

October 15, 2018

Eric Weiss
Senior Planner – Long Range
Planning Division
City of Shakopee
485 Gorman Street
Shakopee, MN 55379

SUBJECT: City of Shakopee 2040 Comprehensive Plan
MnDOT Review # CPA18-085
Shakopee, Scott County

Dear Mr. Weiss:

Thank you for the opportunity to review the City of Shakopee 2040 Comprehensive Plan. MnDOT's staff has reviewed the document and has the following comments:

Transportation Chapter Comments:

- Page 214, Access Management: "The Transportation section of the City of Shakopee 2030 Comprehensive Plan provides guidelines for access spacing..." Please consider including an access spacing table for city streets in the plan update. Otherwise, the reader will need to make reference to an older document.
- Pages 244 and 251: to be more accurate, the new interchange at TH 41/CH 78/US 169 is a "diverging diamond interchange"
- Page 271: Clarify that any ped/bike crossing of US 169 would be a grade separated improvement – the preceding paragraphs discuss at-grade improvement options.

Please contact Matt Engstrom (Matthew.Engstrom@state.mn.us or 651-234-7724) if you have any questions about these comments.

Review Submittal Options:

MnDOT's goal is to complete the review of plans within 30 days. Submittals sent in electronically can usually be turned around faster. There are four submittal options. Please submit either:

1. An electronic .pdf version of the plans. MnDOT can accept the plans via e-mail at metrodevreviews.dot@state.mn.us provided that each separate e-mail is less than 20 megabytes.
2. A compact disc with the plans in .pdf format. The disc can be sent to:

MnDOT – Metro District Planning Section
Development Reviews Coordinator

An equal opportunity employer

1500 West County Road B-2
Roseville, MN 55113

3. A .pdf version of the plans sent to MnDOT's external shared workspace site located at:
<https://mft.dot.state.mn.us> Please contact MnDOT development review staff gain access to the shared workspace site. Also, please send a note to metrodevreviews.dot@state.mn.us indicating the file name and stating that the plans have been submitted on the shared workspace site.
4. If you are unable to send the plans electronically, please submit a set of full size plans to the above address.

If you have any questions concerning this review, please contact me at (651) 234-7797.

Sincerely,



Cameron Muhic
Senior Planner

Copy sent via E-Mail:

Jeff Rones, Design
Hailu Shekur, Water Resources
Almin Ramic, Traffic
Ben Klismith, Right-of-Way
Buck Craig, Permits

Russell Owen, Metropolitan Council
Matt Engstrom, Area Engineer
Cameron Muhic, Bike-Ped
Diane Langenbach, Area Engineer

To: Joe Widing, Planner
City of Shakopee
485 Gorman Street
Shakopee, MN 55379

Re: Agency Response to Proposed Shakopee Comprehensive Plan Update

Applicant: City of Shakopee

Please be advised that **Prior Lake** has received notice from the
City of Shakopee of the proposed 2040 Comprehensive Plan update.

Please check the applicable box below:

- ☒ The update is not anticipated to impact this jurisdiction/agency. No comments will be forthcoming.
- ☐ This agency will submit written comments on the application.
- ☐ Other: (attach separate sheets if necessary)

Casey McCabe GPH
Name

10-23-18
Date

Community Development Director
Title

From: [Diane Lynch](#)
To: [Joseph Widing](#)
Cc: calmer@eorinc.com; [Kirby Templin](#)
Subject: Shakopee's Draft 2040 Comprehensive Plan
Date: Friday, October 26, 2018 4:17:34 PM
Importance: High

Good afternoon, Mr. Widing—

We reviewed your draft plan. On page 291, it states that the City “updated its Local Surface Water Management Plan in 2018.” Isn’t it still under development? We haven’t reviewed it yet. Also, on page 292, it states “Joint Powers Agreement for Prior Lake Outlet Channel” and then states it again, a little differently, in the third bullet. The Memorandum of Agreement is between the SMSC, Shakopee, Prior Lake and the PLSLWD for the Use, Operation and Maintenance of the Prior Lake Outlet Channel and Outlet Structure.

Please let me know if you have any questions.

Thank you!

Diane

Diane Lynch
District Administrator
Prior Lake-Spring Lake Watershed District
4646 Dakota Street SE
Prior Lake, MN 55372
952-440-0067



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

November 2, 2018

Mr. Eric Weiss
Senior Planner – Long Range
Shakopee City Hall
485 Gorman St.
Shakopee, Minnesota 55379

Dear Mr. Weiss:

We are writing to follow up on our first letter, dated March 1, 2017, which discussed manufactured housing and Shakopee's Comprehensive Plan 2018 update.

Manufactured Housing Language in Shakopee's 2040 Comprehensive Plan Draft

To help you complete your draft, we created the following schema for evaluating Comprehensive Plan language as it relates to manufactured housing.

Negative – Mention of manufactured housing in the Comprehensive Plan draft is negative, whether furthering stigma, calling for closure, or describing plans for redevelopment, zoning, or land use changes that reduce protection of manufactured housing parks.

No obvious examples in draft.

Invisible – Little or no mention of manufactured housing or relevant data exists in the Comprehensive Plan draft, or clear opportunities to provide meaningful data on manufactured housing are present but not acted upon. Similar to the category, "Purely Descriptive," described below, the category, "Invisible" applies to Comprehensive Plans that fail to substantially engage with strategies that support a city's manufactured housing. Engaging with and supporting all residents ensures that the entire community is strengthened in the long-run.

Manufactured housing is mentioned in draft.

Purely Descriptive – Mention of manufactured housing is limited to statistics related to how much manufactured housing exists in the city, or other basic facts without discussion of improvement. The Comprehensive Plan draft provides an important opportunity for describing methods of supporting manufactured housing in the City as an unsubsidized and primarily owner-occupied affordable housing resource, and an important source of affordable housing in Shakopee. The City can go further in describing tangible support strategies for these communities.

Examples of Purely Descriptive Language from Shakopee's 2040 Comprehensive Plan Draft:

See Existing Land Use Table on Page 118.

Identifies manufactured housing as affordable housing – Comprehensive Plan language clearly states that manufactured housing provides affordable housing in the City.



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

Example of language identifying manufactured housing as affordable from Shakopee's 2040 Comprehensive Plan Draft:

"Located northwest of the 69/169 interchange, Bonnevista Terrace Mobile Home Park includes more than 200 hundred home sites and is the area's largest mobile home park ... Recommendations: Discourage redevelopment of Bonnevista Terrace Mobile Home Park as it provides Shakopee with housing options" (200). This language could be more specific to say that the park provides affordable housing options. Additional details about how to preserve the park could be added, such as establishing protective zoning/land use designations.

Identifies clear strategies to support manufactured housing – Comprehensive Plan language describes tangible methods to improve manufactured housing.

Example of a clear strategy to support manufactured housing from Shakopee's 2040 Comprehensive Plan Draft:

None

Identifies funding sources to support manufactured housing – Comprehensive Plan language describes funding sources that can be used to improve manufactured housing.

Examples of funding sources to support manufactured housing from Shakopee's 2040 Comprehensive Plan Draft:

None

Connects improvement strategies to funding – Comprehensive Plan language describes both clear strategies to improve manufactured housing and identifies funding sources that can be applied towards them.

Examples connecting strategies to funding from Shakopee's 2040 Comprehensive Plan Draft:

None

Shakopee's 2040 Comprehensive Plan draft could more clearly **identify manufactured housing as affordable housing, identify clear strategies to support manufactured housing, identify funding sources to support manufactured housing, and connect improvement strategies to funding**. Shakopee can improve its language towards manufactured housing across all of the categories described above, so that the draft's treatment of manufactured housing is not invisible, or purely descriptive.

