

## Community Development Committee

Meeting date: November 2, 2020

## Environment Committee

Meeting date: November 10, 2020

For the Metropolitan Council meeting of November 18, 2020

**Subject:** City of East Bethel 2040 Comprehensive Plan and Comprehensive Sewer Plan, Review File 22025-1

**District(s), Member(s):** District 9, Raymond Zeran

**Policy/Legal Reference:** Metropolitan Land Planning Act (Minn. Stat. § 473.175), Minn. Stat. § 473.513

**Staff Prepared/Presented:** Eric Wojchik, Planning Analyst (651-602-1330)  
Angela R. Torres, Local Planning Assistance Manager (651-602-1566)  
Kyle Colvin, Engineering Programs, Manager (651-602-1151)

**Division/Department:** Community Development / Regional Planning  
Environmental Services / Technical Services

### Proposed Action

That the Metropolitan Council adopt the attached Advisory Comments and Review Record and take the following actions:

### Recommendations of the Community Development Committee

1. Authorize the City of East Bethel to place its 2040 Comprehensive Plan into effect.
2. Revise the Community Designation for the Southeastern portion of the City to Diversified Rural from Rural Center as shown in Figure 3 of the Review Record.
3. Advise the City to:
  - a. When available, provide to the Council the dates the WMOs approved the final Local Water Management Plan and the date the City adopted the final Local Water Management Plan, and a copy of the final Local Water Management Plan if it differs from the draft version contained in the City's August 26, 2019 formal Plan submission.
  - b. Implement the advisory comments in the Review Record for Transportation, Wastewater, Water Resources, Land Use, and Water Supply.

### Recommendation of the Environment Committee

1. Approve the City of East Bethel's Comprehensive Sewer Plan.

## *Advisory Comments*

The following Advisory Comments are part of the Council action authorizing the City of East Bethel to implement its 2040 Comprehensive Plan (Plan).

### **Community Development Committee**

1. As stated in the *Local Planning Handbook*, the City must take the following steps:
  - a. Adopt the Plan in final form after considering the Council's review recommendations as contained in the body of this report.
  - b. Submit one hard copy and one electronic copy of the Plan to the Council. The electronic copy must be submitted as one unified file.
  - c. Submit to the Council a copy of the City Council resolution evidencing final adoption of the Plan.
2. The *Local Planning 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 to the Plan, local governments should incorporate those recommended changes into the Plan or respond to the Council before "final adoption" of the comprehensive plan by the governing body of the local governmental unit. (Minn. Stat. § 473.858, subd. 3)
3. Local governments must adopt official controls as identified in their 2040 comprehensive plans and must submit copies of the official controls to the Council within 30 days after the 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 9 months following amendments to comprehensive plans (Minn. Stat. § 473.865, subd. 3).

### **Environment Committee**

1. The Council-approved Comprehensive Sewer Plan becomes effective only after the Plan receives final approval from the local governmental unit's governing body. After the Plan receives final approval from the City and the Comprehensive Sewer Plan becomes effective, the City may implement its Plan to alter, expand, or improve its sewage disposal system consistent with the Council-approved Comprehensive Sewer Plan.
2. A copy of the City Council resolution adopting its 2040 comprehensive plan, including its Comprehensive Sewer Plan, must be submitted to the Council.

## Background

The City of East Bethel is located along the northern border of Anoka County. It is surrounded by the communities of Linwood Township, Columbus, Ham Lake, Andover, Oak Grove, St. Francis, and Bethel.

The City submitted its 2040 Comprehensive Plan (Plan) to the Council for review to meet the Metropolitan Land Planning Act requirements (Minn. Stat. §§ 473.851 to 473.871) and the Council's 2015 System Statement requirements.

## Review Authority & Rationale

Minn. Stat. § 473.175 directs the Metropolitan Council to review a local government's comprehensive plan and provide a written statement to the local government regarding the Plan's:

- **Conformance** with metropolitan system plans
- **Consistency** with the adopted plans and policies of the Council
- **Compatibility** with the plans of adjacent governmental units and plans of affected special districts and school districts

By resolution, the Council may require a local government to modify its comprehensive plan if the Council determines 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 (Minn. Stat. § 473.513).

The attached Review Record details the Council's assessment of the Plan's conformance, consistency, and compatibility, and is summarized below.

Review Standard	Review Area	Plan Status
Conformance	Regional system plan for Parks	Conforms
Conformance	Regional system plan for Transportation, including Aviation	Conforms
Conformance	Water Resources (Wastewater Services and Surface Water Management)	Conforms
Consistency with Council Policy	<i>Thrive MSP 2040</i> and Land Use	Consistent, with the proposed change to Community Designation
Consistency with Council Policy	Forecasts	Consistent
Consistency with Council Policy	<i>2040 Housing Policy Plan</i>	Consistent
Consistency with Council Policy	Water Supply	Consistent
Consistency with Council Policy	Community and Subsurface Sewage Treatment Systems (SSTS)	Consistent
Compatibility	Compatible with the plans of adjacent and affected governmental districts	Compatible

## Thrive Lens Analysis

The proposed 2040 comprehensive plan is reviewed against the land use policies in *Thrive MSP 2040*. To achieve the outcomes identified in Thrive, the metropolitan development guide defines the Land Use Policy for the region and includes strategies for local governments and the Council to implement. These policies and strategies are interrelated and, taken together, serve to achieve the outcomes identified in Thrive.

## **Funding**

The Metropolitan Council awarded the City a Planning Assistance Grant of \$32,000 to complete its 2040 comprehensive plan. The first half of this grant was paid to initiate the local planning process. The second half of the grant will be paid after Council authorization of the City's plan, local adoption, and the City's submittal of final reporting requirements.

## **Known Support / Opposition**

There is no known local opposition to the 2040 comprehensive plan.

# REVIEW RECORD

## City of East Bethel 2040 Comprehensive Plan

### Review File No. 22025-1, Business Item No. 2020-300 JT

The following Review Record documents how the proposed Plan meets the requirements of the Metropolitan Land Planning Act and conforms to regional system plans, is consistent with regional policies, and is compatible with the plans of adjacent and affected jurisdictions.

### Conformance with Regional Systems

The Council reviews plans to determine conformance with metropolitan system plans. The Council has reviewed the City's Plan and finds that it conforms to the Council's regional system plans for Regional Parks, Transportation (including Aviation), and Water Resources.

### Regional Parks and Trails

Reviewer: Colin Kelly, Community Development (CD) - Regional Parks (651-602-1361)

The Plan conforms to the *2040 Regional Parks Policy Plan* for the Regional Parks System element.

