ADVISORY INFORMATION<br>Date: October 28, 2009<br>Subject: City of St. Paul 2030 Comprehensive Plan Update Tier II Comprehensive Sewer Plan Review File No. 20535-1<br>District(s), Member(s): Districts 13 \& 14, Council Members Rick Aguilar and Kirstin Beach<br>Policy/Legal Reference: Minnesota Statutes Section 473.175<br>Staff Prepared/Presented: Denise P. Engen, Principal Reviewer (651-602-1513) Phyllis Hanson, Local Planning Assistance Manager (651-602-1566)<br>Kyle Colvin, Engineering Services Asst. Manager (651-602-1151)<br>Division/Department: Community Development/Planning \& Growth Mgmt. Environmental Services/ Engineering Services

## Proposed Action

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

## Recommendation of the Community Development Committee:

1. Authorize the City of St. Paul (City) to put its 2030 Comprehensive Plan Update into effect;
2. Adopt the revised forecasts for population, households, and employment for the City, as shown in Table 3 of the Review Record;
3. Forward the Council's Critical Area plan review, findings and recommendations to the Minnesota Department of Natural Resources and National Park Service for their records; and
4. Advise the City to:
a. Participate in Council activities to monitor redevelopment in developed communities.
b. Implement the advisory comments noted in the Review Record for Transportation, Forecasts and Water Supply.

## Recommendation of the Environment Committee:

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

## ADVISORY COMMENTS

## City of St. Paul 2030 Comprehensive Plan Update and Tier II Comprehensive Sewer Plan

Review File No. 20535-1, Council Business Item No. 2009-415
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 St. Paul is one of the two central cities in the region. It is a community of approximately 36,000 acres, or 56 square miles, in area. St. Paul is located in southern Ramsey County, immediately east of Minneapolis. The city is north of Lilydale, Mendota, Mendota Heights, South Saint Paul and West Saint Paul in Dakota County and of Newport in Washington County. It is south of the Ramsey county cities of Roseville, Falcon Heights, and Lauderdale, and south and west of Maplewood. The Mississippi River forms part of the southern and western boundaries of the city, and is one of its principal physical influences.

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

The City of St. Paul (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 proposed 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 Yes
(Wastewater Services and Surface Water Management)
Consistent with Council Policy Requirements:
4. Forecasts Yes
5. Housing Yes
6. 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

The Update is compatible with other plans.

## Known Support / Opposition

There is no known opposition.

# REVIEW RECORD <br> City of St. Paul 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 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

## Parks and Trails

Reviewer: Jan Youngquist, CD - Regional Parks System Planning, (651-602-1029)
The Update is in conformance with the Regional Parks Policy Plan (RPPP). Existing regional parks in St. Paul include seven regional parks and eight regional trails (Table 1). The Update acknowledges these regional parks system elements. It also facilitates long range planning for Battle Creek Regional Park, Lilydale-Island Regional Park, the Trout Brook Regional Trail and the Bruce Vento Regional Trail and Nature Sanctuary by guiding the future land use of inholding parcels as "Major Parks and Open Space."

Table 1: City of St. Paul, Existing Regional Parks

| Regional Parks | Regional Trails |
| :---: | :---: |
| - Battle Creek-Indian Mounds Regional Park <br> - Cherokee Heights Regional Park <br> - Como Regional Park, Zoo \& Conservatory <br> - Hidden Falls-Crosby Farm Regional Park <br> - Lilydale-Harriet Island Regional Park <br> - Mississippi Gorge Regional Park <br> - Phalen Regional Park | - Bruce Vento Regional Trail <br> - Como-Phalen Regional Trail (proposed) <br> - Lexington Parkway Regional Trail (proposed) <br> - Mississippi River-Como Regional Trail (proposed) <br> - Samuel Morgan Regional Trail <br> - St. Paul Mississippi River Regional Trail (proposed) <br> - Summit Avenue Regional Trail <br> - Trout Brook Regional Trail |

The Update indicates that the City might seek regional status for Highland Park and for the proposed trails along Ayd Mill Road and Johnson Parkway. The City may request that the park and proposed trails be evaluated for inclusion into the regional parks system during the Metropolitan Council's update of its Regional Parks Policy Plan. Additions to the regional parks system are subject to approval by the Metropolitan Council.