If your City has additional ways that it supports manufactured housing that are not clearly mentioned, we encourage you to address them explicitly in your updated Comprehensive Plan draft.

Based on our analysis, we would like to make the following specific recommendations:

- Create, describe, and maintain a policy of at least a one to one ratio replacement of affordable housing units if any are removed from the City's housing stock.
- Fill vacancies in parks.



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- Create protective land use and zoning designations for Bonnevista Mobile Home Park.
- Incentivize the current owners of manufactured housing parks to sell to residents by creating incentives to do so, which could include forgiving back-taxes, utilities, or providing tax breaks if it is sold to a non-profit with the intention of creating a resident-owned community. Creation of a resident ownership-structure can help reduce tensions between residents and management, provide incentives for residents to get even more involved in supporting the well-being of their community, and ensure that manufactured housing parks remain a valuable affordable housing resource.

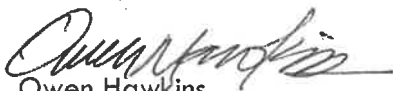
In general, it would help to reflect on the following key points regarding the value of manufactured housing and to address them in your updated comprehensive plan language:

- Manufactured housing is unsubsidized affordable housing.
- Manufactured housing provides more affordable housing in Minnesota than any other form of affordable housing.
- Manufactured housing is valuable to local businesses because it provides workforce housing.
- Manufactured housing provides owner-occupied housing.
- Manufactured housing provides housing to seniors, youth, and low-income individuals, enabling them to stay in a neighborhood and community they value.
- Modern construction of manufactured housing is more cost-effective, generates less waste, is more energy efficient, and more timely than site-built housing.
- Manufactured housing communities are more stable than terms like "mobile homes" or "trailers" suggest, and homes often stay in place and are used like any other type of residence for many years.
- Many issues can be resolved through the creation of a resident-owned community, which incentivizes residents to invest in their park.

We encourage you use the 2018 update process as an opportunity to incorporate positive language towards manufactured housing into your City's 2040 Comprehensive Plan. Doing so does not need to be overly complicated. Start by identifying manufactured housing as an affordable housing resource, describe tangible ways that it can be improved, and identify funding opportunities that support these methods.

We encourage you to contact us when you are working on issues related to manufactured housing. We can help you engage with residents and resolve problems with satisfactory outcomes for all parties. Thank you.

Sincerely,


Owen Hawkins
Program Associate


Dave Anderson
Executive Director

2380 Wycliff Street, Suite 200 ■ St. Paul, MN 55114
Phone: (651) 644-5525 ■ Fax: (651) 523-0173 ■ Toll Free: (855) 361-2722
info@allparksallianceforchange.org ■ www.allparksallianceforchange.org

January 2, 2019

Michael Kerski, Community Development Director
City of Shakopee
485 Gorman Street
Shakopee, MN

RE: Preliminary Review of the City of Shakopee 2040 Comprehensive Plan
Metropolitan Council District 4
Metropolitan Council Review File No. 22004-0

Dear Mr. Kerski:

Metropolitan Council staff have reviewed the preliminary draft of the City of Shakopee's 2040 Comprehensive Plan (Plan), received on July 6, 2018, and resubmitted on August 31, 2018. In the preliminary review, staff focused on whether the draft Plan appeared to be complete and contained any major system issues or policy conflicts. Time did not permit as thorough of a review as will occur when the Plan is officially submitted for Council review. A more detailed review may reveal other important matters that were not identified during this preliminary review.

When addressing the matters in this letter, City staff are advised to refer to the City's Checklist of Minimum Requirements in the Community pages of the online Local Planning Handbook and the City's System Statement:

City of Shakopee's Checklist of Minimum Requirements:
https://metro council.org/Handbook/Files/Checklist/02395854_Shakopee_Checklist.aspx

City of Shakopee's Community Page:
<https://lphonline.metc.state.mn.us/CommPage?ctu=2395854&applicant=Shakopee>

City of Shakopee's System Statement:
https://metro council.org/Communities/Planning/Local-Planning-Assistance/System-Statements/System-Statements/02395854_Shakopee_2015SS.aspx

The preliminary review process found the following sections **complete for review** and did not identify any major system issues or policy conflicts: Water Supply and Solar. Advisory comments are included below.

Water Supply (*Lanya Ross, 651-602-1803*)

The Plan is complete for Water Supply. Council staff offer the following advisory comments for your consideration.

If changes are made to the local water supply plan resulting from the DNR's review of that local water supply plan or from changes as the full comprehensive plan is finalized – such as changes to forecasts – the City will need to provide the Council with the updated information.

The following sections of the draft Plan are considered **incomplete**. Changes in the draft Plan are needed before the Plan is submitted to the Council for formal review.

Transportation (*Russ Owen, 651-602-1724*)

The Plan is **incomplete** for Transportation. To be complete for review, the Plan needs to address the following issues.

Roadways

- Identify future rights-of way that need to be preserved.

Advisory Comments

- The Plan nicely describes Roadway Classes for Principal, Minor, Collectors, and Local Roads. This area could be strengthened by also describing A-minors and Other Arterials which are also labeled on the Existing Functional Classification map.
- The neighborhood network map incorrectly labels several minor arterials as collectors. We recommend using naming consistently in this section.

Transit

- The Plan needs to identify existing and planned transit advantages within the City, as well as existing transit support facilities.
- The Plan notes on page 229 that the City is in Market Area III and IV. However, Shakopee also has an Emerging Market Area II (located in the historical downtown area). The Plan should note this additional market area.
 - Staff recommends that the discussion of Market Areas be shifted to the 'Existing Transit Conditions' section on page 224.
 - This additional Emerging Market Area II may also provide an opportunity for the City to consider as part of the Issues and Opportunities section of the Plan starting on page 238.

Advisory Comment

- A minor edit is needed on the map showing existing transit routes (page 227). In the legend under 'Type of Service' the solid line should indicate 'Local Bus Service' rather than "Existing Bus Service."

Bicycling and Walking

- The Plan needs to map and describe the RBTN within the City including:
 - All Tier 1 and Tier 2 RBTN corridors and alignments within the City.
 - Showing the relationship of the RBTN to the local bicycle network of off-road trails and on-street bikeways including all existing and planned connections.
 - For Tier 1 and/or Tier 2 corridors on the RBTN, describe and map the existing or planned bicycle facility alignments within established corridors that are proposed to fulfill the intent of the RBTN.

Aviation

- The Plan needs to identify policies and ordinances that protect the regional airspace from obstructions, include how your community will notify the FAA of proposed structures.
- The Plan needs to map the Flying Cloud Airport location, including existing and future airport boundaries, land access locations, and runways.
- The Plan needs to describe the existing and future functional and operational characteristics for any airport Flying Cloud Airport.
- The Plan needs to assess existing and future noise impacts of airport operations.
- The Plan also needs to evaluate, address, and establish policies related to land compatibility issues.

Freight

- Map the road network showing volumes of multi-axle trucks, also known as “heavy commercial average annual daily traffic,” for Principal and A-minor arterial roadways. There is a map on page 227, but it does not include volumes.
- The Plan needs to identify any local roadway issues or problem areas for goods movement, such as weight-restricted roads or bridges, bridges with insufficient height or width clearances, locations with unprotected road crossings of active rail lines, or intersections with inadequate turning radii.

General Advisory Comments

- The text should elaborate on the language in Scenario 3 (page 232) that states “currently planned expansion does not necessary line up with where overcapacity is anticipated.”
- Council staff encourage the City to consider including the RBTN on the Issues & Opportunities map on page 299.

