Business Item Item: 2010-178

C Community Development Committee

Meeting date: May 17, 2010

Environment Committee Meeting date: May 11, 2010

ADVISORY INFORMATION

Subject: City of Stillwater 2030 Comprehensive Plan Update

Review File No. 20631-1

Tier II Comprehensive Sewer Plan

District(s), Member(s): District 12, Council Member Sherry Broecker

Policy/Legal Reference: Minnesota Statutes Section 473.175

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

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 Advisory Comment and Review Record and take the following actions:

Recommendations of the Community Development Committee:

- 1. Authorize the City of Stillwater to put its 2030 Comprehensive Plan Update into effect.
- 2. Adopt the revised forecasts for the City of Stillwater as detailed in Table 2 of the Review Record, and revise the City's share of the region's affordable housing need from 142 to 233 units.
- 3. Advise the City to:
 - a. Send to the Council the dates that the watershed management organizations approved the City of Stillwater's local surface water management plan.
 - b. Participate in the Council's activities to monitor redevelopment in Developed communities.
 - c. Implement the advisory comments in the Review Record for Forecasts and Housing.

Recommendations of the Environment Committee:

Approve the City of Stillwater's Tier II Comprehensive Sewer Plan

ADVISORY COMMENTS

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

Review File No. 20631-1 - Council Business Item No. 2010-178

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 Stillwater is located in east central Washington County on the shores of the St. Croix River. The City is bordered by Stillwater Township to the north, the St. Croix River and Wisconsin to the east, the City of Oak Park Heights to the south, the City of Lake Elmo to the southeast, and the City of Grant to the west.

The 2030 Regional Development Framework (RDF) identifies the City as a Developed planning area (see Figure 2). The City submitted its City of Stillwater 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	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

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

Compatible with other plans Yes

Funding

None.

Known Support / Opposition

There is no known opposition.

REVIEW RECORD

Review of the City of Stillwater 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 regional park system facilities in the City, which include the proposed Washington County Greenway Regional Trail and Brown's Creek State Trail.

Transportation

Roads and Transit

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

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

The City is served by segments of one principal arterial, TH 36, as well as a number of expander and connector type "A" Minor arterials. The Update reflects the reconstruction of the TH 36 St. Croix River Bridge, which is identified in the TPP as a Tier 1 bridge, requiring it to be under contract by 2018.

The City is within the Metropolitan Transit Taxing District and lies 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.

Aviation

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

The Update conforms to 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, with supplemental materials, conforms to the 2030 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 St. Croix Valley Wastewater Treatment Plant located in Oak Park Heights. The Update projects that the City will have 8,550 sewered households and 13,600 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 5-year increments. The rationale for the projections is given in the Update and determined appropriate for planning for local services.

The City 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, with supplemental materials, includes a description of a reduction plan, which includes televised inspections to identify causes of potential I/I sources. The City also has adopted an ordinance that prohibits discharge of stormwater, surface water, or groundwater into the sanitary sewer system.

The City has committed to mitigate flood-related I/I through implementing the following improvements during periods of impending flood conditions: construction of a temporary levee over the existing manholes in the downtown area, installation of plugs in sanitary sewer services located in flooded areas, and building temporary flood protection around the two existing lift stations in the City that are impacted by river flooding. The City also proposes improvements of a more permanent nature that includes: sewer lining of the existing sanitary sewer from the Nelson Lift Station to Elm Street (approximately 3,260 feet), installation of watertight manhole covers in flood prone areas, repair of deteriorated manhole adjustment rings, and installation of external chimney seals.

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 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 the 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 Carnelian Marine St. Croix, Middle St. Croix, and Browns Creek watersheds. The Board of Water and Soil Resources (BWSR) approved the Carnelian Marine St. Croix Watershed District's latest watershed management plan in 2000. BWSR approved the Browns Creek Watershed District's and the Middle St. Croix Watershed Management Organization's watershed management plans in 2007 and 2005 respectively.