## TRANSPORTATION

## Roads and Transit

Reviewers: Karen Lyons (651-602-1703) and Bob Paddock (651-602-1340), MTS Systems Planning; Steve Mahowald - Metro Transit (612-349-7775)

The Update is in conformance with the Transportation Policy Plan (TPP) adopted in 2004, and addresses all the applicable transportation and transit requirements of a comprehensive plan. The Update highlights Central Corridor Light Rail Transit (LRT) and transit station area land use plans and the city's bike/walk pilot projects. It stresses the importance of a balanced transportation system, the importance of good pedestrian connections to the proposed LRT stations, and the need for adequate funding of bridge and road maintenance and repavement projects.
The Update is proactive regarding LRT/transit, pedestrian/bicycle infrastructure and providing transit supportive land uses. The Update presents a strong commitment to direct compact, mixed use, pedestrian-friendly development to corridors and neighborhood centers throughout the city of St Paul as well as around the Central Corridor LRT station areas. This commitment is supported by policy and implementation tools, including a number of policies supporting an effective, efficient transportation system. The Update identifies specific projects that need adequate and reliable transportation funding (including the Lafayette Bridge).
Transit. St. Paul is entirely within Transit Market Areas I and II, where the highest levels of transit service are available. Service options for Market Area I include regular-route locals, all-day expresses, special needs paratransit (ADA, seniors), and ridesharing. Market Area II services include small vehicle circulators, in addition to the aforementioned services.

Traffic Analysis Zones (TAZs). The City's TAZ allocation table and map are in conformance with the Metropolitan Council requirements. The TAZ table shows minor variations in totals for forecasted households, population and employment. These variations are insignificant for transportation planning purposes.

Roadways. St Paul is served by the following principal arterials: I-94, TH 280, I-35E, TH 52, and Shepard Road. The City is also served by numerous minor arterials that provide east/west and north/south connections and which relieve traffic from principal arterials.

## Advisory comment:

- The City's functional classification map contains discrepancies within the Minor Arterial System relative to the system adopted by the Transportation Advisory Board (TAB). The City should formally request these changes through the TACPlanning Committee, which is a process outside the Comprehensive Plan Review update effort.


## Aviation

Reviewer: Chauncey Case, MTS - Systems Planning, (651-602-1724)
The Update is in conformance with the Aviation policies of the Transportation Policy Plan and is consistent with Council aviation policy.

## Water Resources Management

## Wastewater Service

Reviewer: Kyle Colvin, ES - Engineering Services, (651-602-1151)
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. It includes growth forecasts that are consistent with the Council's recommended forecasts for population, households, and employment.

Current wastewater treatment services are provided to the City by the Metropolitan Council Environmental Services. Wastewater generated within the City is conveyed to and treated at the Metropolitan Council's Metropolitan Wastewater Treatment Plant located in St. Paul. The City's wastewater conveyance service is provided by multiple Council Interceptors, including 1-MS-100. The Update projects it will have 133,000 sewered households and 220,600 sewered employees by 2030. The Metropolitan Disposal System with its scheduled improvements has or will have adequate capacity to serve the City's growth needs.
The Update provides sanitary flow projections in 10-year increments. The rationale for the projections is given in the Update, and is determined appropriate for planning for local services.
St. Paul has been identified as a community impacted by wet weather occurrences. The City is currently on the Council's list of communities having an I/I reduction goal. The City has committed to mitigate excessive I/I at levels at least equal to the Council's Surcharge amount. At the request of the City, and as allowed under the Council's I/I Program, the City's surcharge is currently capped at a level equal to $25 \%$ of their annual Municipal Wastewater Charge. Remaining portions of the City's annual surcharge is not eliminated but deferred to later years, thus extending the time period in which the City has to achieve their I/I reduction goal. The City's I/I mitigation plan completion date is currently at December 31, 2015.