Wastewater (Roger Janzig, 651-602-1119)

The Plan is **incomplete** for Wastewater. To be complete for review, the Plan needs to address the following issues.

- Include a table that details adopted community sewer forecasts in 10-year increments out to 2040 for Households and Employment. This should be broken down by areas served by the Metropolitan Disposal System Interceptor, and the 714 Subsurface sewage treatment systems referred to in the Plan.
- Provide an electronic map or maps (GIS shape files or equivalent) showing existing sanitary sewer system and the following information:
 - Lift stations.
 - Existing connections 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 your community.
- Provide a copy of intercommunity service agreements entered into with an adjoining community after December 31, 2008, including a map of areas covered by the agreement.
- Include a table or tables that provide the following local-system information:
 - Capacity and design flows for existing trunk sewers and lift stations.
 - Assignment of 2040 growth forecasts by Metropolitan interceptor facility.
- Define your community's goals, policies, and strategies for preventing and reducing excessive inflow and infiltration (I/I) in the local municipal (city) and private (private property) sanitary sewer systems.
 - Include a summary of activities or programs intended to mitigate I/I from both public and private property sources.
- Describe the requirements and standards in your community 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 (I/I) in both the municipal and private sewer systems.
 - Include a description of the existing sources of I/I in the municipal and private sewer infrastructure.
 - Include a summary of the extent of the systems that contributes to I/I such as locations, quantities of piping or manholes, quantity of service laterals, or other measures. If an analysis has not been completed, include a schedule and scope of future system analysis.
 - Include a breakdown of residential housing stock age within the community 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.
 - Include a cost summary for remediating the I/I sources identified in the community. If previous I/I mitigation work has occurred in the community, include a summary of flow reductions and investments completed. If costs for mitigating I/I have not been analyzed, include the anticipated wastewater service rates or other costs attributed to inflow and infiltration.
- Describe the implementation plan for preventing and eliminating excessive inflow and infiltration from entering both the municipal and private sewer systems.
 - Include the strategy for implementing projects, activities, or programs planned to mitigate excessive I/I from entering the municipal and private sewer systems.
 - Include a list of priorities for I/I mitigation projects based on flow reduction, budget, schedule, or other criteria.
 - Include a schedule and the related financial mechanisms planned or needed to implement the I/I mitigation strategy.
- For new trunk sewer systems that require connection to the Metropolitan Disposal System:
 - A table that details the proposed time schedule for the construction of the new trunk sewer system.
 - Type and capacity of the treatment facilities, whether municipally or privately owned.
 - Copies of the associated National Pollutant Discharge Elimination System (NPDES) or State Disposal System (SDS) permits.
- Describe your management program for sub-surface sewage treatment systems (SSTS) to comply with MPCA 7080 regulations.
- 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.

Regional Parks and Trails (*Angela R. Torres, 651-602-1566*)

The Plan is **incomplete** for regional parks and trails. To be complete for review, the Plan needs to address the following issues.

- Describe, map, and label the Regional Parks and Trails System facilities that are located in the City. In both text and on maps the City must identify the following facilities as *components of the regional parks and trails system*, not just destinations or as part of a local system. The correct names of the regional facility must be referenced throughout the Plan.
 - Special Recreation Feature:
 - The Landing
 - Regional Trails and Trail Search Corridors:

- Scott County Regional Trail
- Minnesota River Extension Regional Trail Search Corridor
- Louisville Regional Trail Search Corridor
- Prior Lake Outlet Regional Trail Search Corridor
- Descriptions of these facilities that would meet this requirement are provided in the City's 2015 System Statement as linked on the first page of this letter.
- Describe, map, and label the federal and state recreational lands located in the City. Mapping should identify these facilities differently than the local or regional system facilities. These facilities include:
 - Raguet Wildlife Management Area
 - Minnesota Valley State Recreation Area
 - Minnesota Valley National Wildlife Refuge
- The Minnesota Valley National Wildlife Refuge is identified, although not labeled, in the Natural Environment section maps as "Department of Natural Resource Owned Land." The Refuge is federal land owned by the U.S. Fish and Wildlife Service. This labelling should be corrected throughout the Plan.
- Include a capital improvement program for parks and open space facilities as part of your implementation program.

Advisory Comments

- For clarity on the Shakopee Trails System map, Council staff advises differentiating between the state/federal, regional, and city trails as identifying them all as a single color makes the alignment of specific trails difficult to follow.
- The Plan identifies a City-wide master planning effort for the City's park system, anticipated to be completed in mid-2019. If this planning effort concludes after the adoption of the 2040 Plan, the City should consider if the parks planning efforts change or impact the City's 2040 Plan and with the assistance of your Sector Representative, determine if an amendment to the 2040 Plan is needed.

Forecasts (Todd Graham, 651-602-1322)

The Plan is **incomplete** for transportation analysis zone (TAZ) forecasts. To be complete for review, the Plan needs to address the following issues.

- The Plan needs to include 2020, 2030, and 2040 forecasts assigned to transportation analysis zones (TAZs). The Transportation Plan includes City total population forecasts (page 230) that do not match the forecasts found in earlier chapters. The Plan mentions but does not include the City's TAZ allocations. The Plan includes maps of the Council's preliminary TAZ allocation. Council staff advise that the Council's allocation is preliminary and will be replaced by TAZ allocations received from the City.
- The Metropolitan Urban Service Area (MUSA) section of the 2040 Plan (page 300) does not include sewer-served households, population, and employment forecasts. The Council expected that 500 to 700 households are unserved (using private septic systems) throughout the forecast period. The City does not confirm this, nor provide an alternative table. The Plan needs to clarify the sewer-served forecast section.

Advisory Comments

- City staff can contact Council staff to discuss a reasonable forecast of sewer-served population and households, such as the one recommended below. The Council can adjust the forecast, if requested, to reflect expected numbers of unserved households.

	Census	Recommended Council Forecasts		
	2010	2020	2030	2040
Population	36,946	47,800	55,900	62,600
Metro Sewered	34,646	45,800	54,200	61,200
Unserviced	2,300	2,000	1,700	1,400
Households	12,722	16,300	19,400	22,100
Metro Sewered	11,942	15,600	18,800	21,600
Unserviced	780	700	600	500
Employment	18,831	25,700	29,100	32,800
Metro Sewered	18,831	25,700	29,100	32,800
Unserviced	0	0	0	0

- The City requests a revision to the Metropolitan Council's forecast for Shakopee. The revised forecast appears on page 47 of the preliminary 2040 Plan as below:

Metropolitan Council Forecast: Shakopee

	2010	2020	2030	2040
Population	36,946	47,800	55,900	62,600
Households	12,722	16,300	19,400	22,100
Employment	18,831	25,700	29,100	32,800

Council staff consider the revised forecast to be reasonable - accommodating recent and upcoming projects, known land use changes, and new areas to be annexed from townships west of Shakopee. The Council can approve this forecast revision, concurrent with authorizing the 2040 Plan.

- With the above forecast revision, the 2021-2030 Affordable Housing Need for Shakopee is increased. The new 2021-2030 Affordable Housing Need numbers are: 548 units at <=30% AMI, 145 units at 31-50% AMI; 282 units at 51-80% AMI; 975 units total.

Land Use (*Angela R. Torres, 651-602-1566*)

The Plan is **incomplete** for land use. To be complete for review, the Plan needs to address the following issues.