The City completed a local surface water management plan (LSWMP) that was reviewed under separate cover in 2007. Council staff found the LSWMP to be consistent with Council policy and the Council's WRMPP.

Advisory Comments

The City needs to send to the Council the dates that the watershed management organizations approved the LSWMP for the Council's records.

CONSISTENCY WITH COUNCIL POLICY

Forecasts

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

The Update, with supplemental materials, is consistent with Council policy for forecasted-related content. The Update proposes lower total population and household forecasts for 2010 based on recent housing market trends. The Update also proposes higher sewered population and household forecasts for 2020 and 2030 based on the City's inventory of underutilized vacant lots. The revised forecasts are shown in Table 1 below.

Table 1. City of Stillwater Revised Forecasts

	2010	2020	2030
Population – Unsewered	250	130	120
Population – Sewered	18,150	21,170	19,780
Population - TOTAL	18,400	21,300	19,900
Households – Unsewered	100	50	50
Households - Sewered	7,100	8,050	8,550
Households – TOTAL	7,200	8,100	8,600
Employment – Unsewered	0	0	0
Employment - Sewered	11,600	12,500	13,600
Employment – TOTAL	11,600	12,500	13,600

Council staff find the City's proposed forecast revisions to be reasonable and recommend that the Council revised the City's forecasts effective upon action on the Update. The Council's System Statement Forecasts are shown in Table 2 below. The revised forecasts in Table 1 will replace the System Statement forecasts for the City.

Table 2. Metropolitan Council System Statement Forecasts

	2010	2020	2030
Population	19,100	21,300	19,900
Households	7,500	8,100	8,600
Employment	11,600	12,500	13,600

As noted in the Housing section below, the City's forecast revision results in a change in the City's share of the region's affordable housing need. The affordable housing need calculation is based upon net growth in households between 2010 and 2020. The City's revised forecasts increases this 2010-2020 growth, thereby raising the affordable housing need number from 142 units to 233 units.

Advisory Comments

In the supplemental materials dated March 16, 2010, the text above Table 2-2 states that the table contains both the Metropolitan Council forecasts and the City's preferred forecasts; however, the table only contains the Council's forecasts and is missing the City-preferred forecasts. For clarity, Table 2-2 should be corrected in the final Update to

include the City-preferred forecasts.

2030 Regional Development Framework and Land Use

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

The Update, with supplemental materials, is consistent with the 2030 Regional Development Framework (RDF) for land use. The RDF designates the City as a Developed community, and directs Developed communities to maintain current infrastructure; renew and improve infrastructure, buildings, and land to provide for additional growth, particularly at centers along transit corridors; and to support development that integrate land uses.

The Update describes policies that encourage the use of development concepts that mix uses, provide opportunities for lifecycle housing, reinforce connections between the community and the river front, promote pedestrian access throughout the community. The Update also directs development to existing infrastructure by promoting and maintaining the downtown as a central focus for community economic and cultural activities.

In addition to the Land Use plan, the Update contains a detailed downtown plan that assess the economic and residential potential for downtown Stillwater, details streetscape plans to improve the pedestrian environment and view corridors, analyzes building massing potential, and assesses and plans for future parking needs.

The Update also plans for the remaining areas annexation areas of the City's Orderly Annexation Agreement (OAA) with Stillwater Township (See Figure 6). Most of the areas in the first phases of the (OAA) have been annexed into the City already, but there remain parcels within the first three phases that have not yet been annexed. The majority of the properties identified as Phase IV have not been annexed or developed, but are planned for annexation within the 2030 planning horizon. Vacant and underutilized properties in these areas are included in the City's residential growth capacity analysis.

The Update analyzed the residential growth capacity throughout the City, including the remaining areas for annexation, to determine the development potential based on the land availability. The Update identifies 346 net developable acres of land available for Low, Low/Medium, and Medium Density Residential development. As shown in the table below, the Update is consistent with Council policy in establishing a minimum residential density for future development of more than 3 units per net acre, with higher densities (4.4 -14.5 units/acre) along transportation corridors and in the City's core.

