Business Item Item: 2009-411

C Community Development Committee

Meeting date: November 16, 2009

Environment Committee Meeting date: November 10, 2009

ADVISORY INFORMATION

Subject: City of Hugo 2030 Comprehensive Plan Update

Review File No. 20478-1

Tier II Comprehensive Sewer Plan

District 11, Council Member Georgeanne Hilker, 651-426-1750 **District(s), Member(s):**

Minnesota Statutes Section 473.175 Policy/Legal Reference:

LisaBeth Barajas, Principal Reviewer, 651-602-1895 **Staff Prepared/Presented:**

> Phyllis Hanson, Local Planning Assistance Manager (651-602-1566) Kyle Colvin, Engineering Services Asst. Manager (651-602-1151)

Community Development / Planning & Growth Management **Division/Department:**

Environmental Services / Engineering Services

Proposed Action

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

Recommendations of the Community Development Committee:

1. Authorize the City of Hugo to put its 2030 Comprehensive Plan Update into effect.

2. Advise the City:

- a. That any ordinances implemented in the Diversified Rural long-term service area that allow densities greater than one unit per 10 acres need to be consistent with the Council Flexible Residential Development Guidelines.
- b. To coordinate with the Council in the City's planning to determine wastewater service feasibility and full build-out for the eastern portion of the City.
- c. To implement the advisory comments for Transportation, Aviation, and Water Supply.

Recommendation of the Environment Committee:

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

ADVISORY COMMENTS

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

Review File No. 20478-1 - Council Business Item No. 2009-411

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.
 - c. Submit to the Council a copy of the City Council resolution evidencing final approval of the Update.
- 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 from the City's governing body. After the Update receives final approval from 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 Hugo is located in northwestern Washington County and is bounded by the City of Forest Lake to the north, the City of Scandia to the northeast, May Township to the east, the City of Grant to the south, White Bear Township to the southwest, the City of Lino Lakes to the west, and the City of Columbus to the northwest. The 2030 Regional Development Framework (RDF) identifies the City as a Developing geographic planning area in the western portion of the City and as a Diversified Rural geographic planning area for the remaining eastern portion of the community (see 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 System Statement requirements.

Rationale

- 1. Does the proposed Update conform to Regional Systems Plans?
- 2. Is the Update consistent with Metropolitan Council policies?
- 3. Is the Update compatible with the 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 (see Wastewater advisory comment)

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 the Plans of Adjacent Governmental Units and Plans of Affected Special Districts and School Districts

1. Compatible with other plans

Yes

Funding

The City has received the first half of a \$20,000 planning grant from the Council to facilitate the completion of the Update. The second half will be payable upon successful completion of the Update planning process.

Known Support / Opposition

There is no known opposition.

REVIEW RECORD

Review of the City of Hugo 2030 Comprehensive Plan Update

STATUTORY AUTHORITY

The Metropolitan Land Planning Act (MLPA) requires local units of government to submit comprehensive plans (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 Update 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 such 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

Reviewer: Jan Youngquist, CD – Regional Parks System Planning, (651-602-1029)
The Update conforms to the 2030 Regional Parks Policy Plan. The Update acknowledges the Hardwood Creek Regional Trail and the planned Glacial Hills Regional Trail.

Transportation

Roads and Transit

Reviewer: Ann Braden, MTS – Systems Planning, (651-602-1705)

The Update conforms to the 2030 Transportation Policy Plan adopted in 2004 and addresses all the applicable transportation and transit requirements of a comprehensive plan.

There are not any metropolitan highways in the City, although the City has a minor arterial connection to I-35E, just west of the City border. TH 61, an "A" Minor Arterial, runs north-south through the City.

The City is outside of the Metropolitan Transit Taxing District. The southwest portion of the City is in Market Area III, and the remaining portion is in Market Area IV. The City is in the area of potential transit service expansion. Service options for Market Area III include peak-only express, small vehicle circulators, midday circulators, special needs paratransit (ADA, seniors), and ridesharing. Services options for Market Area IV include dial-a-ride, volunteer driving programs, and ridesharing. The City is also located along the Rush Line Corridor.

Advisory Comments

The Update includes a "2030" Functional Classification of roads that reflects its future development. The City is advised that it must request changes to its functional

classification system through the TAC-Planning Committee, which is a process outside of the comprehensive plan update effort. This is a priority with regard to the designation of "A" Minor Arterials.

