Community Development Committee Meeting date: January 19, 2009

Environment Committee

Meeting date: January 12, 2009

ADVISORY INFORMATION	
Date:	January 6, 2010
Subject:	City of Mendota 2030 Comprehensive Plan Update Tier II Comprehensive Sewer Plan Review File No. 20574-1
District(s), Member(s):	District 13, Councilmember Rick Aguilar
Policy/Legal Reference:	Minnesota Statutes Section 473.175
Staff Prepared/Presented:	Denise P. Engen, Principal Reviewer (651-602-1513) 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 adopts the attached Advisory Comments and Review Record, and the following:

Recommendation of the Community Development Committee:

- 1. Authorize the City of Mendota to put its 2030 Comprehensive Plan Update into effect;
- 2. 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 *Parks, Wastewater* and *Forecasts*.

Recommendation of the Environment Committee:

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

ADVISORY COMMENTS

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

Review File No. 20574-1, Council Business Item No. 2010-22

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 Mendota (City) is a small first-ring suburban community of approximately 193 acres, located in Dakota County. It is rivers edge community, located south of St. Paul on the Mississippi river, and east of Fort Snelling across the Minnesota river. It is bordered on the northeast by the city of Lilydale, and to the east and south by the city of Mendota Heights, (Figure 1).

The 2030 Regional Development Framework (RDF), as adopted by the Metropolitan Council (Council) in January 2004, identified Mendota as 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 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:

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

3.

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

Compatible with other plans

Yes

Known Support / Opposition

There is no known opposition.

REVIEW RECORD City of Mendota 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 *2030 Regional Parks Policy Plan,* as it acknowledges the Big Rivers Regional Trail (Trail). The Update proposes a new trailhead and new local trail connections to the Trail, which is managed by the Dakota County Parks Department.

Advisory Comment

• Council staff encourages the City to coordinate the planned trailhead and trail connections with Dakota County.

TRANSPORTATION

Roads and Transit

Reviewers: Elaine Koutsoukos (651-602-1717), Bob Paddock (651-602-1340), MTS – Systems Planning; Steve Mahowald – Metro Transit (612-349-7775)

The Update is in conformance with the 2030 Transportation Policy Plan (TPP) adopted in 2004, and addresses all the applicable transportation and transit requirements of a comprehensive plan. The transportation chapter of the Update includes analysis of existing and future transportation deficiencies and recommends improvements to the minor arterial, major and minor collectors, and local roadway networks. There is one

metropolitan highway located in the city of Mendota: TH 110. As stated in the Update, there are no expansion plans for this highway.

Mendota is within Transit Market Area III. Service options for Market Area III include peak-only express, small vehicle circulators, midday circulators, special needs paratransit (ADA, seniors), and ridesharing. DARTS provides general public dial-a-ride service for the residents of Mendota. ADA paratransit service is also provided by Metro Mobility.

Aviation

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

The Update is in conformance with the Aviation policies of the *TPP* 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 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 is provided wastewater conveyance service through interceptor 8360. The Update projects it will have 120 sewered households and 170 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 determined appropriate for planning for local services.

Mendota 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 equal to the Council's Surcharge amount. The Update includes a description of a reduction plan, which includes smoke testing and televising to identify and address I/I issues in the public sanitary sewer system. It is City policy to correct sources of excess inflow that originate from City-owned property. The Update indicates that the City will work with private landowners to correct sources of excess of excess inflow that originate from City-owned property.

Advisory Comment

• The City should consider an ordinance prohibiting the connection of sump pumps, rain leaders, and passive drain tiles from 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 (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 Plan. A copy of the City Council Resolution adopting its Plan 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. Mendota lies within the Lower Minnesota River watershed. The Lower Minnesota River Watershed District's (District) watershed management plan was approved by the Board of Water and Soil Resources (BWSR) in 1999.

The City did not prepare a local surface water management plan in response to the District's 1999 watershed management plan, but entered into an agreement with the District, in January 2005, to establish the roles and responsibilities of each party in implementing the District's watershed plan. The District is in the process of updating its current 1999 watershed plan. The City indicates that it will either update this element of its comprehensive plan, or draft a stand-alone local surface water management plan within two years of when the District completes its plan. The City has addressed the remainder of the Council's concerns in the Update, and its plan is found to be consistent with Council policy and the Council's *Water Resources Management Policy Plan*.