Table 3. Residential Density Calculation*

		Net	Minimum
Planned Land Use Category	Density	Acres	Units
Low Density Residential	3	115.1	329^{1}
Low/Medium Density Residential	4.4	185.8	818 ²
Medium Density Residential	6	45.1	349 ³
TOTALS	4.32	346	1496

^{*} Information found in Tables 2.3 and 4.5 in City's supplemental materials received February 23, 2010.

Advisory Comments

As a Developed community, the City is advised to participate in the Council's activities to

 $^{^1}$ Calculation include 3 du/ac for 51.1 net undeveloped acres, plus 136 currently available vacant LDR lots, plus 40 new infill units in the Minar Ave neighborhood

 $^{^{\}rm 2}$ Calculation includes 4.4 du/ac for 111.8 net undeveloped acres, plus 326 currently available vacant lots.

³ Calculation includes 6 units per acre for 32.1 net undeveloped acres, plus vacant developed sites for 156 MDR units.

monitor redevelopment in Developed communities.

Housing

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

The Update, with supplemental materials, fulfills the affordable housing planning requirements of the Metropolitan Land Planning Act (MLPA). The Update acknowledges the City's share of the affordable housing need for 2011-2020 as 142 units; however, based on the net growth in sewered households between 2010 and 2020 as requested through the Update process, that number will increase to 233 units. The Update will need to be revised to acknowledge this number before the City confers final adoption of the Update.

To provide opportunities to meet this need, the Update indicates that approximately 45 acres of land will be available for medium density residential development at 6 to 14.5 units per acre.

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. The City will seek housing developers to work cooperatively with the City to construct affordable housing; consider designating a portion of TIF to funding activities that increase new affordable housing; utilize techniques, such as land trusts, to maintain long-term affordability; and partner with, support, and market programs offered by the County, State, Minnesota Housing, the federal government, and non-profits. The City is an active participant in the Local Housing Incentives program of the Livable Communities Act (LCA), and has applied for and received nearly \$700,000 in grants through the LCA program.

Advisory Comments

Before the City confers final adoption of the Update, the Update needs to be revised to acknowledge the City's revised share of the region's affordable housing need as 233 units rather than 143 units.

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 one hundred (100) ISTS in operation in the City. City Code requires all new system installations to be consistent with MPCA Rule requirements. All maintenance management and system tracking has been delegated to Washington County. The County's ordinance and program are consistent with MPCA Rules and Council policy requirements.

Water Supply

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

The Update is consistent with the WRMPP for water supply planning. The Council encourages the City to continue to promote the efficient use of water through the implementation of water conservation programs.

Resource Protection

Historic Preservation

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

The Update addresses historic preservation in the community as required by the MLPA. The Update contains a chapter addressing historic resources, which details the role of the City's Heritage Preservation Commission, lists historic and cultural resources in the community, and discusses policies for preserving those resources.

Solar Access Protection

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

The Update appropriately addresses the protection of access to solar energy as required by the MLPA. The Update describes the City's intent to protect access to direct sunlight for solar energy systems on principal structures through review of site plans and in planning decisions.

Aggregate Resources Protection

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

The Update contains a section on aggregate resources protection as required by the MLPA. Consistent with *Minnesota Geological Survey Information Circular 46* data, the Update identifies the presence of thin deposits of aggregate resources along the eastern edge of the City. The majority of the resources are located either within the Lower Saint Croix National Scenic Riverway or within urbanized areas of the City, and are therefore unavailable for mining.

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, with a plan for revising or modifying ordinances to implement the plan. Specific implementation strategies are also contained in individual chapters of the Update, with priorities and capital improvements planning detailed in the implementation chapter.

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

The City submitted its Update to the adjacent communities, Washington County, affected school districts, affected watershed districts, and other special districts for comment on December 15, 2008. There do not appear to be any conflicts with the plans of adjacent and affected jurisdictions.

