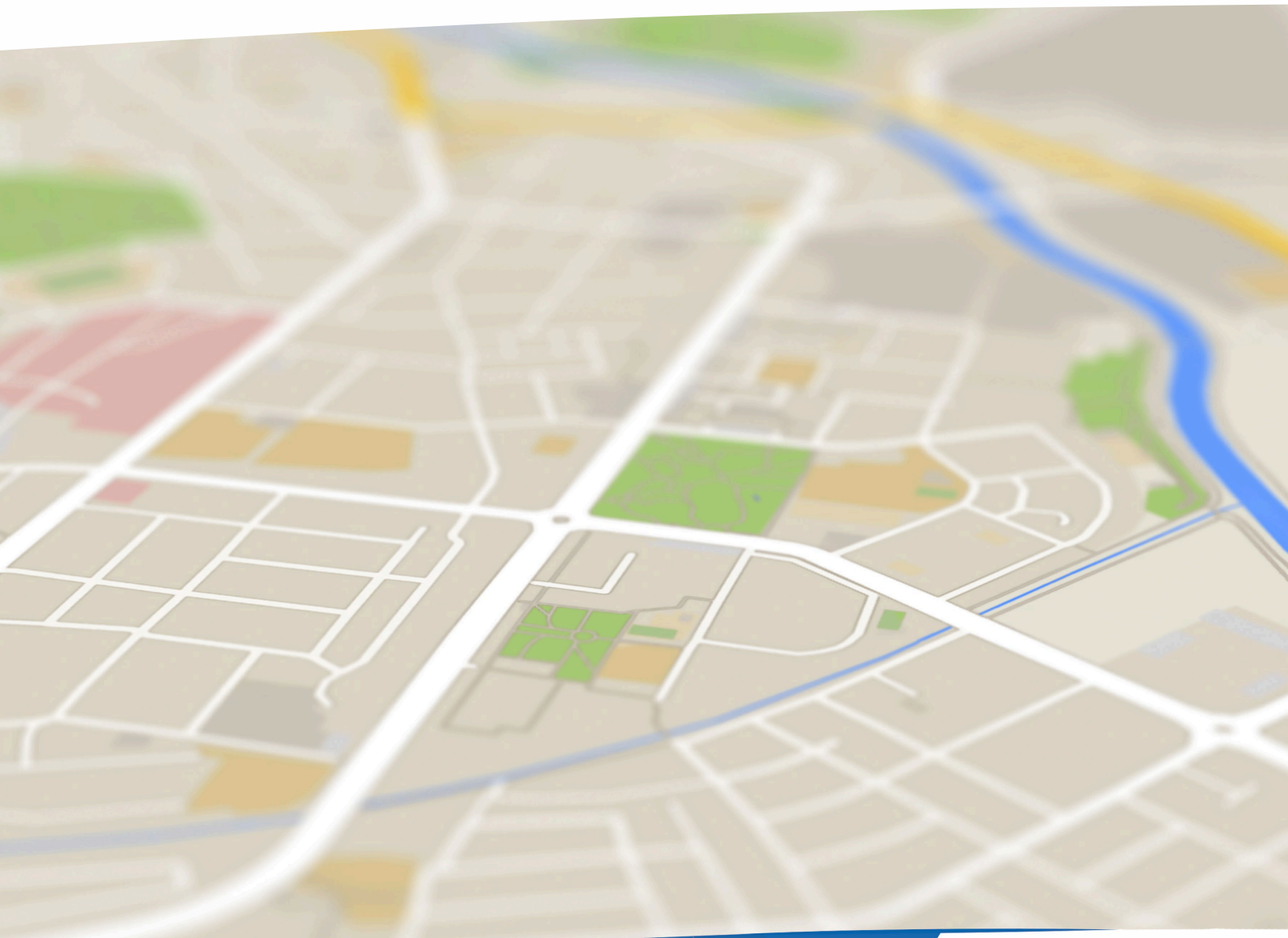
PLAT MONITORING PROGRAM UPDATE

September 18, 2025

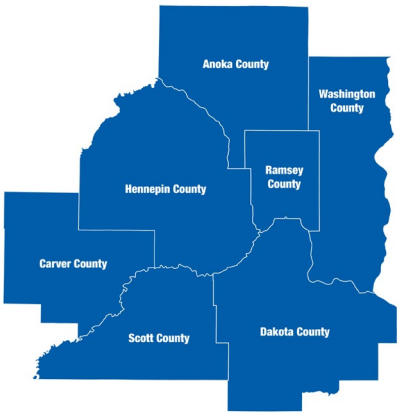


METROPOLITAN
COUNCIL

The Council's mission is to foster efficient and economic growth for a prosperous metropolitan region