Each year the City submits a work plan to the MCES through the Regional I/I Mitigation Program. This work plan details specific projects the City will be undertaking to address I/I in the coming year. The Update includes a description of an I/I reduction plan, which includes televised inspection and maintenance of 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 developed communities. It was found to be complete and consistent with Council polices. 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 the Tier II Element 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 is in conformance with the WRMPP for local surface water management. St. Paul lies within the Capitol Region, Lower Mississippi River, Mississippi River, and Ramsey Washington Metro watersheds. The most recent Capitol Region Watershed District, Lower Mississippi River Watershed Management Organization, Mississippi River Watershed Management Organization, and Ramsey Washington Metro Watershed District watershed
management plans were approved by the Board of Water and Soil Resources in 2000, 2001, 2000, and 2007, respectively. The City prepared a Local Surface Water Management Plan (LSWMP) in 2006 that was reviewed separately by Council staff.

The Update includes a Water Resources Management section, which references the 2006 LSWMP and expands on the goals and policies in the 2006 LSWMP. The LSWMP was found to be consistent with Minnesota Rules Chapter 8410, Council policy and the Council's Water Resource Management Policy Plan. The LSWMP was also found to provide an overall framework for the City to manage successfully its water resources

## CONSISTENCY WITH COUNCIL POLICY

## Forecasts

Reviewer: Dennis Farmer, CD - Research, (651-602-1552)
Forecasts in the Update are consistent with regional policy. Forecast totals used within the Update are consistent with Metropolitan Council forecasts for St. Paul (Table 2). However, within these totals, the forecasts for sanitary sewered households, population and employment within the Update differ slightly from Council forecasts. Metropolitan Council forecasts assume that all households and employment within St. Paul will be sewered by 2010; however, in the Update the city projects that some households and employees will remain on individual sewage treatment systems until 2025 (Table 3).
Council staff recommends that the Council accept the City's preferred forecasts for sanitary sewered and unsewered population, households and employment.

Table 2: City of St. Paul, Metropolitan Council Forecasts

|  |  | 2010 | 2020 | 2030 |
| :---: | :---: | :---: | :---: | :---: |
| Population | Sewered | 305,000 | 320,000 | 331,000 |
|  | Unsewered | 0 | 0 | 0 |
|  | Total | 305,000 | 320,000 | 331,000 |
|  | Sewered | 120,000 | 127,000 | 133,000 |
| Households | Unsewered | 0 | 0 | 0 |
|  | Total | 120,000 | 127,000 | 133,000 |
| Employment | Sewered | 196,600 | 210,000 | 220,600 |
|  | Unsewered | 0 | 0 | 0 |
|  | Total | 196,600 | 210,000 | 220,600 |

Table 3: City of St. Paul, Recommended Forecast Revisions

|  |  | 2010 | 2020 | 2030 |
| :---: | :---: | :---: | :---: | :---: |
| Population | Sewered | 304,700 | 319,700 | 331,000 |
|  | Unsewered | 300 | 300 | 0 |
|  | Total | 305,000 | 320,000 | 331,000 |
|  | Sewered | 119,880 | 126,880 | 133,000 |
| Households | Unsewered | 120 | 120 | 0 |
|  | Total | 120,000 | 127,000 | 133,000 |
| Employment | Sewered | 196,580 | 209,980 | 220,600 |
|  | Unsewered | 20 | 20 | 0 |
|  | Total | 196,600 | 210,000 | 220,600 |

Advisory comment:

- The transportation analysis zones (TAZs) totals in the Update for years 2010 and 2020 differ slightly from Council forecasts (between 2-4\%). The 2030 TAZ
forecasts in the Update are consistent with Council forecasts. In the final version of the Update, which the City submits to the Metropolitan Council, the total TAZ allocation of 2010 and 2020 forecasts need to equal Metropolitan Council forecasts.


## 2030 Regional Development Framework and Land Use

Reviewer: Denise Engen, CD - Local Planning Assistance, (651-602-1513)

## Regional Development Framework

The Update is consistent with the Regional Development Framework (RDF) policies for "developed communities". The RDF contains goals and policies for "developed communities" such as St. Paul. It states that developed communities need to "accommodate growth forecasts through reinvestment at appropriate densities (5 units plus in developed areas and target higher density in locations with convenient access to transportation corridors and with adequate sewer capacity)."

Therefore, St. Paul 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. St. Paul will be encouraged to participate by providing additional information on the City's redevelopment activities. This program will be similar to the Council's existing plat monitoring program.