- The Existing Land Use Map and related Table need to be consistent with one another. Railroad uses are included in the Table but are not identified on the Map. The Existing Land Use Map is confusing with the addition of tree cover to open space areas, which is different than the Table. Tree cover should be included on a separate land cover map if the City is interested in including that information.
- Show existing regional parks, park reserves, and special recreation features with a land use of "Park" on the Existing Land Use Map. There is not a Park Land use category on the Existing Land Use Map or Table to represent these features. These features are described in the City's System Statement.
- The section on Understanding the Distinction between Land Use and Zoning Code needs to be clear that the Comprehensive Plan is a legal document, as defined in the Metropolitan Land Planning Act, and to which ordinances and fiscal devices must conform. A comprehensive plan provides both guiding and serves as a regulatory document because of

the connection between land use and the provision of regional services. The zoning ordinances of the local jurisdiction must be consistent with the adopted land use plan. This section could be misinterpreted and should be clarified to ensure consistency with state statute. This is outlined in Minn. Stat. Chapter 473, and more specifically in Minn. Stat. § 473.864, subd. 2 (<https://www.revisor.mn.gov/statutes/cite/473.864#stat.473.864.2>). Communities have 9 months following the final adoption of the 2040 plan to update all relevant official controls for consistency with the 2040 plan, which includes the zoning ordinance.

- The Planned Land Use Table includes areas in Jackson Township and Louisville Township. Council staff are not aware of an orderly annexation agreement with Louisville Township. Although the table's footnote mentions that the table "does not represent ongoing annexation," the table must distinguish between land area outside the city's jurisdictional authority or included in an executed orderly annexation agreement (OAA) and that which is not yet covered in an OAA.
- The Plan must provide a table that calculates total acres and percent of total acres for each land use category by each 10-year planning period (2020, 2030, 2040). The Development Phasing Table provides some of this information for residential developments, but excludes all other uses and focuses on development areas instead of land uses. This table could easily be used to inform the completion of the required table.
- The Development Phasing Table usefully identifies the redevelopment, infill, and greenfield developments through 2040. This table does not include the following land use categories that permit residential land uses: Downtown Business District, Downtown Transition, Suburban Edge Residential, Rural Transition, or Entertainment District - Valleyfair. Based on recent development proposals and conversations with City staff, it seems feasible that infill or redevelopment may happen in the Downtown Districts, consistent with the Plan's goal for those districts. The Plan should clarify whether development is expected to occur in these other districts, and if so, should include associated acreages and timing as part of the Development Phasing Table. The new table discussed above should include the required information for all land use categories.
- The Suburban Residential Category in the Development Phasing Table identifies a density of 2 units per acres, but the minimum density in that land use category is 3 units per acre. This should be corrected.
- The Rural Transition District should clarify whether utilities will be provided and indicate whether the density is the maximum density expectation. Based on the narrative and maps, it does not appear that the intent is to provide water and sewer to this district, but if it is, then the district description needs to also include a minimum allowable density.
- The total planning area in acres in the Planned Land Use Table is close to the total in the Existing Land Use Table, which implies that the Existing Land Use Table also includes areas in Jackson and Louisville Township, which must be corrected to include only areas within existing City boundaries or within an executed orderly annexation agreement where the City has land use jurisdictional authority.
- Zero (0) is not an acceptable minimum value for minimum density ranges for land use categories. Calculations for land use analysis cannot use these values. The City can start with smaller increments, for example 0.1 dwelling units per acre. This would apply to the Suburban Edge Residential land use category if this area is intended to be provided with sewer services. Like the Rural Transition District note above, the narrative here should also clarify whether the provision of water and sewer is planned for this district.
- To confirm land use planning authority for land areas currently outside the City's boundaries but shown in the Planned Land Use information, please include copies of the most recent

orderly annexation agreements with Jackson Township and Louisville Township. This can be included in the Appendix.

- Land use categories must be used consistently throughout your Plan. The Planned Land Use Map should reference the same category names as used in the various tables and category descriptions.
- The Planned Metropolitan Urban Service Area (MUSA) map on page 301 needs to identify the anticipated urban development for the 2040 planning period in addition to the information already present. If desired, the City can identify post-2040, but the reference to post-2030 is insufficient. Council staff also suggest that a better connection between the MUSA discussion and the planned land use discussion could better integrate land use and urban services.

Advisory Comments

- Readability of maps throughout the Plan would benefit from better resolution for clarity, and clear labeling of transportation features or landmarks. It is not possible to view the City's land use maps at the parcel level, which would be necessary for any future review of potential land use amendments.
- The Development Phasing table includes an expected share of residential uses in mixed use and other residential land use categories. Council staff will use the low end of the range provided for each land use in this table to complete land use analysis. The City is not required to provide this information for non-mixed use districts, but it is informative.
- The City could consider adding a discussion to the Understanding the Distinction between Land Use and Zoning Code section that outlines when amending the Comprehensive Plan might be considered appropriate if the City wants to communicate the ability to respond to potential market changes. This might help identify when future changing circumstances may trigger review of current land use policy.
- Although very similar, there are differences between the city-wide Planned Land Use map and the subarea maps (i.e., Downtown on page 153, Suburban on page 167, East End on page 181, etc.). Some noticeable differences include the lack of representation of Institutional land and the additional detail of Open Space in the subarea maps, different delineated extents, categorization. The City should clarify which representation is the desired planned land use guidance.
- The City includes discussion about the Shakopee Mdewakanton Sioux Community (SMSC) lands on page 127 and represents the land in the subarea map on, page 189 but does not represent the land on the City-wide Planned Land Use map (page 135) or the Downtown subarea map (page 154).

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

The Plan is **incomplete** for surface water management. Shakopee lies within the oversight boundaries of the Lower Minnesota and Prior Lake Spring Lake Watershed Districts and the Scott (County) Watershed Management Organization. The Plan indicates on page 273 that the City updated its Local Water Management Plan (LWMP) in 2018, but the most recent Plan that has been reviewed by Council Water Resources staff is dated 2011.

For the Plan to be complete for review, the updated LWMP will need to be submitted concurrently to the two Watershed Districts, Scott Watershed Management Organization, and Metropolitan Council (Council) Water Resources staff for formal review and comment. Upon receipt of the draft LWMP from the City, Council staff (consistent with Minnesota Board of Soil and Water Resources and Minnesota Rule Chapter 8410 guidance) has 45 days to review the

Plan and provide comments and recommendations to the City and the three watersheds for consideration of incorporation into the final LWMP.

We suggest that the Executive Summary or similar text be incorporated as the Surface Water Management Chapter in the formal Plan. The complete LWMP needs to be incorporated as an Appendix. When they are available, we also request that the City provide to the Council the dates the three watersheds approve the final LWMP, and the date the City adopts the final LWMP.

Community Wastewater Treatment and Subsurface Sewage Treatment Systems (SSTS)

(Jim Larsen, 651-602-1159)

The Plan is **incomplete** for SSTS. To be complete, the Plan needs to address the following issues.

- The Plan indicates that there are 714 SSTS in operation in the City. The City needs to confirm (either in their response to our preliminary Plan review or in their formal Plan submission) that there are no public or privately-owned Community Wastewater Treatment Systems (other than the identified 714 individual SSTS and all Shakopee Mdewakanton Sioux Community facilities) in operation in the City or incorporate a short discussion of any existing operating facilities and include their location on the figure on page 272.
- The Plan needs to include a figure depicting the location of all SSTS in operation in the City, including highlighting any areas known to have nonconforming systems or systems with known problems. If the City or its planning consultant needs any assistance in the preparation of this map for their formal Plan submission, please contact Steve Hack, MCES GIS System Administrator at 651-602-1469 or Steven.Hack@metc.state.mn.us.
- The Plan also needs to incorporate language confirming Scott County still has delegated responsibility for installation, operation, and maintenance management of all SSTS in the City or provide a short discussion of the City's program if it has assumed oversight.