Metropolitan Council Members

Deb Barber	Interim Chair	Diego Morales	District 9
Judy Johnson	District 1	Peter Lindstrom	District 10
Reva Chamblis	District 2	Gail Cederberg	District 11
Tyronne Carter	District 3	Mark Jenkins	District 12
Deb Barber	District 4	Chai Lee	District 13
John Pacheco Jr.	District 5	W. Toni Carter	District 14
Robert Lilligren	District 6	Victor Obisakin	District 15
Yassin Osman	District 7	Wendy Wulff	District 16
Anjuli Cameron	District 8		



The Metropolitan Council is the regional planning organization for the seven-county Twin Cities area. The Council operates the regional bus and rail system, collects and treats wastewater, coordinates regional water resources, plans and helps fund regional parks, and administers federal funds that provide housing opportunities for low- and moderate-income individuals and families. The 17-member Council board is appointed by and serves at the pleasure of the governor.

On request, this publication will be made available in alternative formats to people with disabilities. Call metropolitan council information at 651-602-1140 or tty 651-291-0904.

Plat Monitoring Program Update

Background

In 2001 the Metropolitan Council (Council) worked with 12 pilot cities, Housing First Minnesota, and MetroCities to create the Plat Monitoring Program (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 3 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 sewered 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. 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 residential density policy commits the

Metropolitan Council to reviewing the administrative guidelines relating to the local implementation of density policy and states that the Council will “Update the Plat Monitoring Program to better reflect more recent development patterns by examining a lookback period that is not depended 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 2023 (2010 scenario), based on the rationale of taking the pervious decade’s plus current decade’s information into consideration. The second scenario was using data from 2014 to 2023 (2014 scenario), based on the rationale of using a rolling 10-year evaluation period. The third scenario was using data from 2019 to 2023 (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 realized 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 (2004 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 was started before the 2024 plat monitoring data was received and therefore all scenarios use 2023 as the end year.

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 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 2004 and 2010 scenarios nearly as many cities decreased their net residential density as increased it. In the 2014, 2019, and last 10 plats scenarios a significant number more cities increased net residential density than decreased it, with the last 10 plats scenario having the largest spread with 7 cities losing net residential density and 25 cities gaining net residential density. The breakdown for each scenario is provided in table below.

High Level Impact (Number of Cities out of 45 to Lose/Gain Net Residential Density)															
2004-2023			2010-2023			2014-2023			2019-2023			Last 10		
# lose	# same	# gain	# lose	# same	# gain	# lose	# same	# gain	# lose	# same	# gain	# lose	# same	# gain
10	23	12	15	13	17	12	10	23	14	2	29	7	13	25

The second metric, number of cities platting under Thrive 2040 requirements, indicates how many cities are unable utilize the program for flexibility in their land use planning. Only cities platting above Thrive 2040 policy requirements are eligible for additional flexibility and currently 3 cities rely on program data to maintain consistency with Thrive Land Use Policy. This metric showed an increase from the current total of 13 cities to a total of 14 cities reporting Program numbers under current policy for the 2004, 2010, and 2014 scenarios. This number dropped to 9 in the 2019 scenario and 11 in the last 10 plat scenario. A breakdown of these numbers by Thrive 2040 community designation is provided in the table below.

# of Cities Plating under Thrive 2040 Requirements by Designation						
Designation	Current	2004-2023	2010-2023	2014-2023	2019-2023	Last 10
Suburban (of 4)	1	1	1	1	1	1
Suburban Edge (of 9)	0	0	0	0	0	1
Emerging Suburban Edge (of 21)	7	8	8	7	4	4
Rural Center (of 11)	5	5	5	6	4	5
Total	13	14	14	14	9	11

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 1st, 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 2004 and 2010 scenarios with progressively more cities maintaining eligibility in the 2014, 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.

