

Information Item

Community Development Committee



Meeting Date: February 2, 2026

Topic

2040 Comprehensive Plan Amendment and Environmental Reviews Annual Report

District(s), Member(s):	All
Policy/Legal Reference:	Minn. Stat. § 473.864, subd. 2; Minn. R. 4410
Staff Prepared/Presented:	Gabriela Olvera-Swaray, Planner (651-602-1832) MacKenzie Young-Walters, Senior Planner (651-602-1373)
Division/Department:	Community Development / Regional Planning

Proposed Action

No action necessary. This is an information item.

Background

Local governments amend their comprehensive plans as the need arises. Most amendments are related to development proposals that are supported by the local government but are not consistent with the current guiding land use or other policies in their adopted Plan. Other reasons for amending plans include the incorporation of more detailed planning (e.g., neighborhood or station area plans); refinement of policy; or changes in the timing, location, or staging of development. Sometimes proposed developments are large enough in scope that they require an environmental review. Not all projects that require an environmental review need a comprehensive plan amendment, but, when they do, the environmental review must be completed before the local government can submit a comprehensive plan amendment.

Council staff review amendments for conformance with regional system plans, consistency with regional policy, and compatibility with affected jurisdictions. Many of these are reviewed administratively by staff, but amendments with larger impacts require consideration by the Community Development Committee and full Council, consistent with the Council's adopted Administrative Review Guidelines.

Council staff compile information related to comprehensive plan amendments and environmental reviews to better understand and report on themes related to amendments and review. This ongoing inventory and analysis of amendments helps staff provide assistance to local governments and informs future regional policies and practices. In early 2025, Imagine 2050 was adopted, establishing updated Community Designations (Urban, Urban Edge, Suburban, Suburban Edge, Rural Center, Diversified Rural, Rural Residential, and Agricultural) for communities and townships across the region; this year's CPA Tracking Report reflects data analyzed under the new framework. The Report covers authorized amendments to 2040 comprehensive plans as well as environmental reviews conducted since 2025. Amendments that were found to be incomplete or ultimately withdrawn are not included.

Types of Amendments

The amendments submitted by communities often have multiple components. An amendment may include one or more of the following:

- Changes in guiding land uses:
 - Parcel-specific changes to accommodate development proposals (most common amendment).
 - Modifying many parcels as a result of a small area planning exercise.
 - Assigning a guiding land use as a result of annexation (infrequent).
 - “Correcting” a guiding land use to better match the existing use (uncommon).
- Adjustments to the Metropolitan Urban Service Area (MUSA) or staging areas of the Plan based on development interest or lack thereof.
- Text amendments adjusting the density range of an existing guiding land use to accommodate market conditions or changing local policy for these locations.
- Increases to the community’s forecasts related to a development proposal and/or policy changes that create more favorable conditions for development given market demand.

Less common amendments also occur, such as:

- Text amendments creating a new guiding land use category.
- Infrastructure-related amendments, like the incorporation of a new bicycle plan.
- Change in Community Designation for a parcel(s).

Environmental Reviews

Broadly speaking, Environmental Reviews fall into two categories Environmental Assessment Worksheets (EAW)/Environmental Impact Statements (EIS) and Alternative Urban Areawide Reviews (AUAR). EAWs/EISs are required for known/proposed projects that fall into certain specified categories (i.e. an aggregate mine of 10 acres would not require an environmental review, an aggregate mine of 40 acres would require an EAW, and an aggregate mine of 160 acres would require an EIS). AUARs are a more planning focused document where several scenarios for future development in an area are explored, at least one of which must be consistent with the comprehensive plan.

Common EAWs/EISs:

- Large Residential/Mixed Use Developments
- Large Industrial Developments
- Aggregate Mines

Common AUARs:

- Industrial/Technology Parks
- Mixed Residential/Commercial

Less Common Environmental Reviews:

- Utility Infrastructure (Transmission Lines, Battery Energy Storage Systems, etc.)
- Environmental Restoration (Creek Corridor Stabilizations, etc.)