Anoka County is the Park Implementing Agency for Regional Parks System components in East Bethel, for which the Plan accurately describes the Regional Parks System components (Figure 1).

Regional Trails located within the City include the East Anoka County Extension and North Anoka County regional trail search corridors. The Plan also appropriately acknowledges State recreation lands within the City, including the Gordie Mikkelsen Wildlife Management Area and the Helen Allison Savanna Scientific and Natural Area (Minnesota Department of Natural Resources).

### Regional Transportation, Transit, and Aviation

Reviewer: Russ Owen, Metropolitan Transportation Services (MTS) (651-602-1724)

The Plan conforms to the *2040 Transportation Policy Plan* (TPP) adopted in 2015. It accurately reflects transportation system components of the TPP and is consistent with Council policies regarding transit market roles, the needs of non-automobile transportation, access to job concentrations, and the needs of freight.

### Roadways

The Plan conforms to the highway system element of the TPP. The Plan identified TH 65 as the only metropolitan highway within the City's boundaries and acknowledges that there are no planned mobility improvements for this road identified in the Current Revenue Scenario of the 2040 TPP adopted in 2015. The Plan notes that the City participated on a multiagency advisory committee lead by MnDOT to develop an access management plan for TH 65, and that the City's primary focus for infrastructure improvements is construction of service roads along TH 65, prioritized to coincide with the City's defined growth areas. The Plan also acknowledges that Viking Boulevard is being considered as a future state highway to provide a more efficient east west corridor across northern Anoka County, and states the City is actively engaged with the state and county on discussions about this road. The City is also committed to ensure land use and transportation plans are integrated to set aside needed ROW for this corridor.

The Plan identifies all the required characteristics of the City's roadways, including number of lanes, existing and future functional class, and existing and forecasted traffic volumes for principal and A-minor arterials. Forecasting was completed by the County consistent with regional methodology. The Plan has an extensive discussion of access



management and references the Anoka County guidelines on how access will be managed.

## **Transit**

The Plan conforms to the transit system element of the TPP. It acknowledges that the City is within Transit Market Area V, has no existing transit routes and facilities within the City limits and no transit investments for the City are shown in the 2040 TPP. The Plan notes that residents have alternative transit options such as the Anoka County Traveler dial a ride, ridesharing and volunteer driver programs. It also acknowledges the City has two park and pool locations along TH 65, at 237th and 207th Avenues.

## **Aviation**

The Plan conforms to Aviation system element of the TPP. Coon Lake allows seaplane use, but there is no airport within East Bethel. The Plan acknowledges the nearest airport is Anoka County -Blaine; the City is located outside of the defined airport influence area for this airport which is 15 miles away. The Plan states that local codes and ordinances protect regional airspace from future obstructions.

## **Bicycling and Walking**

The Plan is consistent with the Bicycling and Pedestrian chapter of the TPP. The Plan identifies the existing and planned on and off road trails within the City and acknowledges the Regional Bicycle Transportation Network (RBTN) and regional trails.

## **Freight**

The Plan is consistent with the Freight policies of the TPP. The BNSF railroad from Minneapolis to Duluth runs just west of the City in Oak Grove, although a very short segment passes through the NW corner of the city. The Plan reflects heavy commercial vehicle traffic counts in relation to the rest of the metro area and discusses the City's industrial park located directly west of TH 65. In 2017, the City constructed a service road between 187th Lane and Viking Blvd to provide secondary access to this area.

## **Transportation Analysis Zones (TAZs)**

The Plan conforms to the TPP regarding TAZ allocations. The City's TAZ allocations for employment, households, and population appropriately sum to the Metropolitan Council's city-wide forecast totals for all forecast years.

## ***Advisory comments***

In the forecast allocation to transportation analysis zones (Plan Table 5-4), the City should use Council TAZ numbering. The Council will re-publish this data on its website. Prior to re-publishing, the City TAZs #1 through 13 will be renumbered as Council TAZs #132 through 144.

## **Water Resources**

### **Wastewater Service**

*Reviewer: Kyle Colvin, Environmental Services (ES) – Engineering Programs (651-602-1151)*

The Plan conforms to the 2040 Water Resources Policy Plan (WRPP). It represents the City's guide for future growth and development through the year 2040. It includes growth forecasts that are consistent with the Council's assigned forecasts for population, households, and employment.

Current wastewater treatment services are provided to the City by the Metropolitan Council Environmental Services (MCES). Wastewater generated within the City is conveyed by Council Interceptor 801620 to and treated at the Metropolitan Council's East Bethel wastewater treatment facility in East Bethel. The Plan projects that the City will have 3,000 sewerized households and 2,000 sewerized employees by 2040. The Metropolitan Disposal System with its scheduled improvements has or will have adequate capacity to serve the City's growth forecasts.

The Plan provides sanitary flow projections in 10-year increments. The rationale for the projections were not provided in the Plan. The Metropolitan Council is committing to provide the level of wastewater service based on the sewered forecasts as stated in the sewer element of the Plan.

The Land Use Plan reflects an overall minimum residential sewered density that is consistent with Council policy for future sewered residential growth for Rural Center communities.

The Plan defines the City's goals, policies, and strategies for preventing and reducing excessive inflow and infiltration (I/I) in the local municipal (City) sanitary sewer system. The Plan acknowledges that the municipal wastewater collection system within the City is less than six years old. The Plan identifies policies and strategies that focuses on construction standards and inspection for new wastewater conveyance facilities for the prevention of I/I but also identifies a general ongoing inspection and maintenance program.

The Plan describes the requirements and standards for minimizing I/I and references City Ordinance (Section 74-197) that prohibits any person to discharge or cause to be discharged any stormwater, surface water, groundwater, roof runoff, subsurface drainage, cooling water or unpolluted industrial process waters to any sanitary sewer. The Ordinance does not address any requirement for the disconnection of non-compliant connections if discovered.

In acknowledging the relatively new wastewater collection system within the City, the Plan does not attempt to describe the sources, extent, or significance of existing I/I within the City wastewater collection system. Most connections to the City's collection system is from new development. However, some existing homes and businesses have also, and will continue, to connect to the City system as it becomes available. The Plan does not characterize what portion of the existing private service remains when an existing structure connects to the City system or whether the City requires that the condition of the remaining portion of the existing service be evaluated. Existing homes and businesses that are of pre-1970 vintage commonly have services that are made of clay tile pipe. The significance of clay tile pipe is that as it ages, it can become more susceptible to I/I which is one contributor to the fact that most I/I sources originate in the private property collection system. It is recommended that the City develop a strategy for existing homes that connect to the City's wastewater collection system that includes either a requirement that a new service up to the building be required for all existing buildings with services, or that the condition of the existing service that is to remain be evaluated and rehabilitated, if necessary. Since centralized wastewater service is a relatively new service to the City, there is limited flow data available to characterize the impact wet weather has on community flow, the Plan does not provide an estimate of average or peak flow I/I.