CONSISTENCY WITH COUNCIL POLICY

FORECASTS

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

The Update is consistent with regional policy for forecasts. The City's forecasts are shown in Table 1.

	2010	2020	2030
Population	210	230	270
Households	90	100	120
Employment	130	150	170

Table 1: City of Mendota Forecasts

Advisory comment:

• Minnesota Department of Employment and Economic Development statistics show that the City has already exceeded its 2010 forecasts for employment (164 jobs at Mendota worksites in the second quarter of 2008). As the Update did not request a revision to the City's employment forecast, the Council's forecasts for employment will remain as shown in Table 1.

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 *s*tates 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, the City will be expected to meet densities of at least five units per acre through reinvestment, redevelopment, planning and zoning. Starting in 2010, the Council will monitor redevelopment to ensure the Council's density policies for developed communities are being met, and to assess regional development and residential growth goals. Mendota 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. Mendota is a small city of approximately 193 acres; much of its acreage is water or steep slopes. Public uses take up nearly 142 gross acres (74%) of the city's land area. The largest land uses in the City by acreage are *right-of-way* at 59.33 acres (33.53 net of wetlands and steep slopes) and *open water* at 23.51 acres. *Park/open space* accounts for 38.30 gross acres, (5.05 net acres) and *public/institutional* is 15.06 net acres (7.8%). The largest developed land use is *low density residential* at 20.91 net acres (10.8%). Table 2, below, shows the City's existing land use; existing land use is also mapped in Figure 3.

Land Use	Gross Acres	Net Acres	% of Total
Residential (Low Density)	36.23	20.91	10.8
Residential (Medium Density)	0.56	0.56	0.3
Commercial	4.01	3.69	1.9
Industrial	2.50	2.46	1.3
Public/Institutional	20.62	15.06	7.8
Park/Open Space	38.30	5.05	2.6
Right-of-Way	59.33	33.53	17.3
Open Water	23.51	23.51	12.2
Vacant	8.30	2.29	1.2
Wetlands		30.34	15.7
Steep Slopes		55.98	29.0
Total	193.37	193.37	100.0

Table 2: City of Mendota, Existing Land Uses in 2009

Source: City of Mendota Comprehensive Plan, version received 5/15/09

The future land use map places all land in the City into one of five land use categories, residential, mixed-use, public/institutional, right-of-way and open water, (Table 3 and Figure 4). The City is planning for very few changes to its existing land use pattern between 2009 and 2030 (Figure 5). As in the City's previous plan, Update guides land for mixed-use in the City's downtown, along the north and south sides of Highway 13.

Future growth in the City will occur mainly through redevelopment; however, the City has limited options for redevelopment sites. The Update plans for infill and redevelopment along Highway 13, particularly as this area is relatively flat. The City prohibits development on slopes over 18%. Outside of the Highway 13 area, there are only two

acres of vacant land with slopes less than 18%, and this land is scattered on multiple sites.

Land Use	Gross Acres	Net Acres	% of Total
Residential	43.33	22.05	11.4
Mixed-Use	9.89	9.06	4.7
Public/Institutional	57.29	18.91	9.8
Right-of-Way	59.33	33.53	17.3
Open Water	23.51	23.51	12.2
Wetlands		30.34	15.7
Steep Slopes (>18%)		55.98	29.0
Total	193.37	193.37	100.0

Table 3: City of Mendota, 2030 Future Land Use Table

Source: City of Mendota, supplemental information received 11/06/09

The Update forecasts growth from 90 to 120 households between 2010 and 2030. The Metropolitan Council estimates that the City had 83 existing housing units in 2008. This will require growth of 37 additional households in order to meet the City's 2030 household forecast. Analysis of information provided in the Update indicates that 4.5 acres of land will be available for residential redevelopment. The Update also notes that the City expects approximately 50 percent of the available land to redevelop by 2030.

As guided, the City's redevelopment areas could accommodate 45 to 90 new housing units, at a density range from 10 to 20 units per acre, (Table 4). This is sufficient to accommodate the 37 households needed to reach the City's 2030 household forecast, even at the low end of the density range. At 10 units per acre, the low end of the range is well above the minimum density of five units per acre needed to meet *RDF* policy.

