

# IMAGINE 2050 INTRODUCTION, BACKGROUND, OVERALL PLAN

Public Comment Report

January 2025



**IMAGINE<sup>20</sup><sub>50</sub>**  
the region's plan for an equitable and resilient future

A prosperous, equitable, and resilient region  
with abundant opportunities for all to live,  
work, play, and thrive.

## Regional core values

Equity | Leadership | Accountability | Stewardship

## Regional goals

### Our region is equitable and inclusive

Racial inequities and injustices experienced by historically marginalized communities have been eliminated; and all people feel welcome, included, and empowered.

### Our communities are healthy and safe

All our region's residents live healthy and rewarding lives with a sense of dignity and well-being.

### Our region is dynamic and resilient

Our region meets the opportunities and challenges faced by our communities and economy including issues of choice, access, and affordability.

### We lead on addressing climate change

We have mitigated greenhouse gas emissions and have adapted to ensure our communities and systems are resilient to climate impacts.

### We protect and restore natural systems

We protect, integrate, and restore natural systems to protect habitat and ensure a high quality of life for the people of our region.



## Table of Contents

Public Comment period .....	4
Participation data.....	5
General feedback on the Imagine 2050 plan.....	5
Public comment data .....	6
Feedback on the 2050 population forecasts.....	6
In-person, individual, and anonymous feedback .....	27
Feedback from government, nonprofit, parks, and other partner organizations.....	38

## Public Comment period

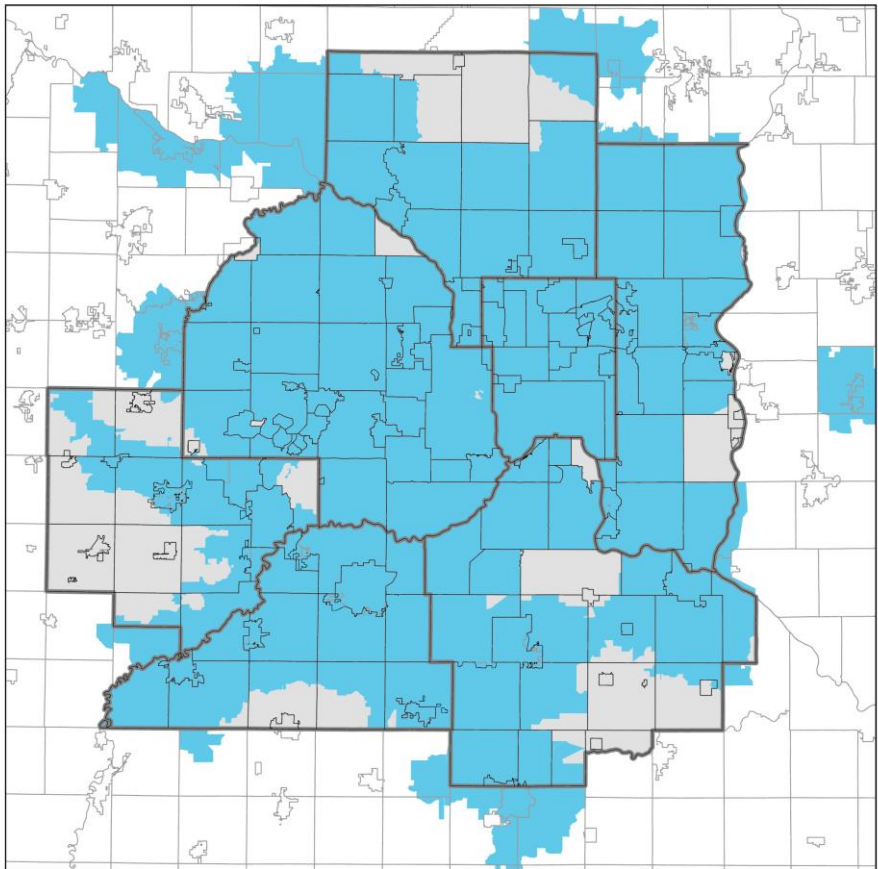
The Metropolitan Council accepted public comments from Aug. 15 through Oct. 7 through various channels, including email, phone, mail, recorded message, an online comment portal, and a public hearing on Sept. 25. During that time, approximately 2,000 total comments were received from approximately 500 organizations and individuals.

Comments were accepted via a number of different means:

- Online, via [engage.metrocouncil.org](https://engage.metrocouncil.org)
  - 240 people contributed
  - More than 1,000 contributions
  - Plan documents were downloaded more than 3,200 times (including significant download statistics in each of the major policy areas)
- In-person (Art + Policy events, community events, and public hearing)
  - Estimate more than 200 participants
- Email
- Mail

We received comments from all seven counties, 58 cities, 12 non-profit/advocacy organizations, two state agencies, one federal agency, and two regional parks agencies (in addition to the cities and counties who operate regional parks). We heard from people and local government officials in about two thirds of the communities in Dakota and Scott counties, about half of the communities in Anoka, Hennepin, and Ramsey counties, and about 40% of the communities in Carver County.

In addition, the number of direct comments from individuals is significantly higher than previous regional development guide formal comment processes. And by combining the system and policy planning areas into one plan and one comment period, we provided an opportunity to show intersections between and among the systems and policy areas.



Map of areas across the region we received comments from during the Imagine 2050 public comment period.

## Participation data

The following information comes from individuals who provided their demographic information on the online portal during the public comment period. Numbers are listed in descending order (greatest to smallest).

<b>Participants by ethnic identity</b>	White	76%
	Other (more than one category)	10%
	Black or African American	4%
	Asian or Asian American	3%
	Hispanic or Latinx	3%
	American Indian or Alaskan Native	2%
	Middle Eastern or North African	2%
<b>Participants by gender identity</b>	Man	53%
	Woman	37%
	Prefer not to answer	7%
	Another gender not listed	1%
	Transgender	1%
	Non-binary	1%
<b>Participants by age category</b>	35-44	22%
	55-64	19%
	25-34	16%
	45-54	16%
	65-74	12%
	18-24	11%
	75-84	3%
	85+	1%
<b>Participants by income category – household annual income</b> <i>(Median household income is \$94,700 in 2022 dollars, according to the 2018-2022 American Community Survey)</i>	\$150,000 and above	35%
	\$50,000 to \$79,000	19%
	\$100,000 to \$149,999	16%
	\$80,000 to \$99,999	13%
	Less than \$30,000	10%
	\$30,000 to \$49,999	7%

## General feedback on the Imagine 2050 plan

Overall, the feedback suggests broad support for regional planning, with some concerns about implementation impacts and flexibility for local governments. Many communities expressed an interest in greater flexibility, as well as resources to support achievement toward regional goals. They also expressed values around maintaining the unique character and capabilities of local communities.

Participants in the online forum and among advocacy organizations also noted the following themes:

- Emphasizing public transit, biking, and walking, while reducing car dependency
- Support for dense, mixed-use neighborhoods, with affordable housing
- Environmental sustainability through climate action, restoration, and renewable energy
- Social justice and equity in planning, supporting marginalized communities and local businesses
- Public spaces including parks, natural areas, and recreational areas
- Infrastructure improvements for accessibility, safety, and community gathering
- Prioritizing affordable housing

- Significant focus on climate change mitigation
- Increasing urban tree canopies and restoring native ecosystems
- Protecting water resources and eliminating pesticide use
- Honoring indigenous land rights and treaties
- Addressing homelessness and drug addiction
- Reducing economic inequalities
- More discussion of urban agriculture
- Universal design principles throughout all planning areas

### **Selected feedback:**

“We commend you on drafting a strong and comprehensive document that addresses racial inequities, clearly identifies the region’s strengths and challenges, and sets the stage for growth in a manner that will serve the region well.”

“The city council appreciates the significant time and effort that Metropolitan Council staff has spent collaborating with city staff through various working groups and focus groups in preparation of drafting Imagine 2050 and the efforts put into drafting such substantial documents.”

“[We] are pleased to provide comment for vision and goals of the Draft Imagine 2050 Policy Plan and commends the Metropolitan Council for its emphasis on envisioning an equitable, resilient, and sustainable future for the Twin Cities region.”

“We aren't acting boldly enough on the climate crisis. If we can't be honest about COVID still being here, that doesn't give a lot of confidence we'll do the bold steps needed to stem and address rapidly accelerating climate change that's also here now (and which is also likely to create additional pandemics).”

“We appreciate the four core values of stewardship, accountability, leadership, and equity. One area to highlight further within these values is partnerships and the collaboration needed to achieve the goals of the plan. Partnerships with other agencies, utilities, community members, etc.”

## **Public comment data**

The following sections provide a full output of all the public comments related to the introductory and background portions of Imagine 2050 and general portions of the document overall. (Specific commentary on the different sections of the plan has been split out into separate documents.)

### **Feedback on the 2050 population forecasts**

The Met Council also collected feedback from local governments and residents on the 2050 population forecasts. A full output of that feedback, along with our responses, is included here.

**Comment**

**Response**

**Carver County**

Forecasts  
The revised Metropolitan Council population and household forecasts for 2050 show a reduction in Carver County 2030 & 2040 numbers. We believe that these reductions are too low and do not reflect the rapid growth that is occurring and likely to continue in the County. Recent building permit data trends and ongoing demand seem to support more robust numbers. We encourage the Council to revisit the forecasts to better include the growth strategies of the individual communities, the acreage included in local comprehensive plans and the trends in this growing area. The resulting forecasts out to 2050 should be higher than what is shown in the 2050 document.

County officials note that the proposed forecasts “show a reduction [from previous forecasts] in Carver County 2030 and 2040 numbers.” County officials believe the results “too low” and ask that the Council consider an alternative approach extrapolating from “building permit data trends and ongoing demand.” Council staff do not find this approach sufficient for our purposes. For discussion purposes though, Carver County’s short-term and long-term average of net housing gain are 7,500 – 8,300 housing units per decade and 5.2% - 5.7% of total metro growth. Met Council’s new forecast proposes households growth averaging 7,300 households per decade and 6.8% of forecasted metro growth.  
Growth expectations are reduced for the nation, the metro area, and local areas. Metropolitan Council released a forecast summary in 2023 describing greater competition between regions for talent, reduced migration to the region, and lower birth numbers. Households growth per decade in Carver County will be slightly diminished for these reasons, even as its share of total metro growth expands. Compared with the six other counties, the forecasted +56 percent cumulative expansion will be the fastest rate of county growth in the metro area.

**City of Bayport**

**Comment**

**Response**

The 48 new homes constructed since 2020 were located in the Inspiration development. This plat is now fully built out. There are no other vacant developed lots within the City at this time. There is a potential annexation of property that may occur resulting in approximately 90 dwelling units, but this should be considered until the annexation petition is accepted. The 2018 Comprehensive Plan identified one 0.34 acre site that is vacant and is planned for high density residential use. Development of this property at a minimum of 8.0 du/ac. would result in at least three dwelling units. The remainder of the household projections for the 2018 Comprehensive Plan were based on potential redevelopment of two areas comprising 2.86 acres designated only to meet the Metropolitan Council's forecasts. The City has no information that any redevelopment of these two areas is at all likely. Each would require assembly of multiple properties to accomplish. If there were redevelopment of these areas, they would yield approximately 25 dwelling units. City staff does not support an approach to Bayport's 2025 Comprehensive Plan that would require identification of additional redevelopment areas to satisfy regional population and household forecasts. Preservation of the existing character of Bayport is one of the primary goals of the City's Comprehensive Plan that should be expected to continue beyond 2040, 2050, and future Comprehensive Plan updates.

Bayport officials mention 'few' and 'limited' lots in 3 locations; and also potential redevelopment. After correspondence with the City, Council staff recommend a lowered forecast: 1113 households in 2030; 1125 in 2040; 1135 households in 2050.

There is a comment that future annexation areas without OAA should not be included in Bayport's land supply. It's not; that land supply is not included.

**City of Brooklyn Park**

Proposed Local Forecasts to 2050  
The City of Brooklyn Park has reviewed the proposed 2050 population, household, and employment forecasts and plans to align long-range planning efforts with these numbers.

Noted. Thank you for commenting.

**City of Chaska**



**Comment**

**Response**

Population, Household, and Employment Projections  
City staff have reviewed the 2050 population, household, and employment forecasts. Staff have found that the population and household forecasts reflect the pace of growth that Chaska has experienced so far this decade, and those numbers anticipate continued sustained growth in line with the city's current land use plan.  
Employment forecasts are inherently challenging to evaluate given their closer tie to unpredictable market cycles and, in Chaska, the unknowns that currently exist in our planned SW Chaska business park. Staff have confirmed that the Met Council's model includes Chaska's current land use plan which guides approximately 350 acres that is guided for business park. Our SW Chaska Growth Plan projects a range of 8,000-10,000 jobs in this area when it is fully developed. City staff believe that the 2050 employment forecast does not fully incorporate the SW Chaska Growth Plan's projection. City staff have made this known to Metropolitan Council staff who have also acknowledged this gap. Met Council staff have clarified that as development plans for the business park come into focus through development proposals, AUAR studies, and other necessary steps employment projections can be reevaluated and refined.

Chaska city staff and Council staff have discussed the potential for new development of up to 350 acres in the Southwest Chaska business park area. Council staff do not agree with Chaska's assumptions of employment intensity. If fully developed with floor area ratio (FAR) that is typical of a suburban edge location, this district could accommodate 3.0 million square feet of built floorspace and 3,000 jobs. Council staff strongly disagree that the result will be triple that.  
  
However, the Council's model does not assume that all land guided for any particular use will be 100% developed and absorbed by 2050. Metro-wide there are multiples more land supply now available for industrial, commercial, office, etc. than can be developed and absorbed in our planning horizon. Instead the model's objective is to interpret what is allowed and within the envelope of possibilities; and to probabilistically forecast where the expected nonresidential development will gravitate to and what amounts of employment result.  
The Council's proposed employment forecast is reasonable and does not need adjustment at this point. City staff are invited to provide details of development proposals when these are known.  
City officials consider the households and population forecast to be appropriate.

**City of Coon Rapids**

**Comment**

**Response**

I'm providing the following comments on the 2050 population forecasts on behalf of the City of Coon Rapids. I'm happy to discuss any of this further. The forecasts currently suggest that Coon Rapids would have 28,760 households by 2050. This represents an increase of 4,242 over the 2020 number. City Community Development Staff believes it would be difficult to achieve an increase of this magnitude simply due to physical constraints. The City requests consideration of more realistic 2050 population projection of around 67,000 in about 27,000 households.

First, Metropolitan Council data suggest Coon Rapids added 1,200 households and 1,386 housing units between 2010 and 2022. Going back to 2005, the City added an average of just over 100 housing units per year. Many of the units added over the last 15-20 years occurred on larger easy-to-develop sites that no longer exist in the City. Further, as many as 700 of the units added during this time were part of large-scale City-initiated redevelopment projects, which are unlikely to continue into the future. City Staff believes a more modest scenario of adding an average of about 50 or 60 housing units per year is more realistic, based on the types of development sites available in the community. This is far less than the approximately 140 units per year envisioned by the proposed forecast.