DOCUMENTS SUBMITTED FOR REVIEW

- City of Stillwater Comprehensive Plan (July 2, 2009)
- Revisions to aviation, ISTS, forecasts, housing, land use, parks, and transportation in response to incomplete letter (February 23, 2010)
- Revisions to I/I and forecasts tables (March 16, 2010)

ATTACHMENTS

Figure 1: Location Map with Regional Systems

Figure 2: 2030 Regional Development Framework Planning Areas

Figure 3: Existing Land Use Figure 4: 2030 Land Use

Figure 5: Future Land Use in 5-Year Stages

Figure 6: Orderly Annexation Agreement Phasing

Figure 1. Location Map with Regional Systems

City of Stillwater

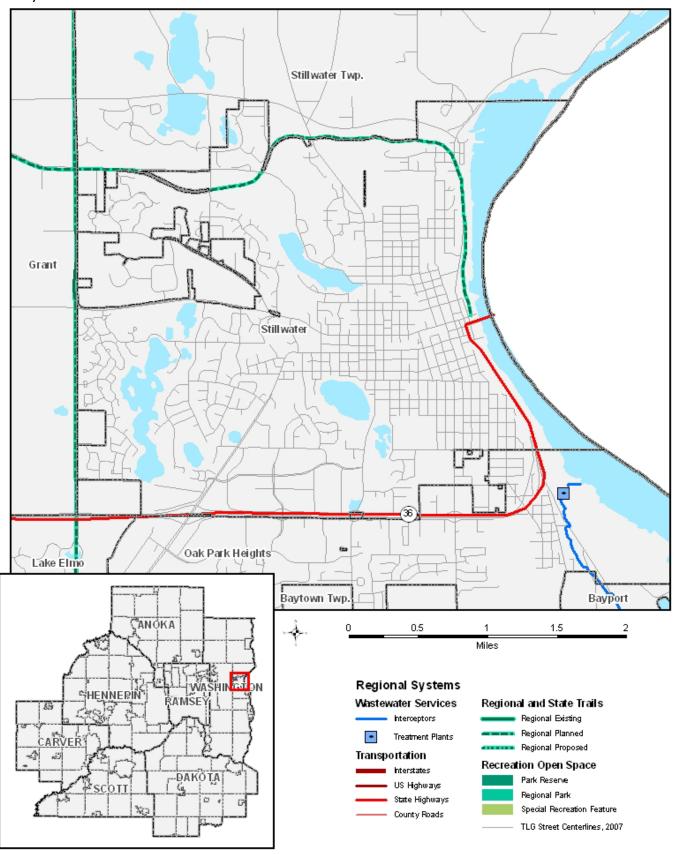


Figure 2. 2030 Regional Development Framework Planning Areas

City of Stillwater

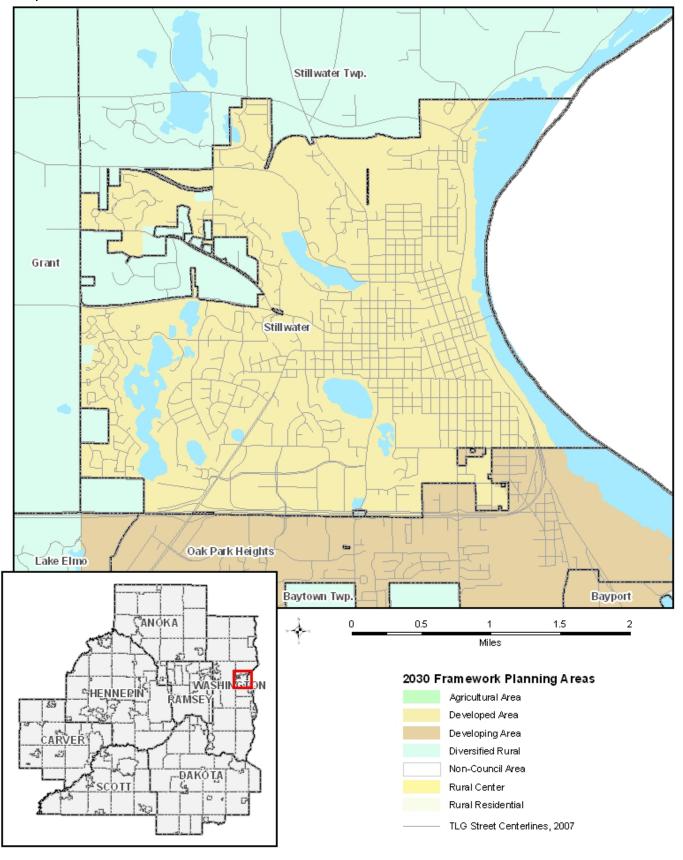


Figure 3. Existing Land Use City of Stillwater 0 3 **Existing Land Use** 2008 Comprehensive Plan 18 Figure 2.1: Existing Land Use