Aviation

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

The Update conforms to the 2030 Transportation Policy Plan and is consistent with Council policy for aviation.

Advisory Comments

The Update needs to update old references in the aviation section. The reference regarding the City being categorized as "other air space" by the Aviation Air Space Policy Area needs to be deleted as it is no longer applicable. The Update also indicates notification requirements as contained in Mn/DOT rules. This needs to be changed to reference the Federal Aviation Administration (FAA) Rules. The City can find the applicable notification requirements and forms on the FAA website.

Water Resources Management

Wastewater Service

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

The Update conforms to the 2030 Water Resources Management Policy Plan (WRMPP). The Update summarizes the City's vision for the next 20 years or to the year 2030. It 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. Wastewater generated within the City is conveyed to and treated at the Metropolitan Council's Metropolitan Wastewater Treatment Plan in St. Paul. The City is provided with wastewater conveyance service through interceptors 7029 and 9708. The Update projects that the City will have 14,400 sewered households and 4,500 sewered employees by 2030. The Metropolitan Disposal System, with its planned scheduled improvements, has or will have adequate capacity to serve the City's growth needs.

The Update provides 2030 sewered forecasts and flow projections by interceptor connection point. The rationale for the 2030 projections is given in the Update and determined to be appropriate for planning for local services. Without input from the City regarding 2010 and 2020 sewered growth forecasts, the Council may not have the necessary information it needs to assess the need for potential future system improvements for Hugo within the 20-year planning period. Projected population, household, and employment forecasts by interceptor connection point, in 5- or 10-year time increments, will likely be needed in future comprehensive plan amendments.

The City is not currently identified by the Council as a community impacted by wet weather occurrences. The Update, however, does include a description of an I/I reduction plan, which includes regular maintenance of the sanitary sewer system. The City prohibits the connection of sum pumps, rain leaders, and passive drain tiles to the sanitary sewer system.

Tier II Comments

The Tier II Sewer Element of the Update has been reviewed against the requirements for Tier II Comprehensive Sewer Plans for Developing communities having both urban reserve and Diversified Rural areas. The Tier II Plan was found to be complete and consistent with Council policies. Upon adoption of the Update by the City, the action of the Council to approve the Tier II Plan becomes effective. At that time, the City may implement its Update to alter, expand, or improve its sewage disposal system consistent

with the approved Tier II Sewer Plan. A copy of the City Council Resolution adopting its Update needs to be submitted to the Metropolitan Council for its records.

Surface Water Management

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

The Update conforms to the WRMPP for local surface water management. The City lies within the Rice Creek, Browns Creek, and Carnelian Marine St. Croix Watersheds, with most of the City within the Rice Creek Watershed District. The Board of Water and Soil Resources (BWSR) approved the Rice Creek Watershed District's watershed management plan in 1997. Browns Creek and Carnelian Marine St. Croix Watershed Districts' latest watershed management plans were approved by BWSR in 2007 and 2000 respectively.

The City prepared a Comprehensive Stormwater Management Plan (CSWMP) in 2002 that was reviewed by Council staff. The City CSWMP and supplemental information in the Update adequately address the Council's concerns related to surface water management in the City.

CONSISTENCY WITH COUNCIL POLICY

Forecasts

Reviewer: Dennis Farmer, CD - Research, (651-602-1552)

The Update is consistent for forecast-related content. The City's System Statement forecasts, which are used in the Update, are shown in Table 1 below.

Table 1. City of Hugo System Statement Forecasts

	2010	2020	2030
Population	19,100	29,000	40,000
Households	7,200	11,100	15,600
Employment	2,600	3,600	4,500

2030 Regional Development Framework and Land Use

Reviewer: Lisa Barajas, CD - Local Planning Assistance, (651-602-1895)

The Update is consistent with the 2030 Regional Development Framework (RDF), which classifies the City partially as a Developing community and partially as a Diversified Rural Area community. The western portion of the community is classified as Developing, with the remaining eastern portion of the community as Diversified Rural. The 2030 Water Resources Management Policy Plan (WRMPP) also designates the entire Diversified Rural portion of the community as a post-2030 Long-Term Wastewater Service Area.