Also, City Staff believes that the development/redevelopment sites most likely to develop over the next 25 years could accommodate about 1,500 new housing units. While some small-scale development will certainly occur on other sites in the City, Staff does not believe these types of projects would result in as many as an additional 4,200-plus housing units. GIS analysis suggests that all of the areas guided for housing or mixed-use development would need to develop at the maximum density allowed to achieve than the current 2050 forecast of 28,760. Because these areas include existing viable commercial areas, as well as vacant land with environmental constraints, it is simply unrealistic to expect that all of these areas will eventually redevelop with housing even if regional demand exists.

For these reasons, City Staff believes the current population and household forecasts for Coon Rapids are too high. In City Staff's opinion, 2050 population of around 67,000 and number of households around 27,000 are likely more realistic based on availability of suitable development sites.

Coon Rapids city officials comment that major redevelopments observed in the past 15-20 years were atypical; the city's land supply is mostly developed and absorbed; future development will have more modest production outcomes.

Council staff can support a decelerated forecast. The City requests a "more realistic 2050 population projection of around 67,000 in about 27,000 households." Met Council staff recommend a 2050 forecast of approximately 27,000 households; population will be adjusted accordingly. To reach this outcome, Council staff propose the households level expands by +900 households in the current decade, +800 households next decade, and +800 households in the final decade.

Please note: This is a substantial reduction from the earlier proposed forecast; and also a substantial reduction from the forecast in the City's Plan.

**City of Corcoran**

**Comment**

**Response**

The current projected forecasts are a noteworthy improvement as compared to the forecasts received earlier this year. However, staff remain concerned that the projections continue to be lower than what was anticipated for the 2040 Comprehensive Plan projections. The City's actual experience since the adoption of the 2040 Plan indicates that the City will reach the projections in the 2040 Comprehensive Plan. With the understanding that there is a widespread housing shortage in the region and a significant amount of undeveloped land is located within Corcoran's MUSA to help contribute to housing supply, it is unclear what data inputs or assumptions are leading to a decrease in projections for 2030 and 2040, however slight it may seem. As such, staff believes the 2050 projected forecast for population and households within Corcoran continues to be underestimated.

Growth expectations are reduced for the nation, the metro area, and local areas. Metropolitan Council released a forecast summary in 2023 describing greater competition between regions for talent, reduced migration to the region, and lower birth numbers. Households growth per decade in western Hennepin County will be slightly diminished. City officials also commented on the timing of growth, and expectations of development earlier in the forecast period. Council staff agree with this comment. While leaving the 2050 numbers as proposed, Council staff can smooth the timing and rate of growth. Council staff recommend: 3,300 households in 2030; 4,000 in 2040; and 5,000 households in 2050.

**City of Crystal**

Comment	Response
<p>Projections Population            These projections should be corrected according to changes to the household projections (see below). The 2030 projection is less than the actual number for 2020.</p> <p>Household.            The 2030 household projection is less than the actual number for 2020. The household projections proposed in early 2024 are more correct than these projections. An increase of 3-5% each decade is a reasonable increase.</p> <p>Do the household projections for 2030-2050 take into account the increased multi-family housing as a result of the Blue Line LRT extension which is expected to become operational in 2030?</p> <p>Employment            The projections for 2040 and 2050 projections reflect a 3-5% increase from the previous decade (this is acceptable to the city), but the 2030 projection reflects a 24% increase from 2020.</p> <p>The 2030 project should reflect a 3-5% increase from 2020 and the 2040 and 2050 projections should be adjusted to reflect the same percentage increase as presented in this iteration of the planning documents.</p>	<p>Crystal city officials ask if projections for 2030-2050 take into account Blue Line LRT extension and TOD development. A number of place characteristics are estimated as development predictors in the Council's UrbanSim model. Accessibility to destinations by transit – which will be improved by LRT extension – is a factor in projection formulas for nonresidential development and employment.</p> <p>Crystal city officials comment that the City expects redevelopment, and specifically multifamily development in TOD areas. They request a forecasted growth rate of 3 – 5% per decade. Council staff find that the City's land use plan can support 3% per decade growth in households. Council staff can agree to: 9,750 households in 2030, 10,050 in 2040, 10,350 households in 2050. The growth rate will be kept at 2% in the current decade as Crystal has experience a loss (not an increase) during 2020-2023.</p> <p>Crystal city officials disagree that Crystal would add +850 jobs during 2020-2030. Council staff advise: Most of this employment growth has already occurred as the economy recovered from pandemic business closures. Minnesota DEED counted 4,228 jobs at Crystal worksites in 2Q 2023. Looking forward, Met Council projects 3% growth in the next decade; 5% in the final decade. This fits the City's expressed preference for an employment growth rate of 3 – 5% per decade. Council staff recommend the employment forecast proposed in August 2024, with no adjustment.</p>
<p><b>City of Dellwood</b></p>	
<p>Community Forecasts. The forecasts show the City of Dellwood continuing to add households and employment. The City does not have much development capacity, whether 1 unit per 10 acres or 1 unit per 2.5 acres. As a nearly fully developed community, the City finds it difficult to identify areas for the additional proposed housing units. Also, the City has no land guided for commercial or industrial land uses and cannot place over 90 units of employment.</p>	<p>The City's planner comments that Dellwood is a fully-developed rural place and 'does not have much development capacity.' Council staff can support a decelerated forecast: 390 households in 2030; 400 in 2040 and in 2050. The City's planner disagrees with employment growth at Dellwood workplaces. Met Council uses the employment counts of all jobs reported by employers to Minnesota DEED. DEED counted 437 jobs at Dellwood employers in 2Q 2023; the forecast of 330 jobs in 2050 is a decrease, but Met Council has determined to hold the employment forecast at that level until local groundwater supply plans conform to DNR and Court requirements.</p>

Comment	Response
<p><b>City of Elko New Market</b></p> <p>Vision, Values &amp; Goals, Population Estimates. The City requests that the population and household projection for Elko New Market be re-evaluated and increased. The City can understand a downward shift from the estimates contained in the 2040 Plan, but believe the estimates shown in the draft Imagine 2050 plan are grossly underestimated. The 2030 projections indicate 240 additional households and 655 persons over a 7-year period of time between 2023 and 2030, averaging only 34 households per year and 94 persons per year. The nations three largest homebuilders are all in various stages of building or developing property in Elko New Market. Elko New Market is an immediate neighbor of Lakeville, one of the fastest growing cities in the State, and offers convenient access to I-35 and the Twin Cities area. The City predicts a higher level of residential growth than is predicted by current 2050 Plan estimates.</p>	<p>Elko New Market planner comments that the households forecast is ‘grossly underestimated’, and requests an upward adjustment of the trendline, especially in the current decade.</p> <p>Council staff find that the predictive model was informed by the slow pace of recent observed growth; Council staff can agree to assume that the rate of growth will double in the current decade, and accelerate further after 2030. The new forecast will be: 2000 households in 2030; 2820 in 2040; 3660 households in 2050; cumulative growth during 2023 – 2050 will be +125%.</p>
<p><b>City of Greenwood</b></p> <p>Fifth: Greenwood would also note that future population estimates that the Metropolitan Council uses to justify density expectations are just that, namely estimates. Long term 20 year plus periods only add to the uncertainty of any estimate. The Metropolitan Council’s recent reduction of the expected 2050 population from 4,001,000 (26% increase from 2020) in its previous estimate to 3,820,000 (21% increase from 2020) in its 2023 Regional Forecast Update illustrates the difficulty in projecting population and households 20 plus years into the future and also calls into question to rationale for using them as a basis for Met Council intervention in City land use and zoning decisions.</p>	<p>Greenwood is a small place and has one of the smallest shares of allocated growth in the metro; in the next decade the Council projects +11 (eleven) households being added. These can be accommodated by whatever housing products Greenwood allows. Considering how small the numbers are, the City can easily conform with regional density policy.</p> <p>Greenwood can approach the Council to request a different forecast during the planning cycle if necessitated by evolving conditions; processes at Metropolitan Council anticipate communicative planning and flexibility.</p> <p>Forecasts do incorporate changing conditions and assumptions. It is unclear how the observations of forecast uncertainty are connected to land use decisions.</p>
<p><b>City of Hugo</b></p>	

We would like to continue conversations with the Metropolitan Council on the 2050 preliminary forecasts. Our calculations for expected growth, using the average building permits for new construction since 2019, show that we will exceed the preliminary forecasts you have for the year 2030 by 1,000 people. The City of Hugo's projected growth is more consistent with the 2040 forecasts that were provided to us last comprehensive plan cycle.

1. Previous forecasts for 2030 led to a system statement that included a population of 40,000 people, 15,600 households, and 4,500 for employment for the City of Hugo. The forecasts for 2040 led to a system statement that included a population of 29,000 people, 11,900 households, and 4,000 for employment for the City of Hugo. At that time, Metropolitan Council staff explained that the Metropolitan Council has planned for infrastructure improvements to serve Hugo for the forecasted numbers in the City's 2030 Comprehensive Plan. It was stated that the Metropolitan Council is committed to providing infrastructure and sanitary sewer flows to accommodate for those population and household projections in the plan. In its 2040 Comprehensive Plan the City continued to plan for a population of 40,000 people, 15,600 households, and 4,500 for employment projections with land uses and the MUSA boundary, even though the forecasts for 2040 were significantly lower. The Metropolitan Council approved the City's plan on October 23, 2019. Per our recent discussions you stated that the Metropolitan Council will continue to plan infrastructure and accommodate sanitary sewer flows from the 2040 Comprehensive Plan and that there are no plans to require changes to the land uses or the MUSA boundary in Hugo for the 2050 Comprehensive Plan. If this is not the case, please let us know as soon as possible.
2. During our recent discussions you stated that water supply was used as one of the elements to forecast employment, but not for population and household forecasts. The City of Hugo would like to meet and learn more about the water supply analysis and effects on the forecasts after water supply is considered.
3. There are 243 single family units with preliminary plat approval and staff expects final plat applications to be filed and/or recorded soon. The City also approved a 54 unit apartment building and expansion of the Hugo Estates manufactured home park that includes an additional 16 units, which is planned to be constructed this summer. Staff has been having discussions with other apartment developers and expects applications to be submitted over the summer.
4. Below is the breakdown of building permits for new construction single family and multi-family building permits over the last 5 years:  
 Year Single-Family Units Multi-Family Units  
 2019 101 4

The City cites the forecast approved in 2006 for use in the Hugo 2030 plan. That approval was the result of political pressure at that time, and did not reflect predictive analysis per se. Since then, Hugo's growth has substantially underperformed city officials' claims; Hugo is on track to have 7,200 households in 2030 – only half the number that city officials proposed in 2006. Real estate demand has been slow to advance in the northern I-35 corridor.

The letter goes on to mis-state the current 2040 forecast that was approved by the Met Council. Met Council stages its infrastructure deployment and service capacity in line with the forecast progression. Met Council staff have assured Hugo officials that wastewater capacity is not an impediment to new development; the Met Council happens to have wastewater capacity beyond what is forecasted; but this is incidental flexibility in this case, and not an entitlement or precedent for other cities. Again, the lack of demand for new real estate in the northern I-35 corridor is the key to understanding why Hugo may expand by only +60%.

Met Council staff find that both the short-term (2010 to present) and long-term (1980 to present) track-record of Hugo's growth are in the range +1,100 to +1,300 households per decade. It is reasonable that the forecast ahead expects +1,100 to +1,300 households per decade and amounts to a 10% share of Washington County's total growth.

The City claims that employment forecasts are restricted. This is a deliberate subregional decision. The forecasts of White Bear Lake-shed communities are held at or below the Thrive 2040 forecasts found in those communities' comprehensive plans; the Met Council is not prepared to extend any enlarged growth entitlement until local groundwater supply plans conform to DNR and Court requirements.

The City indicates a readiness to commence work on 2050 city planning. The Met Council advises that the City wait for system statement issuance in fall 2025; the system statement will include details on regional policies and updated required elements of a local comprehensive plan.

Comment	Response
<p>2020 168 81  2021 189 60  2022 107 0  2023 121 0  The City of Hugo intends to begin our 2050 planning process assuming a planned population of 40,000 people and 15,600 households by 2050. Please contact me with any question at <a href="mailto:rjuba@ci.hugo.mn.us">rjuba@ci.hugo.mn.us</a> or (651) 762-6304, thank you.</p>	
<p><b>City of Independence</b></p>	
<p>Independence current population is 3,916 which is comprised of 1,394 housing units.  The adopted City of Independence 2040 Comprehensive Plan provided for 300 additional sewerred housing units by the year 2030.  The Draft 2050 Regional Development Plan projects a reduction in the total number of housing units and population from the approved 2040 Comprehensive Plan (see projected numbers below). The projected number of housing units for 2050 represents a reduction of approximately 250 units from the approved 2040 projection. The draft plan projects very limited growth in the city (274 units or ~10 units per year) over the next 25 years.</p>	<p>Households growth in Independence has been averaging 10 houses per year in recent decades. As a matter of policy, the Council expects moderate or minimal growth in the metro's rural areas (without urban services). If new development proposals emerge during the new planning cycle, or if Independence decides on a very different land plan, forecast adjustments can be discussed. For the time being, Council staff recommend rounding the Independence forecast for 2050 to 1,700 households; this is the same number as in the City's 2040 plan.</p>

**Comment**

**Response**

The plan does not fully account for growth that will occur outside of the seven-county metropolitan area. Independence experiences significant impacts to local, county and state transportation systems not capable of accommodating the continued growth outside of the seven-county metropolitan area. Understanding, acknowledging and accommodating this growth is an important aspect that should be more fully incorporated into this plan.

The comment is an incorrect characterization. Metropolitan Council's transportation model does analyze and forecast travel in a 19-county area, including the next ring of 12 adjacent counties, beyond the seven metro counties. Travel demand generation projections are derived from socioeconomic and employment levels, current and in 2050. County total expectations are used from Woods & Poole Economics (employment projections) and from the Minnesota and Wisconsin Departments of Administration (population projections). All these projections, listed above, are downscaled to subcounty transportation zones, and the results are used in Met Council's transportation planning. Growth expectations are projected to vary greatly in the next ring of counties. At one extreme, Wright and Sherburne counties are expected to expand by 58,000 and 33,000 residents, respectively; at the opposite extreme, McLeod and Sibley counties, to the west, are projected to lose population (Minnesota Department of Administration, 2023 version population projections).

**City of Lino Lakes**

Preliminary growth forecasts for 2050 have been prepared as part of the Imagine 2050 plan. Recognizing uncertainty over future water supply, forecasts for the City of Lino Lakes have remained flat over the 20-year planning period. The 2050 population and household forecasts are lower than what is currently planned for 2040 as shown in the table below:  
Population Growth  
2040 Plan 22,300 26,100 31,100 N/A 8,800  
2050 Plan 21,399 24,562 26,548 29,069 7,670  
Change (1,130)  
Households Growth  
2040 Plan 7,000 8,600 10,600 N/A 3,600  
2050 Plan 6,957 8,301 9,179 10,151 3,194  
Change (406)  
While the City does not object to the preliminary forecasts, we note that these figures would still require expansion of the City's well field to include wells 7, 8, and 9. Without resolution to the White Bear Lake water supply issue the City will not be able to accommodate even the reduced growth expectations.