# of Cities plating under Imagine 2050 Density (if different)						
Designation	Current	2004-2023	2010-2023	2014-2023	2019-2023	Last 10
Suburban Edge (of 29)	12 (up from 7)	12 (up from 8)	13 (up from 8)	11 (up from 7)	10 (up from 7)	10 (up from 5)
Suburban (of 5)	3 (up from 1)	3 (up from 1)	2 (up from 1)	2 (up from 1)	2 (up from 1)	1 (up from 1)
Total	15 (up from 8)	15 (up from 9)	15 (up from 9)	13 (up from 8)	12 (up from 8)	11 (up from 6)

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 under 45% in 2019 scenario, with much smaller increases in the 2010 and 2014 scenarios. The number of cities with less than 10 plats for each scenario is provided below.

# of Cities with less than 10 Plats					
Current	2004-2023	2010-2023	2014-2023	2019-2023	Last 10
12	12	13	14	20	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.

Average Change in Net Residential Density by Designation					
Designation	2004-2023	2010-2023	2014-2023	2019-2023	Last 10
Suburban	0.09	0.96	4.55	6.97	6.54
Suburban Edge	0.11	0.46	0.54	0.99	1.01
Emerging Suburban Edge	0.01	0.08	0.26	0.83	0.59
Rural Center	0.05	(0.02)	0.01	(0.09)	0.12
All Designations	0.05	0.18	0.61	1.11	1.06

Median Change in Net Residential Density by Designation					
Designation	2004-2023	2010-2023	2014-2023	2019-2023	Last 10
Suburban	0.08	0.64	5.04	8.65	7.72
Suburban Edge	0.00	0.08	0.24	0.65	0.38
Emerging Suburban Edge	0.00	0.00	0.00	0.48	0.31
Rural Center	0.00	0.00	0.00	(0.07)	0.56
All Designations	0.00	0.00	0.03	0.48	0.11

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.

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 2004 scenario did not have a significant impact on most cities, likely because many cities did not join until after 2004 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 is not recommending 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. 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 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 2014 and 2019 scenarios have a significant impact on cities' average net residential density, and in both scenarios nearly twice as many cities increase their average net residential density as 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 20 program participants with datasets of less than 10 plats, raising concerns about the volubility of the data. It is also unclear if a scenario that results in an average increase in average net density of 1.11 unit per acre across all designations accurately reflects cities' historic plating activities or is simply a spike caused by the current high volume of multi-family developments in the region. The 2014 scenario with its larger datasets shows a more moderate average net density increase of .61 units per acre change across all participants. It also has nearly as many cities reporting an increase in average net density with a smaller number of cities reporting a loss in average net density when compared to the 2019 scenario. Though it does result in fewer cities reporting average net densities meeting Thrive 2040 and Imagine 2050 policy than the 2019 scenario. Currently three cities use the Program to maintain consistency with Council density policy, 1 of which would likely be impacted by a switch to the 2014 scenario.

