

September 26, 2019

Tim Gladhill
Community Development Director
City of Ramsey
7550 Sunwood Drive NW
Ramsey, MN, 55303

RE: City of Ramsey 2040 Comprehensive Plan – Incomplete for Review
Metropolitan Council Review File No. 21819-1
Metropolitan Council District 9, Raymond Zeran

Dear Mr. Gladhill:

Thank you for the submission of the City of Ramsey's 2040 Comprehensive Plan (Plan) on September 5, 2019. Council staff found that there are areas where the Plan is incomplete. Review of the Plan will be suspended until the additional information is submitted and found complete for review. The following items were found incomplete:

REQUIRED INFORMATION

Affected Jurisdictions Review (Raya Esmaeili, 651-602-1616)

The Plan must be shared with all affected jurisdictions for a six-month review process. The submittal mentions that the Plan was shared with affected jurisdictions on September 4, 2018. While some comments or indication of no comment were included in a table, it is unclear whether all affected jurisdictions were in fact contacted. In particular, the following need to be confirmed for affected jurisdictions comments: Cities of Dayton, Nowthen and Oak Grove, Hennepin County, School District 11 Anoka-Hennepin, School District 728 Elk River, Elm Creek Watershed Management Commission, Upper Rum River Watershed Management Organization, and the Minnesota Department of Transportation.

Wastewater (Roger Janzig, 651-602-1119)

- Provide an electronic map or maps (GIS shape files or equivalent) showing the following existing sanitary sewer system information:
 - Lift stations.
 - Existing connection points to the metropolitan disposal system.
 - Future connection points for new growth, if needed.
 - Local sewer service districts by connection point.
 - Intercommunity connections.
 - Proposed changes in government boundaries based on orderly annexation agreements.
 - Location of all private and public wastewater treatment plants in the City.
- Include a table or tables that provide the following local system information:
 - Capacity and design flows for existing trunk sewers and lift stations.
 - For local sanitary sewer lines 12" and larger that connect to a Metropolitan Interceptor, provide the 2040 design flow and pipe capacity for each

- connecting trunk sewer and lift station. Pipe capacity is not included in the Plan.
- Assignment of 2040 households and employment growth forecasts by Metropolitan interceptor facility. Table 62: Sewer Flow Forecasts for North Trott Brook Sewer District on Page 220 needs to be adjusted for the Rum River Sewer District row.
- Describe the requirements and standards in the City for minimizing inflow and infiltration.
 - Include a copy of the local ordinance or resolution that prohibits discharge from sump pumps, foundation drains, and/or rain leaders to the sanitary sewer system.
 - Include a copy of the local ordinance or resolution requiring the disconnection of existing foundation drains, sump pumps, and roof leaders from the sanitary sewer system.
- Describe the sources, extent, and significance of existing inflow and infiltration in both the municipal and private sewer systems.
 - Include a breakdown of residential housing stock age within the City into pre- and post- 1970 era, and what percentage of pre-1970 era private services have been evaluated for I/I susceptibility and repair.
 - Include the measured or estimated amount of clearwater flow generated from the public municipal and private sewer systems.
 - For quantifying I/I, some communities have used the EPA guidance to determine the annual I/I and peak month I/I
<https://www3.epa.gov/region1/sso/pdfs/Guide4EstimatingInfiltrationInflow.pdf>
- Describe the management program for sub-surface sewage treatment systems (SSTS) to comply with MPCA 7080 regulations.
- Provide a map or maps (GIS shape files or equivalent) showing the following information:
 - Location of sub-surface sewage treatment systems.
 - Location of nonconforming systems or systems with problems.

Forecasts (Todd Graham, 651-602-1322)

- The City requests a revision of its population, households, and employment forecast, exceeding what is found in the Council's system statement (Tables 1-4, and 22-24). The employment forecast revision now requested has been previously discussed, found reasonable, and agreed to by Council staff. The population and households revision have not been previously agreed to. Council's concern is the several hundreds of households added during the 2030-2040 decade will be unserved and reliant on private septic systems (Table 60). The land consumption entailed by rural, unsewered development is in competition with the City's growth goals inside the MUSA. The Plan is incomplete, awaiting an agreement on an acceptable forecast revision and sewer-served forecast.