Lino Lakes officials note that the proposed city forecast is lower than what was expected in the previous planning and forecast cycle. Metropolitan Council acknowledges this.  
  
Lino Lakes notes "the City does not object to the preliminary forecasts, we note that these figures would still require expansion of the City's well field... Without resolution to the White Bear Lake water supply issue the City will not be able to accommodate even the reduced growth expectations." Metropolitan Council acknowledges this challenge and the participation of city partners in exploring solutions. As cities begin their plan updates, Council staff and local government officials can discuss any needed forecast adjustments.



Comment	Response
<p><b>City of Minneapolis</b></p>	
<p>Draft Forecasts: No additional comments at this time, but we do appreciate and recognize that the changes that have been made since our last conversation on the subject reflect observations that we shared.</p>	<p>Noted. Thank you for commenting.</p>
<p><b>City of Minnetonka</b></p>	
<p>Projections: Minnetonka’s population and household projections seem appropriate. Staff analyzed Minnetonka’s past yearly production to make these numbers more tangible. The forecast would mean roughly 264 units of any type of housing to be built each year, which follows the slower growth predictions provided in the documents. While construction can shift drastically from year to year, the forecast is below the numbers realized in the last 10 years of construction, which produced approximately 4,473 units or 447 per year, on average.</p> <p>The employment forecast is less tangible. Minnetonka has about 7 million square feet of multi-tenant office space (112 buildings), 3.7 million square feet of industrial space and 3.2 million retail office space. The forecasts provide for a growth of 13,583 employees. This forecast may be strong. Staff believes that the vacancy in office space will continue to be a challenge for all commercial properties in the metropolitan area, impacting employment forecasting. Minnetonka would identify the Metropolitan Council’s employment growth as higher than likely to occur, as a comment.</p>	<p>Minnetonka city officials comment that the employment forecast is ‘higher than likely to occur’; the City already has a substantial supply of office and commercial space that is underutilized. Council staff can support a decelerated forecast: 49,600 jobs in 2030; 52,100 in 2040; 55,100 jobs in 2050. We invite further discussion of this as Minnetonka’s 2050 planning gets underway. In the previous planning cycle, Minnetonka favored a significantly larger employment forecast; and expected one-third of employment growth to site in the Opus campus.</p> <p>City officials consider the households and population forecast to be appropriate.</p>
<p><b>City of Mound</b></p>	
<p>The City of Mound conducted a detailed review of the land use assumptions and expectations in its Comprehensive Plan Amendment adopted earlier this year. Given that level of effort, the City requests that its 2040 forecast for households be adjusted to the same number as was adopted in that amendment. The City also requests that the 2050 forecasts for households be reduced as the City is completely developed and has limited opportunity for redevelopment that would accommodate that number of proposed additional households.</p>	<p>Mound planner comments that the households forecast is overstated, and requests that its 2040 forecast for households be adjusted to the same number, 4,340, as was adopted in 2023 via plan amendment. Council staff can support a decelerated forecast: 4,340 households in 2040; 4,360 in 2050.</p>

Comment	Response
<p><b>City of Richfield</b></p> <p>The employment forecasts show Richfield gaining more than 3,600 jobs between 2020 and 2050. We understand that these are high-level, long-range forecasts and it's challenging to predict what the job market may look like in 25 years. However, in the short term since 2020, we have lost jobs due to some of Richfield's largest employers either shrinking their footprint or leaving Richfield altogether as they consolidate their operations into other communities. This short-term job loss, coupled with the fact that Richfield is fully developed community that is primarily residential, creates a large hurdle to surmount in order to achieve the ambitious 2050 employment forecasts.</p> <p>We recommend that the Council reevaluate and consider reducing our employment forecasts. As part of our review of the forecasts, it would have been helpful to have the forecasts by TAZ. The Council's website indicates that this data would be available on 8/26/2024. Our review comments were prepared in early October, but the information was not yet available.</p>	<p>Richfield city officials comment that the forecasted employment change seemed 'ambitious'. But 70% of that expansion had already occurred during the postpandemic recovery (in 2020 – 2023). There were 18,241 jobs at existing employers in Richfield in 2Q 2023 according to MN DEED. The year 2024 employment losses were unknown to us until the release of latest stats from MN DEED. We agree to a lowered time-series: 17,500 jobs in 2030; 18,000 in 2040; 18,500 jobs in 2050. Council and City staff have agreed to this in email correspondence.</p>
<p><b>City of Shorewood</b></p> <p>The population forecast identifies an increase from the Thrive 2040 projection of 8,000 residents to 8,757 residents by 2050. There is limited land remaining in the community for development and the Metropolitan Council's own Imagine 2050 Local Forecast projects a small increase in the number of households in the community by 2050. The population forecast seems unrealistic and should likely be revised downward to reflect the limited development opportunities remaining in the community.</p> <p>Shorewood is built out and would be dependent on converting commercial properties to multiple family in order to make the population or household targets. Eliminating commercial properties is a hard choice for small cities due to the significant impact on tax base.</p>	<p>Shorewood planner comments that there is 'limited land remaining' and the forecast seems unrealistic. Shorewood is currently at 2,990 households (2023). Council staff can support a decelerated forecast: 3,100 households in 2040; 3,150 in 2050.</p>

**Comment**

**Response**

The City of Shorewood is essentially a bedroom community where residents still commute or work remotely to businesses located elsewhere. The largest employers in Shorewood are the Minnetonka School District (at two locations: Minnewashta Elementary and the SAIL program) and the Cub grocery store. The current employee numbers appear to be overly optimistic at best. Shorewood has about 32 commercial properties in the city and that number will be shrinking as newly nonconforming uses (for lands converted to multiple family residential as required by Thrive 2040) are redeveloped for commercial uses in the future.

The newly published forecasts show an increase in employees in Shorewood from the Thrive 2040 projection of 1,600 jobs to 2,031 jobs by 2050. As noted above, that is not likely to be the outcome of the development pattern required by the Thrive 2040 plan and the demand for the additional, approximately 1,000 people indicated above through Imagine 2050.

As stated previously, the City of Shorewood has a limited amount of commercial land and is fully developed. With no ability to increase the amount of commercial land and the pressure to guide and zone more commercial properties to high-density residential to absorb both the requirements of Thrive 2040 and Imagine 2050, the employment forecasts are overly optimistic. This forecast should be revised downward to maintain the current projection of 1,600 jobs by 2050. Even to keep the existing employment number would take substantial effort.

Shorewood planner disagrees with modest employment growth at Shorewood workplaces. Met Council uses the employment counts of all jobs reported by employers to Minnesota DEED. In recent years, the counts at Shorewood employers have been in the range 1,765 to 2,041 jobs. Met Council will not agree to a forecast that doesn't consider the Minnesota DEED employment counts. DEED counted 1,939 jobs at Shorewood employers in 2Q 2023; the forecast of 2,031 jobs in 2050 is reasonable.

**City of Woodbury**

Comment	Response
<p>The long-range forecasts provided for the City of Woodbury do not meet the City's projections for growth, and we request the forecasts to be updated pursuant to the table found in Exhibit A below. For future allocation of growth and population projections, the City of Woodbury has used the 400 units per year guidance consistent with language from its 2040 Comprehensive Plan. Based on the annual projections above, the City of Woodbury would propose the 2030, 2040 and 2050 population forecasts as identified in Exhibit A.</p>	<p>The City's comments are incorrect in three respects. First, Met Council has the authority to prepare forecasts per Minnesota Statutes 473; the City does not have this authority. Second, existing plans are not premised on perpetual growth of +400 housing units or households per year. The forecast currently approved for Woodbury's 2040 Plan, and to be replaced, specifies 32,600 households in 2040 – or +250 households added per year during the planning horizon. Council staff have previously found that the existing Woodbury Plan provides future land supply and staging sufficient to accommodate approximately 33,300 households. Development beyond that will require new planning, which the City will accomplish in the plan update for 2050.</p> <p>The third issue is that the rate of growth proposed by City staff is excessive in the regional context. Total regional growth is forecasted to slow by approximately 20%, from +13,000 households per year during 2010 – 2023 to +10,500 households per year during 2023 – 2050. There is not the regional demand (and the local share of that demand) that Woodbury's expressed vision would be realistic by 2050.</p> <p>In 2024, Woodbury has approximately 29,800 households (unofficial estimate). Council staff will recommend to Met Council a Woodbury forecast significantly expanded beyond the Thrive 2040 forecast and all previous forecasts: 31,400 households in 2030; 34,000 in 2040; 37,400 households in 2050.</p> <p>The population forecast will be expanded accordingly. Met Council does not use an unchanging average household size multiplier though. Like the rest of the region and the rest of the nation, demographic changes include aging of the population, faster growth of smaller households, and shrinking average household sizes. We forecast average household sizes in Woodbury will decline from 2.62 in 2030, to 2.53 in 2040, to 2.50 in 2050.</p>
<p><b>Scott County</b></p>	

Comment	Response
<p>According to the most recent local population, household, and employment forecasts released this summer by the Metropolitan Council, Scott County is projected to grow to a population of 196,833 by 2050. This is a notable downgrade to the Council's projections for the County's population growth released a decade ago, which showed us reaching 211,750 residents by 2040. This latest projection is even a drop from the preliminary forecasts released last winter. While the Board understands the national and regional trends showing a slower pace of growth and development throughout the entire metropolitan area, the Board would like more information on what factors prompted the drop from last winter's preliminary forecasts to this latest release that is now being incorporated into Imagine 2050. It is notable that Shakopee is listed as one of the top five cities in the region (along with Minneapolis, St. Paul, Minnetonka, and Maple Grove) that are forecasted to gain the most residents between 2020 and 2050.</p>	<p>Growth expectations are reduced for the nation, the metro area, and local areas. Metropolitan Council released a forecast summary in 2023 describing greater competition between regions for talent, reduced migration to the region, and lower birth numbers. Due to demographic changes – smaller families, a rise in senior citizen households – household sizes are diminished; thus the number of persons will expand slower than the number of households.</p> <p>Scott County officials ask about the most recent changes in the local forecast modeling. Certain improvements were introduced to the Council's UrbanSim predictive model for Version 2 (August 2024). These improvements included data updates, recalculation of local neighborhoods' maximum housing capacities, and new regional system characteristics, including a refresh of the planned transportation and transit networks. The modeling team finds the following were most influential:</p> <ul style="list-style-type: none"> <li>• Version 2's inclusion of known developments after 2020 had the impact of bolstering development trajectories in recent new development 'hotspots'; Shakopee is an example.</li> <li>• The update of the transportation model yielded a future scenario with slightly more impediment (delay in travel to destinations), and thus lower cumulative accessibility scores outside the developed core of the metro area. The differences were modest – but when introduced the UrbanSim model, growth distributions did shift toward employment-rich parts of the metro – and away from the most rural and remote places.</li> <li>• Recalculation of local neighborhoods' maximum housing capacities generally had the effect of allowing expanded growth in the most urban places; tempering growth in full-mature neighborhoods of suburbs; allowing expanded growth in developing edge communities; and restricting growth in rural areas (without urban services).</li> </ul> <p>Scott County's short-term and long-term average of net housing gain are 7,700 – 11,400 housing units per decade and 5.3% - 7.8% of total metro growth. Met Council's forecast expects households growth averaging 8,000 households per decade and 7.4% of forecasted metro growth. This is consistent with the historical trend.</p> <p>The Council's latest proposed forecast, from Version 2, details growth in Scott County of +46,000 population, or +30 percent over the forecast period. Compared with the six other counties, this is the second fastest rate of county growth.</p>

Comment	Response
<p><b>Allan Campbell</b></p> <p>I question the forecast in Figure 9 of the July 10, 2024 Draft for the Transportation Advisory Board that shows a reacceleration of regional population growth after 2023 producing a 2050 population approximately 32% above the 2010 base. My doubts about the population forecast are based on three factors.</p> <p>The continuing decline in the US birth rate (1.62 births per woman in 2023).</p> <p>An increased level of xenophobia that is likely to result in policies restricting immigration to the United States.</p> <p>Census data showing an estimated 0.15% decline in the seven-county regional population from April 1, 2020 to July 1, 2023, reflecting changing post-pandemic demographic trends as workers are no longer tethered to fixed locations.</p>	<p>The methodology and assumptions of Metropolitan Council's latest forecast are published here. <a href="https://metrocouncil.org/forecasts">https://metrocouncil.org/forecasts</a></p> <p>Also, an Excel workbook of region total demographic results is available at the same location. Tables in that workbook address births and birth rates, domestic and international migration into the metro region. Our findings from this work: population growth slows in the current decade and next decade. Population and economic growth are projected to accelerate again at or after 2040. We acknowledge there is uncertainty; and uncertainty expands with the time horizon considered. International immigration is more a geopolitical variable than a demographic one; and a major source of uncertainty, because it is political. Metropolitan Council staff and our consultants at REMI.com use national long-range projections of total immigration to the US; REMI.com supplements this with its projection of the share of the US total that locate in specific regions.</p> <p>Metropolitan Council does not use the Census Bureau's annual "PEP" population estimates. Prior to the decennial census in 2020, the PEP time-series was systematically undercounting the metro region's population by almost 2 percent. The Bureau has continued to underestimate since 2020. Instead of the Census Bureau's annual PEP estimates, we recommend the Minnesota Statutes 473.24 population estimates, published here: <a href="https://metrocouncil.org/populationestimates">https://metrocouncil.org/populationestimates</a></p>
<p><b>Justin Dexter</b></p>	

Comment	Response
<p>Saw your proposed local forecasts to 2050. I was curious about the impact of these forecasts on local govts. For example, does the forecast for year 2050 population impact housing goals the Met Council would set for local cities or impact grants/funding available for local cities? So for a city like Eden Prairie, would getting the forecast for year 2050 population off by +/- 10,000 make a difference in Met Council requirements or grants/funding?</p>	<p>Metropolitan Council requires that local governments: plan for future growth that is detailed in local forecasts; reconcile the growth forecast with its comprehensive plan, showing that systems and services accommodate the growth forecast; and provide analysis of land supply accommodating the growth forecast. If there are obstacles to this, Council staff and local government officials can discuss forecast adjustments. Metropolitan Council does not set minimum “quotas” for future growth. The Council does not have the power to compel a city to produce housing or other development. Once the Council authorizes a local plan, there are no “penalties” imposed for underperformance – for not growing or for lagging behind an over-ambitious forecast of future growth. However, local governments could find themselves fiscally impacted by their own capital investment commitments if those investments fail to have facility users, ratepayers, or tax base.</p> <p>With respect to eligibility for community development grants and resources, the Council does require a minimum supply of medium- and/or high-density land that makes possible the accommodation of an assigned share of the metro’s affordable housing. If a comprehensive plan does not provide that minimal amount of medium- and/or high-density land supply, the Council may find the plan inconsistent with policy; and with a nonconforming status the local jurisdiction would be ineligible for LCA grant opportunities.</p>
<p><b>Kyle Morell, Scandia</b></p>	

