UNITS AND PLANS OF AFFECTED SPECIAL DISTRICTS AND SCHOOL DISTRICTS

The City submitted the 2030 Comprehensive Plan Update to adjacent local units of government, school districts, counties and special districts for comment on February 22, 2008. The City submitted the comments received. No compatibility issues with plans of adjacent governmental units and plans of affected special districts and school districts were indicated.

DOCUMENTS SUBMITTED FOR REVIEW:

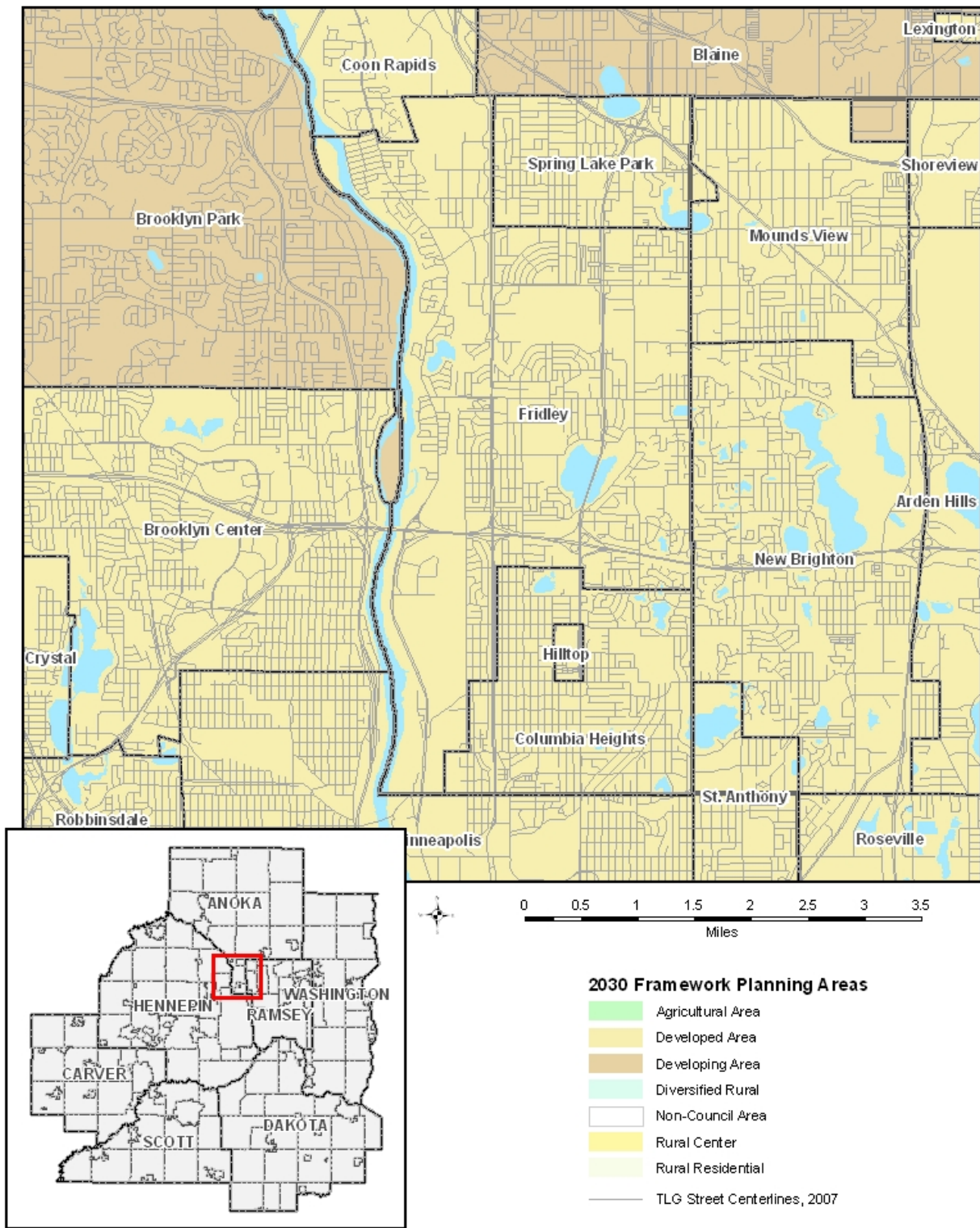
- City of Fridley *Draft Comprehensive Plan*, dated November 7, 2008
- Comprehensive Plan Update Transmittal form
- Resolution No. 2008-55 approving the Fridley 2030 comprehensive plan dated November 10, 2008
- Adjacent Government comments from Six Cities Watershed Management Organization dated October 16, 2008, and from Rice Creek Watershed District dated August 18, 2008
- Supplemental CPU information addressing Housing (*dated March 5, 2009*), Implementation (*dated March 5, 2009*), Land Use (*dated March 9, 2009*), Economic Redevelopment and Parks (*dated March 9, 2009*), Parks and Trails (*dated March 26, 2009*), Sanitary Sewer System (*dated March 23, 2009*), and Transportation (*dated March 23, 2009*).
- Summary of responses from adjacent local governments