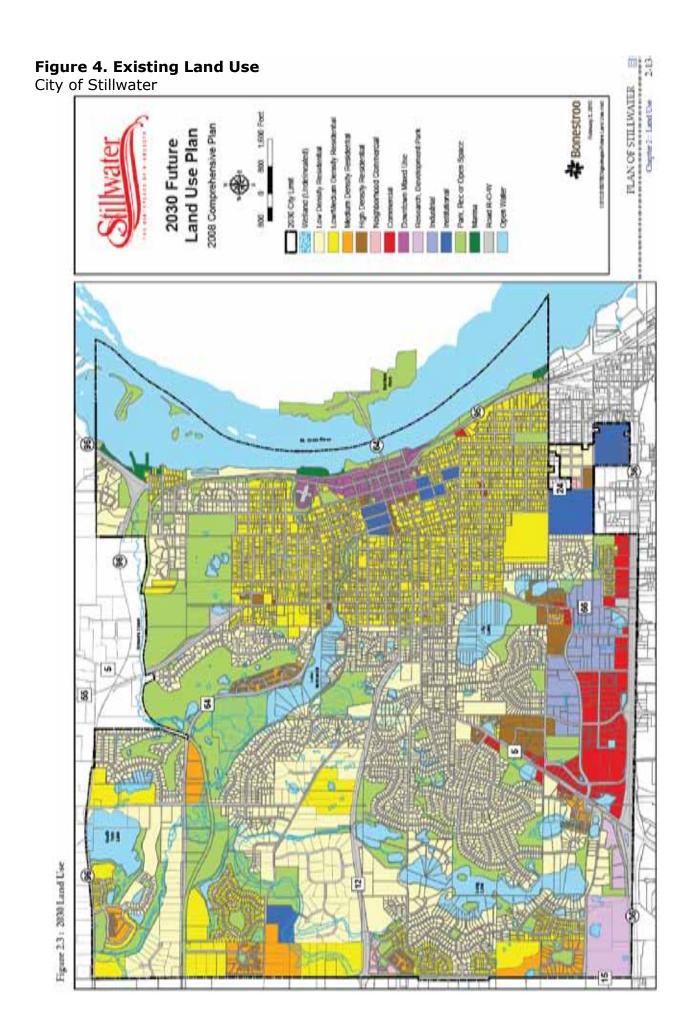


Figure 5. Future Land Use in 5-Year Stages Table City of Stillwater

Land Use Changes Through 2030

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2000 FLU	Density (Units/ac)	2000 Acres	2030 FLU	Density (Units/ac)	2010 Acres	2015 Acres	2020 Acres	2025 Acres	2030 Acres	Change 2000-2030
RESIDENTI	AL									
SFLL	Up to2	1,236.4	LDR.	1-4.4	1,251.4	1,335.4	1,419.4	1,515.8	1,612.2	375.8
SFSL	Up to 4	727.5	LMDR	4.4-9.7	810.5	845.4	880.3	908.4	936.6	209.1
ASF MF	Up to 6 Up to 15	140.0	MDR	6-14.5	105.5	108.3	111.0	113.8	116.5	-23.5
			HDR	12+	69.6	69.6	69.6	69.6	69.6	69.6
SUB-TOTAL		2,103.9	SUB-TOTAL		2,237.0	2,358.7	2,480.3	2,607.6	2,734.9	631.0
COMMERC										
	2000 est. Employees			Est. Employ/Ac						
CN	150	13.7	NC	15	8.4 acres 126 employees	7.7 acres 115 employees	7.0 acres 105 employees	6.6 acres 99 employees	6.2 acres 80 employees	-7.5 acres -70 employees
CC BPC BPO	4,400	160.9	сом	30	156.8 acres 4,703 employees	154.3 acres 4,600 employees	151.8 acres 4,500 employees	153.9 acres 4,400 employees	147.6 acres 4,275 employees	-13.3 acres -125 employees
сс	1,550	48.8	DMU	25	56.3 acres 1,408 employees	56.3 acres 1,400 employees	56.3 acres 1,350 employees	56.3 acres 1,300 employees	56.3 acres 1,186 employees	7.5 acres -364 employees
SUB-TOTAL	6,100	223.4	SUB-TOTAL		221.5 acres 6,237 employees	218.3 acres 6,115 employees	215.1 acres 5,955 employees	216.8 acres 5,799 employees	210.1 acres 5,541 employees	-13.3 acres -559 employees
INDUSTRIA	L AND RESEA	RCH								
	Est. Employees			Est. Employ/Ac						
BPI	3,100	118.3	BPI	30	107.1 acres 3,213 employees	110.0 acres 3,300 employees	112.9 acres 3,388 employees	115.8 acres 3,475 employees	118.7 acres 3,562 employees	0.4 acres 462 employees