Comment	Response
<p>Why is Scandia’s population projected to decrease from 2030 to 2040, when the number of households is projected to increase?</p> <p>Kyle H. Morell City Administrator City of Scandia</p>	<p>Met Council’s forecast calculations consider development, the growth of the population, and demographic change. We describe in Imagine 2050 – and in past presentations and publications – that the region is aging. This aging phenomenon affects household sizes. In the lifecycle of households, households grow in size with the addition of children; peak household sizes (after the final child) are attained for households headed by 35 – 54-year-olds. After 55, children depart (form their own households); and the households of older adults shrink in size. Taking all households together, in summary, Met Council has forecasted these average household sizes:</p> <ul style="list-style-type: none"> <li>• For the metro region: 2.50 in 2020 (Census); 2.44 in 2030; 2.40 in 2040; 2.39 in 2050.</li> <li>• For Scandia: 2.54 in 2020 (Census); 2.53 in 2030; 2.45 in 2040; 2.43 in 2050.</li> </ul> <p>Most communities will experience the shrinkage in average household sizes. In some communities the diminishment will be more than -4%; in other communities, less. It will be most evident when the age 65+ population in your community reaches peak levels. In many of our 1st ring suburbs, this began last decade. In other places, it may be delayed to 2030.</p>
<p><b>Richard Polta</b></p>	



Comment	Response
<p><b>Local Forecast Comments</b>  I was looking at projected growth for Grey Cloud Island Township. The housing and Employment data is really not accurate. Part of the Township was annexed into Saint Paul Park a few years ago decreasing our population and housing numbers.  Housing: Looking at the remaining open spaces there is only room for about an additional 19 homes, not 21 as the study suggests. Looking at maps is deceiving. Most of the area West of County Road 75 have or will be mined to where there will not be any buildable acreage which will meet Zoning and other Governmental setback regulations, maybe 1 or two homes depending on limits of aggregate extraction. East of County Road 75 there are only two areas suitable for housing due to setback regulations, 3 pipeline crossings, cemetery and public property, and septic system restraints due to surface bedrock. There is 1 open lot on Grey Cloud Trail.  Employment: The only employer in the Township is Holcim Aggregate Larson quarry. The study suggest current employment of 17 jobs. In reality Holcim in ( Grey Cloud Township employs around 10 or less employees ), and most are seasonal jobs in the Township. Study shows employment of 36 in 2030, 39 in 2040, and 51 in 2050. The employment number for Holcim will not increase and they will eventually decrease to zero on completion of mining. The employment numbers will most likely remain constantly at 10 or less employees at Holcim till the end of mining.</p>	<p>Grey Cloud officials comment that the households forecast is overstated, and requests the 2050 households forecast should be lower by -2 households. Council staff can support this request.</p> <p>Grey Cloud officials comment that the Minnesota DEED count of employment reported in Grey Cloud is inaccurate, and that the year 2050 employment level should be no more than 10 jobs. Council staff can support a decelerated forecast whereby the employment level steadily declines to 10 jobs.</p>
<p><b>Brad Scheib</b></p>	

Comment	Response
<p>RE: Imagine 2050 proposed local forecasts Greenfield.</p> <p>The forecasts in Greenfield do not exceed our local capacity to serve it. They are reasonable; however, we are aware of a potential project that seems to be gaining momentum and could result in us exceeding the forecasts.</p> <p>Medicine Lake.</p> <p>Household growth of 13 households is unlikely. There are not available lands without major complications and hurdles to redevelopment. Any employment growth must occur within existing developed commercial property. (unless you could work from home or home occupations). So that number is probably not realistic either.</p> <p>I don't know that either warrants an adjustment at this time as they are relatively insignificant.</p>	<p>Medicine Lake planner comments that the households and employment forecast numbers are overstated, and requests a lowered forecast. Council staff can support a decelerated forecast whereby households count increases by +8 households, now to 2050; the employment level increases +10 jobs, now to 2050.</p> <p>Council staff consider the proposed Greenfield forecast to be the right magnitude. As a matter of policy, the Council expects moderate or minimal growth in the metro's rural areas (without urban services); and the City has offered no reason yet for special treatment. If new development proposals emerge during the new planning cycle, or if Greenfield decides on a very different land plan, forecast adjustments can be discussed.</p>
<p><b>Benjamin Werner</b></p>	
<p>It seems like we will have a big population growth, so need to develop enough housing to handle that without the price of housing dramatically increasing.</p> <p>[Patterns] seem reasonable. We need to move quickly to prepare for such a large population growth.</p> <p>The cost of living on the costs is getting out of hand. More people will come to the metro. I expect higher population growth.</p> <p>I think we are not prepared for the population growth. I am afraid of the city becoming inundated with lazy high density, low quality housing that doesn't fit neighborhoods. There is a way to use medium density housing to increase density, vibrancy and safety in a great way.</p>	<p>Met Council staff forecasts the metro region will gain 657,000 population over 30 years. We appreciate the comments that (1) planning is needed in anticipation; (2) housing supply needs to expand at pace; (3) missing middle-density housing products are especially needed.</p> <p>(1) Met Council agrees that planning is needed in anticipation; that is the motivation for both regional and local plans. The pace of growth forecasted is not aggressive, nor extreme compared to other places or other times in the metro's history. The pace of growth will be manageable.</p> <p>(2) Met Council agrees that there is housing price inflation - but in this metro that inflation has been mainly due to construction materials and labor costs. Compared to peer metros, the housing supply situation is good, and housing price inflation has been notably less than elsewhere.</p> <p>(3) Met Council agrees that missing middle-density products - like townhomes, duplexes and triplexes - have been undersupplied; this is a joint challenge to policymakers, local communities, and the homebuilding and development industry.</p>

### In-person, individual, and anonymous feedback

Attendees at several in-person community and youth events were asked what their vision for the region of the future is. Below are their responses.

Commenter Name	Comment	Response
<p>Dan Cahill</p>	<p>I am not for imagine 2050. I understand that you want higher increase of houses per parcel. I lived in Robbinsdale MN before moving to Andover MN to get away from the first ring suburb. I wanted to live in a community with homes and not next to higher density housing. I don't understand why we cannot have options on this when we are not a first ring suburb. Please reimagine your plan and fix the issues that the community in whole is asking your to fix. Thank you for your time.</p>	<p>The Council's statutory directive is to plan for the orderly and economical growth of the region. As we consider the significant public investments made in the region's infrastructure, we want to ensure that we as a region are making the most of those investments, whether they are in the transit or wastewater. The guidance for local units of governments in their comprehensive plans is to plan to make the best use of those investments while also recognizing that not all properties are best for highest densities. The Council continues its policy of supporting local flexibility for accommodating projected growth, so long as local governments in the urban service area plan to meet those community-wide average minimum densities by community type.</p>
<p>Rand Carlson</p>	<p>I appreciate the language in the highway planning on induced demand and fully support the regions goal to maximize existing highway capacity rather than add new highway capacity. This is a bold step compared to other regions and the right step to take. I noticed an error in the map for the spot mobility map. It shows in Elk River there being a planned intersection mobility and safety study for two interchanges on 169. That project is currently under construction unless it is for the city lead citywide safety plan for roads, trails, and ped access.</p>	<p>Thank you for your comment. The two Intersection Mobility and Safety Study points in the Highway Investment Plan's Figure 13 showing spot mobility have been removed per your request.</p>

<p>Katie Jones</p>	<p>Love Minnesota's natural areas. We value our lands and what's so key about our regional planning is it helps us reduce sprawl and find metrics to guide that direction (greenhouse gases and vehicle miles traveled). Regional planning plays a critical role in holding our climate goals front and center and holding local governments accountable to our climate goals. Appreciate holding the MUSA line.</p>	<p>The Met Council's policies and commitments reflect the need to address climate action through land use and transportation planning. While these policies are long-term when it comes to emissions impacts, once communities enact them, they help reduce emissions by virtue of increasing proximity of services and needs for local residents. Adding criteria for Metropolitan Urban Service Area (MUSA) expansion allows for more efficient use of land and infrastructure to serve new and redevelopment.</p>
<p>Malachi Moser</p>	<p>Are your populations accurate based on current population and current number of housing plus known new housing builds expected to come online by 2030 alone.</p>	<p>The commenter asks about Dayton's rate of growth, current population, and forecasts' inclusion of known developments. Starting point populations in Met Council forecasts are benchmarked to Census counts and DEED employment counts. All known developments through calendar year 2023 have been represented; and many proposed developments are included if they are known to Met Council. These are only some of the growth expected in the current decade.</p> <p>The commenter's concern about Dayton may relate to the legacy forecast that Met Council will replace. Dayton will reach or exceed its 2040 Comprehensive Plan population 15 years early. Met Council is aware of this, considered the city officials' input, and has proposed a new forecast with +150% households growth during 2020-2050.</p>
<p>Nancy Negrette</p>	<p>Big fan of the Met Council when it comes to transportation and development. My biggest concern is access to all these resources. How do people have access and knowledge to all these resources. We need one place for people to access all these resources. People lack access to basic resources. Kids would watch a channel. Better access to health care - especially transportation access to health care.</p>	<p>Thank you for your comments.</p>

<p>Dan Petrik</p>	<p>The land use plan and future density requirements should specifically consider three existing DNR regulatory programs that limit density around lakes and rivers in the metro area. This includes the shoreland program which limits density within 1000 feet of basins, including public waters wetlands and within 300 feet of public waters rivers and streams. There is the Wild and scenic river program which also limits density within the legally described boundaries of the Rum River and Cannon River. Finally, there is the Lower St. Croix Riverway district, another district that limits density with legally described boundaries. The boundaries for all three programs fall within every community designation. Assignment of density goals for individual communities needs to consider the physical area of these districts. It is unrealistic for a community to achieve increased housing density by counting land within these districts. Density is accompanied by increased impervious surface and reduction in vegetation and habitat which conflicts with the water quality, habitat and scenic character goals of all three programs. Finding room for new housing is important, but please make a specific effort to consider the fact that these land areas are not available to communities to achieve their increased density housing goals. Conflicts over density in these lake and river shoreland protected areas have occurred in the past when local government state that they need to have higher density to meet Met Council housing goals and therefore need to change their lake and river shoreland zoning standards to meet these goals.</p>	<p>The Met Council supports and implements requirements across all programs the DNR mentions and does not expect communities to accommodate growth in areas that are protected by ordinance or undevelopable because of a multitude of reasons. Net acreage does not include land covered by wetlands, water bodies, public parks and trails, public open space, arterial road rights-of-way, and other undevelopable acres identified in or protected by local ordinances. Communities that believe they are unable to accommodate the growth forecasted for them because of environmental constraints, can contact Met Council staff and revisit their local forecasts. Also, density, at any intensity, and natural systems protection can be mutually beneficial. Compact, dense development accommodates growth on a smaller footprint than less dense development, thereby allowing more land to be protected for natural ecosystem functions. We have updated the Natural Systems goals to reflect all of the state regulatory programs that limit density around lakes and rivers in the metro area.</p>
<p>Evan Roberts</p>	<p>Housing and Land Use - very forward-looking document, with similarities to other plans in the United States and English-speaking parts of the world. I would like to see Minnesota avoid problems of accountability. Imagine 2050 imagines a future where people have more housing choices. We are pushing options that raise housing costs by requiring more land or higher construction costs. We should</p>	<p>Thank you for your feedback on the Met Council's land use policies. The Metropolitan Council is committed to fostering sustainable land use practices and expanding housing choices, including more infill and diverse housing types, to meet the needs of our growing region. Your insights help us</p>

	<p>promote smaller options like townhouses/multi-family (2 to 4 stories), especially for in-fill development. We should provide more opportunities for more housing choices.</p>	<p>shape policies that support equitable and inclusive communities.</p>
<p>Asa Stanfield</p>	<p>Lives in downtown, car free, uses transit. Housing resource navigator at St. Paul College. Helps them find affordable housing. Many students are car free and that limits their ability to find affordable housing. "We need more housing." Limited options for shopping, groceries, and lots of parking ramps downtown. Need more housing so people can be near the places they need to be.</p>	<p>Thank you for your feedback on the Met Council's land use policies. The Metropolitan Council is dedicated to creating multi-modal communities that support safe, connected bike and pedestrian networks, making it easier for residents to live without relying on a car. Your input helps us work toward a future where more people can live closer to the places they need to be.</p>
<p>Lincoln Wells</p>	<p>Moved here for grad school and have since convinced a number of family members to move here because it's so affordable. Really concerned that housing will not be this affordable in the metro area. The only way to keep housing affordability low is to increase density throughout the region, especially in suburban communities. Multi-family housing developments (townhomes, etc.). More rigorous data collection from cities across the region about new greenfield development, as well as experiences with upzoning so the other housing types can be built.</p>	<p>Comment noted. Actions throughout the Objectives acknowledge ways in which Met Council commits to provide data, technical assistance, and best practices to local governments and other partners throughout the region. The 'Provide' actions of 2050 HPP identifies ways the Met Council will support regional goals through programs and funding as well as technical assistance which includes research and data.</p>

Comment	Response
---------	----------

<p>*I imagine a future where getting from where you live to where you want to go—from work to activities to friend’s houses—doesn’t require a car to be quick, safe or convenient.  I imagine a place where more people live in good places they can afford, and that amenities and services support them nearby.  I imagine a culture shift from NIMBY to YIMBY.</p>	<p>Thank you for sharing your vision. Many people have shared the same hopes and expectations and the vision of Imagine 2050 is consistent with your vision. Among our expectations in the 2050 goal to create healthy and safe communities, we imagine: "Inclusive housing options for diverse populations, including seniors, people with disabilities, and multigenerational households, ensure people can live close to desired social connections, education and economic opportunities. In the short term, tenant protections and housing preservation programs for naturally occurring affordable housing help ensure people live in the neighborhoods of their choice." This means we're also tracking local government decisions that impact anti-displacement work, home ownership, housing choices near community and cultural amenities, and investing in social connections.</p>
<p>*I am not a resident yet, but I am considering a move to Minneapolis. As a person with epilepsy, this is an issue that is very personal to me as I can't drive out of fear of a seizure that might kill me and/or others. I also believe that by making the Twin Cities as walkable as possible, it would also be staying true to Minnesota as Nordic heritage as they take the issue of fighting car dependency seriously. You don't have to make the Twin Cities look like Oslo or Copenhagen, but you can be just as good. My suggestion is to continue to make the Twin Cities as bikeable as possible where eventually you see more bikes than cars. You can also do more to add accommodations to help people who can't drive for medical reasons (Epilepsy, ADHD, schizophrenia, anxiety, blindness, narcolepsy, autism, etc). One other thing is to tackle crime in all of Minneapolis and St. Paul, that way, I can walk, bike, or take a tram or bus anywhere and not worry about being shot or mugged, that would feel like paradise even if the weather is too cold.  Lastly, I would like to have lots of trees planted so that even if Trump gets elected, we can counteract the increased fossil fuel usage by having all the trees suck it in.  Anyway, these are my requests. I can't wait to move to the Twin Cities. I've heard amazing things about them and the state in general.</p>	<p>Thank you for sharing your vision for the region. We especially appreciate your insights and experience as a person living with disabilities and choosing where you live based on the community’s commitment to accessibility.</p> <p>Our Transportation Policy Plan, included in Imagine 2050, also highlights the importance of accessible, mobile, and flexible transportation choices for the region. Our pedestrian plan includes guidance for including concepts of universal design in all transportation planning. In addition, the pedestrian plan identifies key areas for an improved and more accessible transportation experience. We also reference, in our bicycle plan section, results of a study we completed just two years ago where we identified the value of co-locating transportation options – called shared mobility hubs – to better connect people with multiple transportation options. We encourage you to learn more about those resources if you are interested: <a href="https://metro council.org/Transportation/Performance/Emerging-Trends/Mobility-Hub-Planning-Guide.aspx">https://metro council.org/Transportation/Performance/Emerging-Trends/Mobility-Hub-Planning-Guide.aspx</a></p>

