

Business Item

Community Development Committee



Community Development Committee Meeting: Dec. 1, 2025

Metropolitan Council Meeting: Dec. 17, 2025

Business Item: 2025-302

Plat Monitoring Program Update Recommendation

District(s), Member(s):	All
Policy/Legal Reference:	Minn. Stat. §473.854 Imagine 2050, Land Use Objective 1, Policy 2, Action 2.3.8
Staff Prepared/Presented:	Mackenzie Young-Walters, Senior Planner, Local Planning Assistance (651-602-1373)
Division/Department:	Community Development / Regional Planning

Proposed Action

That the Metropolitan Council update the Plat Monitoring Program as follows:

- 1) For cities enrolled in the Plat Monitoring Program, the Met Council will calculate net residential density by combining the average net density of the city's last 10 years of actual platting or the average net density of the city's last 10 plats, if fewer than 10 plats have been recorded in the last 10 years, and the lowest allowable density on land identified to support forecasted growth for the relevant staging period. Cities may elect not to have their plat monitoring program data included in the calculations.
- 2) Eligibility for the Plat Monitoring Program should be restricted to cities with the Suburban Edge and Rural Center community designations.

Summary of Committee Review

This proposal appeared as a Business Item on November 20, 2025, LUAC agenda. The Committee reviewed the updated data and adopted the proposed action for the CDC's consideration. The Committee asked about the proposal to limit participation in the Plat Monitoring Program to Suburban Edge and Rural Center communities, noting that some current participants are Suburban cities. Staff responded that those cities were developing cities when they joined the program, but they have transitioned to being nearly fully developed. Now that these cities are engaging in almost exclusively infill development, they are no longer doing the types of developments that the Plat Monitoring Program was designed to monitor.

This proposal appeared as an information item on the November 3, 2025, CDC agenda. The CDC was very supportive of the recommendation. One member asked about evaluation of a mechanism to provide credit to cities that had previously exceeded Thrive MSP 2050's density policy but did not exceed Imagine 2050 density policy. This analysis had previously been completed and not recommended.

This proposal appeared as an information item on the September 18, 2025, LUAC agenda. Committee members expressed support for scenarios that benefited the most number of cities while acknowledging the importance of maintaining a robust data set. They also requested a

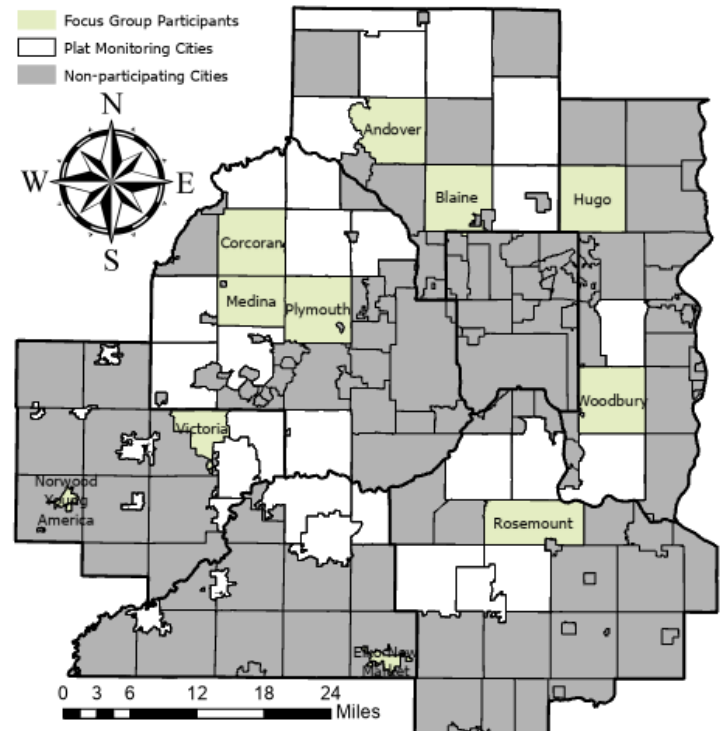
breakdown of the impact of the various scenarios on each individual community. A large portion of the discussion focused on the details and goals of the Plat Monitoring Program (Program).