2009-2030		Pro	perties Ide	ntified for R	edevelopme	nt/Infill		
		Density	Range					
Property / Parcel	Future Land Use	Min	Max	Acres	Percent Residential	Residential Acres	Sector Sector Sector	Max Units
North side of Hwy 13	Mixed Use	10	20	4.45	67%	2.98	29.82	59.63
South side of Hwy 13	Mixed Use	10	20	4.61	33%	1.52	15.21	30.43
			TOTALS	9.06		4.50	45.03	90.06
				Infill	Areas Density	(units/acre)	10.00	20.00

 Table 4: Redevelopment/Infill by Land Use Category

Sources: Metropolitan Council and City of Mendota Comprehensive Plan, version received 5/15/09

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 2011-2020, which is three units. The Update states that the City is nearly fully developed, so opportunities to meet that need will be addressed primarily through redevelopment efforts. The Update indicates that approximately 4.45 acres of land (guided within the

mixed-use land use category) will be available for high-density residential development, at 10-20 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 City will continue to collaborate with the Dakota County Community Development Agency (CDA), which offers a number of services to assist in the creation and preservation of affordable housing. The CDA partners with local communities to develop and manage housing choices for seniors, low-and moderate-income families and minorities. The Update states that the City will also avail itself of other state and federal resources to address lifecycle and affordable housing needs within the community.

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. It indicates that there are three remaining single-family residences served by ISTS in the City, and that no new systems are allowed to be sited in the City. The City indicates that it has adopted Dakota County Ordinance 113 and MPCA Rules. The City has delegated oversight responsibility over the three remaining ISTS to Dakota County until the systems are connected to the local sanitary sewer system.

The City will need to update its ISTS ordinance by February 2011 for consistency with recent Minnesota Pollution Control Agency (MPCA) Chapter 7080-7083 Rule revisions. The City is encouraged to contact the MPCA for assistance in tailoring its model ordinance for the City's future needs.

WATER SUPPLY

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

The Update is consistent with the *WRMPP* for water supply. The St. Paul Regional Water Service provides water to residents in Mendota on a retail basis. As Mendota does not own or operate a water supply system, it is not required to complete a water supply plan.

RESOURCE PROTECTION

Historic Preservation

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

The Update contains a section on Historic Preservation as required by the MLPA.

Mississippi River Critical Area Review

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

The majority of the City lies within the Mississippi River Critical Area boundary – specifically within the Urban Open Space District. The Metropolitan Council reviewed the City's critical area plan on July 26, 2000 (Business item 2000-345, Review No. 16940-2) and found that it addressed both state requirements and federal standards. The Council's 2000 action forwarded the review findings and recommendations to the Minnesota 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 on Solar Access Protection as required by the MLPA.

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 small, identified deposits of aggregate resources in the City; consistent with *Minnesota Geological Survey Information Circular 46*, but that they are encumbered by existing development.

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 contains an implementation chapter as required by the MLPA. The chapter summarizes the City's official controls and discusses a schedule for enacting measures to implement the Update. It provides a zoning map and a brief explanation of the City's zoning and subdivision codes. The City's does not have a capital improvement program. However, the City provided information regarding its budget and capital expenditures.

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 April 15, 2009. No compatibility issues with plans of adjacent governmental units and plans of affected special districts and school districts were identified.

DOCUMENTS SUBMITTED FOR REVIEW:

- Transmittal form and City of Mendota, *Comprehensive Plan: May 2009 Draft,* received May 15, 2009.
- Correspondence, agency comments from MN DOT, dated May 14, 2009.
- Correspondence and supplemental information (for the areas of implementation, ISTS, land use, surface water management, transportation, and wastewater) received November 6, 2009.
- Supplemental information for Transit, received December 1, 2009.