<p>*My dream for the Twin Cities region is one that deprioritizes cars. I know that the Met Council and the State have been making a lot more investments in transit recently, but I want to see much more. I want to see huge, truly groundbreaking investments in transit. I want to see a robust metro rail system that travels ALL around Minneapolis, Saint Paul, and the inner suburbs, connecting all parts of the cities, not just a slow, at-grade light rail system that reaches limited destinations. I want a robust, high speed commuter rail system where people from all middle- and outer-ring suburbs can reach the core metropolitan area FASTER than they could in a car. I want dense systems of bike trails, road diets on every city street to reduce speeds, and pedestrian priority everywhere. If we continue to funnel the vast majority of our transportation tax dollars into car infrastructure like highways, we will NOT fix congestion issues, we will NOT reach our climate and emissions goals, and we will NOT be creating an economically sustainable metro area for ourselves. I want the Met Council to be brave and take huge steps to increase systems of transit, walking, and biking, and phase out personal cars from the metro area as much as possible. Transit-oriented and walkable metropolitan areas are the future, and the sooner we get on it, the better off we'll be.</p>	<p>Thank you for sharing your vision for the region. The Transportation Policy Plan included in Imagine 2050 identifies \$172 billion in transportation revenues from 2025 to 2050. Over the next 25 years, 32% of revenues will be dedicated to transit, 19% to state highways that the Minnesota Department of Transportation manages in the metropolitan area, and 47% of revenues to local government transportation priorities. Local governments have discretion over how those funds are spent, but they will likely spend revenues in all modes, including transit, bicycle infrastructure, and pedestrian infrastructure, as well as roadway needs. The Met Council also allocates an additional 2% of revenues to various transportation purposes. A new sales tax, dedicated to transit in the region by the Minnesota legislature in 2023, will provide significant new revenue for investment during this timeframe.</p>
<p>*Make Minneapolis and St. Paul safe enough to take my family downtown and feel safe leaving a show or event after dark. Ability to cross the cities (east/west or north/south) from suburbs in 30 minutes (ex: woodbury to golden valley or eagan to blaine). more bike paths in the suburbs. more round-a-bouts and less traffic lights in the suburbs. more tree-lined streets in the major cities. quick and easy highway access to hospitals and sports stadiums. more brt and light rail (but on budget and schedule, it is embarrassing and pathetic how much the met council bungled the green line extension). DO NOT REMOVE I-94 FROM ST. PAUL!!! Cap it if you must, but tens of thousands of people from St. Paul and the east metro rely on that for access to massonic childrens hospital, the u of m, and traveling between the down towns. If the highway polution/noise is too much for that specific region, then it must be too much for all of I-94 from Maplewood to Maple Grove, and both I-35E/W. Why is the highway only a nuisance at that particular neighborhood I wonder?</p>	<p>Thank you for sharing your vision for the region. We are making transportation investments to help address some of the items you identify, namely implementing rapid transit services to make travel times between places more efficient. We've also highlighted safe and healthy communities as a key goal for this region over the long-term making sure local and regional investments balance quality of life and sustainability. Our partnerships with state, local, and federal agencies provide an opportunity for us to prioritize and plan for these things together, so the investments we make collectively over the next 25 years support the communities we imagine in the future.</p>



<p>*Transit should be free for everyone under the age of 18. Ideally, free for everyone.</p>	<p>Thank you for sharing your vision for the region. We have heard feedback from many people in recent years asking for free transit service. State law prohibits us from offering regular transit services for free. However, we have been testing free-fare routes in the region, to provide information for considering a fare-free transit policy in the future. A pilot program was still underway in late 2024 as we were finalizing the draft of Imagine 2050. Results will be used to assess the impact fare-free service might have on transit accessibility.</p>
<p>**Preserve what's left of the trees, parks, open space, and environmental protection zones. What's wrong with renovating all the EMPTY buildings in downtown Saint Paul for housing?</p>	<p>Thank you for sharing your vision for the region. We've narrowed your comments to the items that might relate more explicitly to the Imagine 2050 Regional Development Guide. We appreciate your prioritization of our tree canopy, parks, open spaces, and sensitive environmental areas. We have included climate-related policy guidance in Imagine 2050 that we hope also prioritizes those areas for future generations. In addition, we'll be sure to share your suggestions about housing in St. Paul with the city. Their housing and redevelopment authority would be responsible for making those decisions.</p>
<p>*More walkable communities, use of eco building materials &amp; renewable energy sources in new buildings, more electric vehicle charging stations, more outdoor communal spaces in both downtown Saint Paul &amp; Minneapolis (bar &amp; cafe patios), more funding to public libraries</p>	<p>Thank you for sharing your vision for the region. There is policy guidance throughout Imagine 2050 that address the items you mention, including making our communities more accessible and connected, encouraging climate resilience in building practices, continuing to plan for electric vehicle infrastructure, and accounting for community gathering spaces. We also work closely with our local government partners and we'll share your insights related to downtown development and public libraries.</p>
<p>*More trees!!!!</p>	<p>We agree! We created a planning tool to assess tree cover in communities throughout the region and we're seeing many communities create goals for trees in their planning work.  <a href="https://metro council.org/Communities/Planning/Local-Planning-Assistance/Tree-Canopy.aspx">https://metro council.org/Communities/Planning/Local-Planning-Assistance/Tree-Canopy.aspx</a></p>

<p>*Dense, mature tree canopies in urban neighborhoods.</p>	<p>We created a planning tool to assess tree cover in communities throughout the region and we're seeing many communities create goals for trees in their planning work.  <a href="https://metro council.org/Communities/Planning/Local-Planning-Assistance/Tree-Canopy.aspx">https://metro council.org/Communities/Planning/Local-Planning-Assistance/Tree-Canopy.aspx</a></p>
<p>The design of our city drives energy and GHG emissions, and we can't meet the climate targets that we have without focusing on city design. In my view, the long-term plan should be laser focused on:</p> <ol style="list-style-type: none"> <li>1. Dense efficient and affordable housing where people work and find their daily essential shopping. This is likely only possible with continued subsidies</li> <li>2. Road design that priorities the safety of pedestrians and people who bike or roll, and which encourage more cautious driving through their design. Getting to the places you need to go without owning or using a car should be a goal that Met enables.</li> <li>3. Expansion of transit routes and frequency. The number one factor that people I have spoken to have said several their use of transit is long headways or unavailability during desirable hours. This requires investment but also probably a more robust training and employment pipeline</li> </ol>	<p>Thank you for sharing your vision for the region. Policy guidance in Imagine 2050 addresses the items you identify, namely our land use guidance addresses density and affordable housing needs, our transportation guidance prioritizes safety across transportation needs and directs outcomes to assess progress in assuring safety, and the long-term vision for transit identifies key opportunities for investment. We will also share your ideas with transit planners at Metro Transit and suburban transit providers as they work to expand routes and service frequency.</p>
<p>*Every person is housed in a safe and healthy dwelling unit within a respectful and supportive environment/neighborhood. This must be taken seriously because every person is a taxpayer--even if they are homeless, impoverished, addicted, trafficked. When anyone buys a bottle of water, a beer, an apple, or anything else, they are paying taxes--which entitles them to all the benefits that their money pays for: public housing, public transportation, publicly-funded healthcare, etc. And without a safe place to live, there is no real democracy or actual public accountability.</p>	<p>Thank you for sharing your vision for the region. We agree that safe, stable housing is key to economic prosperity and Imagine 2050 is built on that premise. From the Regional Vision, Values, and Goals section: "Housing investments focused on creating stability, safety, and decency can support rewarding lives and well-being, particularly when prioritizing residents with disabilities or facing housing instability and homelessness."</p>
<p>*Way more trees everywhere and way less asphalt. Let's see a road reduction and removal. Let's create pedestrian only areas, especially around lakes and parks.</p>	<p>Thank you for sharing your vision for the region. The Imagine 2050 guide provides guidance and resources to help communities plan for tree cover, transportation needs, and green spaces and natural areas, and connected neighborhoods.</p>

<p>*I dream of areas set aside for wildlife. Ever intensifying use will eventually destroy the wild places we have left. We should set aside 50% of everywhere for wildlife. No people. Then maybe we can slow this certain climate disaster.</p>	<p>Thank you for sharing your vision for the region. The regional parks and trails guidance addresses impacts on wildlife and habitat.</p>
<p>*I dream of a Minnesota that is networked by trains, so that I no longer need to drive and I can use trains to get everywhere I need to go. The hub and spoke model we have now is very insufficient. And buses are not equivalent to rail. Visit Washington DC to see what a glorious networked system should be. And we need to speed up the builds. This last build has been a disaster in timing, budget, route chosen. Do better.</p>	<p>Thank you for your feedback on our transportation system. Imagine 2050 discusses long-term priorities for transportation investment. We'll also share this feedback with our service planners in transit operations.</p>
<p>I dream of an urban area that incorporates the needs of wildlife into our built infrastructure with wildlife overpasses and underpasses, ramps, directional fencing, allowing turtles and fox and opossums and squirrels and deer and raccoons and rabbits and snakes, and all the wonderful fauna with whom we share this land, to have opportunities to safely move through the landscape to fulfill their biological imperatives. Let's take some of these amazing, inspirational ideas, like the Canadian wildlife overpasses, and show that we can do the same and more in urbanized areas. We love our wildlife so let's do this before we lose even more biodiversity. It would be a wonderful opportunity to partner with civil engineering schools, conservation groups, and the government to do something new and incredible.</p>	<p>Thank you for your suggestion. Existing and proposed regional policies support the restoration of degraded lands to a more natural condition. While public access to the variety of landscapes within Regional Parks and Trails System units remains an important consideration, implementing agencies protect, restore, enhance, and maintain natural areas for the benefit of wildlife and the environment, and offer opportunities for the public to experience these spaces from nearby trails, overlooks, and elsewhere. The system's nature-based foundation is part of what makes it unique. Of note, the system's 12 park reserves protect, enhance, and maintain thousands of acres in an undeveloped state, offering many benefits.</p>
<p>Whatever the plan is, climate change MUST be at the #1 consideration. We should be reducing vehicle miles traveled whenever possible, expanding public transit, biking, &amp; walking and eliminating all but electric vehicles from the road. NO new road widening projects.</p>	<p>Thank you for your comment. We agree. One of the primary goals for this plan is that we, as a region, lead on addressing climate change. This plan aims to mitigate greenhouse gas emissions and adapt to ensure our communities and systems are resilient to climate impacts.</p>

<p>A clean water refuge state. When more water is contaminated and the ocean rises we will be a place our people will come to drink. Protecting our water must be priority. Land use must be safe for our water filtration.</p>	<p>Thank you for raising this concern, which are shared by other stakeholders across the region. The Water Policy Plan which includes the Metro Area Water Supply Plan and the Wastewater System plan as well as our policies and actions around protecting surface and groundwater quality and quantity, recognizes the challenges for water planning and protection.</p>
<p>My view is sustainability should be the priority, not growth. There is no such thing as never-ending growth, if balanced quality of life is important. There is only increasing inequity and discomfort for all. We need to promote NO growth, even if we have to plan for some, for now. We already have 8 billion people on this finite planet, and we are killing ourselves now. All change is local - start here. E-vehicle and solar in the metro, high efficiency vehicles outside (PHEV/natural gas/etc.). Insulate older homes on taxpayer subsidies. Build more solar farms. And so forth. I won't live to see it, but it's important to me to try to help current and future people to a decent life.</p>	<p>Land Use Policy does establish minimum density requirements for communities within the MUSA and supports compact, sustainable development patterns consistent with the regional goals in Imagine 2050. The regional goals and related policies support a region in 2050 that reflects the items you raise. In particular, we seek effective and efficient transportation choices that get people where they want to go, greater coordination between different transportation options, climate-related guidance that address energy resilience, and housing guidance that identifies where affordable housing needs are and the realities of emerging housing needs and factors affecting affordability.</p>
<p>Although farming techniques fall outside of the authority of the Metropolitan Council, Imagine 2050 espouses policies that support and encourage environmentally responsible land use and agricultural practices.          ADA design addresses specific standards and requirements. Universal Design does not have prescriptive requirements; it can be approached in many ways that are responsive to community character, needs, and interests. Communities are encouraged to adopt universal design policies suited to the local context. As part of the comprehensive planning process, the Met Council will provide local government units with technical assistance and best practices related to universal design policies.          If public spaces are being designed or updated to be ADA compliant and meet Universal Design standards as part of a larger development project that includes affordable housing or commercial space, then those improvements would potentially be eligible through the Met Council's Livable Communities Act program.</p>	<p>Although farming techniques fall outside of the authority of the Metropolitan Council, Imagine 2050 espouses policies that support and encourage environmentally responsible land use and agricultural practices.          ADA design addresses specific standards and requirements. Universal Design does not have prescriptive requirements; it can be approached in many ways that are responsive to community character, needs, and interests. Communities are encouraged to adopt universal design policies suited to the local context. As part of the comprehensive planning process, the Met Council will provide local government units with technical assistance and best practices related to universal design policies.          If public spaces are being designed or updated to be ADA compliant and meet Universal Design standards as part of a larger development project that includes affordable housing or commercial space, then those improvements would potentially be eligible through the Met Council's Livable Communities Act program.</p>

<p>A return of Minnesota native plants and better environmental stewardship in the city!</p>	<p>Yes, the regional development guide, Imagine 2050 has been written with quality of natural systems in mind, especially enhancing that quality in opportunity areas within and between our cities. This policy approach represents a departure from viewing natural systems through a purely conservation lens. Rather, we have opportunities for protection, restoration, and enhancement at all scales and on both public and private land.</p>
<p>Zoning reformation to promote racial and economic justice as well as “15-minute cities” with higher-density housing (that doesn’t compromise on public green spaces).</p>	<p>The Metropolitan Council establishes policies and expectations for land use planning and housing density across the region, tailored to local context, conditions, and infrastructure. It is the responsibility of local governments to update their zoning codes in a manner that is consistent with Metropolitan Council policies and requirements, as identified in their Met Council authorized and locally adopted Comprehensive Plan. While the Met Council does not review or regulate local zoning decisions, the Livable Communities Act (LCA) Policy Development grant program can offer financial resources for local zoning ordinance updates that advance equitable development patterns.</p>
<p>Local businesses! Tired of chains! Let’s stimulate our local economy and reclaim the city’s beautiful character.</p>	<p>The Met Council is committed to supporting local and small businesses in partnership with our economic development stakeholders. The Met Council is currently in the process of updating the Regional Economic Framework which will provide a pathway for the region to access grant opportunities from the Economic Development Administration.</p>

## Feedback from government, nonprofit, parks, and other partner organizations

The following pages include full output of public comment from various organizations who provided their feedback during the public comment period. Comments are organized, alphabetically, by organization name.