Diversified Rural Area Policies

The RDF directs Diversified Rural areas to accommodate forecasted growth without requiring the provision of regional urban services. In addition, Diversified Rural areas are expected to protect natural resources, to prevent scattered rural residential development, and to adopt conservation subdivision, cluster, or other environmental protection provisions in their ordinances. The RDF indicates that densities in the Diversified Rural Area are not to exceed one unit per 10 acres. In addition, the WRMPP and subsequent Council action regarding densities these areas indicate that communities that adopt ordinances allowing residential densities greater than one unit per 10 acres in the Long-Term Wastewater Service Area (LTSA) must ensure that their ordinances are consistent with the Council's Flexible Development Ordinance Guidelines.

The City focuses its development efforts within the proposed 2030 MUSA in the western portion of the community. The Update establishes policies to continue agricultural uses in the eastern portion of the City; to encourage development that preserves open spaces

and creates connections to natural areas; to participate in county, state, and federal programs to encourage the retention of natural resources in the community; to identify areas suitable for conservation development; to work with land owners, developers, and stakeholders to identify land to contribute to green corridors and stormwater management areas; and to support open space planning and use it to develop tools and techniques to support conservation development and other low impact development alternatives.

As discussed in the Update, the eastern portion of the City is home to an abundance of wetlands and sensitive natural resources and habitats. Consistent with Council policy, the Update guides the land in this portion of the community mostly as Agricultural (maximum of one dwelling unit per 10 acres), with Large Lot Residential in the southern portion of the City (maximum of one dwelling unit per 10 acres). The Agricultural designation is intended to allow the continuation of agricultural uses, hobby farms, horse stables, conservation, and other low density uses. The Large Lot Residential district is intended to be primarily residential in nature, encompassing many existing lots that are less than five acres in size.

Post-2030 Long-Term Wastewater Service Area

The supplemental materials received on August 24, 2009, show revisions removing the allowance of densities up to one unit per 5 acres with a planned unit development (PUD) in those two land use categories. Removing this language establishes a firm maximum density of one unit per 10 acres, consistent with the Council's policies for the Diversified Rural Area and for the 2030 LTSA.

In addition, the City indicates in the August 24, 2009, supplemental materials the need for further study in the eastern portion of the community to determine the feasibility, both in the short- and long-term, of extending regional wastewater services into this area. The City proposes to initiate a study prior to the next 10-year comprehensive plan update that will determine the following:

- Ultimate limits of growth served by wastewater services in the City
- Identify important natural resources for protection
- A full build-out analysis for the City, including eastern Hugo, defining ultimate land use densities and infrastructure needs
- Feasibility for sewer extension to eastern Hugo, including the identification of barriers, costs, and areas that can and cannot be served by sewer

The Council staff supports these efforts and will work with the community in the feasibility study process.

Developing Area Policies

Developing communities are expected to accommodate growth, support centers along centers, and encourage the development of communities where shopping, jobs, and a variety of housing choices co-existing by design. Developing communities are also expected to accommodate sewered residential growth at a net density of 3 to 5 units per acre.

The Update identifies policies to encourage life cycle housing opportunities within the community, to promote opportunities for commercial services and employment, to develop downtown as a pedestrian-friendly town center, to develop solutions to mitigate conflicting land uses, to maximize public service efficiencies, to promote urban development in areas where public infrastructure is available, and to promote development patterns that link different uses and support connections between residential uses and commercial and public uses.

The Update builds off of the City's existing comprehensive plan, maintaining land uses within the existing 2020 MUSA and guiding land within the expanded 2030 MUSA. The City is planning for nearly 3,400 new acres of residential and Mixed Use development. The majority of the residential use (2,511 acres) is designated as Low Density Residential at 2 to 4 units per acre, 635 acres as Medium Density Residential at 3 to 8 units per acre, and 109 acres of High Density Residential at 6 to 12 units per acre. The Mixed Use designation includes 378 net acres, with an estimated 3% allocated toward high density residential uses at a minimum density of 60 units per acre.

Table 2. Density Calculation for Newly Planned Areas

		nsity nge	Net		
Category	Min	Max	Acres	Min Units	Max Units
Low Density Residential	2	4	1646	3292	6584
Medium Density Residential	3	8	379	1137	3032
High Density Residential	6	12	109	654	1308
Mixed Use	60		11	680	680
		OTALS_	2145	5763	11604
Overall Density			2.7	5.4	

The City's guiding is consistent with the Council's policy for sewered residential development, resulting in minimum net density of 2.7 units per acre (see Table 2). At a minimum average density of 3 units per acre, 6,435 new units would be required on the residential land guided in the 2020-2030 MUSA and newly guided land. With the 633 unit credit, however, the City is needs to provide at least 5,801 units at density of 2.7 units per acre. As a participant in the Council's Plat Monitoring Program, with data submitted back to the year 2001, the City's density is calculated as follows (see Table 3):