At the February 2, 2026, Community Development Committee meeting, staff will present an overview of this information with additional data, graphs, and examples of amendments authorized during 2025.

Findings

When communities submit amendments for Council review, they might include multiple policy changes or actions. For example, a city might submit a proposed amendment for the reguinding of properties for two unrelated developments. Council staff have disaggregated this information for reporting and analysis.

The Big Picture for 2040 Plans

- The Council has authorized 543 amendments¹ to 2040 Plans, consisting of 543 actions. Of the 543 amendments, 123 required Council action and 404 were reviewed administratively by Council staff.
 - Communities within the Metropolitan Urban Service Area (MUSA) account for approximately 88% of amendments.
 - The Council authorized the highest number of amendments in Suburban Edge (125), followed by Suburban (116). As a reminder, Emerging Suburban Edge is no longer listed as a Community Designation (see Figures 1 and 2).
- The number of amendments has declined since its peak in 2021 (Figure 3).
 - Only three amendments were submitted in 2019, which is not surprising as many plans were still under review for the 2040 decennial update.
 - Amendments grew to 47 in 2020 and peaked in 2021 with 115 amendments.
 - Amendments declined in 2022 and 2023 with 81 and 76 amendments, respectively.
 - Amendments increased to 87 in 2024 and 90 amendments in 2025.
- The most frequently submitted amendments included changes in guiding land use (411), including those associated with a development (265) and those without a specific development proposal (146). There have been 112 amendments related to changes in the text, such as the creation of a new guiding land use or revisions to density ranges.
- Amendments associated with development were linked to the creation of over 24,500 dwelling units, nearly 2,300 affordable dwelling units, and nearly 3,300,000 square feet of commercial and industrial uses.
- Of the 543 total amendments to 2040 Plans, the Council found 17 amendments to be inconsistent with regional policy.
 - Eleven amendments created inconsistencies with housing policy.
 - Two amendments created inconsistencies with natural resources policy.
 - Two amendments created inconsistencies with land use policy.
 - One amendment created an inconsistency with both land use and natural resources policies.
 - One amendment created an inconsistency with agricultural preserves policy.

A Closer Look at 2025

In 2025, the Council authorized 90 amendments through December 31, 2025. Of these amendments, 16 required Council action and 74 were reviewed administratively by staff. The general trends in 2025 align with those seen across all amendments authorized by the Council. The following are some key findings of the amendments authorized in 2025:

- Frequency of amendments:
 - Among the 181 communities and 7 counties in the region that require comprehensive plans, 50 amended their plans in 2025.
 - Communities within the MUSA account for 82% of amendments.
 - The Council authorized the highest number of amendments in Suburban Edge (31) and Suburban (28) communities, followed by Urban Edge (12) and Urban communities (11).

¹ The Council authorized the first 2040 Comprehensive Plan on February 14, 2018, and adopted Imagine 2050 on February 12, 2025.

- The most frequently submitted amendments included changes in guiding land use (68), split among those associated with a development (44) and those without a specific development proposal (24).
- There were 13 amendments related to changes in the text, such as the creation of a new guiding land use or revisions to density ranges.
- Land use impacts:
 - Development-driven amendments authorized in 2025 accounted for 3,409 housing units, including 379 affordable housing units.
 - Approximately 68% development-driven changes in guiding land use in 2025 were either a change from one residential land use to another residential land use (34%), or a change from non-residential land use to a residential land use (34%).
 - Of the 44 amendments involving residential land uses, 25 resulted in increased development capacity and 15 resulted in decreased development capacity. One amendment did not lead to a change in development capacity.
 - The net impact of all amendments was an increased development capacity of over 4,000 (inclusive of units associated with developments and additional units that could be constructed due to amendments that are not associated with a known development).
- Regional policy impacts:
 - No regional policy inconsistencies

Environmental Reviews in 2025

In 2025, Local Planning Assistance staff participated in 49 environmental reviews, 24 EAW/EIS and 25 AUAR. The following are some facts and statistics about these environmental reviews.