Commenting Organization	Comment	Response
City of Sunfish Lake	521 people with 193 households - designation of rural residential. All septic systems and wells. No commercial properties. All building must be single-family residential. They require drain fields and alternate drain fields. Couldn't accommodate multi-unit housing with that structure. Laud this Met Council on affordable housing efforts, but the one-size-fits-all approach won't work. Each community must allow more than one type of residential/housing land use. Please exclude cities like Sunfish Lake from that requirement.	The Council's allocation of affordable housing need and guidance related to higher density residential development is directed toward communities with wastewater service. Language in the land use and housing chapters will be revised to add that clarity around which community designations are impacted by the different policies.
Carver County	Thank you for the opportunity to review and comment on the draft Imagine 2050 Regional Development Framework and the set of regional policy plans under consideration by the Metropolitan Council. Carver County recognizes the importance of these documents in setting the tone and direction of the region's growth and development over the next several decades. This is particularly important to Carver County as we are one of the fastest growing counties in the State of Minnesota. The letter provides comments on the following planning documents: Transportation, Land Use, Parks and Trails, Housing, and Water.	Thank you for your feedback.

Commenting Organization	Comment	Response
Carver County	<p>Overall County Perspective Imagine 2050 has 5 Goals: Our region is equitable and inclusive. Our communities are healthy and safe. Our region is dynamic and resilient. We lead on addressing climate change. We protect and restore natural systems. The 2050 TPP does not appear to have specific transportation goals. This is a significant departure from 2040 and makes it difficult to establish a transportation vision for the region. The 2050 TPP appears to now contain objectives related to the 5 regional goals. This is fine unless objectives are missing because they don't fit with the goals. There are no goals or objectives that address how the future population growth in all counties and corresponding transportation needs will be met. Land use and transportation are directly linked but this is not adequately reflected in the plan. Carver County's top priority related to transportation is that we provide a safe a reliable system that meets the needs of all users now and into the future. The 2050 TPP should account for the growth patterns in every county in the region. Not all areas of the region have the same transportation needs. Currently, the regional transportation facilities in Carver County do not meet the transportation needs generated from the substantial growth the County and region have seen in recent years. This issue is of increasing importance given that Carver County is growing at a rapid pace, the fastest in the region and state according to the 2020 Census and is projected to maintain its significant growth into the future. Underinvestment in regional mobility projects on the minor arterial Trunk Highways further emphasizes the need for the 2050 TPP to establish goals and policies that address the growth of our region.</p>	<p>Thank you for your comment. The Metropolitan Council acknowledges the responsibility, shared with implementing partners like Carver County, to address a wide range of current and future transportation needs across modal systems. The Work Program has a wide range of future studies that will further identify regional needs across the region and prioritize funding.</p>
City of Andover	<p>On behalf of the City of Andover, its residents, and City Council, I am writing to you to convey our support and commitment to regional planning in the Twin Cities. However, we do want to share our deepest concerns with several of the policies proposed in the Metropolitan Council's Draft Imagine 2050 Policy Plan.</p>	<p>Thank you for taking the time to review the draft Imagine 2050 and provide your comments.</p>

Commenting Organization	Comment	Response
City of Andover	<p>Request for an Appeals Process:  The City of Andover is also requesting the Metropolitan Council consider an appeals process. This process would allow for Cities to have the opportunity to speak directly with the Community Development Committee or the Met Council Board when Met Council staff and Cities have a different interpretation on what is needed for amendments, and/or disagreements on policy interpretation. At this time a City has no formal action to take when Met Council staff and City Staff have a different interpretation. At the local level, if a resident and staff have a disagreement on interpretations of an ordinance, or policy those residents are allowed to bring their concern forward as an appeal to either a Planning and Zoning Commission or City Council for an interpretation on their concerns. The City of Andover is formally requesting the Met Council institute a similar appeals process that would allow local governments to speak directly with the Metropolitan Council board on policy disputes.</p>	<p>The Met Council adopts administrative guidelines which implement the comprehensive plan and plan amendment processes, including identifying required information in applications and expectations for minimum planning requirements to ensure consistent application in all communities throughout the region. The staff role is to ensure that applications contain the necessary materials required under the law and consistent with these guidelines and requirements, especially as it relates to ensuring that staff can adequately evaluate plans and plan amendments for their conformance with system plans and consistency with Council policy. This staff review of applications is modeled after city planning application review, which completeness determinations made by staff following prescribed guidelines. Met Council staff do not have the authority to waiver or vary from these guidelines when reviewing applications and where information may be needed to review for conformance with system plans, consistency with regional policy, or compatibility with plans of affected jurisdictions, as required by the Metropolitan Land Planning Act. In these instances, the City may contact their Council member or attend any Met Council or Committee meeting and request to speak. There is not a mechanism for appeal and a process is not under consideration given these other avenues of connection with Met Council members.</p>
City of Andover	<p>Impacts of the density requirements and rural residential - would like an appeals process for being able to argue for how they are meeting the intent of an objective. Discussion of sanitary sewer infrastructure and calculating capacity. Concerned about the community designation density limits and their wastewater capacity.</p>	<p>The Met Council adopts administrative guidelines which implement the comprehensive plan and plan amendment process including identifying required information in applications and expectations for minimum planning requirements to ensure consistent application in all communities throughout the region. Met Council staff do not have the authority to waiver or vary from these guidelines when reviewing applications and where information may be needed to review for conformance with system plans, consistency with regional policy, or compatibility with plans of affected jurisdictions, as required by the Metropolitan Land Planning Act. In these instances, the City may contact their Council member or attend any Met Council or Committee meeting and request to speak. There is not a mechanism for appeal and a process is not under consideration given these other avenues of connection with Met Council members.</p>



Commenting Organization	Comment	Response
City of Belle Plaine	<p>The City Council acknowledges and values the Metro Council's role in planning and coordinating the region's growth and setting policies addressing regional issues. We value the professional planning, detailed process, and well thought out guidance in the draft Imagine 2050 Land Use Policy Plan. Our comments are intended to provide insight from a rural growth center in an effort to further enhance the plan.</p>	<p>We appreciate the supportive comments and appreciate the thoughtful and helpful insights from the City. We value and support Rural Center communities and will be making clarifications and refinements as the plan moves toward final adoption. We look forward to continuing to work with the City as collaborative partners when we shift toward implementation of Imagine 2050.</p>
City of Belle Plaine	<p>Clarify Definition of Urban and Rural Service Areas. We embrace Imagine 2050's regional vision "A prosperous, equitable, and resilient region with abundant opportunities for all to live, work, play, and thrive" and, in general, Metro Council's core values and regional goals. We recommend Land Use Policy Plan objectives, policies, and actions clarify expectations for rural growth centers as it relates to urban service areas. The City of Belle Plaine is designated as a "Rural Growth Center". We provide municipal drinking water and wastewater treatment services.</p>	<p>Page 8 of the public comment draft of the Land Use Chapter describes Urban and Rural Service Areas. This text was clarified to identify the community designations within each service area. Rural Centers are within the Rural Service Area which hasn't changed from Thrive. The inextricable connection to the surrounding rural landscape of most Rural Center communities, necessitates the Rural Service Area connection. We have worked to clarify and call out, where possible, the policies from the Urban Service Areas that do apply to Rural Centers (minimum density expectations, for example). We will also work on some visual references for clarity that will work to address this. Please note that in the Local Planning Handbook, the checklist of minimum requirements, and other resources will provide individual direction for the City as it relates to comprehensive planning requirements and clarification is always available by contacting your sector representative.</p>

Commenting Organization	Comment	Response
City of Belle Plaine	<p>The policy plan urban and rural service area discussion alludes to "rural centers" being included in the urban service area and "small towns" being included in the rural service area. Clarification is essential to defining the City of Belle Plaine's place in the regional policy framework. Therefore, we request the language be appropriately restated to plainly state rural growth centers are considered urban service areas.</p>	<p>Page 8 of the public comment draft of the Land Use Chapter describes Urban and Rural Service Areas. This text was clarified to identify the community designations within each service area. Rural Centers are within the Rural Service Area which hasn't changed from Thrive. The inextricable connection to the surrounding rural landscape of most Rural Center communities, necessitates the Rural Service Area connection. We have worked to clarify and call out, where possible, the policies from the Urban Service Areas that do apply to Rural Centers (minimum density expectations, for example). We will also work on some visual references for clarity that will work to address this. Please note that in the Local Planning Handbook, the checklist of minimum requirements, and other resources will provide individual direction for the City as it relates to comprehensive planning requirements and clarification is always available by contacting your sector representative.</p> <p>The Met Council is evaluating if there are additional ways to clarify this for these cities understanding that while most Rural Centers provide urban services like water and wastewater through local infrastructure, both East Bethel and Elko New Market are part of the regional wastewater system. The Community Designations and density requirements for the Rural Service Areas, which include Rural Center, Rural Residential, Diversified Rural, and Agricultural, reflected in Table 2 did not change from Thrive MSP 2040 expectations. The Met Council has distinguished between urban and rural land areas with the Metropolitan Urban Service Area (MUSA) as a means to manage land consumption, to deliver efficient regional services, and to preserve valued rural and agricultural areas. Examples of regional services differentiated in this manner include metropolitan wastewater services, the regional highway system, and the regular route transit system. The Met Council monitors available land, density of development, and local government growth planning to ensure regional services are provided as requested. The MUSA represents the areas that already have regional wastewater service or are planned to receive service within the planning horizon.</p>

Commenting Organization	Comment	Response
City of Belle Plaine	<p>City residents and community members have for decades invested in infrastructure. Our community is currently investing in a new public drinking water well and WWTP expansion. Significant investments in wells, water treatment facilities, the water distribution system, water storage facilities, the wastewater collection system, the wastewater treatment plant, the stormwater collection system, stormwater facilities, and local cost-shares in regional transportation facilities have contributed to the vitality of the metro region. These investments serve not only existing demand but must be designed, financed, and built in a forward-looking manner to accommodate future growth. These investments are not able to be scaled incrementally and paid in cash to serve a few connections at a time. Rather they must be scaled in large increments, financed by debt issues, and essentially 'bank' on forecast growth to cash flow. It is crucial the Metro Council works with the City to best capitalize on these infrastructure investments and provide for managed growth in rural growth centers. Therefore, we strongly request policy and objective language be added to acknowledge rural growth centers have and will continue to make infrastructure investments that necessarily require orderly, managed growth unconstrained by large lot rural residential clusters and commercial/industrial development patterns in urban expansion areas (i.e. areas for which municipal services have been designed to accommodate).</p>	<p>Supportive language for Rural Centers is in Objective 1, Policy 3. We did include additional language which further supports Rural Center growth. The Met Council acknowledges that Rural Centers plan for infrastructure to serve future needs, as all communities do as part of their local comprehensive plans, and the Met Council supports long-range planning. The Met Council can support collaborative land use planning efforts between the City, County, and Townships where there may be conflict or disagreement between jurisdictions relating to these issues. The Met Council assists with facilitated discussions, technical assistance, resources, and supportive policies where appropriate. However, the Council cannot act as an arbitrator of disputes between jurisdictions on annexation matters. There is already a process under the law to handle those matters.</p>

Commenting Organization	Comment	Response
City of Belle Plaine	<p>Building on the previous comment, policy and objective language in the 2050 Land Use Policy Plan may potentially ignite urban v. rural divides manifesting in urban expansion areas adjacent to corporate limits and high volume roadways. The plan provides, fittingly, for clustering of residential density into 2.5 ac lots. The policy plan offers zero guidance on development of commercial/industrial land uses in diversified rural and rural residential community designations. We request further thoughtful consideration as to how those policies directly oppose orderly, efficient growth and instead contribute to uncoordinated, non-compact sprawl as evident in the built environment. Examination of recent residential clustering and rural commercial/industrial land uses shows clearly that those patterns are rapidly developing adjacent to municipal service areas and high volume roadways likely driven by lower development costs and regulatory burdens to entry in rural service areas. Those market forces appear to be enhanced, perhaps unintentionally, by several policy decisions which will undoubtedly accelerate the trend.</p>	<p>The Met Council is committed to promoting orderly and efficient development throughout the region and recognizes the important role that land use planning plays in allowing communities to confidently invest in infrastructure. Met Council staff is exploring the feasibility of limiting industrial/commercial developments in rural service areas; however, in many cases our role is limited to encouraging collaboration between jurisdictions with comprehensive planning authority.</p>

Commenting Organization	Comment	Response
City of Belle Plaine	<p>Therefore, we request the Metro Council establish policies and objectives providing for a better balance of allowing sensible development while protecting natural systems and public health and safety in rural service areas. Policies/actions could help ensure rural subdivisions are developed with definitive acknowledgement of existing/planned municipal utility service depth/capacity so that logical extension of urban services can be physically achieved minus subdivision design/site elevation impediments.</p> <p>Similarly, policies/actions could help ensure rural development doesn't impact public health, such as incompatible land uses in highly vulnerable portions of public drinking water supply management areas over which city's do not have planning authority (i.e. external to city corporate limits where no annexation agreement is in place).</p> <p>Finally, policies/actions could help ensure sprawling rural commercial/industrial subdivisions are not premature and that the development at least in part pays for itself. Premature development at intensive scales negatively impacts the ability to appropriately design/fund/manage arterial and collector roadways so as to avoid high speed traffic conflicts with slow moving heavy truck traffic at direct access points. Such situations often result in unanticipated expenses to remedy dangerous situations which are ultimately subsidized by local/regional governments rather than the development paying for itself.</p>	<p>The Met Council is committed to establishing a policy framework that discourages premature development and facilitates the efficient expansion of urban services. Many of the items listed here are areas where local jurisdictions have approval authority, and the Met Council's role is limited to encouraging cooperation and coordination.</p> <p>We understand that there have been challenges recently in collaborative agreements for growth in rural areas. In support of Rural Centers, we have added more language to the policy draft stating that unincorporated areas should not encourage development patterns that preclude the extension of future urban services, especially when that area is currently guided for future urban uses. This would apply to transition areas, urban expansion areas, and other similar categories that anticipate future coordination between the two jurisdictions to accommodate future growth. Additional language also includes a reminder about the need for plans of adjacent jurisdictions to be compatible with one another.</p>