ATTACHMENTS

- Figure 1: Location Map Showing Regional Systems
- Figure 2: 2030 Regional Development Framework Planning Areas
- Figure 3: Existing Land Use, 2009
- Figure 4 2030 Future Land Use Plan
- Figure 5 City of Mendota, Land Use Table in 5-Year Stages

Figure 1. Location Map Showing Regional Systems
Mendota

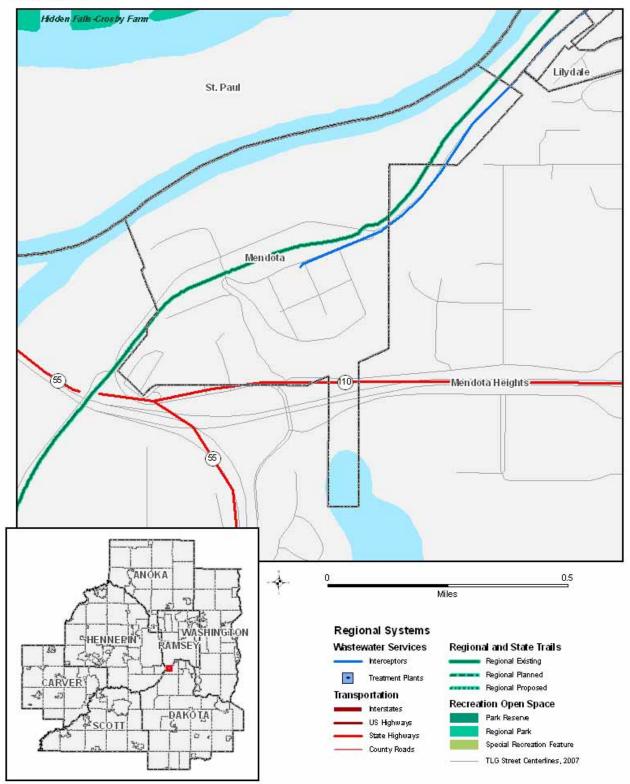


Figure 2. 2030 Regional Development Framework Planning Areas Mendota

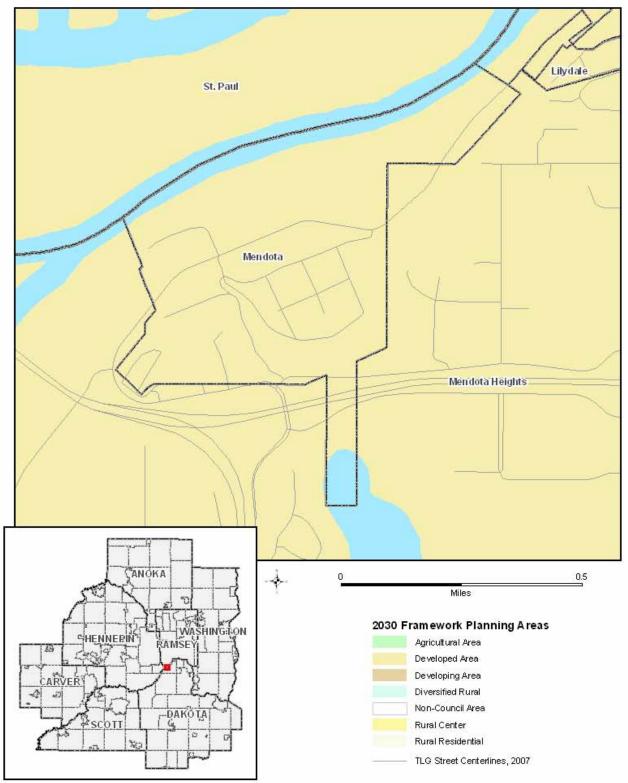
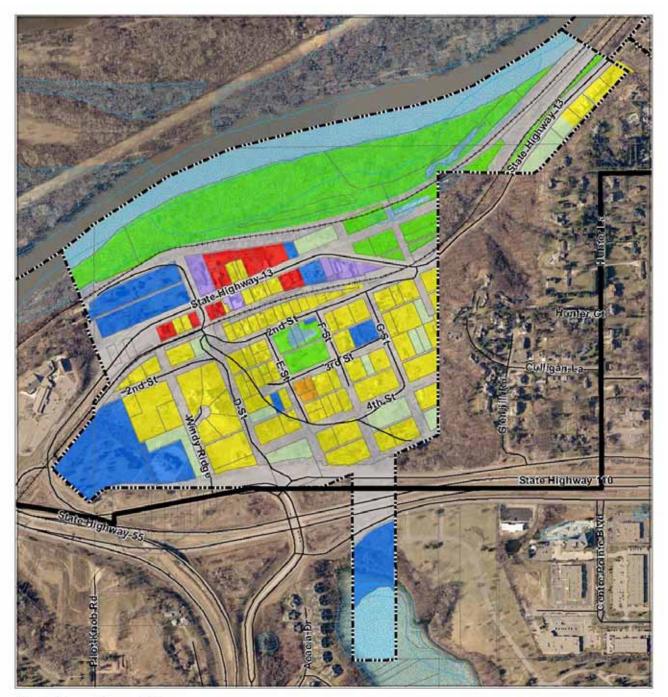