	Census	Council Forecast			Observed	City's Proposed Forecast		
	2010	2020	2030	2040	2018	2020	2030	2040
Population	23,668	26,400	30,700	34,700	27,051	27,550	33,350	39,150
Households	8,033	9,400	11,300	13,000	9,211	9,500 or 9,600**	11,500	13,500
Employment	4,779	6,700*	7,500*	8,100*	6,864	6,900	7,800	8,400

**The employment forecast for Ramsey was revised, at the City's request, at the meeting of Metropolitan Council on January 10, 2018.*

*** Slightly different numbers of 2020 households appear in different tables of the City's Plan; TAZ allocations (Table 41) use the 9,500 figure.*

- The Land Use plan describes how land supply and staging accommodate forecasted growth. The City analyzes that the land supply within MUSA (1,204 acres guided) can accommodate 5,506 housing units at the midpoint of allowed density ranges (Tables 32-33). Council staff did not find a similar table for rural housing capacity. Table 60 describes a future increase in unsewered households, outside the MUSA. Council staff will reanalyze this after discussion of forecasts, as described above.
- The Plan needs to include some measure of employment-bearing land use intensity. Acceptable measurements of intensity include Floor Area Ratio (FAR), or building footprint coverage, or jobs per acre, or setback and height restrictions.
- The Transportation Plan includes an allocation of the forecast to Transportation Analysis Zones (Table 41). The allocations may need to be revised, pending an agreement on an acceptable forecast revision. Council staff will reanalyze this after discussion of the forecast issue, described above.

Advisory Comments

- Council staff find that the TAZ table allocates 9,500 households in year 2020. The City should verify whether the request is for 9,500 or 9,600 households.
- If the TAZ table is revised, a re-run of transportation network modeling (AADT, LOS, etc.) is not required. Council staff only look for a TAZ table that is ready for use by the Council, the City, or Anoka County for transportation models.

Land Use (Raya Esmaeili, 651-602-1616)

Future Land Use

- The Plan needs to include a higher resolution Future Land Use map with narrower width parcel lines for better legibility. The resolution of the current map does not allow for a thorough review of the Future Land Use map.
- The total acreage of land uses within the City in Table 28: Future Land Use Categories by Planning Period is reported as 16,950 acres. However, the total acreage of land uses within the City based on Table 27: 2016 Existing Land Use Categories is over 19,000 acres. Staff are unable to determine the source of this difference. If there is no land being annexed from the City of Ramsey into a neighboring City, the Existing and Future Land Use acreage need to match.
- The Rural Developing (0.1-0.4 units/acre) and Low Density Residential (3-4 units/acre) density ranges leave a gap for planned development densities of 0.4 to three units per acre. While the Plan acknowledges a transitional development approach where the two land uses are adjacent to one another, it is unclear whether the density of this transitional development would be within the two categories' allowed density ranges.
- The Mixed Use category is identified as Mixed Use Low (5-15 units/acre), Medium (8-25 units/acre) and High (15-75 units/acre) in both the land use category descriptions and Tables 30, 31, and 32. However, there is only one Mixed Use category identified on the Future Land Use map. Land use information needs to be consistently displayed throughout the Plan.

Density Calculations

The Plan needs to demonstrate how the land use guiding is anticipated to achieve minimum development/redevelopment densities of 15 units per acre within 1/2 mile of the Northstar Commuter rail station. Minimum average net densities within 1/2 mile of the Ramsey Northstar Commuter rail station must meet the minimum of 15 units per acre based on the standards in the *2040 Transportation Policy Plan*.

Advisory Comments

- The acreage of Single Family Detached land use in Table 27: 2016 Existing Land Use Categories is reported as 77,395 acres, which seems to be an error.
- The Future Land Use map seems to have been duplicated in the Plan on pages 30 and 31. Moreover, Table 28: Future Land Use Categories by Planning Period is displayed in two separate pages.
- The Medium Density Residential (4-8 units/acre) and High Density Residential (10-15 units/acre) density ranges leave a gap for planned development densities of 8 to 10 units per acre. Council staff encourage the City to ensure continuity in density ranges between different residential land use categories to reduce the need for future amendments to the Plan.
- The City should be aware that with no clear locational distinction between the three identified Mixed Use subcategories, the minimum density of 5 units per acre (Mixed Use Low) and the maximum density of 75 units per acre (Mixed Use High) has been used for the overall density calculations.

Housing (Tara Beard, 651-602-1051)

Implementation Plan

Some tools the City must consider to address housing needs are not included in the Plan. Plans consistent with Council Housing Policy will consider all widely recognized tools available and state if the City is likely or unlikely to use the tool, and if so, for what specific housing needs. Please note that the Plan does not have to commit to use each tool at this time, but it can indicate a willingness to research and explore tools within a certain timeframe, if it is not ready to commit to a specific tool at this time. Specifically:

- Preservation of any naturally occurring affordable housing (NOAH) rental units is a region-wide need that the existing housing assessment data suggests may be relevant in the City of Ramsey. However, there is no mention of the City's willingness to support and engage in applications to Minnesota Housing's Consolidated Request for Proposals, the creation of Housing Improvement Areas, a local 4(d) policy program, the issuance of housing bonds or partnership with organizations such as Greater Minnesota Housing Fund who have NOAH resources.
- The Plan discusses Anoka County HRA's programs thoroughly, but it must acknowledge that a local HRA/EDA is also a tool that can support a variety of local housing needs. The Plan must indicate if the City will consider the use of local HRA/EDA powers, and if so, for what identified housing needs.
- One publicly subsidized housing development in the City could see their affordability requirements expire before 2023. The Plan must state whether the City would encourage and support efforts to explore the preservation of expiring low-income housing tax credit properties with partners such as Minnesota Housing or Anoka County HRA.
- City support or direct application to specific resources within the Minnesota Housing Consolidated RFP, including what types of affordable housing projects would be

prioritized (by affordability level, size, location or type – whatever the City would be most likely to support).