### ***Comprehensive Sewer Plan Comments***

The City is covered under two Metropolitan Council Planning designations; Diversified Rural and Rural Center communities. That portion of the City that is serviced through the MDS is identified in the Rural Center designation and therefore the Sewer Element of the Plan has been reviewed against the requirements for Comprehensive Sewer Plans for Rural Center communities. It was found to be complete and consistent with Council policies and the regional wastewater system plan. Upon adoption of the Plan by the City, the action of the Council to approve the Sewer Plan becomes effective. At that time, the City may implement its Plan to alter, expand, or improve its sewage disposal system consistent with the approved Sewer Plan. A copy of the City Council Resolution adopting its Plan needs to be submitted to the Metropolitan Council for its records.

### ***Advisory Comments***

It is recommended that the City develop a policy regarding the extent of existing service lateral replacement, or condition evaluation for the private services of existing buildings that are connecting to the municipal wastewater collection system.

## **Surface Water Management**

Reviewer: Judy Sventek, ES – Water Resources (651-602-1156)

The Plan is consistent with Council policy requirements and conforms to the WRPP for local surface water management. The Plan satisfies the requirements for 2040 comprehensive plans. East Bethel is located within the oversight boundaries of the Upper Rum and Sunrise River Watershed Management Organizations (WMOs). East Bethel submitted a draft Local Water Management Plan (LWMP) update to the Council on June 10, 2019. Council Water Resources staff reviewed and commented on the draft LWMP to the City and WMOs in a letter dated July 10, 2019. The Plan incorporates the City's draft LWMP as an Attachment.

## **Advisory Comments**

When available, we request that the City provide to the Council the dates the WMOs approved the final LWMP and the date the City adopted the final LWMP, and a copy of the final LWMP if it differs from the draft version contained in the City's August 26, 2019 formal Plan submission.

## **Consistency with Council Policies**

The Council reviews plans to evaluate their apparent consistency with the adopted plans of the Council. Council staff have reviewed the City's Plan and find that it is consistent with the Council's policies, as detailed below.

## **Forecasts**

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

The Plan includes the Metropolitan Council forecast totals for East Bethel (Tables 1-4 and 3-3). For reference, Metropolitan Council's forecasts are included in Table 1 below.

Table 1. City of East Bethel Forecasts

	Census 2010	Estimated 2018	Council Forecasts		
			2020	2030	2040
Population	11,626	12,029	12,400	15,400	18,400
Households	4,060	4,230	4,700	6,000	7,400
Employment	1,123	1,342	1,700	1,950	2,200

Chapter 3 of the Plan describes and inventories land supply for future development and redevelopment. If all the identified land supply was developed at the mid-point of allowed density ranges, East Bethel could accommodate 5,029 new housing units, from 2020 to 2040 (Table 3-4 of March 2020 supplemental information). This land supply accommodates the growth forecast.

Metropolitan Council requires some measure of employment-bearing land use intensity. Expected Floor Area Ratios (FAR) are included in land use descriptions in Chapter 3.

## **Thrive MSP 2040 and Land Use**

Reviewer: Eric Wojchik, CD – Local Planning Assistance (651-602-1330)

## **Revised Community Designation**

The Plan is consistent with *Thrive MSP 2040* (*Thrive*). The Plan acknowledges the *Thrive* community designation of Rural Center and Diversified Rural (Figure 2), but requests a change to the Community Designation for the southeastern portion of the City, from Rural Center to Diversified Rural (Figure 3).

During the development of the 2040 Plan, the City initiated discussion with Council staff regarding a change to the community designation for the southeastern portion of the City. Future sewered residential development in the southeastern portion of the City is constrained by ground conditions and limited development potential in the near term.

Further, the small lots within East Bethel on the southeast shore of Coon Lake could not be feasibly served with municipal utilities without those services being installed within either the City of Ham Lake or within the City of Columbus. The City commits to working with the Coon Lake property owners to communicate the importance of maintaining the individual septic systems near Coon Lake and has created a new Coon Lake land use category to allow the City to enact ordinances and regulations necessary for the unique characteristics of the lots around Coon Lake. The City acknowledges the need for a coordinated, long-term solution for the water quality issues at Coon Lake; therefore, the Plan details that the southeast corner of the City will remain within the Long-term Wastewater Service Area.

Council staff find that the City's request to change its community designation to be reasonable and supports the City's request for a change in community designation from Rural Center to Diversified Rural in the southeastern portion of the City as reflected in Figure 3 of this Review Record. At such time that a coordinated solution for issues is developed, the Council will consider a change in community designation that reflects local and regional wastewater system planning for this area.

## **Land Use**

The Plan acknowledges the Thrive community designations of Rural Center and Diversified Rural (Figure 3). The existing land uses in East Bethel are predominantly undeveloped land (47%), residential (18%), and agricultural land (11%). The majority of the commercial (1.8%), industrial (0.6%) and institutional (0.3%) uses are located along TH 65 corridor. Approximately 13% of the City consists of parks and open space (Figure 4).

Figure 5 shows the future residential land use categories within the Rural Center portion of the City to include Low Density Residential, Medium Density Residential, High Density Residential, and Mixed Use (72.5% Low Density Residential, 7.5% High Density Residential, and 20% General Commercial).

### *Rural Center*

Rural Centers are local commercial, employment, and residential activity centers serving rural areas in the region. These small towns are surrounded by agricultural lands and serve as centers of commerce to those surrounding farm lands and the accompanying population. Rural Center communities are expected to plan for forecasted population and household growth at average densities of at least 3 -5 units per acre for new development and redevelopment. In addition, Rural Center communities should strive for higher-density commercial uses and compatible higher-density residential land uses in the commercial core of the community to ensure efficient uses of existing infrastructure investments.

In the 2030 Comprehensive Plan, the residential districts with urban services and the Mixed Use district had a narrow density range of 3 to 6 units per acre. The residential districts with urban services and the Mixed Use district within the 2040 Plan have density ranges from 2.25 units per acre to 30.0 units per acre. Additionally, the 2040 population and household forecasts do not support the full development of the corridor and therefore there is a new Future Growth Area land use that allows for limited low density development (1 unit per 10 acres) on septic systems until population growth demands additional urban development. Another difference between the 2030 and 2040 Plans is the change in the Coon Lake area from designated as Low/Medium Density Residential with a density range of 3 to 4 units per acre to a new Coon Lake land use plan intended to maintain or decrease density by combining lots through redevelopment.

