

Board of Commissioners

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August 14, 2018

Emily Becker, Planning Director 3880 Laverne Avenue North, Suite 100 Lake Elmo, MN 55042

RE: Review of the draft Lake Elmo Comprehensive Plan

Dear Ms. Becker,

Washington County appreciates the opportunity to review the draft Lake Elmo Comprehensive Plan. These comments are intended to be supportive and constructive in nature. The county recognizes the city's authority to adopt its plan and commends the city on the work performed to-date.

County staff from the departments of Administration, Public Health and Environment, and Public Works, and staff from the Washington County Community Development Agency have reviewed the draft plan. Comments are included as an attachment to this letter.

The comments provided are intended to identify opportunities to improve the draft plan, and provide additional information or context. The comments should be construed as suggestions for the city to consider as it works to finalize its comprehensive plan.

Again, we appreciate the opportunity to review the draft Lake Elmo Comprehensive Plan and look forward to working with the city to create a common vision for the future of the county.

Sincerely,

Commissioner Gary Kriesel

Washington County Board Chair

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Washington County Comments Draft Lake Elmo Comprehensive Plan

Chapter 2: Vision, Goals and Strategies

Page 12, Housing: The county supports the main ideas behind Goals #1 and #2 that seek to expand the
range of housing options as a way to meet resident housing needs at all stages of life and affordability
levels.

Chapter 3: Land Use

- The county supports the city's approach to developing the plan, including:
 - O Updating the comprehensive plan for compliance with the Metropolitan Council's minimum requirements, while tailoring the plan to meet the city's long-term vision and aspirations.
 - Simplifying and synthesizing the city's existing adopted plan to make it easier to read, understand and implement for policy makers, staff, residents, stakeholders and developers.
 - O Engaging the public early and often, and providing them with opportunities to help guide the development of this plan update.
 - Incorporating goals to provide a mix of housing opportunities
- Page 32: The county is encouraged by Lake Elmo's support of solar resources through the city's adopted
 ordinances and official controls. The county looks forward to partnering with Lake Elmo when
 opportunities arise to create a more sustainable region.

Chapter 5: Housing

- Page 4, Housing Principles: The county values the inclusion of this section that describes the benefits of a diverse and affordable housing supply for residents and local businesses.
- Page 21, Implementation Table: The county appreciates the inclusion of several Community Development Agency (CDA) housing programs and initiatives.
- Page 21, Implementation Table, "Protect and Reserve Housing Stock" Goal: The county encourages the city to consider including the CDA's Septic Loan and Grant Program as one of the tools.
- Page 21, Implementation Table, "Explore Ways to Integrate Lifecycle Housing" Goal: The county encourages the city to consider including the CDA's GROW Program and Low Income Housing Tax Credit Program among the tools in the table.

Chapter 6: Parks, Trails and Open Space

- Lake Elmo Regional Park Reserve can be referred to as Lake Elmo Park Reserve.
 - o Park Reserves, as the Metropolitan Council defines them, are regional by default.
- Page 129: Lake Elmo Park Reserve is currently 2,178.9 acres
- Page 137:
 - o Inwood Avenue N should say south of CSAH 6, not CSAH 14
 - o Lake Elmo Avenue N (recently installed sidewalk through Old Village District)
 - Minnesota State Law prohibits biking on sidewalks in a business district, this bullet point should specify where biking is allowed on Lake Elmo Avenue
- Pages 141 142: Text and map is showing a "Special Use" Park facility to provide access to Lake Elmo
 Park Reserve south of Lake Elmo. Access at this location is not in the Lake Elmo Park Reserve Master
 Plan.



• The county is encouraged by the city's commitment to maintain current parks and trails and in exploring new opportunities for parks and trails and enhancing their connectivity. To align with the Washington County Waste Management Master Plan 2018-2036 "in creating away-from-home recycling opportunities based on best practices in parks, athletic fields, arenas, and recreation centers" consider collaborating with the county to potentially plan for and include waste and recycling stations in various areas throughout park and trail systems.

Chapter 7: Transportation

- Page 22: The city proposes County State Aid Highway (CSAH) 17's designation to be changed from a B-Minor Arterial to a Major Collector. This is not part of Washington County's Comprehensive Plan as the county has no plans to change the designation of CSAH 17.
- Page 29, Table 7-6, Access Management Guidelines: Consider matching the Washington County Access
 Spacing Guidelines found on page 5-41 of the Washington County draft 2040 Comprehensive Plan.

Chapter 8: Surface Water Management

- The county is encouraged by the city's water resources goals that recognize the preservation and protection of groundwater resources. The county is also encouraged to see reference to the county Groundwater Plan.
- With regard to the title of this chapter, the city's plan covers preservation and protection of
 groundwater and surface water, therefore the county recommends the city remove the word "Surface"
 from the name of the plan and title it "Local Water Management Plan" as it is defined in Minnesota
 Statute 103b.235. This would require changing the wording throughout the plan to be inclusive of all
 water resources where appropriate.

Chapter 9: Wastewater Services

- Consider adding the following statement which describes the county's Subsurface Sewage Treatment
 System (SSTS) program:
 - O All systems must be installed and maintained to meet the standards of the Washington County Subsurface Sewage Treatment System (SSTS) ordinance, and Minnesota Rules Chapter 7080-7083. The county SSTS Ordinance is codified in the Development Code as Chapter 4, Ordinance # 206. The county is responsible for implementing the ordinance in the city of Lake Elmo, including requirements for: Compliance Inspections of existing systems, permitting and inspection of new and replacement systems, site review, maintenance requirements, and operating permits for Type IV Advanced Sewage Treatment Systems.
- The SSTS agreement referenced in the city's comp plan as Appendix C in Chapter 9 is no longer in effect and is replaced by Ordinance #206, administered by the County Department of Public Health and Environment.

<u>Healthy Communities</u> Please note: The city does not specifically include a Healthy Communities component in its draft comprehensive plan, but it is a component of the Resiliency and Sustainability chapter of the draft Washington County Comprehensive Plan.

- The county is encouraged by the city's goals and objectives to support the health of their community in numerous ways. The following efforts are of particular note in supporting healthy communities:
 - Recognizing the need for affordable housing and plans to support the development of life-cycle housing for older and low income residents.

- Efforts to engage community members throughout the comprehensive planning process through public input and open houses.
- Endorsing residential developments that integrate pedestrian, bikeway and transit connections to services, commerce and recreational opportunities.
- Preservation and continued support of rural residential landscape, parks, and open space system.
- o Providing accessible options to purchase healthy and fresh foods and products.
- Not addressed in plan:
 - Chapter 6: Parks, Trails & Open Space: Consideration for Americans with Disabilities Act (ADA)
 accessibility in planning, adaptive playground equipment and tobacco free recreation space;
- The county appreciates the inclusion of the following statement on page 28 of Chapter 3: "As part of the 2040 Comprehensive Plan Update process, the City obtained a grant from Washington County Health Services through the State Health and Improvement Program (SHIP) to incorporate living healthy principles into this Comprehensive Plan."
 - We respectfully ask that the wording is updated as follows: "the City obtained a grant from Washington County <u>Department of Public Health and Environment</u> through the <u>Statewide</u> Health Improvement Partnership (SHIP)..."