May 20, 2019

Joe Widing
Long Range Planner
City of Shakopee
485 Gorman Street
Shakopee, MN, 55379

RE: City of Shakopee 2040 Comprehensive Plan – Incomplete for Review
Metropolitan Council Review File No. 22004-1
Metropolitan Council District 4, Deb Barber

Dear Mr. Widing:

Thank you for the submission of the City of Shakopee's 2040 Comprehensive Plan (Plan) on April 29, 2019. Council staff found that there are areas where the Plan is incomplete. Review of the Plan will be suspended until the additional information is submitted and found complete for review. The following items were found incomplete:

REQUIRED INFORMATION

Wastewater (Roger Janzig, 651-602-1119)

- Provide an electronic map or maps (GIS shape files or equivalent) showing the following information about the existing sanitary sewer system:
  - Future connection points for new growth if needed.
  - Proposed changes in government boundaries based on orderly annexation agreements.
- Include table or tables that provide the following local system information:
  - Capacity and design flows for existing trunk sewers and lift stations. For local sanitary sewer lines 12" and larger that connect to a Metropolitan Interceptor, provide the 2040 design flow and pipe capacity for each connecting trunk sewer and lift station.
  - Assignment of 2040 household and employment growth forecasts by Metropolitan interceptor facility.
    - 9206-2 (Entering interceptor west of Townline Avenue)
    - 9206-1 (Entering interceptor east of Townline Avenue to 7120)
    - 7120
    - 6903/6904
- For new trunk sewer systems that require connection to the Metropolitan Disposal System, provide a table that details the proposed time schedule for the construction of the new trunk sewer system.

Transportation (Russ Owen, 651-602-1724)

Freight

The Plan needs to identify any local roadway issues or problems for goods' movement. This can include weight-restricted roads or bridges, bridges with insufficient height or

width clearances, unprotected road crossings of active rail lines, or intersections with inadequate turning radii. If such issues do not exist, the Plan needs to state that.

Advisory Comments

- Consider replacing "B" arterial roadways with "other" arterial roadways throughout the Plan. This terminology change occurred with the most recent update of the Transportation Policy Plan (TPP) and although, not required at this time, would be consistent with the updated TPP.
- Consider showing the Regional Bicycle Transportation Network (RBTN) alignment's and corridors on either Figure 3.25 or Figure 3.45.

Parks (Colin Kelly, 651-602-1724)

- Describe, map, and label the Minnesota River Extension Regional Trail Search Corridor. This corridor is described in the City's System statement.
- Describe the Raguet Wildlife Management Area. The following language would meet this requirement: "From downtown Shakopee, Raguet Wildlife Management Area (WMA) is located just north of the Minnesota River and west of County Road 101. Like other WMAs in the state's outdoor recreation system, Raguet WMA was established to protect land and waters that have a high potential for wildlife production, public hunting, trapping, fishing, and other compatible recreational uses. Raguet WMA is entirely within the floodplain of the Minnesota River and contains floodplain forest, wetland areas and grassland. The management emphasis for this WMA is maintaining and improving habitat for wetland species."

Advisory Comments

- Council staff recommend including additional key/legend items to Figure 3.15 Minnesota River Greenway on page 164 that define the different shades of green, gray, and hatched areas for clarity.
    - Consider using the same key/legend items as Figure 4.4 – Minnesota River Greenway on page 320.
- Council staff recommend differentiating the "Regional Destinations" included in Figure 4.1 – Shakopee's Parks & Open Space System on page 312. While The Landing (Special Recreation Feature) is a recognized component of the Regional Parks System, Stonebrooke Golf Course and SMSC Wascipi Grounds are not.

Forecasts (Todd Graham, 651-602-1322)

The Plan needs to include a Transportation Analysis Zone (TAZ) allocation that indicates the City's jurisdiction in 2020 and 2040; and ensure the 2020, 2030, and 2040 allocations for Shakopee's own TAZs summarize to the correct column totals. The Plan includes a partial table of TAZ allocations (appendix C, table C.2). In table c.2, year 2020 and 2030 forecast allocations need to be included. The table needs to distinguish what TAZs are within Shakopee's planning jurisdiction. Council staff find that the subset of TAZ allocations that are in Shakopee's jurisdiction do not adequately allocate the revised forecasts, as requested by the City.