The Plan is consistent with Thrive for land use and residential density policies for a Rural Center community designation. Thrive calls for Rural Center communities to plan for forecasted population and household growth at overall average densities of at least 3 units per acre. As shown in Table 2 below, the overall planned residential density in the City is between 3.2 and 7.2 units per acre, which is consistent with Thrive for land use and residential density policies for Rural Center community designation.

Table 2. Planned Residential Density, City of East Bethel

Category	2018-2040 Change				
	Density			Min Units	Max Units
	Min	Max	Net Acres		
Low Density Residential	2.25	4	152.2	343	609
Medium Density Residential	4	12	212.4	850	2549
Mixed Use – Low Density Residential*	2.25	4	614.7	1383	2459
Mixed Use – High Density Residential**	12	30	63.6	763	1908
	<b>TOTALS</b>		<b>1042.9</b>	<b>3338</b>	<b>7525</b>
	<b>Overall Density</b>			<b>3.2</b>	<b>7.2</b>

\*72.5% Low Density Residential  
\*\*7.5% High Density Residential

### Diversified Rural

Diversified Rural communities are home to a variety of farm and nonfarm land uses including very large-lot residential, clustered housing, hobby farms, and agricultural uses. Diversified Rural communities are expected to plan for growth not to exceed forecasts and in patterns that do not exceed 4 units per 40 acres. In addition, Diversified Rural communities are expected to manage land uses to prevent the premature demand for extension of urban services, and so that existing service levels will meet service needs.

The future residential land use categories within the Diversified Rural Community Designation includes a Future Growth Area, within 3/4 mile of the TH 65 corridor. This area will be guided at low density (1 unit per 10 acres) to allow for the future expansion of urban services. The Plan also includes a land use for Rural Residential existing lots (average density of 1 unit per 10 acres), Agricultural land use (1 unit per 40 acres), and a designation for the Coon Lake area. The Coon Lake land use recognizes the small lots adjacent to Coon Lake with the aim of addressing nonconforming lots through encouraging parcel assembly and reducing environmental impacts associated with noncompliant SSTS. The Plan includes the [Metropolitan Council's Flexible Residential Development Guidelines](#) to preserve land for the provision of future urban services through cluster development, ghostplanning, or conservation easements.

### Agricultural Preserves

The Plan is consistent with Council policy for lands enrolled in the Agricultural Preserve Program. The Plan identifies lands enrolled in the Agricultural Preserve Program on the Future Land Use map as Agricultural Preserve with a maximum density of one unit per 40 acres, which is consistent with Minnesota Statute § 473H.02, subdivision 7.

### Advisory Comments

Table 3-4 shows the Residential Growth Potential within the City. Contrary to the communitywide net average minimum density shown as 5.09 units per acre, which appears to have been taken from the midpoint of the various density ranges, the Council's calculation, based on minimum density is 3.2 units per acre (Table 2 above). The Council calculates minimum average community density based on net acres and the minimum density of each land use category. The City should revise Table 3-4 to be consistent with the Council's calculation prior to final plan submission.

The current Diversified Rural area within the City has an existing density of approximately 1 unit per 6.5 acres. To achieve an average net density of 1 unit per 10 acres within the Diversified Rural area of the City, the City should consider creating a new land use category that recognizes existing density, while creating another land use category that protects undeveloped areas through density restrictions. The City can allow for densities higher than 1 unit per 10 acres in certain cases (see the Metropolitan Council's [Flexible Residential Development Examples for the Diversified Rural Area](#)), provided that the

overall average net density of the Diversified Rural portion of the City remains at 1 unit per 10 acres. Council staff can continue to assist the City with this prior to final plan submission.

## ***Housing***

*Reviewer: Hilary Lovelace, CD – Housing (651-602-1555)*

The Plan is consistent with the 2040 *Housing Policy Plan*. As of 2016, the City has more than 4,300 homes including 19 multifamily units and more than 4,000 single-family homes. Approximately 250 homes are rented. More than 3,000 housing units are currently affordable to households earning under 80% of Area Median Income (AMI); however, more than 500 households earning 80% of AMI or below are paying more than 30% of their income toward housing costs. There are 280 units affordable to households with income at or below 30% AMI and about 150 cost burdened households with incomes at or below 30% AMI.

The Plan identifies existing housing needs including the housing needs of aging residents, and housing that is affordable to a range of income levels, especially cost-burdened moderate and low income households. The City does not currently have any publicly subsidized housing.

The Plan acknowledges the 2021-2030 affordable housing need allocation of 214 units; 109 of which are needed at prices affordable to households earning 30% of AMI or less, 68 of which are needed at prices affordable to households earning between 31 and 50% of AMI, and 37 of which are needed at prices affordable to households earning between 51 and 80% of AMI. As shown in Figure 6, the Plan guides sufficient land expected to develop in the 2021-2030 time period at a minimum of eight units per acre to allow for development of at least 380 new housing units.

The housing implementation plan component of the Plan describes that the City will actively support the creation of additional affordable housing units if manufactured housing units are removed from the City's housing stock as part of a redevelopment of an existing manufacturing home park. The Plan also indicates that the City will consider applying for livable communities grants on behalf of developers who provide affordable housing for households at or below 80% with the guaranteed length of affordability at least 20 years, and will consider adoption of a local fair housing policy if the City applies for and is awarded an LCA grant. The City states that they will continue the rental licensing and inspection program currently in place.

## ***Water Supply***

*Reviewer: John D. Clark, ES – Water Supply Planning (651-602-1452)*

The Plan is consistent with WRPP policies related to water supply, including the policy on sustainable water supplies, the policy on assessing and protecting regional water resources, and the policy on water conservation and reuse.

East Bethel prepared a Local Water Supply Plan that was submitted to the DNR in 2017 that was reviewed separately by the Council. The Council found the plan to be complete in a letter to the DNR in July of 2017. The DNR found the LWSP to be complete in March of 2018.

## ***Advisory Comments***

To ensure plan consistency, we ask that the City confirm that the version of the LWSP attached to their 2040 Plan is the same version of the LWSP approved by the DNR in March of 2018.

## ***Community and Subsurface Sewage Treatment Systems (SSTS)***

*Reviewer: Kyle Colvin, ES – Engineering Programs (651-602-1151)*

The Plan indicates that there are approximately 4,300 existing individual SSTS in operation in the City. In addition to the publicly owned MCES Wastewater Reclamation Facility, there are two Community Wastewater Treatment Facilities operating in the City. One is the privately-owned Village Green Facility which treats wastewater from a manufactured home community, and the other is a publicly owned facility serving the Cedar Creek and East Bethel Community Schools. The City has adopted an

ordinance for SSTS regulation in the City (Ordinance 61G) that is consistent with Minnesota Pollution Control Agency Chapter 7080-7083 Rules and Council 2040 Water Resources Policy Plan requirements.