- Since the year 2001, the City has developed 2,607 units on 657.8 net acres, resulting in a density of 3.96 units per acre.
- Consistent with the Council's Revised MUSA Expansion Guidelines, the City is credited on a 1:1 basis for these developments, resulting in a credit of 633 units.
- The MUSA Guidelines indicate that any remaining undeveloped land within the 2020 MUSA will not figure into the density calculation unless it is being reguided to change land use classification. The City has not reguided land within the 2020 MUSA except for the Mixed Use category.
- The analysis of future density is based on the land area within the 2020-2030 MUSA, which includes the Low, Medium, and High Density Residential land uses, as well as Mixed Use (Table 2) for a total of 2,145 acres of net developable residential land.
- At a minimum average density of 3 units per acre, 6,435 new units would be required on the residential land guided in the 2020-2030 MUSA and newly guided land. With the 633 unit credit, however, the City is needs to provide at least 5,801 units at density of 2.7 units per acre.
- As shown in Table 2, the City is providing for at least 5,763 units at 2.7 units per acre, with the possibility of more than 11,000 units.

Table 3. MUSA Guideline Density Calculation

	Units	Acres	Density
PMP Data 2000-2008	2607	657.8	3.96
Min Units at 3 du/ac	1973.4		
1:1 Credit	633.6		
2020-2030 MUSA Acres		2145	
2020-2030 MUSA @ 3 du/ac	6435	2145	3.0
Required Units after Credit	5801.4		2.7

Advisory Comments

As the City is aware, any ordinances implemented in the Diversified Rural long-term service area that allow densities greater than one unit per 10 acres need to be consistent with the Council Flexible Residential Development Guidelines.

The Council staff supports the City's efforts to determine wastewater service feasibility for the eastern portion of the City and will work with the City in the feasibility study process.

Housing

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

The Update fulfills the housing 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 of 855 units.

To provide opportunities to meet this need, the Update indicates that approximately 635 acres of land will be available for Medium Density residential development, at 3 to 8 units per acre, 101 acres are designated for High Density residential development at 6 to 12 units per acre, and approximately 149 acres are designated as Mixed Use, which will include high density residential development at a density of 6 to 20 units per acres.

The Update provides the implementation tools and programs that the City will use to promote opportunities to address its share of the region's housing need. These include participating in local, state, and federal programs that address lifecycle and affordable housing needs, as well as use of local financial resources and tools such as CDBG funds, TIF, bonding, and tax abatement. The City is an active participant in the Local Housing Incentive program of the Livable Communities Act and received a \$45,000 Opportunity Grant in 2004 to develop the Downtown Redevelopment Plan.

Community and Individual Sewage Treatment Systems (ISTS)

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

The Update is consistent with the WRMPP for ISTS. The Update indicates that there are approximately 1,122 ISTS currently in operation in the City. The City has delegated all ISTS program responsibilities for the installation, inspection, maintenance management, records tracking, and ISTS owner notification to Washington County. The County's program is consistent with MPCA Rules and with Council policy requirements.

Water Supply

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

The Update is complete and the City's water supply plan (WSP) is consistent with the policies of the WRMPP.

Advisory Comment

The Council recommends that the City continue to implement conservation programs targeted at reducing residential water use.

Resource Protection

Historic Preservation

Reviewer: Lisa Barajas, CD - Local Planning Assistance, (651-602-1895)

The Update appropriately addresses historic preservation in the community. The Update indicates that there are not any sites within the community that are listed on the National Register of Historic Places. The City does have an active Hugo Historical Commission that is charged with leading preservation efforts in the community.

Solar Access Protection

Reviewer: Lisa Barajas, CD – Local Planning Assistance, (651-602-1895)

The Update contains a section in the Land Use Chapter addressing Solar Access Protection as required by the MLPA. The Update establishes goals and policies to protect solar access and to promote solar energy systems.

Aggregate Resources Protection

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

The Update contains a section on aggregate resource protection as required by the MLPA. Consistent with *Minnesota Geological Survey Information Circular 46* information, the Update identifies the presence of limited amounts of viable aggregate resources in the City. The City does not currently have any active mining operations, but its Zoning Ordinance allows for future mining operations as a conditional use in the Agricultural Zoning District, subject to certain standards.