## Land Use and Density Analysis

The City has guided sufficient residential land and at the appropriate densities to accommodate the forecasts presented in the Update. St. Paul is 35,931 acres in size. Table 3 (below) and Figure 3 illustrate existing land use patterns, using 2005 as a frame of reference. The Update shows that in 2005, the City's existing development was primarily Low Density Residential at 14,854 acres (41.3\%), and there were 1,711 acres of Medium-High Density Residential land use (4.8\%). As of 2005, there were also 2,283 acres (6.4\%) of Mixed Use and Commercial land, and 5,146 acres (14.3\%) used for Parks and Open Space. The Update reports 1,570 acres (4.4\%) of Undeveloped Iand.

Table 3: City of St. Paul, Existing Land Use, 2005

| Land Use Category | Acres |
| :--- | ---: |
| Low Density Residential | 14,854 |
| Medium-High Density Residential | 1,711 |
| Mixed Use \& Commercial | 2,283 |
| Industrial | 2,807 |
| Institutional | 2,480 |
| Parks and Open Space | 5,146 |
| Transportation | 2,115 |
| Airport | 541 |
| Water | 2,423 |
| Undeveloped | 1,570 |
| Total | $\mathbf{3 5 , 9 3 1}$ |

Table 4: City of St. Paul, Land Use Table in 5-Year Stages

| Within Urban Service Area | Allowed Density Range Housing Units/Acre |  | $\begin{gathered} \hline \text { Existing } \\ (2000) \end{gathered}$ | 2010 | 2015 | 2020 | 2025 | 2030 | $\begin{array}{c\|} \hline \text { Change } \\ 2000-2030 \\ \hline \end{array}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Minimum | Maximum |  |  |  |  |  |  |  |
| Residential Land Uses ${ }^{* * *}$ |  |  |  |  |  |  |  |  |  |
| Established Neighborhood | 3 | 20 | 17503 | 17467 | 17467 | 17465 | 17465 | 17465 | -38 |
| Residential Corridor | 4 | 30 | 1638 | 1632 | 1615 | 1581 | 1552 | 1523 | -115 |
| Mixed Use Corridor (Include NCs) | 30 | 150 | 1818 | 1898 | 2139 | 2621 | 3022 | 3423 | 1605 |
| Downtown | 35 | 200 | 283 | 285 | 292 | 305 | 315 | 326 | 43 |
| C/I Land Uses | Est. Employees/Acre |  |  |  |  |  |  |  |  |
| Commercial/Office* | 48 |  | 2101 | 2183 | 2431 | 2925 | 3337 | 3749 | 1648 |
| Industria/Utility | 18 |  | 3135 | 3127 | 3127 | 3127 | 3127 | 3127 | -8 |
| Public/Semi Public Land Uses |  |  |  |  |  |  |  |  |  |
| Major Institutional** | 67 |  | 630 | 631 | 634 | 640 | 645 | 650 | 20 |
| Major Parks |  |  | 3940 | 3990 | 3990 | 3992 | 3992 | 3992 | 52 |
| Transportation |  |  | 2500 | 2500 | 2500 | 2500 | 2500 | 2500 | 0 |
| Subtotal Sewered |  |  |  |  |  |  |  |  |  |
| Outside Urban Service Area | Minimum lot size | Maximum lot size | $\begin{aligned} & \text { Existing } \\ & (2000) \end{aligned}$ | 2010 | 2015 | 2020 | 2025 | 2030 | $\begin{array}{c\|} \hline \text { Change } \\ 2000-2030 \end{array}$ |
| Rural Residential 2.5 acres or less |  |  |  |  |  |  |  |  | 0 |
| Rural Residential 2.5-10 acres |  |  |  |  |  |  |  |  | 0 |
| Rural Residential 10-40 acres |  |  |  |  |  |  |  |  | 0 |
| Agricultural 40+ acres |  |  |  |  |  |  |  |  | 0 |
| Subtotal Unsewered |  |  |  |  |  |  |  |  |  |
| Undeveloped |  |  | 2059 | 1981 | 1747 | 1280 | 890 | 500 | -1559 |
| Wetlands | -- | -- | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Open Water, Rivers and Streams | -- | -- | 3197 | 3197 | 3197 | 3197 | 3197 | 3197 | 0 |
| Total |  |  | 36,703 |  |  |  |  | 36,703 | 0 |

.-Major Institutional also represents a portion of projected job growth.
"- This table represents land use guiding and not total acres of actual (re-)development.
"'"See "Saint Paul Residential Uses by 2030 Land Use Category" for actual predicted (re-)development in Saint Paul (ie. how it will meet its 2030 household forecast).

