

Business Item

Land Use Advisory Committee



LUAC Meeting Date: November 20, 2025

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 an information item on the November 3, 2025, CDC agenda. The CDC was very supportive of the recommendation. One members 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).

This item has been presented to both LUAC and CDC for review, with general agreement on the proposal for updates. The tentative schedule for adoption of these updates is as follows:

- CDC meeting on December 1, 2025, to recommend actions to the Met Council
- Metropolitan Council for action on December 17, 2025.

Background

In 2001, the Metropolitan Council (Council) worked with 12 pilot cities, Housing First Minnesota, and Metro Cities to create the Program. The Program was designed to help the 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. Currently 45 cities participate in the program and 5 of those cities rely on the flexibility provided by the program to remain consistent with Council density policy.

The Program works by asking participants to submit a list of the prior year's approved sewer residential developments in the spring of each year. The data provided indicates the mix of housing in developments (i.e. the number of single-family and multi-family units) along with a breakdown of the development's acreage indicating how many acres are being used for housing, parks, arterial right-of-way, wetlands, and other uses (i.e. being reserved for future development). This information allows the Council to calculate the actual net residential density of developments and see how land is being utilized in these cities.

Plats corresponding to the reported developments are added to a GIS database along with building permit data. The resulting data allows the Council to visually see where development is occurring in these Cities and track how quickly building permits are being pulled for platted lots. Monitoring the changes in these trends helps inform the Council's forecasting and understanding of development patterns.

Participating cities whose plat monitoring data indicates that their actual developments' average net residential density is higher than the minimum average net residential density required by Council policy can incorporate their Program performance into their average net density calculations to allow for additional flexibility in how they guide land within their city. To clarify, ordinarily compliance with the Council's density policy is determined by assuming that all planned land uses will develop at the minimum permitted density range; however, Program participants can add their actual development data to these calculations. If a city has consistently been approving developments above their minimum permitted net density, this will result in a higher average net density for the city. In practice this means that they can guide larger areas of their city for lower density uses or employ land use categories with lower density ranges because they have demonstrated that they are approving developments with net densities above the permitted minimums. This allows a city to better provide a mix of housing types, both lower and higher density, to meet the overall housing needs within their community. It is important to note that Program data is only ever used to benefit cities. Cities that have planned for an average net density that meets Council policy, but which have reported actual developments to the Program resulting in an average net density below Council policy are not penalized.

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 initially identified three 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. The first scenario was using data from 2010 to



2024 (2010 scenario), based on the rationale of taking the previous decade's plus current decade's information into consideration. The second scenario was using data from 2015 to 2024 (2015 scenario), based on the rationale of using a rolling 10-year evaluation period. The third scenario was using data from 2019 to 2024 (2019 scenario), based on the rationale that this would roughly align the data with developments approved under the 2040 Comprehensive plans.

During the analysis, staff observed that the 2019 scenario left many cities with a very small dataset and a fourth scenario of only considering the most recent 10 plats (10 plat scenario) was added. Finally, after receiving feedback from focus group participants on the initial four scenarios, a fifth scenario looking at the last 20 years of data (2005 scenario) was added in response to concerns about the impact of shorter lookback periods on cities with small volumes of platting activity. It should be noted that this analysis has been conducted with both 2023 and 2024 as the end dates which allows for an evaluation of year-to-year changes cities could experience under the various scenarios.

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.

The first metric, increasing or decreasing net residential density, provides a very high-level assessment of how many cities would benefit under each scenario. It showed that in the 2005, 2010, and last 10 plat scenarios double digit numbers of cities experienced no change, 23, 14, and 12 respectively. In all scenarios significantly more cities increased net residential density than decreased it, with the 2019 having the largest spread with 32 cities gaining compared to 10 cities losing net residential density. The breakdown for each scenario is provided in table below.