## **Special Resource Protection**

### **Solar Access Protection**

Reviewer: Cameran Bailey, CD – Local Planning Assistance (651-602-1212)

The Plan is consistent with statutory requirements (Minn. Stat. § 473.859) and Council policy regarding planning for the protection and development of access to direct sunlight for solar energy systems as required by the Metropolitan Land Planning Act (MLPA). The Plan includes the required solar planning elements.

### **Aggregate Resource Protection**

Reviewer: Cameran Bailey, CD – Local Planning Assistance (651-602-1212)

The Plan indicates, consistent with the Council's aggregate resources inventory included in *Minnesota Geological Survey Information Circular 46*, that there are no known deposits of viable aggregate resources available for mining within the community.

### **Historic Preservation**

Reviewer: Eric Wojchik, CD – Local Planning Assistance (651-602-1330)

The Plan addresses historic resources as required by the MLPA. Within Chapter 3, Land Use Plan, the City of East Bethel commits to the creation of an inventory of historically significant features, landmarks, and buildings, and evaluation tools for preserving these areas and structures. The Plan also states that, where feasible, the City will assist with the acquisition of historically significant sites or structures in order to provide educational or recreational opportunities.

### **Plan Implementation**

Reviewer: Eric Wojchik, CD – Local Planning Assistance (651-602-1330)

The Plan includes implementation details in Chapter 7, Implementation. The Plan includes a description of and schedule for any necessary changes to the capital improvement program, the zoning code, the subdivision code, and the the SSTS code; the housing implementation program is included in the Housing Chapter, Chapter 2.

## **Compatibility with Plans of Adjacent Governmental Units and Plans of Affected Special Districts and School Districts**

The proposed Plan is compatible with the plans of adjacent jurisdictions. No compatibility issues with plans of adjacent governmental units and plans of affected special districts and school districts were identified.

## **Documents Submitted for Review**

In response to the 2015 System Statement, the City submitted the following documents for review:

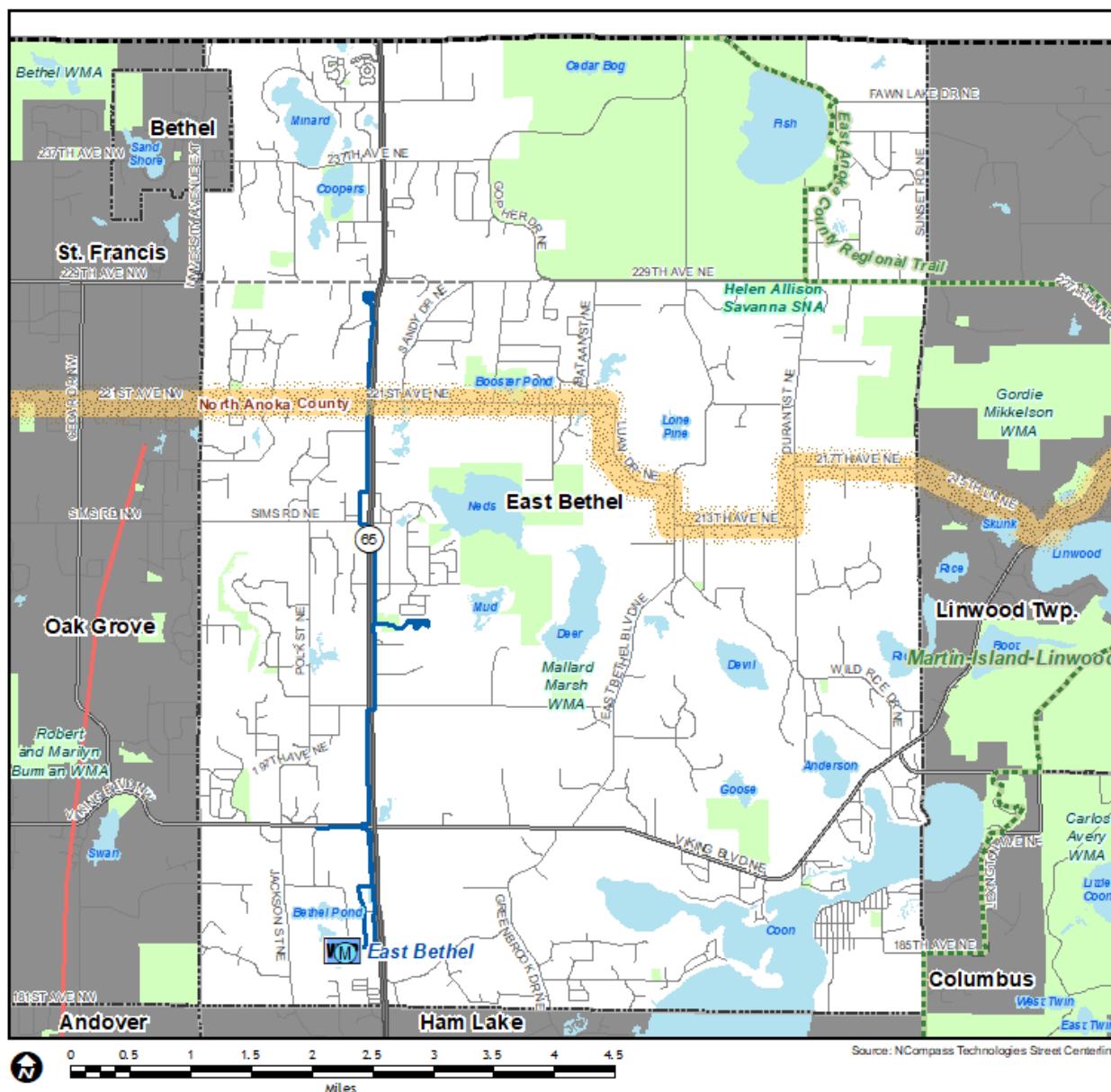
- July 27, 2018: East Bethel Preliminary 2040 Comprehensive Plan
- June 10, 2019: East Bethel 2040 Comprehensive Plan
- June 10, 2019: Local Surface Water Management Plan
- July 31, 2019: Revised Local Surface Water Management Plan
- August 26, 2019: Revised Comprehensive Plan Responding to Council Incomplete Items for Organization, Transportation, Wastewater, Land Use, Forecasts, Water Resources, Housing, and Community Wastewater Treatment and Subsurface Sewage Treatment Systems (SSTS).