Aggregate Resources

The Plan is **incomplete** for aggregate resources. While the Plan acknowledges the presence of aggregate resource deposits within the City and identifies the location of several active mine sites on the figure on page 341, it also needs to address the following issues:

- The Plan needs to incorporate a map depicting the aggregate resources geologically present within the City and its orderly annexation agreement areas, consistent with the Council's aggregate resources inventory information contained in *Minnesota Geological Survey Information Circular 46*. The information should be overlain onto a Future Land Use Map, as indicated in the Special Resource Protection section of the Council's *Local Planning Handbook* guidance. A map depicting the Council's 1997 Aggregate Resources GIS dataset (available to the City for use in fulfilling this requirement) is attached.
- The City also needs to address and minimize the potential land use conflicts between aggregate extraction and urbanization by identifying the planning and regulatory measures it has in place to ensure that available aggregate resources on non-environmentally protected lands are extracted prior to urbanization of aggregate-rich sites.

Housing (*Hilary Lovelace, 651-602-1555*)

The Plan is **incomplete** for housing. Inconsistent items and advisory comments are also described below. To be complete for review, the Plan needs to address the following issues.

- Existing Housing Needs
 - The table on page 84 does not adequately show the number of existing households that are experiencing housing cost burden. Specifically, the table or the discussion that follows it, needs to show the renter-occupied households experiencing housing cost burden. It is not necessary to separate housing cost burden out by ownership and rental, but it is necessary to show cost burden by AMI band. These figures can be found in the Local Planning Handbook. (https://metro council.org/Handbook/Files/Existing-Housing-Assessment/02395854_Shakopee_ExistingHsg.aspx)
Please either correct the data or clarify the source of data for the table on page 84 in the Plan. These numbers are different than what the Council has on record.
- Projected Housing Need
 - The Plan currently acknowledges Shakopee's allocation of the region's 2021-2030 need for affordable housing at the three affordability levels, which were based on the City's previous forecasts. The City is proposing increased forecasts of population, households, and employment, which impacts the 2021-2030 Affordable Housing Need numbers. The revised 2021-2030 Affordable Housing Need numbers are:
 - 548 units at <=30% AMI
 - 145 units at 31-50% AMI
 - 282 units at 51-80% AMI
 - 975 units total.
 - These changes will be reflected on the City's Community Page in the Local Planning Handbook following action by the Metropolitan Council on the City's Plan.
 - Land guided to address the City's allocation of affordable housing need for 2021-2030 is not sufficiently described for review. The Development Phasing table on page 132 shows units per decade, but will need to also include acres expected to develop per decade to be considered complete.
- Implementation Plan
 - The following tools are mentioned, but will need to be connected to stated housing needs:
 - TIF (mentioned on pages 71, 187)
 - Tax abatement (page 71)
 - The need for workforce housing and preserving naturally occurring affordable housing (NOAH) are both mentioned, but no specific tools (with possibly the exception of zoning flexibility for higher density residential) are explored to address those needs.

Inconsistent Items

- Implementation Plan
 - To be consistent, all housing tools described will be linked clearly and consistently to stated housing needs. Strategies in the Implementation section on page 406 are not clearly connected to existing housing needs mentioned in the Housing section.
 - The easiest way to satisfy the items in the checklist relating tools to needs is to include a matrix in the housing section of the Plan. An example is detailed in this housing fact sheet: <https://metro council.org/Handbook/Files/Resources/Fact-Sheet/HOUSING/Linking-Tools-to-Needs.aspx>
 - Housing needs are not linked to affordability levels in the Plan. Future needs are identified within the three levels of affordability, and tools should therefore be addressed

within the levels of affordability as well. For example, if the City is willing to consider TIF to support affordable housing, would there be more support within a particular level of affordability (i.e. less than 30% AMI) given projected needs?

- Some widely used tools to address housing needs are not included. To be consistent, tools must be acknowledged, and the Plan should state if, and if so when and why, it would consider using them to address housing needs. Missing tools are listed below, and facts sheets on many of these tools can be found on the Local Planning Handbook.
 - Explore and advocate for a local Community Land Trust to investigate the potential for affordable homeownership options – Scott County CDA is currently exploring this and local engagement would be useful.
 - Support for or direct application to specific resources within the Consolidated RFP put out by Minnesota Housing.
 - Site assembly, which is described but not connected to specific needs or priorities, including partnering with the Land Bank Twin Cities.
 - Application of (if a subrecipient) federal HOME funds.
 - Tax Abatement (mentioned in the Economic Environment Implementation table, but not directly tied to housing).
 - Housing Bond Issuance.
 - The use of Scott County CDA to levy funding and other support for affordable housing projects.
 - A Fair Housing policy (Required to draw LCA funds, more information in Advisory Comments section)
 - Rental license and inspection program.
 - Please describe in more detail the types of housing projects for which the City would consider using TIF.
 - Preservation resources, including 4d tax incentives and financial resources available through Minnesota Housing and Greater Minnesota Housing Fund's NOAH Impact fund.
 - Policies that protect and support the City's manufactured home community, specifically outlining preservation guidelines. Rehabilitation resources, sewer connections (if not already provided), conversion to a co-operative (if not one already), and local notice-of-sale or first-look provisions could be considered.

Advisory Comments

- Existing Housing Needs
 - The narrative analysis of existing housing needs in the Current Housing Needs section on pages 85 and 86 describes the extent of housing cost burden in the City. We recommend that it also mention other housing needs discussed elsewhere in the housing section including maintenance of existing neighborhoods and age-appropriate housing for the aging population and young professionals noted in the overview. Further housing needs can be determined by reviewing the data included in the housing assessment.
- Tools to meet housing need
 - With respect to a Fair Housing Policy: Local Fair Housing policies do not mean that cities should or can manage or administer Fair Housing complaints. A local fair housing policy rather ensures the City is aware of fair housing requirements with regard to housing decisions and provides sufficient resources to educate and refer residents who feel their fair housing rights have been violated (this can be as simple as having links to resources on the City's website). The Metropolitan Council will require a local Fair Housing policy as a requirement to draw upon Livable Communities Act (LCA) awards beginning in 2019. To learn more, please review the following resources:

- Creating a Local Fair Housing Policy webinar:
<https://www.youtube.com/watch?v=38JY4pNGnZ8&feature=youtu.be>
- Best Practices: <https://metro council.org/Handbook/PlanIt/Files/Webinar-Fair-Housing-Handout2.aspx>
- Policy Template: <https://metro council.org/Handbook/Training/Webinars.aspx> - click on Handout 1 under the Implementing A Local Fair Housing Policy at the bottom of the screen.
- Staff suggests that any inclusionary zoning policy offer incentives (financial or regulatory) that trigger affordable housing requirements. Encouraging inclusionary housing has typically not resulted in the creation of actual affordable units. Cities that have recently adopted inclusionary housing policies include Brooklyn Park, Golden Valley, St. Louis Park, and Edina.
- On page 372, it is unclear if residences are included in the consideration of strategy 2A because other housing strategies are listed in the economic environment section. If the City is considering redevelopment of residential areas, tools that can be used to address the disruption to communities could also be discussed.
- A need for workforce housing is identified, but there is also language that considers the relocation of manufactured housing on page 159. Manufactured housing is an important source of housing for low-wage workers, and preservation (or strong resident supports detailed in a relocation plan) is encouraged to be explored in more detail.
- The Plan states that the City "should consider" writing a Housing Plan. The Plan would be stronger if it described what issues would be covered in a Housing Plan that are not already covered in the comprehensive plan, and in what situation the City would or would not write a Housing Plan (availability of funds, rise in code violations, etc.).
- Consider if the number of publicly subsidized units by type on page 84 should be in a table of their own. It is unclear how these four rows under "Other types" relate to one another, assuming there may be some overlap in units in different categories.