- EAW/EIS
 - 20 EAWs, 3 EISs (large aggregate mines), 1 Environmental Review (Battery Energy Storage System).
 - Mostly Suburban Edge (10), followed by Diversified Rural (4) and Suburban (4).
 - 22 Ok with comments, 1 incomplete (failed to discuss drinking water supply management area), 1 inadequate (high likelihood of significant environmental impacts)
 - 5 were identified as likely to require a Comprehensive Plan Amendment
 - Reviews covered:
 - 2,307 acres
 - 3,486 housing units (952 single-family detached, 552 single-family attached, 1,982 multi-family)
 - 1,398,000 sq. ft. of Industrial Uses
 - 535,776 sq. ft. of Commercial Uses
 - 532,500 sq. ft. of Medical/Institutional Uses
- AUAR
 - 10 AUAR Updates, 5 Scoping AUARs, 6 Draft AUARs, and 4 Final AUARs
 - 19 unique projects, exploring 43 unique scenarios.
 - Mostly Suburban Edge (14), followed by Urban (2)
 - 16 Ok with comments, 5 Ok with Substantial comments (possible impact to regional systems, possible inconsistency with Council policy, missing scenarios/information), 1 Objection (inadequate scenarios, internally inconsistent)
 - Evaluated potential development scenarios over 21,283 acres.

We are interested in the Committee's thoughts and questions about this data, and what you think would warrant further investigation and reporting. We will continue to build upon this effort so that we have an ongoing means to track and report on trends in amendments.



Figure 1. Comprehensive Plan Amendments by Community Designation (2019-2024)