PLAN IMPLEMENTATION

Reviewer: Lisa Barajas, CD – Local Planning Assistance, (651-602-1895)
The Update includes a description of and schedule for any necessary changes to:

Capital Improvement Program
 Zoning Code
 Subdivision Code
 ISTS Code
 Housing Implementation Program

The Update contains an Implementation Plan, which describes the official controls and fiscal devices that the City will employ to implement the Update, along with a schedule for the approximate timing of implementation strategies. The Implementation Plan describes specific changes needed to the ordinances and other actions the City needs to take to implement the Update. The Update also contains the existing zoning map and a brief description of the existing zoning districts.

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

The City submitted it's Update to the adjacent communities, county and affected school districts, affected watershed districts, and other special districts for comment on June 9, 2008. There do not appear to be any conflicts with the plans of adjacent and affected jurisdictions.

DOCUMENTS SUBMITTED FOR REVIEW

- City of Hugo 2030 Comprehensive Plan (January 5, 2009)
- Revisions to local surface water management and wastewater in response to Council incomplete letter (February 10, 2009)
- Revisions to local surface water management and wastewater in response to Council incomplete letter (August 24, 2009)

ATTACHMENTS

Figure 1: Location Map with Regional Systems

Figure 2: 2030 Regional Development Framework Planning Areas

Figure 3: Existing and Future Land Use Tables

Figure 4: Existing Land Use