The City's future land use map places all land in the City into one of nine land use categories and describes the character of each category (Figure 4). The City anticipates some change to its land use pattern from 2010 to 2030 (Table 4). In particular, the land use plan shows a decrease in Residential Corridor (-115 acres) and growth in Mixed Use Corridor (+1,605 acres).

The Metropolitan Council estimates that the city had approximately 115,088 households in 2008. The City has proposed forecasts showing that it will grow to 133,000 households by 2030. This leaves a growth of approximately 17,912 households until 2030.

In a developed community such as St. Paul, growth will occur mainly through redevelopment. The Update indicates that most of the City's growth will occur along specific, identified corridors and "opportunity sites" (Figure 5). Analysis of information provided by the City on October 2, 2009 shows that the future land use plan could accommodate a range of approximately 4,234 to 22,487 new housing units (Table 5). At the high end of this range, these areas could accommodate the 17,912 units necessary to reach the City's 2030 forecasts for households. The lowest minimum density for new development is approximately 30 units per acre, which is above the minimum density needed to fulfill RDF policy calling for redevelopment densities of five plus units per acre in Developed Communities.

Table 5: Redevelopment/Infill by Land Use Category

| 2010-2030 | Redevelopment/ Infill by Land Use Category |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Land Use Category | Density Range <br> Min Max |  | $\begin{aligned} & 2030 \\ & \text { Acres } \end{aligned}$ | $\begin{gathered} 2010- \\ 2030 \end{gathered}$ | Percent Residential | Gross Res. Acres | Percent to | Net Acres | Minimum Development Scenario | Maximum Development Scenario |
| Established Neighborhood | 3 | 20 | 17,465 | -2 | 86\% | -1.7 | 11.8\% | -0.2 | -4 | -1 |
| Residential Corridor | 4 | 30 | 1,523 | -109 | 76\% | -82.8 | 10.1\% | -8.4 | -251 | -33 |
| Mixed Use Corridor | 30 | 150 | 3,423 | 1,525 | 72\% | 1,098.0 | 13.3\% | 146.0 | 4,381 | 21,905 |
| Downtown | 35 | 200 | 326 | 41 | 75\% | 30.8 | 10.0\% | 3.1 | 108 | 615 |
|  | TOTALS |  | 22,737 |  |  | 1,044 |  | 140.7 | 4,234 | 22,487 |
|  |  |  |  |  |  | Infill Areas | Density ( | units/acre) | 30.1 | 159.8 |

## Housing

Reviewer: Linda Milashius, CD - Livable Communities, (651-602-1541)
The Update is consistent with the Council's Housing requirements. The housing element 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 2011-2020, which is 2,625 units. To provide opportunities to meet this need, the Update identifies specific sites within the city that have the potential to redevelop. This includes approximately 1,525 acres of land designated as Mixed Use Corridor, with densities ranging from 30 to 150 units per acre, and 41 acres within the Downtown, with densities ranging from 35 to 200 units per acre. This will provide opportunities for the City to address its affordable housing needs.

The Update provides an extensive list of the implementation tools and programs the city will use to promote opportunities to address its share of the region's housing need. The Update indicates the city will strive to accommodate a range of housing needs, promote housing development of various types in the major housing sites throughout the city, maintain the quality of existing housing and residential neighborhoods, and collaborate with partners at the regional, state and federal levels to pursue solutions to the city's housing issues. The Update identifies a list of fiscal devices the city will use to stimulate
and assist residential development, and to continue housing redevelopment, preservation and assistance for city residents. St. Paul is an active participant in the Livable
Communities Local Housing Incentives Account program, and has applied for and received nearly $\$ 40$ million in grants through the LCA program.