ATTACHMENTS

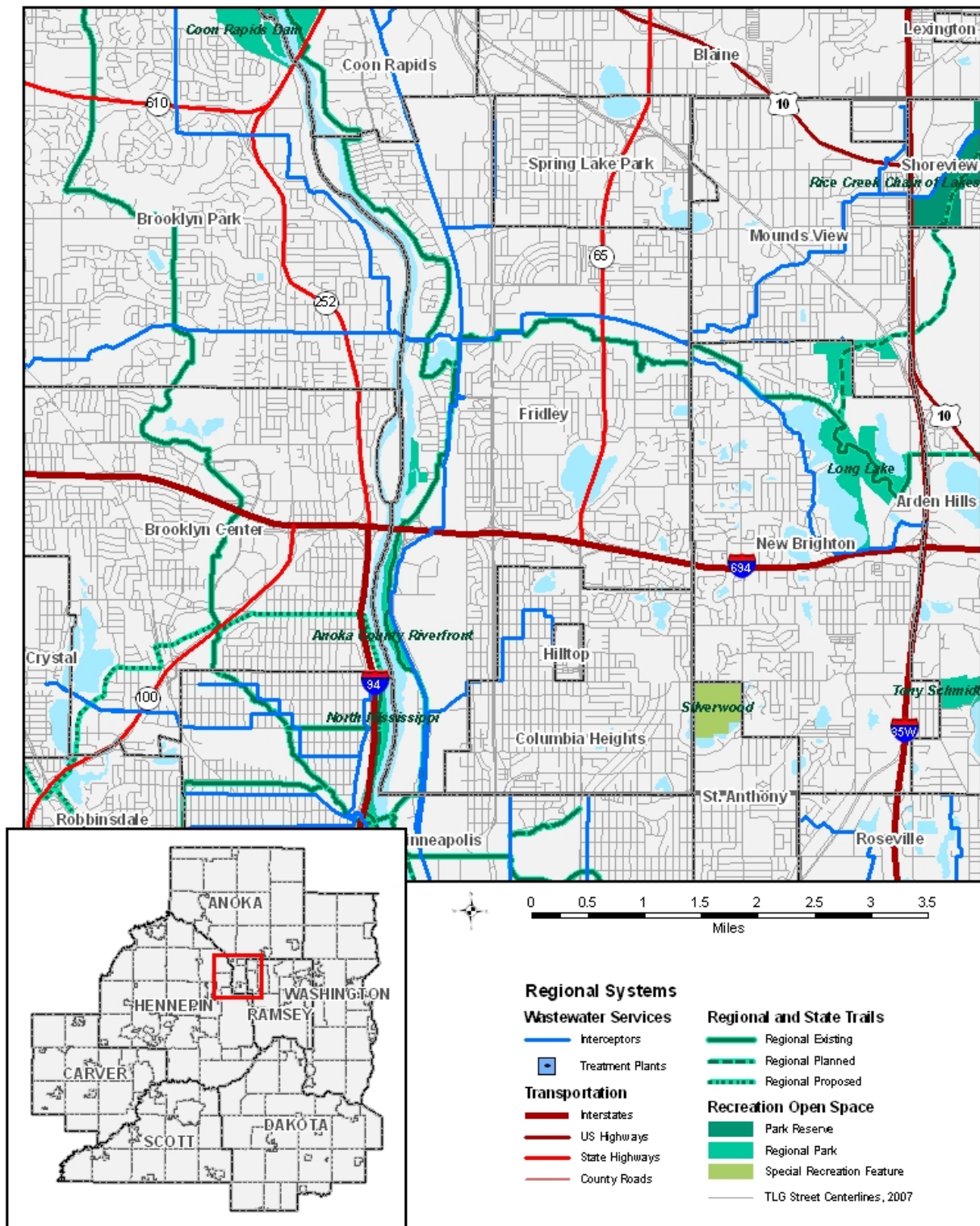
- Figure 1: Location Map Showing Regional Systems
- Figure 2: 2030 Regional Development Framework Planning Areas
- Figure 3: Existing Land Use
- Figure 4: 2030 Planned Land Use