Implementation (*Angela R. Torres, 651-602-1566*)

The Plan is **incomplete** for implementation. To be complete for review, the Plan needs to address the following issues.

- Describe all public programs, fiscal devices, and other actions that the City will use to implement the Plan. Define a timeline as to when actions will be taken to implement each required element of the Plan.
- Include a Capital Improvement Program (CIP) for transportation, sewers, parks, water supply, and open space facilities. Specify the timing and sequence of major local public investments. The CIP must align with development staging identified in other parts of the Plan and include budgets and expenditure schedules.
- The Plan identifies several ordinances related to water resources (the City's sewer system, stormwater, wetland management, etc.), but does not specifically identify if water supply or private sewer systems are included in those City Code chapters. A description of official controls for water supply and private sewer systems are required.
- The Plan discusses a possible comprehensive update to the City's Zoning Ordinance as well as subdivision and water resources codes as needed, but does not identify what changes are needed to ensure zoning is not in conflict with the new land use plan and is consistent with regional system plans and policies.
- Include a schedule for the preparation, adoption, and administration of needed changes to official controls.

Advisory Comments

- Update of official controls must be done within 9 months of adopting your Plan to ensure that official controls are not in conflict with the Plan. Copies of all revised official controls must be provided to the Council for information purposes only.

In summary, the submitted draft Plan is missing a number of items and may require revision. If you have any questions or need further information regarding the comments in this letter, please contact Angela R. Torres, Principal Reviewer at 651-602-1566.

Sincerely



Lisa Beth Barajas, Director
Community Development

CC: Deb Barber, Metropolitan Council District 4
Angela R. Torres, Sector Representative/Principal Reviewer
Raya Esmaeili, Reviews Coordinator

N:\CommDev\LPA\Communities\Shakopee\2040 Preliminary Plan Review\Shakopee 22004-0 CPU_PreliminaryReview.docx

Joseph Widing

From: Julie Klima <jklima@edenprairie.org>
Sent: Tuesday, January 22, 2019 4:02 PM
To: Joseph Widing
Subject: RE: Shakopee 2040 Comprehensive Plan Update Adjacent Agency Review

Hi Joe,

Thank you for the opportunity to review and comment on Shakopee's 2040 Comprehensive Plan. The City of Eden Prairie does not have any additional comments to provide on Envision Shakopee.

Please let me know if you have any questions.

Julie

Julie Klima, AICP
City Planner

City of Eden Prairie

8080 Mitchell Road | Eden Prairie, MN 55344-4485

952.949.8489 | jklima@edenprairie.org | edenprairie.org



Please consider the environment before printing

From: Joseph Widing <jwiding@shakopeemn.gov>
Sent: Thursday, September 20, 2018 2:15 PM
To: planning@bloomingtonMN.gov; kaanenson@ci.chanhassen.mn.us; Julie Klima <jklima@edenprairie.org>; Tom.weckman@yahoo.com; mrmenke1@comcast.net; John.weckman@comcast.net; cmccabe@cityofpriorlake.com; csandey@mfcproperties.com; btucker@ci.savage.mn.us; gkelley@mchsi.com; pmoline@co.carver.mn.us; Katie.walker@hennepin.us; bdavis@co.scott.mn.us; info@isd191.org; dorlowsky@shakopee.k12.mn.us; naiadconsulting@gmail.com; dlynch@plslwd.org; pnelson@co.scott.mn.us; pfreeman@co.scott.mn.us; Mrosenbloom-jones@mvta.com; Martha.vickery@state.mn.us; karen.s.voz@state.mn.us; Bridget.rief@mshpmac.org; jadams@shakopeeutilities.com; Bill.rudnicki@shakopeedakota.org; Metrodevreviews.dot@state.mn.us
Subject: Shakopee 2040 Comprehensive Plan Update Adjacent Agency Review

Good afternoon,

Per Minnesota Statute 473.858 Subd. 2 and the Metropolitan Council, we are distributing the proposed Shakopee 2040 Comprehensive Plan Update, known as Envision Shakopee, for your review and comment. The 2040 Comprehensive Plan Update can be found at https://issuu.com/mkskstudios/docs/shakopee_comp_plan_-_prd-08302018. An Executive Summary and other information is available at <https://envisionshakopee.com/review-the-draft-plan-2/>.

Envision Shakopee represents a complete overhaul of the city's current comprehensive plan focused on community engagement. The City Council authorized its release for adjacent and affected jurisdiction review on September 18, 2019.

It is respectfully requested that you review the proposed 2040 Comprehensive Plan Update. If you would like additional information or if you have questions regarding the update, please contact Joe Widing at 952-233-9325 or jwiding@shakopeemn.gov. Please return any written comments by March 19, 2019, which represents the end of the six-

month review period. On behalf of the City of Shakopee, we would like to thank you in advance for your assistance and prompt response.

Sincerely,



Joe Widing
Planner, Planning and Development
485 Gorman St., Shakopee MN 55379
952-233-9325 | www.ShakopeeMN.gov

Joseph Widing

From: Farnham, Julie <jfarnham@BloomingtonMN.gov>
Sent: Monday, March 11, 2019 1:49 PM
To: Joseph Widing
Subject: FW: Shakopee 2040 Comprehensive Plan Comment Period Reminder

Hi Joe,

Thanks for the opportunity to review Shakopee's draft 2040 Comprehensive Plan. The City of Bloomington does not have any comments or concerns.
Nice looking plan and well organized!

Thanks
Julie

Julie Farnham | Senior Planner
City of Bloomington
Community Development Department
1800 W. Old Shakopee Road
Bloomington, MN 55431
952.563.4739
jfarnham@bloomingtonmn.gov

From: O'Day, Elizabeth
Sent: Tuesday, February 26, 2019 8:52 AM
To: Farnham, Julie <jfarnham@BloomingtonMN.gov>
Subject: FW: Shakopee 2040 Comprehensive Plan Comment Period Reminder

FYI

From: Joseph Widing [<mailto:jwiding@shakopeemn.gov>]
Sent: Tuesday, February 26, 2019 8:49 AM
To: Planning <planning@BloomingtonMN.gov>; kaanenson@ci.chanhassen.mn.us; mrmenke1@comcast.net; John.weckman@comcast.net; csandey@mfcproperties.com; btucker@ci.savage.mn.us; pmoline@co.carver.mn.us; catherine.walker@hennepin.us; Davis, Brad <BDavis@co.scott.mn.us>; info@isd191.org; pfreeman@co.scott.mn.us; Mrosenbloom-jones@mvt.com; jadams@shakopeeutilities.com; Bill.rudnicki@shakopeedakota.org
Subject: Shakopee 2040 Comprehensive Plan Comment Period Reminder

Good morning,

I am reaching out to send a reminder to those who have not had a chance to comment on Shakopee's draft 2040 Comprehensive Plan, Envision Shakopee. The comment period for this plan will end on Friday March 22nd, roughly 3 weeks from today. The entire draft document can be found at the Envision Shakopee Website by going to either following links, first link is a flippable version and the second link is to a PDF of the document which may be downloaded or viewed online. If anyone has any issues accessing the document, please let me know and I can get you the document another way, thank you for your time.

https://issuu.com/mkskstudios/docs/shakopee_comp_plan_-_prd-08302018_-
<https://envisionshakopee.com/wp-content/uploads/2018/08/Shakopee-Comp-Plan-PRD-08302018-LR-1.pdf>

Regards,



Joe Widing
Senior Planner, Planning and Development
485 Gorman St., Shakopee MN 55379
952-233-9325 | www.ShakopeeMN.gov

From: [Bryan Tucker](#)
To: [Joseph Widing](#)
Subject: RE: Shakopee 2040 Comprehensive Plan Update Adjacent Agency Review
Date: Wednesday, March 20, 2019 9:54:49 AM
Attachments: [image003.png](#)

Joseph,

Looks like I'm a couple of days late on this. Sorry about that.