RDP	50	28.1	RDP	30	14.6 acres 439 employees	31.1 acres 932 employees	47.5 acres 1,424 employees	63.9 acres 1,917 employees	86.4 acres 2,568 employees	58.3 acres 2,518 employees
SUB-TOTAL	3,150	146.4	SUB-TOTAL		121.7 acres 3,652 employees	141.1 acres 4,232 employees	160.4 acres 4,812 employees	179.7 acres 5,392 employees	205.1 acres 6,130 employees	58.7 acres 2,980 employees
INSTITUTIO	ONAL									•
CEM ES.SS	1,500	180.2	INST	15	107.1 ac 1,605 employees	112.5 ac 1,687 employees	117.9 ac 1,768 employees	123.3 ac 1,850 employees	128.7 ac 1,931 employees	-51.5 ac 431 employees
SUB-TOTAL	1,500	180.2	SUB-TOTAL		107.0 acres 1,605 employees	112.5 acres 1,687 employees	117.9 acres 1,768 employees	123.3 acres 1,850 employees	128.7 acres 1,931 employees	-51.5 acres 431 employees
PARK AND	OPEN SPACE				Agent surprises	ajoo majarjas	agree emperies	April Camput Just	ajour simplojest	To a simple past
PN PC PG OPS RAIL		551.4	PR.		908.8	912.8	916.8	924.3	931.8	380.4
PM		17.3	М		17.3	17.3	17.3	17.3	17.3	0.0
SUB-TOTAL		568.7	SUB-TOTAL		926.1	930.1	934.1	941.6	949.1	380.4
WATER BASINS										
WATER & WETLANDS		671.4	WATER & WETLANDS		691.8	712.0	732.1	752.2	772.4	101.0
ROADS										
ROW		705.3	ROW		814.4	821.1	827.7	834.4	841.0	135.7
TOTAL	10,750 employees	4,599.3 acres		TOTAL	5,119.5 acres 11,494 employees	5,293.8 acres 12,034 employees	5,467.6 acres 12,535 employees	5,655.6 acres 13,041 employees	5,841.3 acres 13,602 employees	1,242.0 acres 2,852 employees
Met Council Estimate	10,719 employees			Met Council Estimate	11,600 employees	22,707 (1007) (407	12,500 employees	22,778 (10071) (407	13,600 employees	2,881 employees
	200000000000000000000000000000000000000									