Figure 3. Existing Land Use, 2008 **City of Mendota**



Existing Land Use

600

Figure 6

April 9, 2009

Bonestroo

K./361/36108002/GIS/Mapa/elu mxd

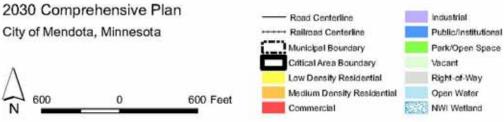


Figure 4. 2030 Future Land Use **City of Mendota**



2030 Land Use Plan

2030 Comprehensive Plan City of Mendota, Minnesota



Road Centerline
Reilroad Centerline
Municipal Boundary
Critical Area Boundary
Residential
Mixed Use
Public/Institutional
Right-of-Way
Open Water
NW/ Wetland

Figure 7



Figure 5: City of Mendota, Land Use Table in 5-Year Stages

	Contraction of the	Density Range	Existing	0,00				0000	Change
	Housing	ng Units/Acre	(£008)	2010	2015	2020	2025	2030	2000-2030
Within Urban Service Area	Minimum	Maximum							
Residential Land Uses									
Low Density Residential	2	4	20.91	21.47	21.47	21.47	21.47	22.05	1.14
Medium Density Residential	3	6	0.56						-0.56
High Density Residential			00'0						0.00
Mixed Use Primarily Residential ²	10	20	00.0	1.18	2.42	3.18	3.97	4.45	4.45
C/I Land Uses	Est. Emplo	nployees/Acre							
Commercial	20 - 40 6	40 emp/acre	3.69	3.69	2.10	0.79			-3.69
Industrial	20 - 40 e	40 emp/acre	2.46	2.46	2.10	0.65			-2.46
Mixed Use Primarily C/I ²	20 - 40 e	40 emp/acre	0.00	0.00	1.00	3.00	4.00	4.61	4.61
Public/Semi Public Land Uses									
Public/Institutional ³			15.06	18.90	18.90	18.90	18.90	18.91	3.85
Park/Open Space			5.05						-5.05
Rights of Way			33.53	33.53	33.53	33.53	33.53	33.53	00.00
Subtotal Sewered			81.26	81.23	81.52	81.52	81.87	83.55	2.29
Undeveloped									
Wetlands ⁴	1	ī	30.34	30.34	30.34	30.34	30.34	30.31	-0.03
Steep Slopes (>18%)	3	3	55.98	55.98	55.98	55.98	55.98	55.98	0.00
Open Water, Rivers and Streams	6	Ð	23.51	23.51	23.51	23.51	23.51	23.51	0.00
Vacant	8	1	2.29	2.29	2.00	2.00	1.65	0.00	-2.29
Total			193.35	193.35	193.35	193.35	193.35	193.35	

zoning ordinance. Residential could accommodate densities ranging from 2 - 9 units/acre. Existing Commercial and Industrial areas are included " Existing low and medium density residential is include in one "Residential" category consistent with the City's 1999 Comp Plan and adopted in Mixed Use (2030)

² The Mixed Use category that covers Downtown Mendota includes the following assumptions:

* the north side of TH 13 is assumed to accommodate 2/3 residential uses and 1/3 non-residential uses

* the south side of TH 13 is assumed to accommodate 1/3 residential uses and 2/3 non-residential uses

* the estimated density range is 10 - 20 units/acre

total acres guided Public/ Institutional and Parks/Open Space is attributed to the Post Office being reguided from Public/Institutional to Mixed Use. ³ Existing Parks and Open Space are include in Public/Institutional consistent with the City's 1999 Comp Plan. The reduction from 2009 to 2030 in

⁴ Change in wetlands due to rounding. No wetland impacts are anticipated.