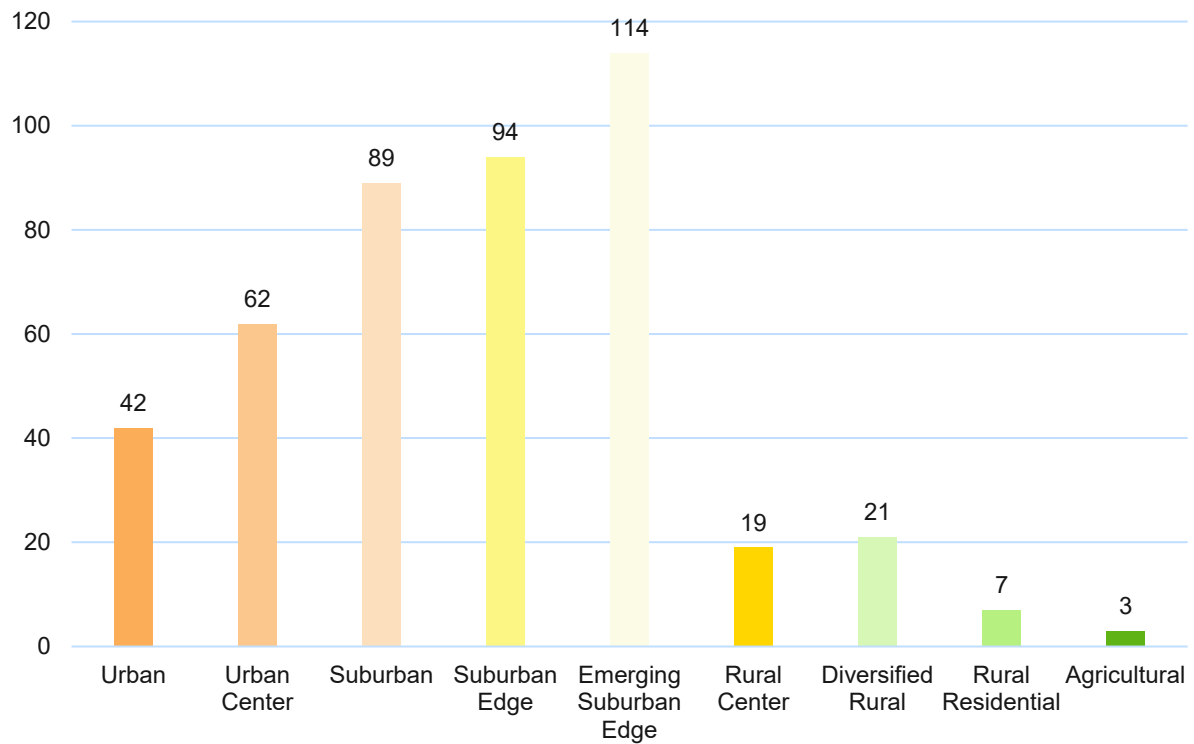
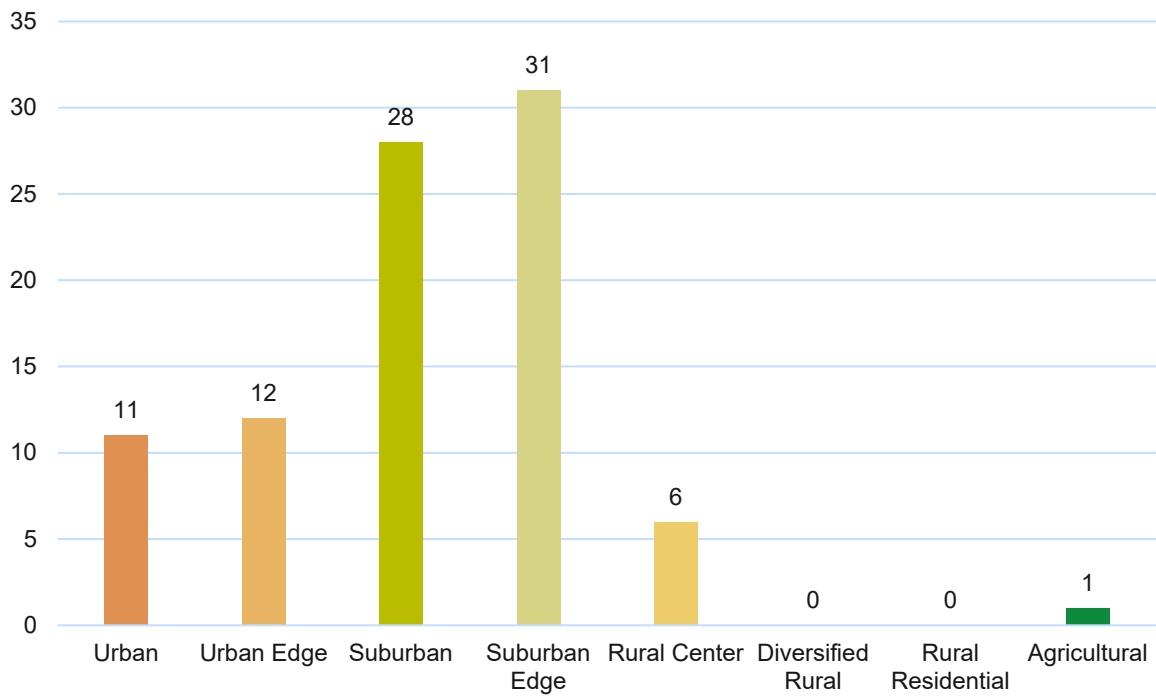


Figure 2. Comprehensive Plan Amendments by Community Designation (2025)