Advisory Comments

- Based on the Jackson Township annexation areas (Figure 3.4), Shakopee Mdewakanton Sioux Community (SMSC) Land Holdings (Figure 3.5), and planned Metropolitan Urban Service Area (MUSA) staging (Figure 3.60), Council staff

recommend that the Plan's replacement of table C.2 should allocate the City's total forecasts, revised as requested, to an expanding set of TAZs. Council staff recommend defining Shakopee's geographic scope as follows:
  - Shakopee jurisdiction 2020: includes Scott Co. TAZs # 1-2, 6-74, 210, 212-213, 215-229, 234-239, 242-254, 258, 260, 262-263, 281-282, as well as half of 241, half of 285, and half of 286.
  - Shakopee jurisdiction 2030: includes all of the above + Scott Co. TAZ # 257.
  - Shakopee jurisdiction 2040: includes all of the above + Scott Co. TAZs # 3-5, 259, 261, 275, as well as half of 255, and half of 274.
- Shakopee's TAZ table should not allocate activity into TAZs that remain with Jackson Township throughout the forecast period:
  - Jackson Township jurisdiction 2040: includes Scott Co. TAZs # 256, 278-279, half of 255, and half of 274.
- Shakopee's TAZ table should not allocate activity into TAZs that are controlled by Shakopee Mdewakanton Sioux Community (SMSC). Per an agreement between the Council, the City, and SMSC, the City's forecast (and subsequent TAZ allocations) does not include population, households, and employment located on SMSC holdings and trust lands:
  - SMSC jurisdiction, all years: includes Scott Co. TAZs # 211, 214, 230-233, 240, half of 241, half of 285, and half of 286.

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

Community Designation

The Plan acknowledges the City's Suburban Edge community designation, but it needs to also acknowledge the overall density expectations of 3-5 units per acre for the Suburban Edge Community Designation in the land use chapter.

Existing Land Use

- Provide an existing land use map that shows the area within the current boundary of the City. Figure 3.2 Existing Land Use includes areas within Jackson Township with a defined exiting land use. While an orderly annexation agreement (OAA) exists between the City and the Township, the Plan cannot designate land uses to areas outside of the current boundary of the City using categories defined by the City.
- Figure 3.1 Existing Land Use Table shows the acreage of the existing land use planning area total that includes Jackson Township. Since the Township is not part of the City yet, the table needs to separate those acres.

Future Land Use

- The Plan identifies areas to be annexed from Jackson Township into the City on Figure 3.4 Jackson Township Orderly Annexation. This map represents the eligibility of these areas to be annexed into the City. Moreover, areas E and F (over 1,000 acres) are identified as not being eligible for annexation until 2050. Therefore, the areas shown on this map are not currently part of the boundary of the City. The Plan needs to distinguish areas of annexation and post-2040 annexation in Figure 3.10. As currently presented, the total acreage of land in Figure 3.10 is reported as 22,727 acres, which contains all areas of annexation, including areas E and F. The acreage reported in this table needs to be corrected to exclude these areas from land use inventory between 2018 and 2040.

- Provide an expected share of individual land uses within each mixed-use category. Figure 3.8 effectively provides detailed information about types and locations of future infill developments, redevelopments, and greenfield developments. However, Downtown Transition and Old Shakopee Neighborhoods are reported together, and it is unclear what the share of residential uses within each of these categories is individually.
- Figure 3.8 Development Phasing identifies the redevelopment, infill, and greenfield developments through 2040. However, the Plan needs to include a table that includes all areas with changes to planned land use designations. The Plan needs to identify where all development is expected to occur and needs to include associated acreages and timing as part of the Development Phasing figure or in a separate table. Net developable acreage for all areas that allow for residential development needs to be provided in a table for each 10-year planning period (2020, 2030, and 2040). Figure 3.8 does not meet this requirement. Council staff suggest including a new table that includes all of the land uses in the City with the information needed.
    - For example, the cluster of parcels south of the intersection of County Road 101 and Highway 169 are depicted as Industrial on Figure 3.2 Existing Land Use. These parcels are identified as Mixed Employment Center on Figure 3.11 Planned Land Use. The Mixed Employment Center land use allows for a range of 16 to 30 housing units per acre, but this area is not identified on Figure 3.9 Greenfield, Redevelopment and Infill Areas associated with Figure 3.8. Council staff assume there are other similar areas around the City that are not shown in Figure 3.8.
- In the Planned Land Use section on page 131, the Plan states that *"The intent of the Planned Land Use Map is to guide a broad pattern of land use and development types across the City of Shakopee and its potential growth areas."* The Plan then goes on to state, *"It is not intended to designate very specific land uses for individual parcels of land."* The second statement is incorrect. Land use is applied to every parcel in the City. This can be corrected by removing the second statement.
- Figure 3.10 identifies a corresponding planned use category of Undeveloped for the existing use category of Undeveloped. As shown and described elsewhere in the Plan, Undeveloped is not a planned land use category and needs to be absorbed into other categories to insure consistency between all the information presented in the Plan.
- 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.

