

Business Item

Community Development Committee



Committee meeting date: April 21, 2025

For the Metropolitan Council: May 14, 2025

Business Item: 2025-113

Implementation of Imagine 2050 in the Review of Local Comprehensive Plans and Plan Amendments

District(s), member(s):	ALL
Policy/legal reference:	Metropolitan Land Planning Act, Minn. Stat. 473.854
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Division/department:	Community Development / Regional Planning

Proposed action

That the Metropolitan Council:

1. Issue System Statements to communities in the seven-county metropolitan area in September 2025, with local comprehensive plan updates due to the Council by December 31, 2028.
2. Accept comprehensive plan amendments to 2040 local comprehensive plans through September 30, 2028. Proposed amendments must be submitted and found complete for review by September 30, 2028, in order to be considered by the Council and authorized to be placed into effect. After September 30, 2028, the Council will no longer accept amendments to 2040 local comprehensive plans.
3. Advise communities that:
 - a. All communities must use regional policy and system plans adopted by the Council as a part of Imagine 2050 for all local comprehensive plan updates and for all comprehensive plan amendments submitted to the Council for review after December 31, 2025.
 - b. For comprehensive plan amendments submitted and found complete for review before December 31, 2025, communities may choose to have those amendments reviewed under the Thrive MSP 2040 and its system plans *or* under Imagine 2050 and its system plans, provided that the proposed amendment is not found more likely than not to have a substantial impact on or contain a substantial departure from the 2050 metropolitan system plans adopted in 2025.
 - c. For comprehensive plan amendments submitted before the issuance of System Statements, the Council will consider any requests for forecast changes in light of Imagine 2050 forecasts and consider interim revisions to those forecasts for inclusion in

2025 System Statements. Council staff will work with communities on how best to incorporate any proposed forecast changes into 2040 local comprehensive plans.

- d. The Council will no longer make revisions to the allocations of affordable housing need for the 2021-2030 decade, which were originally adopted as a part of Thrive MSP 2040. Any proposed changes to Imagine 2050 forecasts may affect the allocation of affordable housing need for the 2031-2040 decade and will be considered consistent with the forecast revision approach.

Background

On February 12, 2025, the Council adopted Imagine 2050, including the related system and policy plans as chapters of the plan. As we turn to implementation, it is important that the Council provide guidance regarding how Imagine 2050 will be implemented as it relates to local comprehensive plans during this period between the adoption of Imagine 2050 and the submittal of comprehensive plans which are due by December 31, 2028. Foundational to the Council's guidelines is the implementation of the Metropolitan Land Planning Act. Specifically, the directive to "ensure the *coordinated*, orderly, and economic development" of the region. (Minnesota Statutes section 473.851 (emphasis added)). The decennial regional and local planning process relies upon that coordination to ensure its effectiveness. Coordination among both local governments (planning together at the same time) and the local and regional governments is important. There are some milestones during this period that also serve as key markers in this period and around which Council staff propose providing guidance as discussed below.

The Council will issue System Statements to communities in September 2025, initiating the decennial local comprehensive planning process, with local plans due to the Council on December 31, 2028. Each community will receive a System Statement which is an individualized compilation of the regional policies, forecasted growth, and systems plans that affect a community and that are determined necessary for the individual community to consider in updating its local comprehensive plan. Once System Statements are issued, Minn. Stat. 473.857 allows a community to request a hearing to resolve any disagreements the community may have with the contents of the statement. As provided in statutes, hearings and resolutions are typically completed within 120 days. Disagreements notwithstanding, all communities are expected to use Imagine 2050 and its system and policy plans when they amend or update their local comprehensive plans after December 31, 2025.

Pursuant to Minn. Stat. 473.858 subd. 4, all existing 2040 local comprehensive plans remain in full force and effect until updated as part of the decennial planning process. Communities may continue to amend their 2040 local plans up until the time when the decennial plan update is required by the Council.

Amendments to 2040 Comprehensive Plans

Establishing a termination date for comprehensive plan amendments to 2040 plans, pending the submission of complete plan updates, will help to ensure that planning and development within the metropolitan area occurs in a coordinated and orderly manner. This deadline will also help to ensure that the Council's own capital and service planning for regional systems affecting multiple communities can occur in a coordinated and efficient manner.