We've reviewed the proposed plan for Shakopee and appreciate the overall planning approach that is being pursued.

We don't have any specific comments or concerns.



Bryan Tucker

Planning Manager

6000 McColl Drive, Savage, MN 55378

Direct: 952-882-2692 | Cell: 612-490-0982 | cityofsavage.com

From: Joseph Widing [mailto:jwiding@shakopeedmn.gov]
Sent: Thursday, September 20, 2018 2:15 PM
To: planning@bloomingtonMN.gov; kaanenson@ci.chanhassen.mn.us; jklima@edenprairie.org; Tom.weckman@yahoo.com; mrmenke1@comcast.net; John.weckman@comcast.net; cmccabe@cityofpriorlake.com; csandey@mfcproperties.com; Bryan Tucker; gkelley@mchsi.com; pmoline@co.carver.mn.us; Katie.walker@hennepin.us; bdavis@co.scott.mn.us; info@isd191.org; dorlowsky@shakopee.k12.mn.us; naiadconsulting@gmail.com; dlynch@plslwd.org; pnelson@co.scott.mn.us; pfreeman@co.scott.mn.us; Mrosenbloom-jones@mvta.com; Martha.vickery@state.mn.us; karen.s.voz@state.mn.us; Bridget.rief@mspm.com; jadams@shakopeedutilities.com; Bill.rudnicki@shakopeedakota.org; Metrodevreviews.dot@state.mn.us
Subject: Shakopee 2040 Comprehensive Plan Update Adjacent Agency Review

Good afternoon,

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Envision Shakopee represents a complete overhaul of the city's current comprehensive plan focused on community engagement. The City Council authorized its release for adjacent and affected jurisdiction review on September 18, 2019.

It is respectfully requested that you review the proposed 2040 Comprehensive Plan Update. If you

would like additional information or if you have questions regarding the update, please contact Joe Widing at 952-233-9325 or jwiding@shakopeemn.gov. Please return any written comments by March 19, 2019, which represents the end of the six-month review period. On behalf of the City of Shakopee, we would like to thank you in advance for your assistance and prompt response.

Sincerely,

Joe Widing
Planner, Planning and Development
485 Gorman St., Shakopee MN 55379
952-233-9325 | www.ShakopeeMN.gov



SCOTT COUNTY PLANNING & RESOURCE MANAGEMENT Planning Department

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March 19, 2019

Joe Widing
Senior Planner
City of Shakopee
Shakopee, MN 55379

RE: Envision Shakopee 2040 Comprehensive Plan

Dear Mr. Widing,

Thank you for the opportunity to review and comment on the *Envision Shakopee 2040 Comprehensive Plan*. Staff from Scott County's planning, zoning, highway, transit, and parks departments have completed a review of the city's draft plan and provide the following comments based on approved 2040 Scott County plans and policies. The County's land use philosophy promotes the majority of new growth in the County's seven cities and preserves urban expansion areas around the cities where municipal services are expected or planned. Our comments are provided below.

LAND USE, DEVELOPMENT & COMMUNITY DESIGN

- Redevelopment/Infill Potential: County staff supports the City's objective to include redevelopment and infill strategies as a component to city's growth plans as indicated on pages 124, 125, and 131.
- Rural Transition Planning District: County staff supports the City's goals of protecting environmentally sensitive areas, preserving right-of-way for future thoroughfares, and preserving rural character and open space in this district. Most of the properties shown on the "Rural Transitions" map on page 191 is guided in the County's 2040 planned land use map as "urban expansion," which calls for the continuation of agricultural uses and low density (1 home per 40 acres) residential uses until urban services are available. Preserving land in the unincorporated area for future development on municipal sewer and water is a key component of the County's growth management philosophy.
- Rural Living: County staff supports the City's goals of preserving the rural character of Marystown in Louisville Township. For the first time, the County's 2040 planned land use map included a new land use category called "Hamlet Mixed Use" and designated Marystown in this category. The purpose of this new land use category is to provide residential and small-scale commercial uses in these hamlets while maintaining their rural character and history. The County will be drafting a new Hamlet Mixed Use overlay zoning district in 2019 to guide development in these hamlets.
- Greater West End Planning District: The County supports orderly, predictable urban growth and development and is open to working with the City and its neighboring townships to update existing or draft new Orderly Annexation Agreements.



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- Quarry Swath: It is the County's stated policy in its 2040 Comprehensive Plan to encourage aggregate resources be mined and extracted prior to end land use development. The County share's the City's goal of promoting long-term redevelopment after quarry operations end. The County set a new policy in its 2040 Plan that requires at least 25% of the net developable acreage of the property under new mining permit be left in a condition that allows for future extension of roads and/or utilities to develop the site for end land uses.

TRANSPORTATION/TRANSIT

- Once all city comp plans are approved in 2019, Scott County plans to update the County Traffic Model and provide the updated model to the cities.
- Suggest adding information on the Land to Air service at the Marschall Road Transit Center.
- On Page 214: Marschall Road is County Highway (CSAH) 17 not County Highway 83.
- Roadway Jurisdiction Map Corrections on page 217:
 - The former County Highway 15 north of US 169 is no longer under the County's jurisdiction.
 - Please include the extension of CSAH 16 (17th Avenue) west toward CH 69.
 - Ramps at the CH 42 and 17 interchange - the color should reflect County jurisdiction.
- County transit staff is pleased to see that *Envision Shakopee 2040* supports TH 169 Bus Rapid Transit and encourages fixed route solutions from Marshal Road Transit Station (MRTS), but wonders what the city's vision is for MRTS if it moves away from a park and ride facility? County staff thinks a mobility hub design at MRTS is a better vision for the future; where the hub could offer bikes, scooters, hourCar, and autonomous vehicles and provide the first/last mile solution for commuters and also for those coming into the area for jobs and entertainment. This would also be a way that visitors could connect to the entertainment destinations of Mystic Lake Casino, Canterbury Park and ValleyFair. The bike path network definitely needs to be improved to make this a viable solution for employees and recreational uses throughout the city. Mobility Hubs are being designed and implemented in the more urban areas; but Shakopee, because of its unique business and entertainment uses, could benefit from this concept as AV's and other societal changes of owning a vehicle become less likely in the future. This change would impact the current parking lots and what those will look like when nearby car dealerships are in the fleet business of sending someone a car instead, malls are a thing of the past, and owning a car is for the more rural parts of the County.

PARKS, TRAILS & OPEN SPACE

- County parks and trails staff thought this was a very thoughtful plan and incorporated many goals that the County supports including strategies that Three Rivers Park District and Statewide Health Improvement Program (SHIP) are interested in furthering. SHIP is pleased to see the plan's emphasis on food systems and active living and SHIP staff is willing to partner on projects that would support shared strategies.