- Municipalities may issue housing revenue bonds to support affordable housing preservation and new construction. The Plan needs to identify whether the City is likely or unlikely to issue housing bonds, and if so, for what types of housing.
- Tax Increment Financing and Tax Abatement to meet housing needs is not considered.
- Proactive site assembly to create sites for affordable housing is not considered.
- Ways the City could support/preserve its existing manufactured housing are not considered. This might include:
 - Including manufactured housing as an allowable use in land use and zoning districts assigned to the existing manufactured home community.
 - Supporting a local notice of sale or first look provisions to provide residents time to consider cooperative ownership if/when the community becomes available for sale.
 - Engaging with the manufactured housing community to ensure infrastructure and other City service needs are being met.

Advisory Comments

- Pages 38 and 125 state that planning for the City's allocation of affordable housing need is a requirement of Livable Communities Act (LCA) participation. The City's allocation and requirements to plan for it are part of the Metropolitan Land Planning Act requirements for all Cities, regardless of LCA participation. Furthermore, on page 125 the Plan states that "the City of Ramsey will need to provide an additional 499 units by 2030." This should be amended to state that the City must plan for 499 affordable units between 2021 and 2030. Staff recommend amending the language accordingly.
- Staff recommend a matrix or implementation table that lists identified housing needs (existing housing needs identified in the Plan and the allocation of affordable housing need at the three affordability levels), as well as available tools that could meet those needs, and provides policy direction, or consideration, of how the City would use those tools to meet the listed needs.
- While Table 33 identifies the number of acres anticipated to develop in each of the three Mixed Use districts, in the corresponding Map (Figure 7), Mixed Use is shown as a singular category. Staff recommend identifying the low, medium, and high density categories within the Mixed Use district on the Future Land Use map in a manner consistent with the acreages noted in Table 33.

Mississippi River Corridor Critical Area (Jim Larsen, 651-602-1159)

The Plan is incomplete for the Mississippi River Corridor Critical Area (MRCCA) section. The MRCCA section of the Plan has been reviewed by the Minnesota Department of Natural Resources (DNR) staff. As noted in the DNR's September 12, 2019 letter, the City will need to satisfy all required items, before the DNR can issue its conditional approval and before the MRCCA section can be considered complete.

Solar (Cameran Bailey, 651-602-1212)

the Plan must include the Solar Potential Map's four (4) accompanying Solar Resource Calculations. These calculations can be found on the City of Ramsey's Community Page in the "Solar Resource Calculation" document:

https://metro council.org/Handbook/Files/Solar-Resource-Calculation/02396311_Ramsey_SolarCalc.aspx

Implementation (Raya Esmaeili, 651-602-1616)

- Include the local zoning map and zoning category descriptions.
- Describe all relevant official controls addressing at least zoning, subdivision, water supply, and private sewer systems.
- Include a Capital Improvement Program (CIP) for transportation, sewers, parks, water supply, and open space facilities. The CIP must align with development staging and include budgets and expenditure schedules.

OTHER ADVISORY INFORMATION

Council staff offer the following additional advisory comments for your consideration.

Surface Water Management (Jim Larsen, 651-602-1159)

When available, Council staff request that the City provide the date the City adopted the final Local Water Management Plan (LWMP), and a copy of the final adopted LWMP that will be included in the Plan that the City adopts, if it differs from the August 23, 2018 version contained in the September 5, 2019 Plan submittal.

To expedite the Council's review of supplemental materials submitted in response to incomplete items, please provide a cover memo that outlines where and how the incomplete items are addressed in the new material. Also, as with the original submittal, please use the online submittal for supplemental information.

After all of the required elements of the Plan are submitted and found complete, Council staff will begin the official review process. If you have any questions or need further information regarding the comments in this letter, please contact Raya Esmaeili, Principal Reviewer, at 651-602-1616, or Eric Wojchik, Sector Representative, at 651-602-1330 with any questions or for additional assistance.

Sincerely,



Angela R. Torres, AICP, Manager
Local Planning Assistance

CC: Matt Bauman, Minnesota Department of Natural Resources
Raymond Zeran, Metropolitan Council District 9
Eric Wojchik, Sector Representative
Raya Esmaeili, Principal Reviewer/Reviews Coordinator