- March 18, 2020: Revised Comprehensive Plan Responding to Council Incomplete Items for Wastewater, Forecasts, and Community Wastewater Treatment and Subsurface Sewage Treatment Systems (SSTS).
- April 6, 2020: Deadline Extension
- May 13, 2020: Deadline Extension
- June 1, 2020: Deadline Extension
- June 11, 2020: Updated Shape Files and Figures
- July 29, 2020: Revised Introduction Chapter and Water Resources Management Plan
- August 17, 2020: Deadline Extension
- August 31, 2020: Deadline Extension
- September 9, 2020: Revised Introduction Chapter and Water Resources Management Plan

## **Attachments**

- Figure 1: Location Map with Regional Systems  
Figure 2: *Thrive MSP 2040* Community Designations  
Figure 3: Revised Community Designations  
Figure 4: Existing 2030 Planned Land Use  
Figure 5: 2040 Planned Land Use  
Figure 6: Land Guided for Affordable Housing

**Figure 1. Location Map with Regional Systems**



Source: NCompass Technologies Street Centerline

## Regional Systems

### Transportation

Transitways  
2040 Transportation System Policy - adopted January 2015

- Existing
- - - - - Planned Current Revenue Scenario
- - - - - Planned Current Revenue Scenario - CTIB\* Phase 1 Projects
- Potential Increased Revenue Scenario

### Regional Highway System

- Existing Principal Arterials
- ===== Planned Principal Arterials
- Existing Minor Arterials
- ===== Planned Minor Arterials
- Existing Other Arterials
- ===== Planned Other Arterials

### Recreation Open Space

- Regional Parks
- Existing (Open to Public)
  - In Master Plan (Not Open to Public)
  - Planned Units

- Regional Trails
- Existing (Open to Public)
  - Existing (Not Open to Public)
  - Planned

### Wastewater

- (M) Meters
- (L) Lift Stations
- MCES Interceptors
- MCES Treatment Plants

### Regional Park Search Areas and Regional Trail Search Corridors

- Boundary Adjustment
- Search Area
- Regional Trail Search Corridors

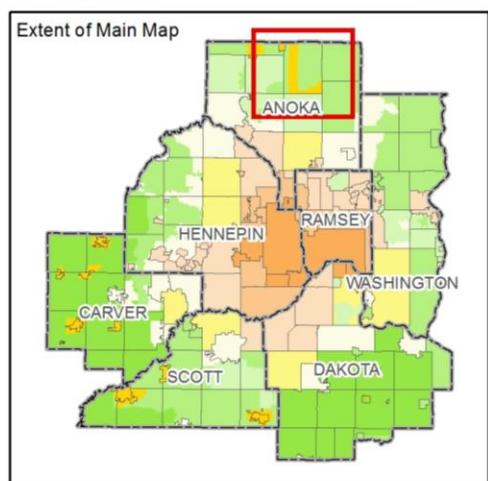
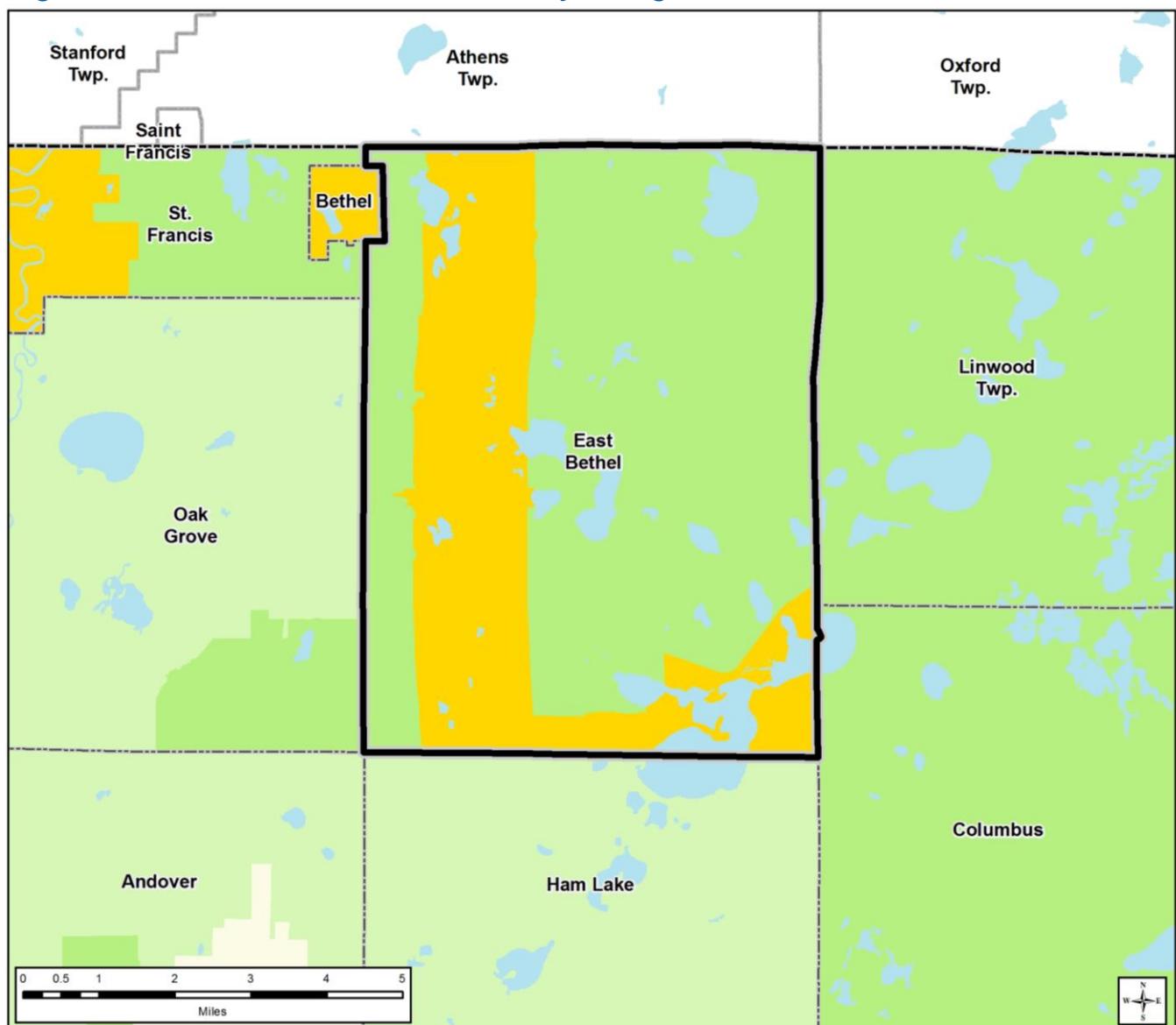
— Local Streets