Commenting Organization	Comment	Response
City of Belle Plaine	<p>The Council's policy standpoint continues to be land use authority external to corporate rural growth center boundaries is conditioned upon the existence of an orderly annexation agreement. This policy stance is a headwind toward negotiating annexation agreements and increasingly a flashpoint contributing to uncoordinated growth and discordant jurisdictional relationships. If there is no Metro Council policy management of required dialogue between abutting units of government, except for adjacent jurisdiction review of comprehensive plan updates, then uncoordinated growth will increasingly be the norm. We acknowledge and are pleased the Metro Council is available to facilitate discussion and resolution of annexation related issues. Further calibration of what the Metro Council intends to provide for results-oriented resolution is required. OAA discussion facilitation and resolution of annexation related issues could be an extremely valuable tool or lip service depending on what role the Met Council is envisioning.</p>	<p>The Met Council cannot establish a policy that contradicts or circumvents state law. The Met Council's policy is reflective of Minn. Stat. §462.353, subd. 1, which empowers each municipality with comprehensive planning authority and Minn. Stat. §463.357, which enables a city to extend its zoning regulations to unincorporated areas up to 2 miles outside of its boundary if the county/town does not have adopted zoning regulations. These statutes together indicate that only way to acquire long-range planning authority from another local government (for the purposes of comprehensive planning, for example) is through an orderly annexation agreement. Because of the agreement and timelines inherent to OAAs, the Council has long supported OAAs as the most effective tool for facilitating long-range planning and growth management, as compared to the other allowable approaches to annexation under the law. Where there may be conflict or disagreement between jurisdictions relating to these issues, the Met Council instead tries to assist with facilitated discussions, technical assistance, resources, and supportive policies where appropriate. However, the Council cannot act as an arbitrator of disputes between jurisdictions on annexation matters. There is already a process under the law to handle those matters.</p>
City of Belle Plaine	<p>A final note, in several instances the 2050 Land Use Policy Plan alludes to abundant supplies of land within existing MUSA. While presumably not the intent, the Metro Council should be aware that this is being used as a disincentive for negotiating annexation agreements (i.e. growth should occur on well/septic).</p>	<p>Noted. The language will be adjusted to focus on land supply availability within the planning horizon. While that doesn't change the facts around land supply, it is helpful to understand how policy is being used in these localized conversations.</p>
City of Belle Plaine	<p>Some actions have been softened by incorporating modifiers such as 'consider' or 'examine'. We recommend the Metro Council consider the vast difference in staffing levels, staff expertise, and financial positions/budgets of communities across the region when applying new directives. This could be achieved by incorporating additional modifiers to preface action statements or clarify that 'must' and 'shall' are mandatory while the remaining are discretionary for local government consideration.</p>	<p>Adjustments will be made to add clarity on required elements and those that are encouraged. The clarification of roles for the Met Council or the local government will also be addressed. Where requirements are identified, the Met Council provides technical assistance, tools and resources, and financial assistance to eligible communities via Planning Assistance Grants. These resources alleviate some, but not all of the impact to local governments from the decennial planning process, and they are intended to assist meet minimum planning requirements to the extent possible.</p>

Commenting Organization	Comment	Response
City of Blaine	<p>The City is also requesting the Metropolitan Council consider an appeals process. This process would allow for Cities to have the opportunity to speak directly with the Community Development Committee or the Met Council Board when Met Council staff and Cities have a different interpretation on what is needed for amendments, and/or disagreements on policy interpretation. At this time a city has no formal action to take when Met Council staff and City Staff have a different interpretation. At the local level, if a resident and staff have a disagreement on interpretations of an ordinance, or policy those residents are allowed to bring their concern forward as an appeal to either a Planning and Zoning Commission or City Council for an interpretation on their concerns. The City of Blaine has not experienced any policy interpretation conflicts with staff in recent years that were not able to be solved to the satisfaction of both the City and the Council, however, the City believes that an appeals process is important to ensuring any future conflicts can be resolved.</p>	<p>The Met Council adopts administrative guidelines which implement the comprehensive plan and plan amendment processes, including identifying required information in applications and expectations for minimum planning requirements to ensure consistent application in all communities throughout the region. The staff role is to ensure that applications contain the necessary materials required under the law and consistent with these guidelines and requirements, especially as it relates to ensuring that staff can adequately evaluate plans and plan amendments for their conformance with system plans and consistency with Council policy. This staff review of applications is modeled after city planning application review, in which completeness determinations made by staff following prescribed guidelines. Met Council staff do not have the authority to waive or vary from these guidelines when reviewing applications and where information may be needed to review for conformance with system plans, consistency with regional policy, or compatibility with plans of affected jurisdictions, as required by the Metropolitan Land Planning Act. In these instances, the City may contact their Council member or attend any Met Council or Committee meeting and request to speak. There is not a mechanism for appeal and a process is not under consideration given these other avenues of connection with Met Council members.</p>
City of Bloomington	<p>Plan Focus. As easily happens in large plans, the focus of the plan can get lost in the crowd. The draft plans list hundreds of laudable goals and objectives. But what are the one to three key efforts that demand special regional focus before the next plan update? For the region to rally around the plan and its recommendations, the plan needs to identify a few key efforts, provide a definition of success on each effort and a program of regular measurement and reporting of the region's progress.</p>	<p>Thank you for your feedback.</p>
City of Brooklyn Park	<p>Thank you for the opportunity to review and comment on the Metropolitan Council's Draft Imagine 2050 Policy Plan. I am writing this letter on behalf of the City of Brooklyn Park in support of the draft content with several comments we would like to communicate.</p>	<p>We appreciate your review of the policies in Imagine 2050 and look forward to collaborating with you on implementation in the coming years.</p>

Commenting Organization	Comment	Response
City of Brooklyn Park	The City of Brooklyn Park is aligned with the Metropolitan Council's efforts to improve the metro region as we look forward to 2050 and looks forward to the next steps.	We look forward to continue to collaborate with you on implementation in the coming years.
City of Chaska	<p>On September 4, 2024, City staff were notified by Met Council staff that the Imagine 2050 Regional Policy Plans are available for review and comment. Met Council staff noted that a public hearing would be open on September 16 and would continue through October 7 for local governments and the public to submit comments and questions.</p> <p>Since September 4th, City of Chaska staff has worked to review all of the policy plans comprised of 1,125 total pages. In comparison, the Metropolitan Council receives up to 120 days to review a local comprehensive plan amendment. With a compressed review timeline and the breadth of information and policy language contained in the Imagine 2050 document being what they are, staff has focused on identifying and understanding the most impactful proposed changes to submit comments on. The following outlines the areas of comment that staff has identified, and City Council and Planning Commission support, the city provide to the Metropolitan Council ahead of the October 7th closing of the comment period.</p>	Thank you for taking the time to review the draft of Imagine 2050. We appreciate your taking the time to review and provide comments.



Commenting Organization	Comment	Response
City of Chaska	<p><b>Clarifying Local Requirements</b>  Throughout the policy plan chapters, many policies, strategies, and actions identify local communities as lead agencies for implementation. At the same time, these chapters vary in their definition of requirements and suggestions for local community actions identified. For example, the Land Use Policy Plan identifies local communities as responsible parties after many actions but does not define the level of accountability that the Metropolitan Council intends to apply to these actions. In another example, the Transportation Policy Plan (TPP) utilizes a table to identify “lead role” and “supporting role” tied to actions for various agencies including Cities. The TPP defines lead role as, “the lead agency will be responsible for delivering the activities identified in the actions.” The TPP goes on to qualify that actions identified for local planning implementation are, “requirements or guidelines for agencies to incorporate.” The TPP falls short of distinguishing between requirements or guidelines.</p> <p>The City of Chaska understands the statutory role of the Metropolitan Council is to coordinate and align regional land use as it pertains to efficient sewer service and regional transportation to ensure cross-jurisdiction cooperation in regional travel. The City further understand that some actions are necessarily required to ensure these objectives. However, many actions subscribed to local responsibility that appear in the policy plans such as reducing parking requirements, approaches to public participation, sites of cultural significance, actions to address climate change, data collection on trails, advancing pollinator corridors, and others are getting to details that appear beyond the regional coordination mandate of the Metropolitan Council. While the City of Chaska would agree that many of these actions align with commonly held best practices and mandates from other state and federal agencies, and often align with work the City is actively doing, the City also maintains these are actions that it should not be held accountable to by the Metropolitan Council.</p> <p>The City of Chaska requests that the Metropolitan Council clearly articulate which policies, strategies, and actions the Metropolitan Council is mandating and which it is suggesting as best practices through its policy plan chapters.</p>	<p>There are several areas where we acknowledge that additional clarity is required. We have added a section at the end of the Land Use chapter on Roles and Responsibilities as well as clarifying the "Met Council" and "Local Government" tags within the text. Where there are policies and actions that are encouraged by the Met Council, the intention is to provide supportive regional policy language to assist local governments where needed and provide guiding on best practices. While adjustments will be made to the existing policy documents, additional guidance, resources, and support for the local planning process will be provided through the Local Planning Handbook update planned for release in late 2025 along with other technical assistance. The TPP identifies many actions to support best practices in local planning, both for comprehensive planning and project development. The minimum comprehensive plan requirements are being developed and will be released after the adoption of the Imagine 2050 as part of the Local Planning Handbook update. Similar to Thrive 2040, PlanIt and other supportive materials will be provided giving direction on the plan's policies and actions with direction specific to each community or community type.</p>

Commenting Organization	Comment	Response
City of Corcoran	City of Corcoran staff reviewed the Metropolitan Council's preliminary draft documents for the 2050 Comprehensive Plan and appreciate the outreach ahead of adopting the policy.	Thank you for providing your comments. We look forward to continued collaboration with you as we move toward implementation.
City of Credit River	<p>In general, the statements made in the Vision, Values, and Goals Chapter does not meaningfully reflect the actual vibrant region that we are very fortunate to live in. Our region thrives with quality transportation, robust recreation and a strong economic base. Those qualities should be the foundation of this plan and for the future growth and development of the region. The current draft document sets a very negative and apologetic tone and should instead focus on our prosperous region and how we all move forward.</p> <p>In addition, this Chapter should be shorter as the current content gives very little value or clear guidance to local governments who are compelled to utilize this plan. The overall draft plan is long, repetitive and hard for agencies to read let alone incorporate into our local planning process. It reaches far beyond the purposes of what a "Regional Plan" may include which is fundamentally limited to transportation, regional park planning, and long-term sanitary sewer operations.</p>	We have updated the introduction section (Landscape of the Region) to highlight the strengths of region and the successes of the region's coordination of planning together. The Council is tasked with creating a long range plan for the orderly and economical development of the region and is directed to consider a broad range of issues under statute. We have revised the introduction to include the full statutory text of guidance for the development guide. It should be noted that the Council has responsibilities in addition to the three regional systems, including planning responsibilities around water supply, climate change directives, our discretionary funding programs, our Housing and Redevelopment Authority, and other directives as outlined in Chapter 473. Imagine 2050 identifies the Council's priorities for the programs and responsibilities as they relate to the growth and development of the region.
City of Dayton	The DRAFT Imagine 2050 is a detailed and robust document over 1,100 pages. The seven weeks provided was not enough time for Staff to review in its entirety and discuss with the City Council and advisory commissions. The City's comments relate to Land Use polices only.	We appreciate the time you were able to dedicate to reviewing the land use portions.
City of Elko New Market	Thank you for the opportunity to provide comment on the Draft Image 2050 Regional Policy Plans. The size, complexity, and volume of information was substantial and given the timeframe provided, it was an unreasonable expectation for a community of our size and resources, considering the day-to-day responsibilities we have, to thoroughly review the Plan in its entirety. The City of Elko New Market would like to submit the initial comments below, which are limited to the Regional Vision, Values, & Goals, and the Land Use Policy for consideration. This should not be considered the entirety of our position regarding the Draft Imagine 2050 Policy Plans.	We appreciate your review of the policies in Imagine 2050 and look forward to working with you on implementation in the coming years.

Commenting Organization	Comment	Response
City of Elko New Market	Miscellaneous comments. The formatting between the various Plan components is inconsistent.	We will work to ensure consistent formatting among all Plan components as part of our final published document.
City of Elko New Market	The Plan is very long and overwhelming to read. It is difficult for small communities such as Elko New Market to find the time and resources to review and comment on the Plan, given our daily responsibilities.	We appreciate the time you have taken to review the draft content. We understand the balance of creating a comprehensive development plan with all plan components at once versus a plan with the different policy chapters released on different timeframes. We will continue to consider how best to communicate about the breadth of this work in a digestible format.
City of Elko New Market	Some policies and objectives stated in the Plan seem to reach beyond the authority provided to the Metropolitan Council and remove local control and decision-making authority.	The Council has identified five regional goals and objectives to advance those goals across the policy chapters. The policies and actions both guide the Council's own actions and priorities, identify areas where the Council will seek partnerships, and identify items that local governments are either required or encouraged to advance. We will review content to better clarify areas where it may be unclear.
City of Elko New Market	The City of Elko New Market requests that the public comment period be extended to January 1, 2025, to allow additional time for review and comment on the very overwhelming Draft Imagine 2050 Policy Plan. We appreciate your consideration of our comments and look forward to the opportunity to discuss these comments further.	Thank you for taking the time to review and comment on Imagine 2050. Recognizing that a comprehensive development guide is a large document, the Met Council released a preliminary draft (or "60% draft") in May for early review, informal comments, and continued conversations, in addition to releasing the proposed draft for official public comment in mid-August. We understand that review of large documents can still be an undertaking, particularly for smaller staff teams. We appreciate your time and look forward to continued conversations with you on Imagine 2050.
City of Empire	It would be helpful to have a document/table summarizing the changes from 2040 to 2050 for each policy to be more transparent in what is changing. It would also be more efficient to focus on key items as there is much to take in with all the Policy Plans. It takes a lot of resources to review and provide meaningful comments on these policy plans. Anything to assist with efficiencies and prioritizing concerns would be helpful to all.	We appreciate your review of the policies in Imagine 2050 and understand that it can be a lot to review. With each planning cycle, the Council considers the successes and challenges of the previous planning cycle, and where applicable, has prepared comparative approaches in summary form that have been shared in public meetings with the Council and with work groups. The comparison between Thrive MSP 2040 and Imagine 2050 policies is not included in the policy document to avoid confusion about what local governments are expected to respond to in local plans.