## Individual Sewage Treatment Systems (ISTS) Program

Reviewer: Jim Larsen, CD - Local Planning Assistance, (651-602-1159)
The Update is consistent with the Water Resources Management Policy Plan for ISTS. The Update indicates that there are approximately 120 ISTS in operation in the City. Figure S in Appendix E of the Update's Water Resources Management (WRM) chapter shows the location of these systems. A description of the City's ISTS program and copy of ISTS Code Chapter 50 are included in Appendix J of the WRM plan chapter. The City requires all ISTS to be inspected and pumped biennially. The City has a goal of eliminating all ISTS by 2025. The City's program is consistent with MPCA Rules and Council policy requirements.

## Water Supply

Reviewer: Sara Bertelsen Smith, ES - Water Supply Planning, (651-602-1035)
The Update is consistent with the WRMPP for water supply.
Advisory comment:

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


## Resource Protection

## 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. The Update indicates that there are no available aggregate resources in the City. The Council's aggregate resources inventory - Minnesota Geological Survey Information Circular 46, does identify the presence of potential aggregate resource deposits within the City. However, the resources are quite dispersed and, since the City is fully developed, it is unlikely that any of the deposits will be mined.

## Historic Preservation

Reviewer: Denise Engen, CD - Local Planning Assistance, (651-602-1513)
The Update contains a section on Historic Preservation, (Chapter 5: Historic Preservation Plan), as required by the MLPA.

## Mississippi River Critical Area Review

Reviewer: Tori Dupre, CD - Local Planning Assistance (651-602-1621)
St. Paul is located within the Mississippi River Critical Area corridor where both state Critical Area act requirements and federal Mississippi National River and Recreation Area (MNRRA) standards apply. From west to east, the Critical Area river districts are Urban Open Space and Urban Diversified.

The Update indicates that the current Mississippi River Corridor Plan, adopted in 2002, governs land use in the river corridor. The Metropolitan Council reviewed the City's critical area plan on August 22, 2001 (Business item 2001-294) and found that it
addressed both state requirements and federal standards. The Council's action forwarded the review findings and recommendations to the MN Department of Natural Resources (DNR), which has final approval authority, and to the National Park Service (NPS). The Council will forward the review findings for the City's 2030 Update to the DNR and to the NPS for their records.

## Solar Access Protection

Reviewer: Denise Engen, CD - Local Planning Assistance, (651-602-1513)
The Update contains a section addressing Solar Access Protection as required by the MLPA.

## PLAN IMPLEMENTATION

Reviewer: Denise Engen, CD - Local Planning Assistance, (651-602-1513)
The Update includes a description of:

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

The Update includes a discussion of the policy framework and tools that will be used to implement the City's comprehensive plan. This includes a discussion of the regional framework, as provided by the state statute and Metropolitan Council policy, and City policies, programs, budgetary and regulatory tools. These tools include the City's Zoning Ordinance, Subdivision Ordinance, Heritage Preservation Regulations, fiscal tools and other official controls such as the Critical Area Plan, Housing Implementation program and Capital Improvement Program.

The Update also discusses implementation tools such as small area plans and the site plan review process. In addition, the Update (Appendix 5) includes a chart of the City's Capital Improvement Program and a zoning map and description of the City's zoning districts (Appendix 6).

## 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 October 6, 2008. No compatibility issues with plans of adjacent governmental units and plans of affected special districts and school districts were indicated.

## DOCUMENTS SUBMITTED FOR REVIEW:

- St. Paul Comprehensive Plan, received April 3, 2009.
- Adjacent Community comments, received April 15, 2009.
- Response to April 24, 2009 incomplete letter with supplemental information, received August 10, 2009.
- Supplemental Information: Fort Road Development Plan Summary, received July 24, 2009.
- Response to August 11, 2009 incomplete letter with supplemental information, received October 2, 2009.
- Revised versions of Figure 1.2 and Figure 1.2a, received October 7 and 8, 2009, respectively.
- Supplemental information for Regional Parks, received October 8, 2009.


## ATTACHMENTS

Figure 1: Location Map Showing Regional Systems
Figure 2: 2030 Regional Development Framework Planning Areas
Figure 3: Existing Land Use, 2005
Figure 4. 2030 Future Land Use Plan (Generalized)
Figure 5: Areas of Change

Figure 1. Location Map Showing Regional Systems
St. Paul


Figure 2. 2030 Regional Development Framework Planning Areas
St. Paul


Figure 4. 2030 Future Land Use (Generalized) City of St. Paul
Fig. 1.2. Generalized 2030 Land Uses*












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