— Existing State Trails

— Other Parks, Preserves, Refuges and Natural Areas

\* Counties Transit Improvement Board (CTIB)

**Figure 2. Thrive MSP 2040 Community Designations**

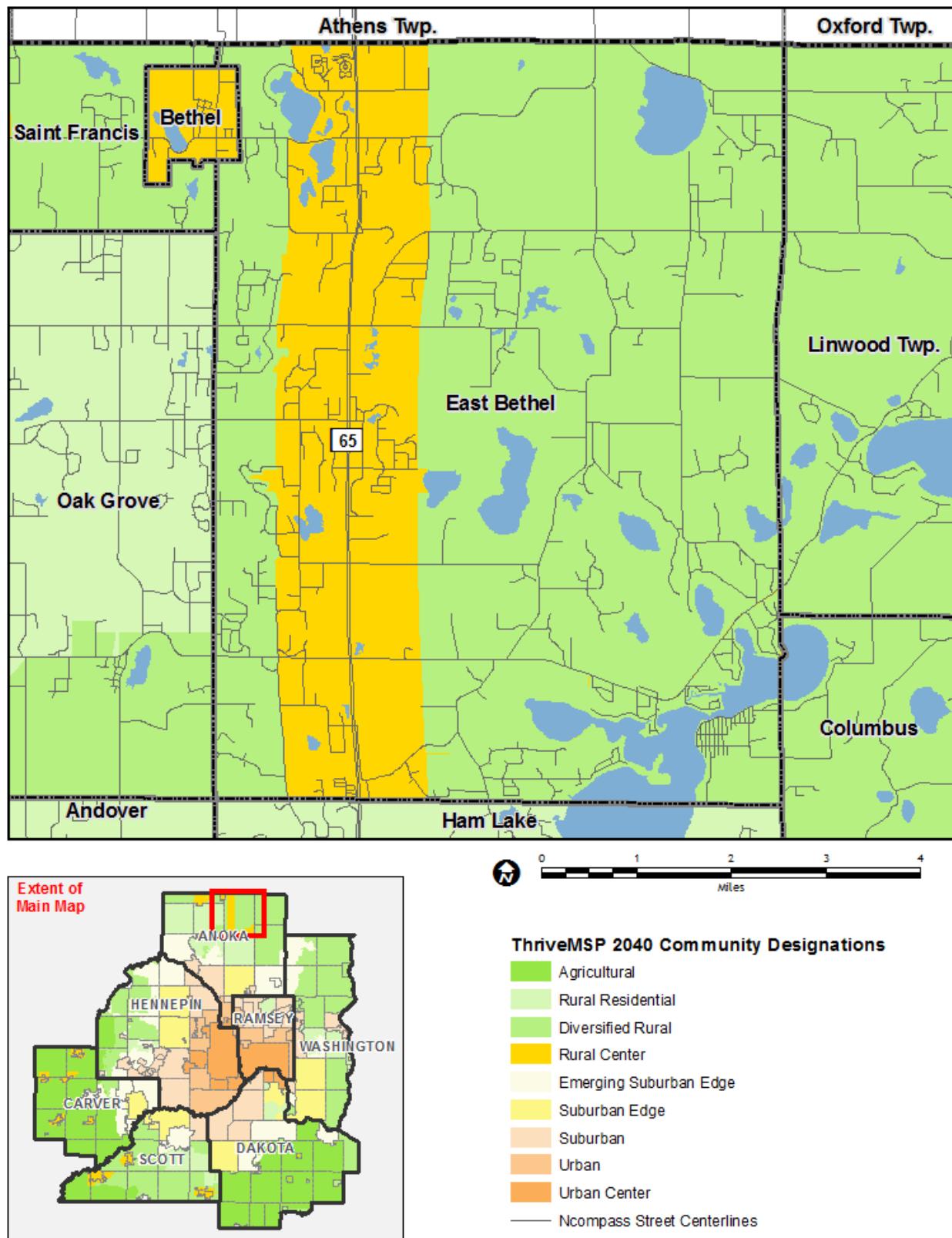


#### Community Designations

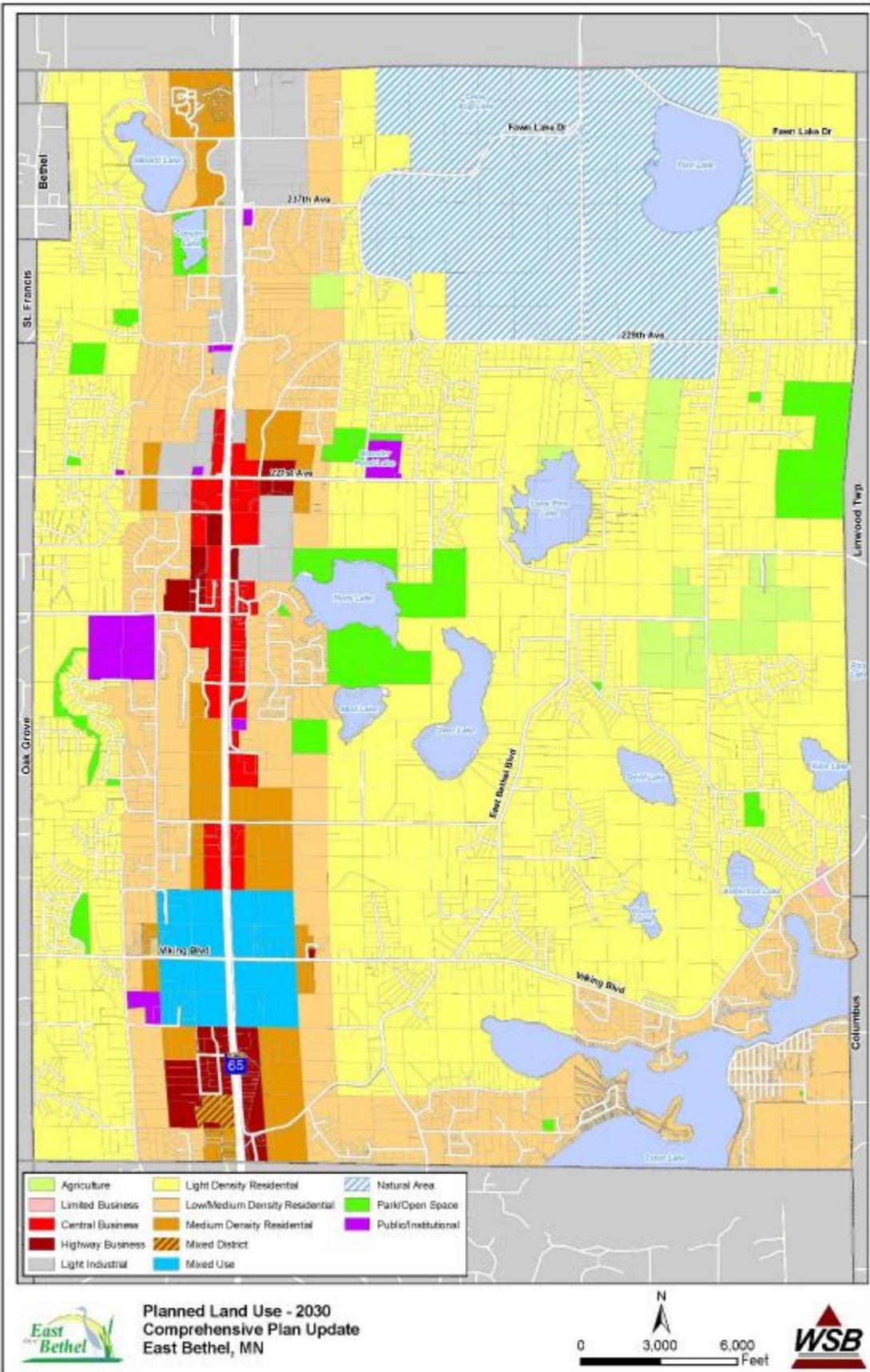
Outside Council planning authority	Emerging Suburban Edge
Agricultural	Suburban Edge
Rural Residential	Suburban
Diversified Rural	Urban
Rural Center	Urban Center

