

March 31, 2020

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

Dear Mr. Gladhill:

Thank you for the submission of the City of Ramsey's 2040 Comprehensive Plan (Plan) on September 5, 2019. The Council reviewed the Plan and sent a response letter on September 26, 2019. The City submitted a revised 2040 Comprehensive Plan on March 10, 2020. Council staff found that there are areas where the Plan is still 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

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.
- 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>
 - Council staff advise review of the www.metrocouncil.org/iandj website and the [Thrive 2040 plan](#) for current policy.
- 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.

Subsurface Sewage Treatment Systems (SSTS) (Kyle Colvin, 651-602-1151)

On Page 4 of Chapter 9, Water Resources Plan (PDF page 226), the Plan states that the City maintains a database of approximately 4,170 SSTS; and that the City has an estimated 4,170 SSTS. On Page 2 of Chapter 9 (PDF page 224) Table 1 shows 4,418 SSTS in 2010 and 4,600 SSTS in 2020. These numbers need to be consistent throughout the Plan.

Forecasts (Todd Graham, 651-602-1322)

The City requests a revision of its population, households, and employment forecast. (Forecasts appear in Tables 1 thru 4, and 22 through 24). The employment forecast revision has been previously discussed and agreed to by Council staff. The population and households revision has not been agreed to.

At this time, Council staff can agree to the City’s requested revision of 2020 and 2030 numbers. The Council will require that the 2040 sewer-serviced forecast remain as specified in the System Statement: 8,940 sewer-serviced households. The corresponding sewer-serviced population will be 25,900 in 2040. The Plan is incomplete, awaiting an agreement on an acceptable sewer-serviced forecast.

Sewer-Serviced Forecast: City of Ramsey

	Census		System Statement		City’s Proposed Forecast			Council staff Recommendation
	2010	2020	2030	2040	2020	2030	2040	2040
Population	10,615	13,340	21,160	23,920	<u>14,210</u>	<u>19,865</u>	25,520	<u>25,900</u>
Households	3,615	4,720	7,780	8,940	<u>5,000</u>	<u>6,850</u>	8,800	8,940
Employment	4,304	6,080	6,800	7,340	<u>6,280</u>	<u>7,100</u>	7,640	<u>7,640</u>

Total Forecast: City of Ramsey

	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	<u>27,550</u>	<u>33,350</u>	<u>39,150</u>
Households	8,033	9,400	11,300	13,000	9,211	<u>9,600</u>	<u>11,500</u>	<u>13,500</u>
Employment	4,779	6,700	7,500	8,100	6,864	<u>6,900</u>	<u>7,800</u>	<u>8,400</u>

Advisory Comments

Red-line edits contained in the TAZ table (Table 43) cause errors in extracting the data into a database. This needs to be corrected in the final version of the Plan.

Land Use (Eric Wojchik, 651-602-1330)

Future Land Use

- This resubmitted Plan includes a revision to the High Density Residential land use category density range. Previously, the density range of this category was 10-15 units/acre. The Plan has been revised to 8-15 units/acre which results in the density range for this land use now inconsistently referenced in the Plan:
 - Both Table 35, Development Staging by Planning Period, on page 41, and Future Land Use Descriptions, on page 32, still show the HDR land use category with a minimum residential density of 10 units/acre. The density ranges for this land use category must be consistently referenced throughout the Plan.
- Table 35, Development Staging by Planning Period, on page 41, shows MU High Density Residential land use as having 16.39 development acres, but this is inconsistent with the 6.9

development acres for this land use shown in Table 34, Forecasted Growth Allocations, on page 38. Information must be consistently referenced throughout the Plan.

- Per the previous response letter, 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 in Tables 31, 32, 33, and 34. However, there is only one Mixed Use category identified in Figure 4, page 30, Future Land Use map. If the Plan does not differentiate these Mixed Use categories the Future Land Use map, the Council will use the minimum (MU Low at 5 units/acre) and the maximum (MU High at 75 units/acre) in all density and Affordable Housing Need allocation calculations.
 - The calculation results in a lower overall community density and a lower Affordable Housing calculation for the City. For instance, for 2021-2030, only 295 affordable housing units can be calculated using the minimum, as opposed to 502 units when MU Medium and MU High are included. It would be in the City's interest to display all the MU land uses on the Future Land Use map to allow for calculation of Mixed Use (Low Density), Mixed Use (Medium Density), and Mixed Use (High Density) land uses, respectively.
 - If the City does not wish to identify specific areas within the Center of Ramsey (COR) on the Future Land Use map for MU Low, MU Medium, and MU High, then an alternative approach to including these acreages in calculations may be feasible, but it will require specific Plan language regarding the MU acreages and the amendment process should such acreages change. Such an approach should be discussed with Council staff.