Figure 2. 2030 Regional Development Framework Planning Areas

Fridley



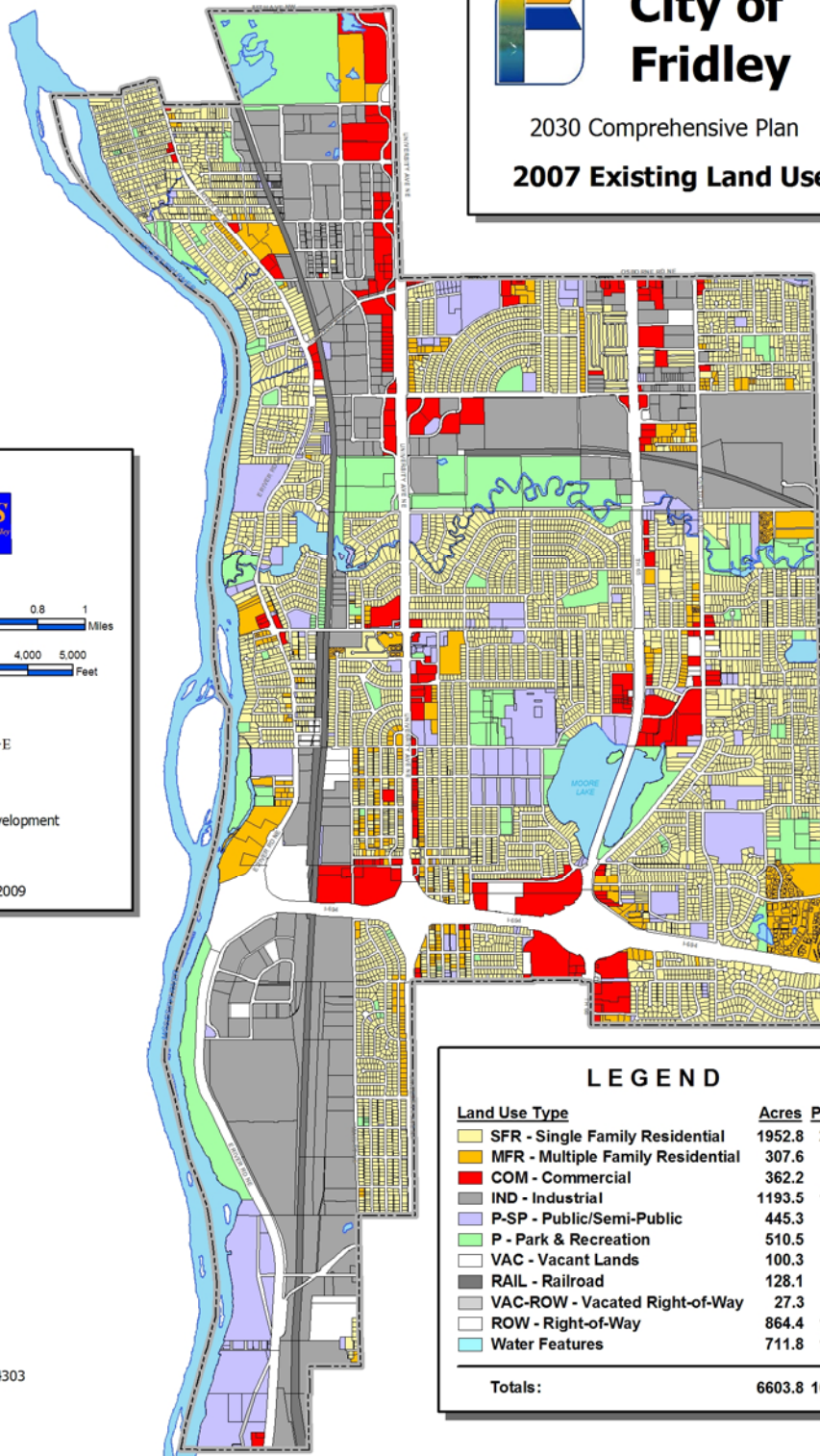

**Figure 1. Location Map Showing Regional Systems
Fridley**






City of Fridley

2030 Comprehensive Plan
2007 Existing Land Use

0 0.2 0.4 0.6 0.8 1 Miles

0 1,000 2,000 3,000 4,000 5,000 Feet



Sources:
Fridley Community Development
Fridley GIS

Map Date: February 23, 2009

LEGEND

Land Use Type	Acres	Percent
SFR - Single Family Residential	1952.8	29.6%
MFR - Multiple Family Residential	307.6	4.7%
COM - Commercial	362.2	5.5%
IND - Industrial	1193.5	18.1%
P-SP - Public/Semi-Public	445.3	6.7%
P - Park & Recreation	510.5	7.7%
VAC - Vacant Lands	100.3	1.5%
RAIL - Railroad	128.1	1.9%
VAC-ROW - Vacated Right-of-Way	27.3	0.4%
ROW - Right-of-Way	864.4	13.1%
Water Features	711.8	10.8%
Totals:	6603.8	100.0%