As such, Council staff recommend that after September 30, 2028, any plan changes that would otherwise be proposed as amendments should be incorporated into the 2050 local comprehensive plan, prior to submission to the Council for review. Communities can still implement development as planned in their 2040 comprehensive plans until their 2050 plans are authorized by the Council and adopted by the local unit of government.

This approach is consistent with the 2040 decennial planning guidance and establishes that the Council will not accept proposed comprehensive plan amendments to 2040 local plans for review and authorization after September 30, 2028. After that time, the Council will expect that communities focus on completing their local comprehensive plans and submit those updated plans to the Council for review and authorization.

Forecasts

With the adoption of Imagine 2050, the Council also adopted local forecasts of population, households, and employment. The Council has used these adopted forecasts for developing the systems and policy plans and forecasting future demand for transportation, transit, water and sewer service. The System Statements issued in September 2025 will include these updated forecasts.

Council staff may propose a set of forecast adjustments in the next month. Discussions are underway with a few cities that may request accelerated growth forecasts.

Council staff recommend that communities may continue to implement and amend their local comprehensive plans which extend through the year 2040 using Thrive MSP 2040 forecasts. Some proposed comprehensive plan amendments may include requests to change local forecasts. In the time period before System Statements are issued, Council staff recommend that the Council consider revisions to the Imagine 2050 forecasts with its review of comprehensive plan amendments. Examples of plan changes that could result in a revision to Imagine 2050 forecasts include:

- Substantial changes in land supply, planned land uses, and/or allowable density ranges
- Substantial changes in the extent of staging of MUSA (or comparable municipal urban service area)

Sewer-Serviced Forecasts

Where Imagine 2050 sewer-serviced households or sewer-serviced employment are lower than the Thrive MSP 2040 sewer-serviced forecasts, cities may continue to plan for urban services in those areas that are authorized in their local comprehensive plans and comprehensive sewer plans as reviewed and approved by the Council until 2050 local comprehensive plans are authorized and locally adopted.

Housing Allocations

Within Imagine 2050, the 2050 Housing Policy Plan allocates future affordable housing need for the 2031-2040 decade, which will be planned for in 2050 local comprehensive plans. System Statements issued in September of 2025 will include 2031-2040 allocations of future affordable housing need.

The 2040 Housing Policy Plan, part of Thrive MSP 2040, allocated the region's affordable housing need to sewer-serviced municipalities in the region for the 2021-2030 decade. As described above, communities may continue to implement and amend their 2040 local comprehensive plans which use the 2021-2030 allocation of future affordable housing need. Council staff recommend that the 2021-2030 allocation values now be fixed to the Thrive 2040 forecasts, as of the adoption of Imagine 2050 on February 12, 2025, and **will** not change.

Some proposed comprehensive plan amendments may include requests to change local forecasts, as stated above, which may then affect the 2031-2040 allocation of affordable housing need. Council staff advise that any changes to Imagine 2050 local forecasts may also result in changes to the 2031-2040 local allocation of affordable housing need for that community.

Rationale

As directed by Minn. Stat. 473.854, the Council shall prepare guidelines and procedures that assist local governments in accomplishing local planning requirements and provisions. The process proposed in this report is similar to the process implemented for the 2040 decennial comprehensive planning process.

Thrive lens analysis

On February 12, 2025, the Council adopted Imagine 2050, which builds on policy direction in Thrive MSP 2040. As a part of implementing Imagine 2050, the Council committed to developing clear guidelines across a range of topic areas to aid local governments in implementing their portions of Imagine 2050. The guidance and timelines in this report are one of the first steps of Imagine 2050

implementation with local governments. While the proposed process and related deadlines are neutral on regional goals, addressing a changing market for development ensures that the region continues to accommodate growth consistent with Imagine 2050. It also aligns with the Imagine 2050 values of leadership and accountability, recognizing that shared efforts advance our region most effectively toward shared outcomes.

Funding

No additional funding. Implementation of the Metropolitan Land Planning Act through review of comprehensive plans and plan amendments is a regular part of the Council's work plan.

Small business inclusion

There are not direct impacts to small businesses with the proposed action, which is focused on providing guidance to local units of government.



Figure 1. Summary of Local Comprehensive Plan Transition Schedule