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- The County is pleased to work with the City to improve wayfinding for the regional trail and, in particular, how it may aide in assisting people in making connections to the riverfront from downtown. County staff will continue working with the City to bring people closer to the Minnesota River. Additionally, staff is pleased to see that improvements to the on-road segments of the regional trail are a priority in the city plan.
- County staff concurs with the Three Rivers Park District comments on pages 274 and 230 regarding future partnerships with the city on trails, park development, and other partnership opportunities where they align with our organizations goals and vision.
- On page 43, neither The Landing nor the Scott West Regional Trail are represented on the map. They may be worth adding as regional assets.
- On pages 224 and 315, it states that the Scott West Regional Trail will connect to the Minnesota River Bluffs LRT Regional Trail. While it will come close, an on-road segment of non-regional trail still exists in Carver County.
- On the maps on pages 101, 225, 249, 317, and 319, it shows a segment of the Scott West Regional Trail that does not yet exist. The extant portion ends at CSAH 42. As this segment will not be constructed for some time (currently programmed for 2026), staff would like to see it shown as either planned or only shown as a complete trail where it is already constructed.
- On page 231, 251, and 274, the references to the Scot West Trail should be changed to the Scott West Regional Trail.
- On the map on page 249, there is a depiction of regional trail search corridors. The search corridor along CR 14 coincides with a search corridor recognized by the County, as is the connection to Prior Lake paralleling CSAH 21. The other two, east/west along CR 78 and east/west between Canterbury Road and Independence Dr. are not search corridors per the Met Council's designation. Staff would recommend these be changed to Bike/Ped Facility Opportunities.
- The Scott West Regional Trail includes 13.25 miles of built trail. 4.8 miles have yet to be constructed. On page 314 it references 8 miles open and 8.4 to be built.
- On page 320, it references the Three Rivers District. Please revise to: Three Rivers Park District.

RESILIENCE

- County staff applauds the City's decision to dedicate an entire chapter on Resilience. The County has partnered with the University of Minnesota's Resilient Communities Program in 2018/19 to advance some of city's goals on this topic, including identifying suitable public lands for edible landscapes or food forests, and evaluating how current policies and practices support or hinder active living. If certain research projects can help advance the



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city's plan's goals and objectives on resiliency, county staff will reach out to city staff for potential collaboration and information-sharing.

We recognize the importance of planning for growth in Scott County. We also believe that the City and County share many of the same growth and development pressures. As Scott County works to implement its 2040 Comprehensive Plan, we look forward to working collaboratively with you to address these issues and work together toward our mutual visions and guiding principles.

If you have any questions about the County's review, please contact me at 952-496-8654 or bdavis@co.scott.mn.us.

Sincerely,

Brad Davis, AICP
Planning Manager



SHAKOPEE MDEWAKANTON SIOUX COMMUNITY

2330 Sioux Trail NW • Prior Lake, Minnesota 55372
Tribal Office: 952.445.8900 • Fax: 952.233.4256

CHARLES R. VIG
Chairman

KEITH B. ANDERSON
Vice-Chairman

REBECCA CROOKS-STRATTON
Secretary/Treasurer

March 20, 2019

Michael Kerski, Planning Director
City of Shakopee, MN
485 Gorman St
Shakopee, MN 55379

RE: Review Comments on Draft City of Shakopee 2040 Comprehensive Plan

Dear Mr. Kerski;

The Shakopee Mdewakanton Sioux Community (SMSC) appreciates the opportunity to review Shakopee's draft comprehensive plan. Further, the SMSC applauds the extensive public engagement work that the city has done in preparation for this long-term vision for the City of Shakopee.

The SMSC also appreciates that the plan at pages 37 and 127 makes some mention of the Dakota history and the SMSC. However, in light of the goals of the draft plan on relating the city's history, "connecting people to nature," and "environmental stewardship," it is the SMSC's belief that the plan could and should further describe both the role that the Dakota people played, and continue to play, in the history and development of the city, as well as the opportunities to collaborate with the SMSC as it relates to the following;

Executive Summary at page 14, "Item 2, Rediscover the River;"

At page 37 of the Executive Summary the mention of the Dakota people is cursory and could create the impression that their history in the area of the city only goes back to the 1700s. Indeed the history of the history of the Dakota people and their ancestors goes back hundreds of years further than that. That history has significant ties to the Minnesota River, and played a significant role in the later establishment of the city of Shakopee as a significant settlement and trade center. This history of the Dakota people in the region and the role it played in the establishment of Shakopee should be an integral part of the relating the history of the city of Shakopee.

Executive Summary at page 17, "Item 7, Connect People to Nature/page 400 regarding "environmental stewardship;"

The SMSC agrees with the City of Shakopee that it is important to connect people to nature. Indeed, the connection to nature is central to the history of the Dakota people in this region, and well as an important present cultural value of the SMSC. The SMSC commitment to this value is in evidence in the lands which have been acquired and whose natural character has been restored. Examples include the SMSC properties on the north and south side of CH 101 that were the site of Chief Sakpe's

village as well as the settlement of the Samuel Pond, the restoration to oak savannah of a site on the north side of CH 16.

The SMSC is already partnering with the City of Shakopee on a riverfront study that will presumably address connecting people to nature and environmental stewardship. The SMSC also cooperates with the city by maintaining McKenna Road, which is a city street. The SMSC looks forward to further collaboration toward these ends even related to properties that are not currently, or anticipated to be in SMSC control in the future.

Page 127 Requiring the SMSC and Future Collaboration;

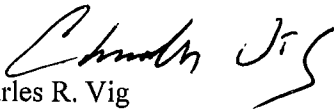
The description of the current SMSC in the plan is cursory, and we would suggest that additional description would be appropriate. The SMSC suggests language such as the following as it sets the stage for understanding current collaborations as well as future opportunities for "continued collaboration;

The Shakopee Mdewakanton Sioux Community (SMSC) is a federally recognized sovereign tribal nation. The SMSC is governed by the General Council (consisting of all adult members of the SMSC) and the Business Council, which is responsible for enacting the vision, values, goals, and direction of its people.

The SMSC has a longstanding nation-to-nation relationship with the United States government enacted through treaties of 1851 and 1853. With more than 4,000 employees, the SMSC is the largest employer in Scott County. The tribe has contributed more than \$86 million to local governments, since 1992 in taxes on lands held in fee, and by agreement(s) in support of law enforcement, infrastructure, and other essential services.

Please contact Raymond Leak at Raymond.Leek@ShakopeeDakota.org or 952-496-6153 if you have any questions regarding the comments above.

Sincerely,


Charles R. Vig
Chairman



Three Rivers
Park District
Board of
Commissioners

March 7, 2019

Joe Widing, Planner
jwiding@shakopeemn.gov
485 Gorman Street
Shakopee, MN 55379

Penny Steele
District 1

RE: City of Shakopee, 2040 Comprehensive Plan Update

Dear Joe:

Jennifer DeJournett
District 2

Three Rivers Park District (Park District) submits the following comments regarding your 2040 Comprehensive Plan. If you have further questions or comments, please contact Ann Rexine, Principal Planner at ann.rexine@threeriversparks.org or by phone at 763-694-1103.

Daniel Freeman
Vice Chair
District 3

John Gonyou
Chair
District 4

John Gibbs
District 5

Steven Antolzk
Appointed
At Large

Text modification requested.

"The proposed Scott West Trail alignment would run through Downtown Shakopee on 10th Avenue and Holmes Street. These segments of the trail are currently identified as bicycle boulevards, which are typically facilities shared by bicyclists and drivers. This investment by the **Scott County in partnership with** Three Rivers Park District provides an excellent opportunity for Shakopee to implement a high-quality, signature on-street bicycle facility."

Page
274

Text modification requested.

"Opportunities to open up views, vistas and physical access to the river, both in Downtown and beyond should be explored. Over time, as properties located within the floodplain become available, the city should strategically acquire or work with other partners **such as MnDNR, the Scott County/Three Rivers Park District partnership** and the SMSC to preserve riverfront lands and integrate into the larger river greenway system."

Page
320

CC:

Gene Kay
Appointed
At Large

File
Metropolitan Council
Nathan Moe, Scott County Parks Planner
Danny McCullough, Park District Regional Trails System Manager

Boe Carlson
Superintendent