Table 1. High level impact of scenarios analysis: Number of cities resulting in a loss, gain, or no change (same) to Net Residential Density based on the Scenario analysis

Scenario 2005-2024			Scenario 2010-2024			Scenario 2015-2024			Scenario 2019-2024			Scenario Last 10		
loss	same	gain	loss	same	gain	loss	same	gain	loss	same	gain	loss	same	gain
6	23	16	10	14	21	11	8	26	10	3	32	7	12	26

* Out of 45 participating communities

The second metric, number of cities platting under Thrive MSP 2040 requirements, indicates how many cities are unable to utilize the program for flexibility in their land use planning. Only cities platting above Thrive policy requirements are eligible for additional flexibility, and currently only 5 cities rely on program data to maintain consistency with Thrive Land Use Policy. Currently, 13 cities are reporting Program data under Thrive's density policy and this number increases in the 2005 scenarios to 14 cities. It stays the same in the 2010 scenario and drops to 9 in the 2019 scenario and to 12 in the last 10 plats and 2015 scenarios. A breakdown of these numbers by Thrive community designation is provided in the table below.

Table 2. Cities platting under Thrive Density Requirements by Community Designation and Scenario

Community Designation	Scenario Current	Scenario 2005-2024	Scenario 2010-2024	Scenario 2015-2024	Scenario 2019-2024	Scenario Last 10
Suburban (of 4)	1	1	1	1	0	0
Suburban Edge (of 9)	0	0	0	1	1	2
Emerging Suburban Edge (of 21)	7	8	7	5	4	5
Rural Center (of 11)	5	5	5	5	4	5
Total (of 45)	13	14	13	12	9	12

The third metric, number of cities platting under Imagine 2050 requirements, indicates how many cities will be unable to utilize the program for flexibility once Imagine 2050's density policy goes into effect on January 1, 2026. Rural Center communities were not included in this metric as their density requirements did not change between Thrive 2040 and Imagine 2050. The least number of cities would be eligible for flexibility in the 2005 scenario with progressively more cities maintaining eligibility in the 2010, 2015, 2019, and last 10 scenarios. A breakdown of these numbers by Imagine 2050 community designation is provided in the table below with an indication of increase when compared to Thrive 2040 provided for reference.

Table 3. Cities platting under Imagine 2050 density requirements by Community Designation

Community Designation	Scenario Current	Scenario 2005-2024	Scenario 2010-2024	Scenario 2015-2024	Scenario 2019-2024	Scenario Last 10
Suburban (of 5)	3 (up from 1)	3 (up from 1)	2 (up from 1)	2 (up from 1)	1 (up from 0)	1 (up from 0)
Suburban Edge (of 29)	11 (up from 7)	12 (up from 9)	10 (up from 8)	10 (up from 7)	9 (up from 5)	9 (up from 7)
Rural Center (of 11)	5 (no change)	5 (no change)	5 (no change)	5 (no change)	4 (no change)	5 (no change)
Total	19 (up from 13)	20 (up from 14)	17 (up from 13)	17 (up from 12)	14 (up from 9)	15 (up from 12)

The fourth metric, number of cities reporting 10 or less plats, indicates how many cities would have datasets of 10 plats or less. Predictably, the shorter the lookback period, the higher the number of cities with these constrained datasets. Under the current Program, about 25% of participants have reported less than 10 plats. This increased to just over 35% in 2019 scenario, with much smaller increases in the 2010 and 2014 scenarios. The number of cities with fewer than 10 plats for each scenario is provided below.

Table 4: Cities with less than 10 plats by Scenario

Scenario Current	Scenario 2005-2024	Scenario 2010-2024	Scenario 2015-2024	Scenario 2019-2024	Scenario Last 10
12	12	13	13	16	12

The fifth metric, average and median change in net density by city designation, indicates how large an impact each scenario would have on participating cities broken down by community designation. Shorter lookback periods had the largest impact on cities in every category and, with the exception of Rural Centers in the 2010 and 2019 scenarios, the average impact was always positive. The median impact was also generally positive, though for many categories it was neutral in multiple scenarios. The tables below show the average and median change in net density by community designation.