- County Boundaries
- City and Township Boundaries
- Lakes and Major Rivers

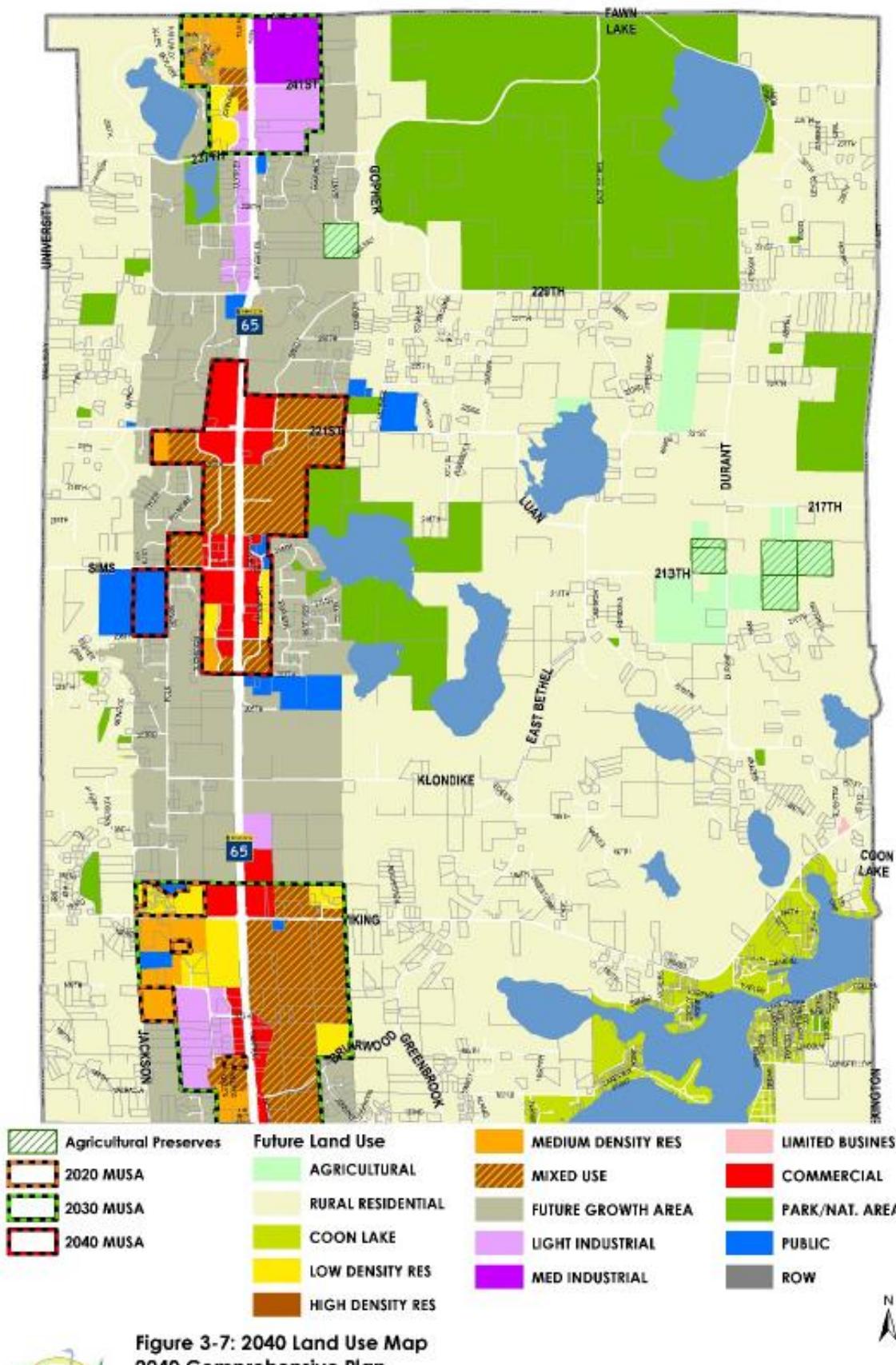
*Figure 3. Revised Community Designations*



*Figure 4. Existing 2030 Planned Land Use*



*Figure 5. 2040 Planned Land Use*



**Figure 3-7: 2040 Land Use Map**  
**2040 Comprehensive Plan**  
**East Bethel, MN (draft January 16, 2019)**



0 1,250 2,500 5,000  
Feet

wsb

*Figure 6. Land Guided for Affordable Housing*

2021-2030 share of regional need for Affordable Housing:	<b>214 units</b>			
2021-2030 total regional need for Affordable Housing:	<b>37,900 units</b>			
<b>Mixed Use High Density Residential</b>				
Available Acres	×	Minimum Density (units per acre)	Expected % Residential (if mixed use)	= Minimum Units Possible
31.65		12	100%	380
<b>Total</b>	<b>32</b>			<b>380</b>

Sufficient/(insufficient) units possible against share of regional need: **166**

Affordable units built since 2021: **0**

Sufficient/(insufficient) units possible adjusted for affordable units built: **166**

Number of Comp Plan Amendments approved since Comp Plan Update: **0**

