

January 22, 2020

Cary Teague, Community Development Director  
City of Edina  
4801 W. 50th Street  
Edina, MN 55424

**RE: City of Edina 2040 Comprehensive Plan – Incomplete for Review**  
Metropolitan Council Review File No. 22400-1  
Metropolitan Council District 5, Molly Cummings

Dear Mr. Teague:

Thank you for the submission of the City of Edina's 2040 Comprehensive Plan (Plan) on December 31, 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 copies of intercommunity service agreements entered with an adjoining community, or language that confirms the Council's understanding that the communities reimburse each other for the municipal wastewater charges that each will incur by receiving flow from the adjacent community. Include maps of areas covered by the agreement. The Plan should identify how intercommunity connections being billed for wastewater service, whether by the community receiving the flow or whether the Council should adjust wastewater flow billing for each community.
- Include a 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. The Plan needs to identify what percentage of the total capacity each pipe will be used by 2040. Table 7.3: Capacity and Design Flow for Existing Trunk Sewer provides "Existing Conditions Daily Mean Flow" but not 2040 projected design flow. It appears that this table was a product of the City's referenced wastewater system model. This table needs to be updated to include the 2040 design flows.
  - Assignment of 2040 household and employment forecasts by Metropolitan interceptor facility.
- Describe the requirements and standards in the City 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 or summarize the ordinance restrictions in narrative form.

- 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, or provide a narrative in the Plan.
- 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 contribute to I/I such as locations, quantities of piping or maintenance holes, quantity of service laterals, or other measures. If an analysis has not been completed, include a schedule and scope of future system analysis.
  - Identify the percentage of pre-1970 era private services that 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 City. If previous I/I mitigation work has occurred in the City, 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.

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

Roadways

- The Plan needs to identify the future number of lanes for Principal Arterials and A-Minor Arterials. This could be done in a table or stated in the text.
- The Plan needs to identify needs for future right-of-way or state that there are no needs.

**Land Use** (Michael Larson, 651-602-1407)

Guiding Land Use

- The Plan needs to incorporate a higher resolution image for Figure 3.12: Future Land Use. Please contact your sector representative for guidance.
- Table 3.6: Future Land Use Categories needs to identify an expected residential development percentage for Regional Medical. It appears from the calculations in Table 3.12 that this percentage should be 50%.
- Table 3.6 needs to be revised to include minimum and maximum densities for each iteration of the Neighborhood Node designation. The designation at 70th/Cahill has a density range of 10-50 units/acre, which is used in calculations for Table 3.12: Staged Development or Redevelopment. However, the designation at Wooddale/Valley View has no minimum (up to 30 units/acre) while the designation at 44th & France has no maximum (12 units/acre and up). Upon revision, these designations need to be consistent with calculations in Table 3.6 and with legend notations in Figure 3.12.

- The footnote in Table 3.12 related to mixed-use acreage needs to be more explicit. This can be done by making a reference to the percentages identified in Table 3.6 and the gross acreage identified in Table 3.7.

#### *Advisory Comments*

- The existing land use of Railway (Canadian Pacific Railway) (described on page 3-12) is not represented on Figure 3.3: Existing Land Use.
- The legend of Figure 3.12: Future Land Use does not include the guiding land use of Limited Access Highway (LAH), which is included in Table 3.6.

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

##### Projected Housing Needs

- The Plan needs to acknowledge the correct affordable housing need allocation. The correct Need, provided to the City at the time of a forecast change in late 2018, is 751 units affordable at or below 30% of area median income (AMI), 480 units affordable between 31 and 50% AMI, and 573 units affordable between 51 and 80% AMI for a total of 1,804. The information in Table 4.4 and text references on pages 4-20 through 4-23 are outdated.
- To be consistent with Council housing policy, the Plan needs to guide enough land expected to develop during the 2021-2030 timeframe to meet the City's allocation of affordable housing need. It appears that the Plan does this. However, the Plan needs to address incomplete items discussed above under Land Use related to density ranges and percentage residential.

##### Implementation Plan

To be consistent with Council housing policy, the Plan needs to consider all widely accepted tools listed in the Local Planning Handbook to address their housing needs. The Plan does not address one widely accepted housing tool: Housing Improvement Areas.

#### **Community Wastewater Treatment and Individual Subsurface Sewage Treatment Systems (SSTS)** (Jim Larsen, 651-602-1159)

- The Plan needs to be revised to incorporate text clarifying which party is responsible for SSTS maintenance management program oversight in the City. Hennepin County's 2040 Plan indicates that it oversees SSTS in Edina.
- The Plan needs to include a map depicting the parcel location of the properties served solely by SSTS in the City. The Plan indicates that there are "less than 10" individual SSTS and no public or privately-owned Community Wastewater Treatment Systems in operation in the City. However, Hennepin County's 2040 Plan indicates that there are at least 12 SSTS in operation in the City. The Plan needs to reconcile this information with the County and incorporate the correct information in the Plan. Please contact Steve Hack, MCEs GIS System Administrator at 651-602-1469 or [Steven.Hack@metc.state.mn.us](mailto:Steven.Hack@metc.state.mn.us) for assistance.

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

The Plan needs to incorporate the City's Local Water Supply Plan (LWSP) template as an attachment. The City prepared a Local Water Supply Plan (LWSP) that was submitted the Minnesota Department of Natural Resources (DNR) in November 2018 and forwarded to the Council in December 2019. Please be advised that this LWSP

needs to be revised to incorporate revised population forecasts for 2020, 2030, and 2040.

## **OTHER ADVISORY INFORMATION**

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

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

#### Transit

- Please consider updating the information in Table 5.1 on page 5-9, as follows:
  - Replace “Eden Prairie” with “Minnetonka” in the description to the right of Route 46. Metro Transit does not operate bus routes into Eden Prairie.
  - Remove reference to evening service in the description to the right of Route 537, as this route stops running at 6:30 pm.
- Please consider updating the transit map shown in Figure 5.4 on page 5-11, as follows:
  - There is no park-and-ride near Tracy Avenue and Highway 62. The only park-and-ride facility in the City of Edina is at Southdale.
  - As of 2019, there is no bus service on Lincoln Drive north of Bren Road/Londonderry just east of Highway 169. Please remove this segment of Route 146 on the map.
- Please describe the levels of transit service that are associated with the transit market areas that cover Edina. The Plan can incorporate the following language from the System Statement:
  - Transit Market Area II has high to moderately high population and employment densities and typically has a traditional street grid comparable to Market Area I. Much of Market Area II is also categorized as an Urban Center and it can support many of the same types of fixed-route transit as Market Area I, although usually at lower frequencies or shorter service spans.
  - Transit Market Area III has moderate density but tends to have a less traditional street grid that can limit the effectiveness of transit. It is typically Urban with large portions of Suburban and Suburban Edge communities. Transit service in this area is primarily commuter express bus service with some fixed-route local service providing basic coverage. General public dial-a-ride services are available where fixed-route service is not viable.

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 Michael Larson, Sector Representative, at 651-602-1407 with any questions or for additional assistance.

Sincerely,

A handwritten signature in black ink that reads "Angela R. Torres". The signature is written in a cursive, flowing style.

Angela R. Torres, AICP, Manager  
Local Planning Assistance

CC: Molly Cummings, Metropolitan Council District 5  
Michael Larson, AICP, Sector Representative / Principal Reviewer  
Raya Esmaeili, Reviews Coordinator