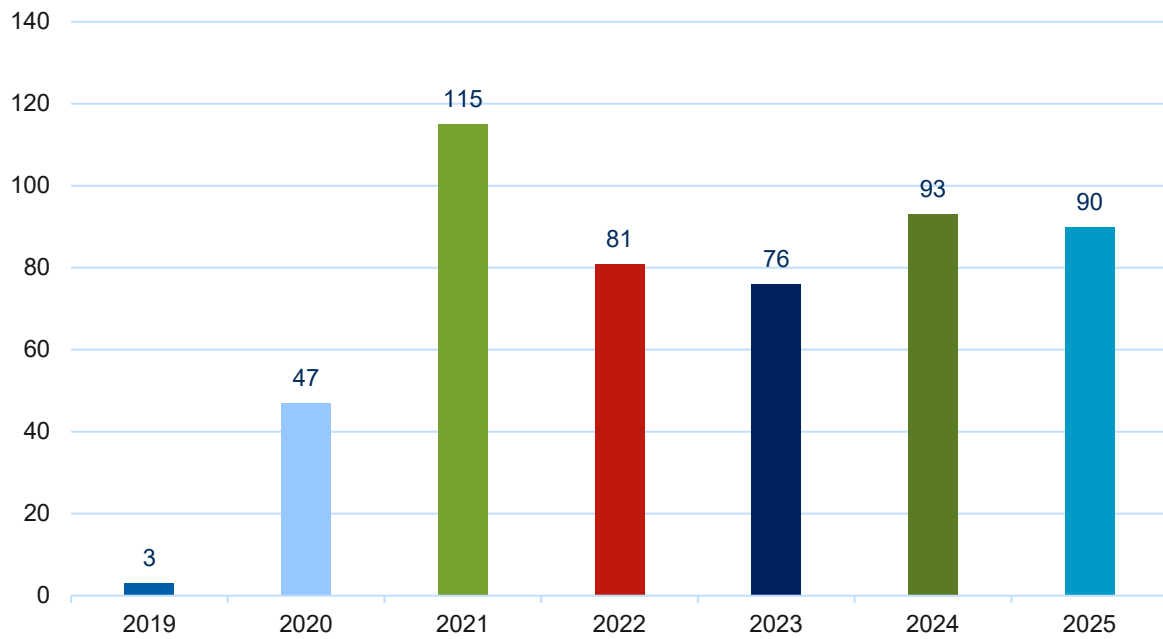


* Reminder: As part of Imagine 2050, Community Designation categories were updated, and Emerging Suburban Edge was removed.

** Not shown in table: 1 amendment from a County (Scott County).



Figure 3. Comprehensive Plan Amendments by Year



*The total for 2024 includes 6 additional amendments authorized in December 2024, which was not included in the 2024 CPA Tracking Report.

Figure 4. EAW/EIS by Community Designation (2025)

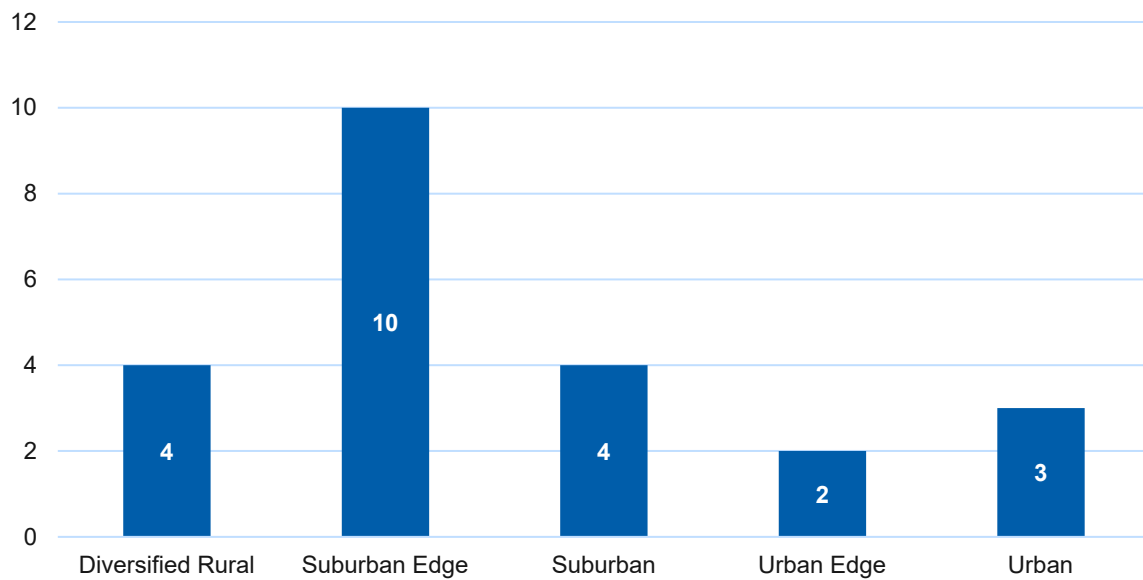


Figure 5. AUAR by Community Designation