Engagement Since Last Meeting

The focus group was reconvened on November 12, 2025, and staff informed participants of the ways in which their feedback had been incorporated into the analysis and current recommendation. Participants asked for clarification on if cities that had previously been platting above Thrive MSP 2040's density policy would be able to receive credit towards meeting Imagine 2050's density policy. Staff shared that they had investigated the possibility of developing a system to provide credit for cities that had met the policy requirements of Thrive MSP 2040, but whose reported average net residential density did not meet the policy requirement of Imagine 2050. Ultimately, this system was not created due to: 1) the adopted policy direction in Imagine 2050 for cities to develop at higher densities is based on regional goals for more compact development patterns over time; 2) the complexities of developing a system that was both impactful and fair; 3) the determination that the system would only apply to four cities; 4) proposals to increase flexibility in density calculations are present in the updated MUSA Implementation Guidelines; and 5) the significant increases to average net residential densities experienced by most cities with the reduced lookback periods.

Participants were generally supportive of the proposed program update, and no major concerns were raised.

Figure 1. Focus Group Participants



Background

The Program was designed to help the Metropolitan Council (Council) measure how land use policy, specifically policies relating to density, were implemented at the local level in developing communities. In addition to providing the Council with data, the Program also provides participants with additional flexibility in their land use planning.

While this flexibility is valuable and several communities utilize it to demonstrate consistency with Council policy, the Program now includes over 20 years of data for some of the communities. This has resulted in the Program data no longer providing appropriate credit for recent developments in cities. Additionally, the data set now spans multiple comprehensive planning cycles, including those with different density requirements for some of the community designations. For these reasons, Imagine 2050's Land Use policy commits the Metropolitan Council to reviewing the administrative guidelines relating to the local implementation of density policy and states that the Council will "[u]pdate the Plat Monitoring Program to better reflect more recent development patterns by examining a lookback period that is not dependent on when the program was initiated in 2000, or when participation in the program began." This review also needs to consider how the Program can fairly incorporate the average net density increases in Imagine 2050 and the role the Program will have in evaluating Metropolitan Urban Service Area (MUSA) expansion requests from participating cities.

Lookback Scenarios Analysis

Responding to Council direction, staff investigated five different potential lookback periods that could be used in lieu of Program start date or Program enrollment for determining past performance and consistency with Council policy. These scenarios were:

1. A 20-year rolling data set (2005 scenario)
2. Previous decade plus current decade (2010 scenario)
3. A 10-year rolling data set (2015 scenario)
4. Post 2040 Comprehensive Plan Adoption (2019 scenario)
5. Last 10 plats (10 plat scenario)

To evaluate the impact of the five scenarios on participating cities, staff calculated the average net density each city would have under each scenario and the number of plats that would be included under each scenario. For each scenario staff determined how many cities would have higher or lower average net densities, the number of cities that would have Program average net densities under Thrive MSP 2040 requirements, the number of cities that would have Program average net densities under Imagine 2050 requirements, and the number of cities that would fall below 10 reported plats. The mean and median change in net residential density was also calculated for each community designation under each scenario. All of these numbers were compared against or derived from the baseline created by current Program information. Finally, each scenario was run with both 2023 and 2024 data to gauge how much year to year change occurred.

Evaluating the Lookback Scenarios

Using the data generated by the analysis of the lookback scenarios, staff evaluated the scenarios to determine which was best suited to meeting the goals of: 1) providing information about how the Council's density policy is being implemented on the local level; 2) serving as a mechanism to provide flexibility to Cities; and, 3) reflecting the changing density requirements. Viable scenarios would have to maintain a large enough data set to avoid massive year to year fluctuations, while still being small enough to allow developments approved under new or revised comprehensive plans to meaningfully impact a city's average net residential density.

The 2005 scenario did not have a significant impact on most cities, likely because many cities did not join until after 2005 and thus did not have any older data removed. Similarly, the 2010 scenario, while more impactful on the Program's pilot cities who have been reporting data since 2001, did not have a significant impact on the 21 cities that enrolled in and after 2008. Due to the limited impact of these scenarios and the desirability of having a more uniform dataset (i.e. having more participants reporting for the same period of time), staff does not recommend either of these scenarios.