Figure 5: 2030 Future Land Use

Figure 1. Location Map with Regional Systems

City of Hugo

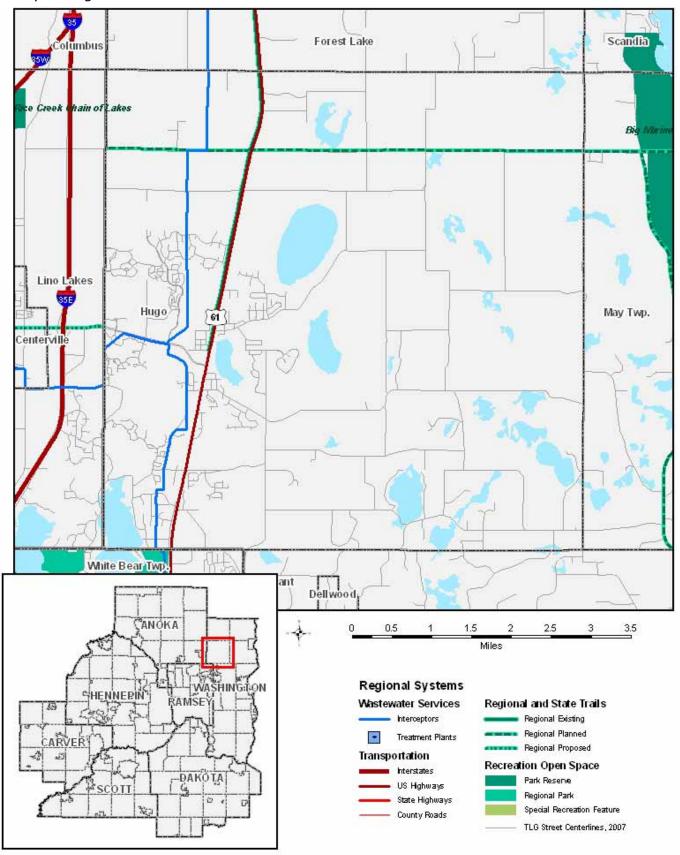


Figure 2. 2030 Regional Development Framework and Planning Areas City of Hugo

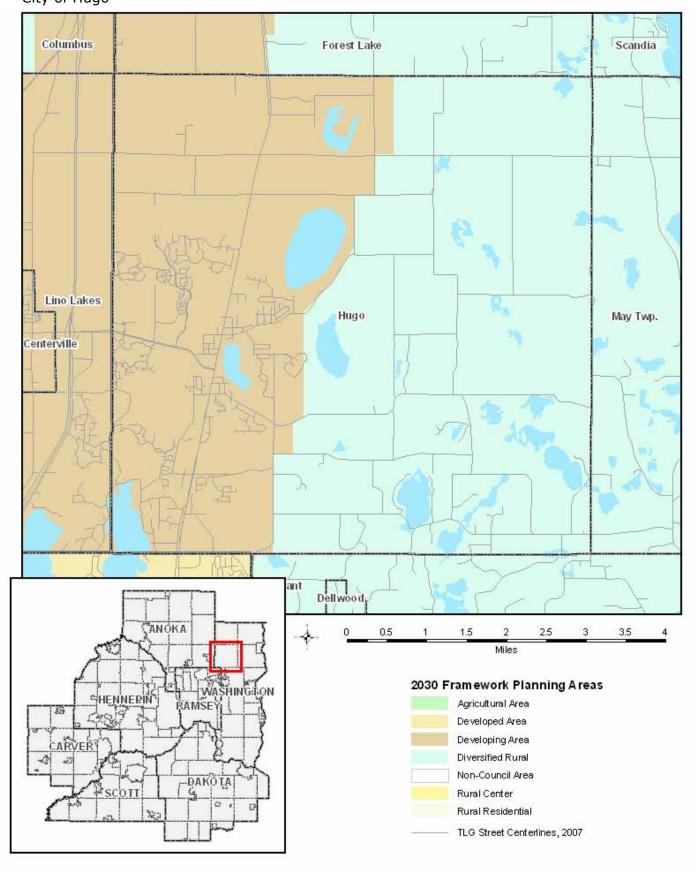


Figure 3. Existing and Future Land Use Tables

City of Hugo

Table 2-21. Existing Land Use in Hugo

Existing Land Use	Acres	Percentage
Undeveloped	11321	49.00
Agricultural	5784	25.04
Single Family Detached	2421	10.48
Water	1904	8.24
Park, Recreational or Preserve	639	2.77
Farmstead	281	1.22
Industrial and Utility	204	0.88
Single Family Attached	123	0.53
Golf Course	122	0.53
Retail, Office and other Commercial	105	0.45
Extractive	81	0.35
Institutional	68	0.29
Manufactured Housing Park	22	0.10
Major Highway	19	0.08
Multifamily	7	0.03
Total	23,102	100.00

Source: Metropolitan Council, 2005 Generalized Land Use Map

Table 4-1. City of Hugo 2030 Land Use Plan

	Gross	Developable	Percent of Total Developable
Land Use	Acres	Acres*	Land in the City
Agriculture	8,180	6,043	45.9%
Large Lot Residential	3,817	3,023	22.3%
Very Low Density			
Residential	467	27	0.2%
Low Density Residential	6,042	2,511	17.2%
Medium Density			
Residential	1,682	635	3.9%
High Density Residential	226	101	0.7%
Mixed Use	647	495	3.5%
Commercial	286	92	0.6%
Business Park	469	363	2.7%
Industrial	494	190	2.1%
Public/Quasi-Public	746	139	0.9%

^{*}Developable Acres = gross acreage - developed land acreage - wetland acreage - floodplain acreage

Figure 4. Existing Land Use

City of Hugo

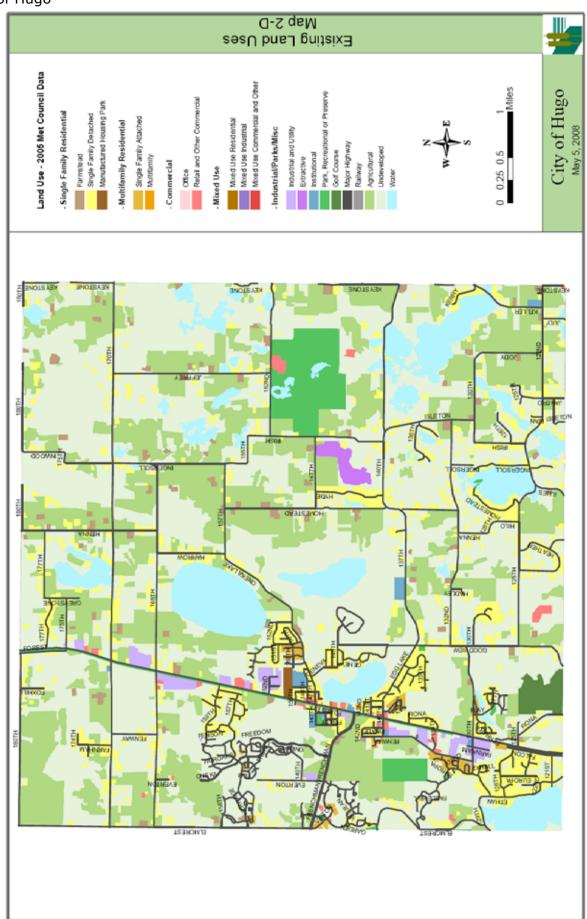


Figure 5. 2030 Future Land Use

City of Hugo