Advisory Comments

- The City should be aware that as areas within the OAAs are annexed into the City, the Community Designation of these areas will need to change in order to reflect the Suburban Edge community designation of the entire City. The only exception is if the City intends to retain the Diversified Rural designation in these areas, which does not appear to be the intention based on the Planned Land Use map.
- The Plan could be strengthened by including additional language in the "Understanding the Distinction between Density and Design" section, stating the role of zoning code and local ordinances in implementing the vision and goals of the Plan to achieve the most desirable outcomes.

- The Plan acknowledges that regular updates may be needed. The City should be aware that if there are any changes proposed to the Plan, a comprehensive plan amendment is required.
- The Plan includes the expected share of residential uses within each of the areas identified in Figure 3.8 Development Phasing. Since the estimated share of the residential land uses within these areas represents a range (for example, 10% to 80% residential within the MU Commercial Center category), the low end of the range is considered in calculating the overall density of development within the City.

Housing (Tara Beard, 651-602-1051)

Projected Housing Need

- Future land use is not sufficiently described for review. Figure 3.8 must specify whether or not the acres available in the 2021-2030 decade have already factored in the percent of the area that is planned to be residential. This is especially important because if the acreages listed have not yet been adjusted for the percent residential expected, there is not sufficient land to meet Shakopee's 2021-2030 allocation of affordable housing need.
- Land use information must be presented consistently throughout the Plan. In Figure 3.8 the Canterbury Entertainment District is listed at a density of 30 units/acre, but Figure 3.12 lists that land use as having a minimum of 25 units/acre.

Implementation Plan

- The housing implementation plan (Figure B-6), at a minimum, must be its own independent appendix that is listed in the Table of Contents and referred to in the housing element of the Plan. Council staff recommend including it directly in the housing element so that these iterative policy components are shown together.
- The issuance of housing bonds is considered for senior housing, but housing bonds can also be used to support general affordable housing. The Plan must indicate whether or not the City would consider issuing bonds for future affordable housing needs within each band of affordability.
- The Plan must acknowledge all recognized tools that could be used to address future affordable housing needs and indicate whether the City is likely to use them to meet existing or future housing needs. The following tools are not considered:
  - Housing Improvement Areas (preserving existing affordable housing)
  - Minnesota Housing's Consolidated Request for Proposals
  - Tax Abatement
  - CDBG and HOME funds whether directly or through application to Scott County

Water Supply (Brian Davis, 651-602-1519)

The City needs to provide the final Local Water Supply Plan in an appendix to the 2040 Plan.

OTHER ADVISORY INFORMATION

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

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

Council staff request that, when available, the City provide the dates the three watersheds approve the final Local Water Management Plan (LWMP), the date the City

adopts the final LWMP, and a copy of the final adopted LWMP if it differs from the January 2019 draft submitted in the Plan on April 29, 2019.

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

After all of the required elements of the Plan are submitted and found complete, Council staff will begin the official review process. If you have any questions or need further information regarding the comments in this letter, please contact me at 651-602-1566, or Raya Esmaeili, Principal Reviewer, at 651-602-1616 with any questions or for additional assistance.

Sincerely,

Angela R. Torres

Angela R. Torres, AICP, Manager
Local Planning Assistance

CC: Deb Barber, Metropolitan Council District 4
Raya Esmaeili, Principal Reviewer/Reviews Coordinator

N:\CommDev\LPA\Communities\Shakopee\Letters\Shakopee 2019 2040 CPU 22004-1 - Incomplete.docx