Table 5. Average change in density by community designation

Community Designation	2005-2024	2010-2024	2015-2024	2019-2024	Last 10
Suburban	0.12	0.75	3.91	5.97	6.20
Suburban Edge	0.05	0.20	0.37	0.78	0.89
Rural Center	0.06	(0.00)	0.03	(0.12)	0.03
All Designations	0.06	0.20	0.67	1.16	1.28

Table 6. Median change in net residential density by community designation

Community Designation	2005-2024	2010-2024	2015-2024	2019-2024	Last 10
Suburban	0.00	0.40	5.10	7.68	6.98
Suburban Edge	0.00	0.00	0.09	0.60	0.31
Rural Center	0.00	0.00	0.00	0.00	0.00
All Designations	0.00	0.00	0.09	0.56	0.25

It should be noted that the large average and median changes reported for Suburban cities likely

reflect the fact that these cities have mostly pivoted from greenfield to infill development over the years they have been enrolled in the program. This results in very large density increases when the low-density single-family developments of the early years are removed and the predominantly higher density multi-family developments of the later years remain. This phenomenon is seen to a lesser extent in the Suburban Edge and Emerging Suburban Edge where there has been an appreciable uptick in infill and multifamily development in recent years.

A final metric is the volatility cities experienced in their Program reported net residential density between 2023 and 2024. The current system showed that the largest change in Program reported net residential density was 1.6 was identical in the 2005 and 2010 scenarios. The 2015 scenario showed slightly more volatility with a largest change of 1.86. Both the 2019 and last 10 plats scenarios showed significantly larger swings with largest values of 2.9 and 8, respectively. It should also be noted that the 2015, 2019, and last 10 plats scenarios all exhibit more significant decreases than the current, 2005, and 2010 scenarios.

Table 7. Year to year volatility in reported net residential density from 2023 to 2024

Change	Current	2005-2024	2010-2024	2015-2024	2019-2024	Last 10
Mean	0.09	0.11	0.12	0.16	0.16	0.27
Range	-0.27 to 1.6	-0.4 to 1.6	-0.27 to 1.6	-1.02 to 1.86	-2.16 to 2.9	-5.96 to 8
Largest Change	1.6	1.6	1.6	1.86	2.9	8

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.

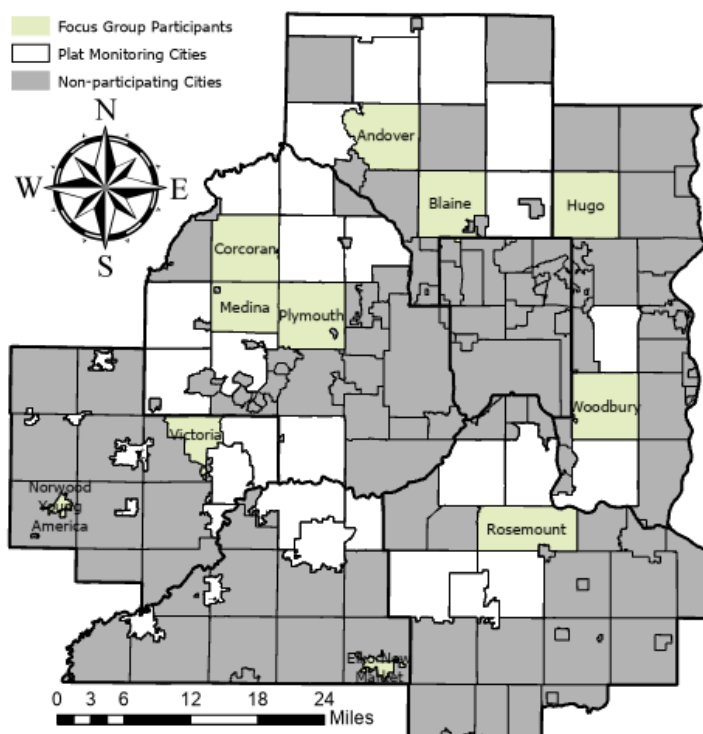
Engagement Activities

Any change to the Program has the potential to impact cities, especially cities interested in utilizing its flexibility to meet Thrive 2040 or Imagine 2050 density requirements. For these reasons the Council is committed to soliciting feedback from and working with our local partners to ensure that their concerns are understood and addressed by any proposed change.