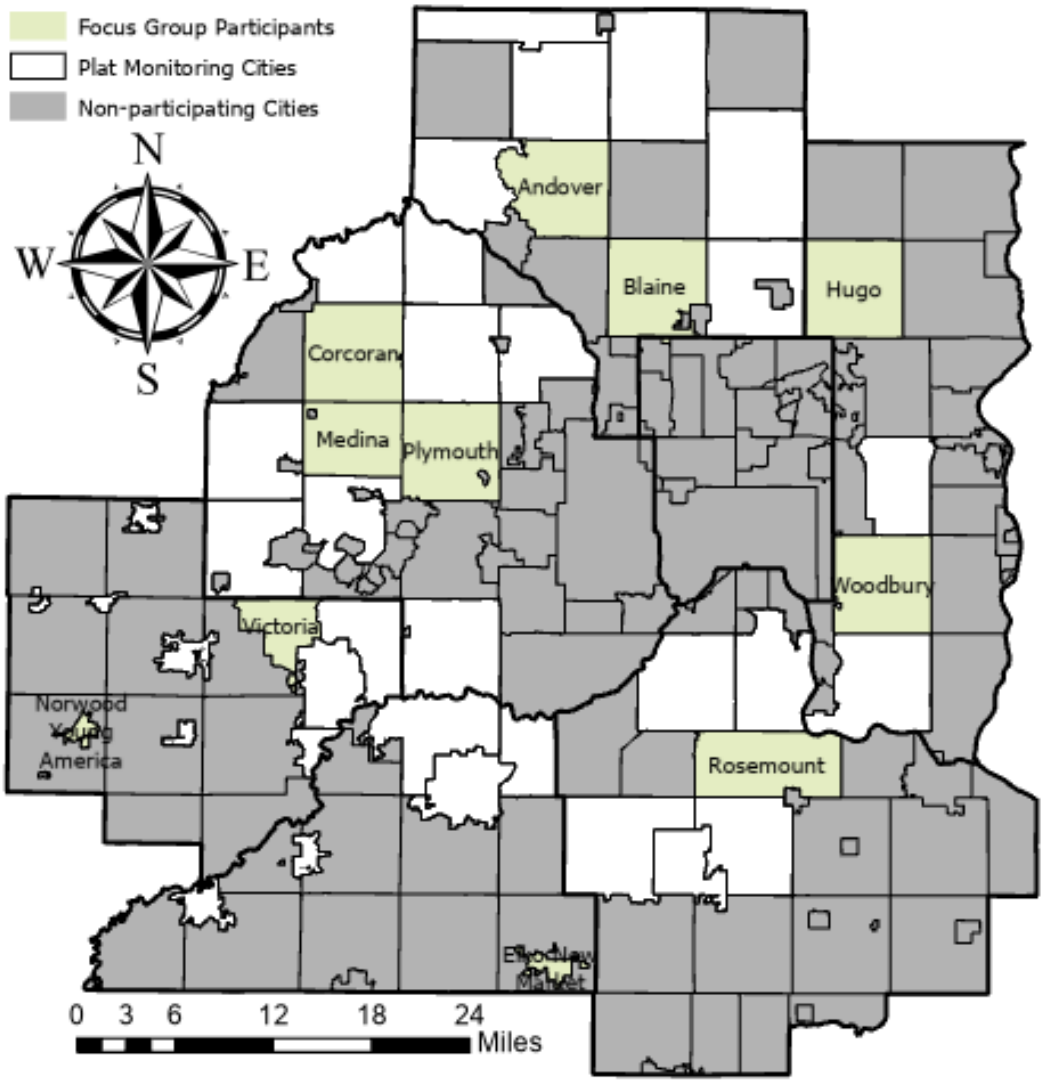
Engagement Activities

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 1st, 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 Program participants to volunteer to be part of a focus group to provide feedback on the specific scenarios being considered. Eleven out of the forty-five cities agreed to participate. While some Council districts with fewer Program participants were not represented and no cities with a Suburban Communities 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 chose to participate in the focus group.



F

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 conclusion 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 2014 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. 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.

Overall, participants were receptive to the idea of updating and refining the Program but understandably wanted to make sure that any changes would not negatively impact their cities. Participants expressed a desire for further discussions around the issue, which staff is committed to facilitating once we've received input from the Land Use Advisory Committee (LUAC) and Community Development Committee (CDC) on the initial proposals.

In response to the feedback received during the focus group staff added a 20-year scenario, the 2004 scenario discussed earlier, to the analysis and investigated the impact of modifying the 2014 scenario to incorporate the last 10 reported plats for cities that have reported 10 or less plats in the last 10 years.

Recommendation

Based on identified program needs, staff's analysis, and the feedback from the focus group, the current recommendation is for the Council to adopt a 10-year lookback period for the purpose of determining eligibility for flexibility, with a provision that cities with 10 or less 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 pervious lower density plans from consideration. Either legacy data or a phased in compliance standard could be used for determining past performance for the purpose of evaluating past performance associated with MUSA requests.

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 data set towards the end of the planning cycle, precisely the issue the reduced lookback period is designed to solve.

While this modified 2015 scenarios 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 2014 scenario 26 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.

Next Steps

Based on feedback and direction received from LUAC and CDC staff will conduct any necessary refinements to the analysis and possible scenarios. Once this is complete staff will reconvene the focus group to solicit additional feedback and provide all Program participants with an opportunity to comment on the proposed changes. This information will be incorporated into a formal recommendation for action by the Council.

390 Robert Street North
St Paul, MN 55101-1805

651-602-1000
TTY 651-291-0904
public.info@metc.state.mn.us
metrocouncil.org

Follow us on:
twitter.com/MetCouncilNews
facebook.com/MetropolitanCouncil