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*.

- The revised Plan includes Table 33, on page 38, to address this requirement. However, this table does not calculate minimum average net densities; instead, it uses the midpoint to calculate density.
 - Moreover, this calculation should be made for all development/redevelopment areas within 1/2 of the station, but no acreages are included in the calculation.
 - To meet this requirement, some communities have opted to use a transit overlay district which includes a minimum density of 15 units per acre for any future proposed residential development within 1/2 mile of the station area.
 - For more guidance, please refer to the Council resource “Density and Activity Near Transit”: <https://metrocouncil.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Density-and-Activity-Near-Transit.aspx>
- On page 120, in the Housing Chapter, the total planned affordable housing units is detailed to be 528 units. However, this total of 528 units, calculated from Table 34, on page 38, should be revised based on Table 35 for the 2021-2030 decade. Moreover, per the Land Use comments above, the Low, Medium, and High MU acreages and resulting minimum units can only be applied if the MU land uses are mapped in Figure 4, Future Land Use map, on page 30.

Advisory Comments

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.

Housing (Hilary Lovelace, 651-602-1555)

The Plan is complete for review, but inconsistent with Council housing policy.

- Table 57, on page 119, in the Housing Chapter details the original community forecast. This page and any subsequent details need to be revised to reflect the City's revised forecast.

Implementation Plan

The Plan fails to consider the use of their own municipal HRA or EDA, which is a widely accepted tool that must be considered. If a community plans to rely on cooperation with County HRA or EDAs and not use their own local development powers, stating so in the Plan will satisfy this requirement for consistency with Council housing policy.

Advisory Comments

- Page 120, in the Housing Chapter, makes reference to Table 7, Forecasted Growth Allocations. This reference should be revised to Table 34.
- If the community forecast is revised upward, this may increase the Affordable Housing Need allocation number. The City should consider this factor in making any Plan revisions. The City may need to guide more High Density Residential land to meet a revised housing need number.

Water Supply (John Clark, 651-602-1452)

Because the community has a municipal public water supply system, the Local Water Supply Plan (LWSP) must be included as part of the 2040 Plan. Council staff request that the City provide the complete final LWSP in an appendix to the 2040 Plan.

The City prepared a LWSP in 2016 that was submitted to both the MN Department of Natural Resources (DNR) and Metropolitan Council and reviewed separately. Council comments were shared with the DNR on July 5, 2017.

Advisory Comments

The City will need to update its LWSP with the current total population forecast revisions requested by the City. This includes Table 7 "Projected Annual Water Demand" and any other Plan information that the population changes may impact such as future infrastructure needs. The updated Plan would then need to be submitted to the Council as an appendix to the 2040 Plan. In order to ensure Plan consistency across agencies the updated LWSP needs to be provided to the DNR.

Mississippi River Corridor Critical Area (MRCCA) (Raya Esmaili, 651-602-1616)

The MRCCA section of the Plan is still undergoing review through the DNR's 45-day review period. Please note that the DNR will communicate directly with the City about the review and approval of the MRCCA plan under the Critical Areas Act (Minn. Statute § 116G.07 Subd. 3) and the MRCCA Rules (Minn. Rules 6106.0070 Subp. 3. E.). The Plan will be considered complete for this item once the DNR has issued its conditional approval letter.

Implementation (Eric Wojchik, 651-602-1330)

The Plan does include an Implementation Chapter, Chapter 10. However, as stated in the previous response letter, the Plan and Implementation Chapter needs to include the following:

- Local zoning map and zoning category descriptions.
- Descriptions of all relevant official controls addressing at least zoning, subdivision, water supply, and private sewer systems.

- 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 (Judy Sventek, 651-602-1156)

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
Tod Sherman, Development Reviews Coordinator, MnDOT Metro Division
Raymond Zeran, Metropolitan Council District 9
Eric Wojchik, Sector Representative
Raya Esmaeili, Principal Reviewer/Reviews Coordinator

N:\CommDev\LPA\Communities\Ramsey\Letters\Ramsey2040CPU21819-1_2nd_Incomplete.docx