To this end, a brief presentation outlining what changes the Council was considering was shared with the Regional Planners Advisory Group (RPAG) on October 1, 2024. Generally, RPAG members were supportive of a shorter lookback period, recognizing that in many cases the sheer volume of data was preventing them from getting much credit for recent denser developments. They expressed the sentiment that any use of the Program to determine compliance with Council policy should take into consideration and reflect the standards that were in place at the time plats were approved and not retroactively apply Imagine 2050's higher density standards to periods covered by earlier comprehensive plans.

In addition to presenting a broad outline of the proposed changes to RPAG, staff invited all 45 Program participants to be part of a focus group to provide feedback on the specific scenarios being considered. Eleven cities agreed to participate. While some Council districts with fewer Program participants were not represented and no cities with a Suburban Community Designation chose to participate, the focus group had a good geographic spread and reflected the general makeup of Program participants. The map below shows which of the Program cities participated in the focus group.

Figure 1. Focus Group Participants



Focus group participants were sent both the composite data generated by the analysis, similar to the tables included earlier in this report, and the city-by-city breakdown of each scenario's impact for all focus group members about a week before the group met. The goal was to allow participants time to review the data and draw their own conclusions prior to the meeting. During the meeting staff talked through the analysis, clarified the goals of the program update, and indicated a preference for the 2015 scenario.

There was a robust discussion from participants on the proposed changes to the Program, with slower growing communities, particularly Rural Centers, indicating that a longer lookback period, preferably 20 years, was needed. Fast growing communities generally indicated that they would receive the most benefit

from shorter lookback periods. Some cities expressed concern that lookback periods of under 20 years would not capture their community's performance under previous comprehensive plans. Cities suggested creating a mechanism which would allow cities that had historically met the required 3 units per acre density requirement to receive credit towards the 3.5 unit per acre density requirement established by Imagine 2050. Participants were not interested in a Council proposal to have a "grace" period for cities that had previously met the 3 unit per acre requirement but did not meet the new density requirements, noting that there was no way to guarantee that higher density developments would occur within the timeframe. There was also general concern that the more the Council relied upon Program data in determining consistency with density policy and for evaluating MUSA expansion requests, the greater the risk that cities would be penalized due to incorrect data. Finally, cities expressed concern that removing past high density apartment plats could negatively impact cities where most of the viable apartment sites have already been developed and where there is not anticipated to be much multi-family development in future years.

In response to the feedback received during the focus group, staff added a 20-year scenario, the 2005 scenario discussed earlier, to the analysis and investigated the impact of modifying the 2015 scenario to incorporate the last 10 reported plats for cities that have reported 10 or less plats in the last 10 years. Staff also investigated the possibility of developing a system to provide credit for cities that had met the policy requirements of Thrive MPS 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.

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 explained that it would not be possible to use net average densities under Imagine 2050's density policy to get credit towards meeting that policy, even if those densities had exceeded Thrive MSP 2050's requirements. Participants were generally supportive of the proposed program update, and no major concerns were raised.

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 have largely shifted away from greenfield development. Additionally, their higher minimum net density requirements do slightly pull up the average reported density for Program Communities. Staff would welcome direction on if these cities should remain in the program. Regardless of if these cities remain in the program, it would likely be beneficial to begin reporting on Rural Center, Suburban Edge, and Suburban density separately once Imagine 2050's density policy is implemented.

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.

Attachment

City by City Breakdown of Scenario Impacts