The last 10 plats scenario was very impactful and resulted in more cities reporting plats with an average net density meeting Thrive 2040 and Imagine 2050 than most other scenarios. This scenario also allows for new developments to significantly shift a city's average net residential density. Unfortunately, limiting the program to such a small data set means that fast developing communities will be cycling out most or all their plats every year. This means that those cities could conceivably vacillate between being in and out of consistency with Council policy every year. For example, between 2023 and 2024, one city's net residential density decreased by -5.96 while another's increased by 8 under this scenario. That level of volatility would make it difficult for the Council and cities to rely on the program as a flexibility tool. Additionally, while the current market supports multi-family developments, a slowdown in those developments would quickly pull cities out of compliance or severely reduce their flexibility in this scenario. Despite those drawbacks, this scenario is attractive for cities with a smaller volume of platting activity as it ensures they have a minimum number of data points.

Both the 2015 and 2019 scenarios have a significant impact on cities' average net residential density, and in both scenarios significantly more cities increase their average net residential density than decrease it. The 2019 scenario has the least number of cities with net residential

densities below Thrive 2040 and Imagine 2050 policy requirements but does leave 16 program participants with datasets of less than 10 plats and, along with the last 10 plats scenario, is one of the two scenarios where year-to-year volatility significantly increases from the current baseline. It is also unclear if a scenario that results in an average increase in average net density of 1.14 unit per acre across all designations accurately reflects cities' historic platting activities or is simply a spike caused by the current high volume of multi-family developments in the region. The 2015 scenario with its larger datasets shows a more moderate average net density increase of 0.68 units per acre across all participants, while still having approximately twice as many cities increase net residential density as lose it. Though it does result in fewer cities reporting average net densities meeting Thrive 2040 and Imagine 2050 policy than the 2019 scenario. Currently, five cities use the Program to maintain consistency with Council density policy.

Rationale and Recommendation

Based on identified program needs, the data analysis, and feedback from local governments, staff recommend the 10-year lookback period (the 2015 Scenario) for the purpose of determining eligibility for flexibility, with an added provision that cities with 10 or fewer plats would instead use the average net density of all reported plats.

Allowing cities with lower platting activities to utilize their last 10 plats will help offset the impact of the shorter lookback period on those cities and provide a safety net to prevent datasets from dropping to a handful of plats. For most cities this scenario will result in an increase in reported average net density and a data set that can be impacted by platting higher density developments. It will also slowly remove developments approved under previous lower density plans from consideration.

The major drawback to this scenario is that it does not directly align with the comprehensive planning cycle and will result in reporting periods that span multiple comprehensive plans with different density policies. This drawback is present in every scenario except for an alternative scenario where all data from the current and previous comprehensive plan is retained. This comprehensive plan scenario would essentially be the 2010 scenario with the potential for a significant shift in cities consistency with Council policy every planning cycle as the lookback range contracted from 20 years to 10 years. It would also have the drawback of creating a very large and relatively static dataset toward the end of the planning cycle, precisely the issue the reduced lookback period is designed to solve.

While this modified 2015 scenario's drawback could limit cities' abilities to use the Program for flexibility, especially immediately following the approval of a comprehensive plan, it must be remembered that cities which have a land use plan meeting Council density policy are consistent with Council policy regardless of their reported Program totals. Generally, flexibility is most important later in the comprehensive planning cycle when comprehensive plan amendments reducing planned density are being considered to accommodate lower density development proposals. Under the recommended modified 2015 scenario, 27 of the 45 participating cities would be eligible for flexibility in meeting Imagine 2050 density policy with their existing platting data.

In reviewing the data staff observed that the enrolled cities with a Suburban Community Designation are no longer engaging in the type of development that the Program was designed to monitor. When these cities first joined the Program, they were still engaging in greenfield development; however, that has shifted to almost entirely infill development in recent years. Including a handful of nearly completely developed cities with a group from the region's developing edge can distort the picture created by the Program's data. For this reason it is recommended that program be available to only Suburban Edge and Rural Center cities.

Thrive lens analysis

On February 12, 2025, the Council adopted Imagine 2050, which builds on policy direction in Thrive MSP 2040. As part of its implementation of Imagine 2050, the proposed programmatic updates aim to advance the core responsibilities for the Council in the Metropolitan Land Planning Act as well as Imagine 2050 regional goals and adopted Land Use policies.

Funding

This is an existing program update and the changes proposed do not include direct funding.