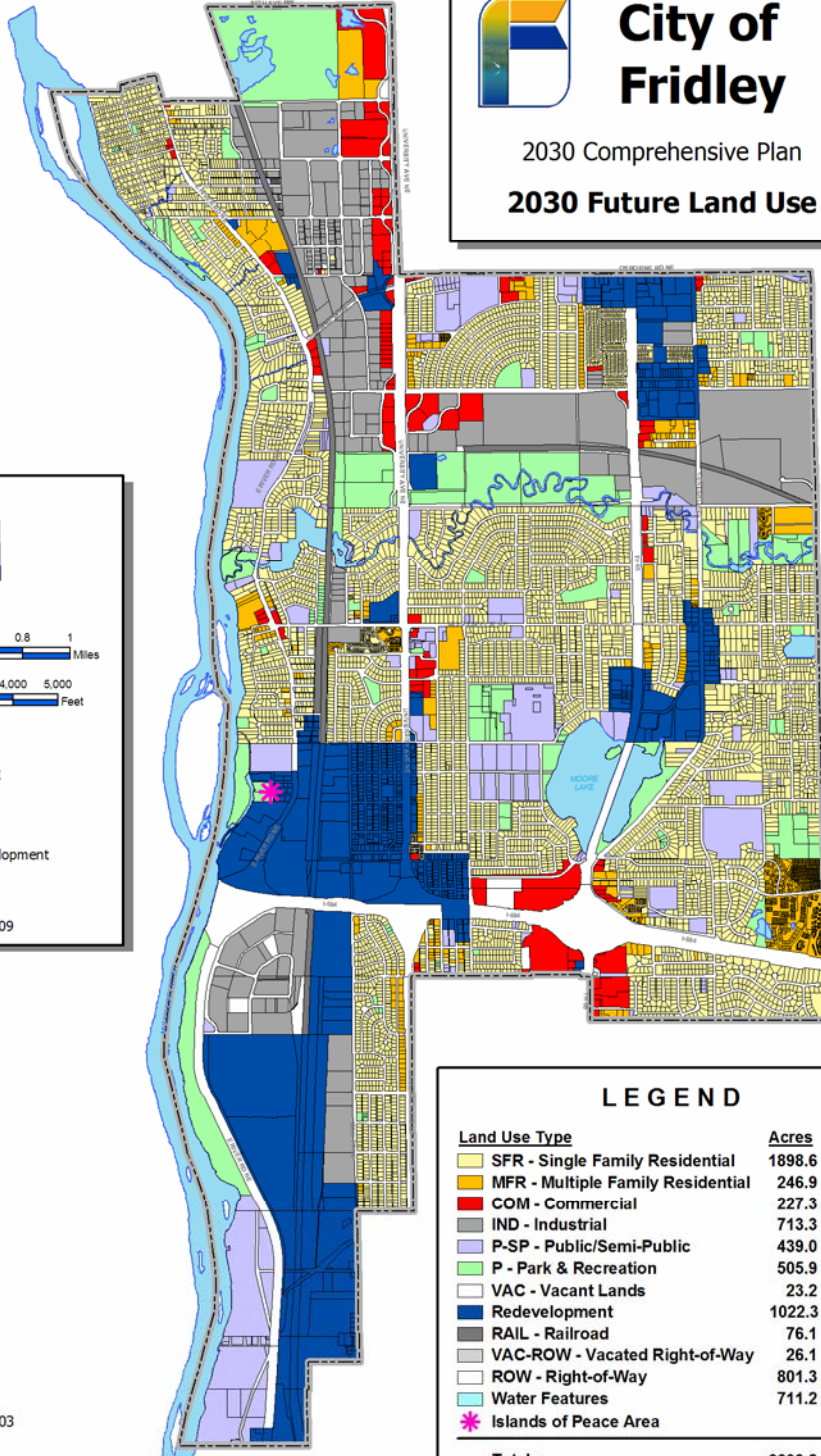
City of Fridley
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City of Fridley

2030 Comprehensive Plan

2030 Future Land Use



0 0.2 0.4 0.6 0.8 1 Miles

0 1,000 2,000 3,000 4,000 5,000 Feet

Sources:
Fridley Community Development
Fridley GIS

Map Date: February 11, 2009

LEGEND

Land Use Type	Acres	Percent
SFR - Single Family Residential	1898.6	28.8%
MFR - Multiple Family Residential	246.9	3.7%
COM - Commercial	227.3	3.4%
IND - Industrial	713.3	10.8%
P-SP - Public/Semi-Public	439.0	6.6%
P - Park & Recreation	505.9	7.6%
VAC - Vacant Lands	23.2	0.4%
Redevelopment	1022.3	15.4%
RAIL - Railroad	76.1	1.2%
VAC-ROW - Vacated Right-of-Way	26.1	0.4%
ROW - Right-of-Way	801.3	12.1%
Water Features	711.2	10.8%
* Islands of Peace Area		
Totals:	6603.8	100.0%

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