Commenting Organization	Comment	Response
City of Forest Lake	<p>The City of Forest Lake (City) understands the Metropolitan Council (Council) is seeking comment on its draft long range plan, Imagine 2050. The City recognizes the need to establish policy foundation for the region's land use, housing, transportation, water resources, and parks. However, as these policies affect future requirements and actions of local governments across the metro region, the City believes it is important for the Council plan with caution and to be mindful when considering new policies and regulations that could have the unintended consequence of burdening local governments.</p> <p>The City of Forest Lake appreciates the Metropolitan Council's willingness to accept and consider these comments as part of the Imagine 2050 planning process.</p>	<p>Thank you for your comments. We understand the importance of clarity and have provided revisions in the various chapters of Imagine 2050 to provide more clarity around requirements and areas that are encouraged.</p>
City of Greenwood	<p>As a city that may be significantly affected by the proposed Density Expectations Greenwood requests that the Met Council provide a response to our comments in this letter. If our comments are felt to be incorrect or unsubstantiated we would appreciate receiving copies of the data or reports that are used to justify the response.</p>	<p>The City of Greenwood's Community Designation in the draft 90% Plan is Suburban Edge which currently recommends a minimum density requirement of 4 units per acre. In Thrive MSP 2040, the City's Community Designation was Suburban with a minimum density expectation of 5 units per acre. The City's density expectation reduces in Imagine 2050. The proposed Suburban Edge Community Designation for the City in the draft for adoption is not proposed to change.</p>
City of Hugo	<p>Thank you for meeting with us in September to discuss the preliminary forecasts and the Imagine 2050 Policy Plans. Staff has reviewed the Imagine 2050 policy plans. With Imagine 2050, there are five core values on how the Metropolitan Council will guide and implement its policies to achieve a vision for the region. These core values include stewardship, accountability, leadership, and equity, with goals that will be seen through policies, practices, programs, and partnerships. The City of Hugo believes that these core values and goals are a good base for planning the future of the region. These values and goals coincide with the goals and polices that the City of Hugo already has in place.</p>	<p>Thank you for your supportive comments. We appreciate partnering with the city.</p>

Commenting Organization	Comment	Response
City of Independence	<p>The plan does not fully account for growth that will occur outside of the seven-county metropolitan area. Independence experiences significant impacts to local, county and state transportation systems not capable of accommodating the continued growth outside of the seven-county metropolitan area. Understanding, acknowledging and accommodating this growth is an important aspect that should be more fully incorporated into this plan.</p>	<p>The comment is an incorrect characterization. Metropolitan Council's transportation model does analyze and forecast travel in a 19-county area, including the next ring of 12 adjacent counties, beyond the seven metro counties. Travel demand generation projections are derived from socioeconomic and employment levels, current and in 2050. County total expectations are used from Woods &amp; Poole Economics (employment projections) and from the Minnesota and Wisconsin Departments of Administration (population projections). All these projections, listed above, are downscaled to subcounty transportation zones, and the results are used in Met Council's transportation planning. Growth expectations are projected to vary greatly in the next ring of counties. At one extreme, Wright and Sherburne counties are expected to expand by 58,000 and 33,000 residents, respectively; at the opposite extreme, McLeod and Sibley counties, to the west, are projected to lose population (Minnesota Department of Administration, 2023 version population projections).</p>
City of Independence	<p>The plan indirectly states that communities that agree to exceed standards will be given preference relating to Metropolitan Councils investment in all growth allocations (sewer, transportation, parks, etc.).</p>	<p>It is not clear where the commentor is finding this indirect statement. Imagine 2050 identifies priorities for certain discretionary funds such as Livable Communities Act funds, as well as discusses considering additional flexibility based on developed densities (similar to the current credits provided in the Plat Monitoring Program). The delivery of regional services like wastewater is based upon the agreed-upon plans in the existing 2040 comprehensive plans and in future 2050 plans. The investment approaches for regional parks and trails are primarily prescribed in statute with few pots of discretionary funds that the Council has designated to advance equity in regional parks.</p>
City of Inver Grove Heights	<p>The City of Inver Grove Heights comments on the Land Use, Housing, and Water Policy Plans are included in other records in this list.</p> <p>As for the rest of Imagine 2050, the City of Inver Grove Heights does not have comments regarding the Parks and Trails Policy Plan or the Transportation Policy Plan at this time.</p>	<p>Thank you for your review of the policy chapters of Imagine 2050. We appreciate your time and comments.</p>

Commenting Organization	Comment	Response
City of Jordan	<p>General:            We appreciate the opportunity to provide feedback on the policies presented in the Imagine 2050 plan. However, the Met Council should provide a document itemizing and summarizing the changes from 2040 to 2050 policies to be more transparent for the public in what is changing. While the policies presented may be readily discernable to land use policy professionals who work with the policies on a day to day basis, others including recently elected officials and the public at large will not reasonably be able to discern differences in the policy documents. More meaningful feedback from the local governments, elected officials, and the public at large could be achieved on these policy plans. As a result, the region as a whole may function more efficiently as it navigates land use decisions and comprehensive planning over the upcoming decade.</p>	Thank you for your feedback.
City of Lakeville	<p>The general character of the Imagine 2050 regional plan leans heavily into social justice matters involving indigenous persons or populations that have experience inequities over time that is far afield of its traditional role in regional planning for housing, wastewater, transportation, and regional parks in which the Metropolitan Council has actual statutory authority. The social justice elements of Imagine 2050 are set forth primarily in the Regional Vision, Values, and Goals chapter. This chapter outlines directional statements that describe desired outcomes for the Twin Cities Metropolitan Area. These goals, in turn, are reflected by other policy and system plans included in Imagine 2050 addressing land use, housing, water, regional parks, and transportation).            Lakeville's approach to comprehensive planning has always been provision of practical official controls that facilitate growth and orderly development supported by necessary public services reflecting the core functions of local government. To this end, the City's concerns with the Imagine 2050 Regional Vision, Values, and Goals chapter are limited only to how these statements are incorporated into the policy and system plans to the extent that they must be incorporated into the 2050 Lakeville Comprehensive Plan.</p>	While the Council has statutory authority over specific system plans, it should be noted that the statutory direction states: "The comprehensive development guide must recognize and encompass physical, social, or economic needs of the metropolitan area..." As discussed in the regional goal "Our region is equitable and inclusive," decisions around the provision of public services and how all governments in the region plan for the growth and development of the region have an impact on the social needs of the region as well.

Commenting Organization	Comment	Response
City of Lilydale	Thank you very much for the opportunity to provide input on the referenced planning ideas. We have also been able to discuss all of this with your staff (Patrick Boylan) and that is much appreciated. We hope that our observations and comments will be helpful to the Council and motivate a somewhat different approach as you seek to lead our metropolitan cities in effective planning for our collective future.	Thank you for your feedback. We appreciate the ability to partner with the city in imagining our future.
City of Lilydale	The mere existence of the Council and its policies and services reflect the fact that the future and well-being of each city, each community, is inextricably tied to all the others in achieving success in our region, in whatever way that is defined. By the same token, we all depend on the talent, judgment, courage and diligence of the hundreds, perhaps thousands, of people who lead and work for the cities that comprise our metropolitan area, and the goals and aspirations of our 3,000,000 people.	Comment noted.
City of Lilydale	It is my understanding that the Council's initiatives in proposing new standards for approval of the cities' 2050 comprehensive plans have been described as its contribution to make more housing available at prices affordable to more people in our metropolitan area. Judging by the encampments of homeless people and the reported fragility of the economic capability of many people that do have housing, something is lacking, but we are not sure that the solution is an arbitrary assignment of greater amounts of housing density within "zones" of communities in the metro area.	
City of Lilydale	We are proud to be a constructive part of the metropolitan community and we are grateful for the policies and support provided by our Metropolitan Council its volunteer leaders and talented staff- and we should not be treated as a problem. We represent a contributing part of the Metropolitan community and Lilydale will conduct itself in a positive way.	Thank you for your supportive comment.

Commenting Organization	Comment	Response
City of Lilydale	<p>Which gets to my view of our collective goal of better addressing housing needs: First, the Metro Council should provide a forum for discussion and decision-making on the definition of the problem. This should be heavy with data on who is homeless ( or on the margin), what they need to be in a different position, and how those that improve their situations accomplish that. Maybe it's zoning, but maybe it is the state building code, or local building codes, or market forces, or poor health. We really need to know why people have these issues, and why are they here.</p>	<p>The Met Council understands that homelessness looks different in different areas of the region and there are a variety of supports need to help people obtain and maintain stable housing. Engaging with Cities, residents, and those experiencing housing insecurity is important in learning about local needs. Met Council plans to provide opportunities for discussion on this issue. As staff engage with communities to address issues of the high cost of housing, lack of access to services that support housing stability, and other challenges that make it difficult to afford the cost of housing, Met Council will continue to work with cities.</p>
City of Lilydale	<p>Second, the Metro Council should engage with each city, and work with those cities that see ways that they can contribute to solutions to the problem as defined.</p>	



Commenting Organization	Comment	Response
City of Lilydale	<p>I find it very difficult to look at your proposed standards for cities' 2050 Plans independent of the proposed legislation in the 2024 Legislative Session that sought to remove local regulation of land use from cities' authority, supposedly for the purpose of creating more housing, at supposedly "affordable" costs. The City of Lilydale looked at that legislation very closely and our City Council voted unanimously to oppose that legislation. We were opposed to that because it was indifferent to the unique problems and opportunities in our respective cities, it was disrespectful of the people that live in Lilydale and elsewhere who choose their places of residence to meet their personal needs and whose lives would be immeasurably disrupted if those preferences were disregarded in favor of ill-conceived regulatory tactics that would leave our neighborhoods vulnerable to whatever a mindless mandate of density would produce. Perhaps most disappointing to me, that legislation usurped the cities' involvement in defining the problem and finding solutions to the real needs of society. That legislation was personally insulting. The people involved in governing Lilydale are doing what they do because they care about our community and they feel it is their duty to contribute their collective talent to solving problems. And, by the accident of history that has created the Lilydale of today, our city is a collection of a lot of talent and wisdom, i.e., we are an older demographic, and to assume an incompetence or malevolence of our people is disrespectful. And it is wrong.</p>	<p>Regarding legislative initiatives, the Met Council is charged with planning for the 7-county region and addressing a wide range of issues as noted in statute and also as it relates to the need for low to moderate income housing. This work must be completed on a timeline that is prescribed in statute. We understand that there is interest at the legislature in solving for some of the very same issues the regional plan discusses. The objectives, policies, and actions in the draft plan are grounded in what is available or possible today rather than what might happen or change at the legislature. Should there be significant changes in statutes that affect how the Met Council or the local governments are able to carry out plans and actions, the Met Council will consider whether revisions to the plan may be necessary at that time.</p>
City of Lilydale	<p>Now, if density is the salvation of our Metro area, Lilydale is nirvana. We have five single family homes and all of the rest of our 900 or so residents are in apartments, condos and townhouses. We have plenty people per acre, so our comments are not based on a concern that we will not be able to conform. My comments are based on the invalidity of the premises for these regulatory mandates for our cities. First, as noted, it is not valid to assume that local officials should be excluded from the process of improving our metropolitan community.</p>	<p>The Council's density expectations by community designation are a planning practice that the Council has used for at least the last 30 years as a tool to ensure economical use of regional infrastructure investments and to manage growth within the region. As was the case in the last two regional plans, the Met Council continues its practice of asking for community-wide average minimum densities for areas identified to accommodate forecasted growth. This provides local governments with the flexibility to determine where and at what densities to guide forecasted growth, so long as the overall average minimum density of those areas is consistent with regional policy.</p>

Commenting Organization	Comment	Response
City of Lilydale	<p>Second, it is also invalid to assume that the Legislature or the Metropolitan Council is better qualified or more properly motivated to provide the solutions to our problems. It is an invalid premise that there should be no communities that may be characterized by pastoral settings, pleasing to those who choose to live there, and low density. It is an invalid premise that, since so many people like a "walkable, dense urban setting" that all other life styles are unworthy of respect and protection.</p> <p>It is not a valid premise that our density "guidance" should be less demanding the further one gets from the urban center. This may codify the status quo, but it is completely illogical. Politically expedient, but not rational. (By the way, we have conflicted mandates in Lilydale and other Mississippi River towns – we are committed to the aesthetics of the Mississippi River corridor, i.e., less development, versus the proposed mandates for increased density; and, it should be noted that the strategy of delineating zones in the River Corridor that have different standards from one another has little to do with river aesthetics and everything to do with the status quo and the relative economic and political practicalities of the older cities. So, to me, the new comp plan standards provide regulators with a means to be involved in virtually all land use decisions in the metro area, but without much promise for any real help in solving our problems.)</p>	<p>Minn. Stat 473.145 requires the Met Council to plan for the orderly and economical development of the region and establishes our roles and responsibilities in regional planning. Land use policies that manage the region's planned land supply like supporting compact development, redevelopment, and infill, establishing criteria for expanding the Metropolitan Urban Service Area (MUSA), as well as adjusting density minimums all work in concert to help manage growth and development in urban, suburban, and rural areas of the region. The Met Council has a statutory responsibility to continue implementing the Metropolitan Land Planning Act, which also includes new statutory requirements to address climate change. While not the only tool in addressing climate impacts in the region, density and land use policy are tools, and we have to use every tool available if we are to meet the legislative requirement for Net Zero by 2050. This creates a pathway to achieve that requirement.</p> <p>Further, density and other land use policies address the form/design of growth, not the quantity of growth. A modest increase in minimum densities does not require local governments to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land. This also includes protecting the natural systems, such as the Mississippi River, as a part of how we as a region support expected growth. The City's 2050 forecast shows a total growth over the planning period of 31 units. This is the amount of growth that we believe the City will accommodate by 2050. However, where there are concerns about the amount of forecasted growth, we will work in collaboration with the City to come to agreement on the appropriate forecast.</p>

Commenting Organization	Comment	Response
City of Lilydale	<p>Third, if we do adopt your regulatory strategy, we should measure the problems and the solutions not strictly by city limits, but by different (usually bigger) areas, and the appropriateness of land use should be looked at in that geographical context. In other words, a low density area would benefit from a nearby high density area if, together, they met the consensus objectives, even if they are not in the same municipality.</p>	<p>We appreciate the City offering a solutions-based approach to their concerns. Statutory requirements drive the necessity and requirement for each individual jurisdiction to complete a local comprehensive plan addressing each system and policy area the Met Council has a statutory obligation to implement. In some aspects, you are correct in that there are many planning issues in which a broader regional approach is necessary. That is why the region's success depends so heavily on every individual municipality addressing issues that cross boundaries like addressing climate change, supporting development of affordable housing, and providing walkable, connected communities for all people in the region. Further, the Metropolitan Land Planning Act requires compatibility with the plans of adjacent communities. We know that many communities have taken to a more collaborative process with their neighbors, and we continue to support that collaboration to meet shared goals.</p>
City of Lilydale	<p>Fourth, we should make absolutely sure that this entire effort is not, in fact, driven by the need/desire to merely improve the financial performance of utilities and other services. The capacity, planning, location and design of the infrastructure may, in some cases, have been ill advised. If that were true we may be in for some major corrections but problems like that should be addressed by making the corrections ( or, perhaps, charging differential amounts for a service if the inefficiency is caused by local choices), not by driving higher volumes of business through land use regulation.</p>	<p>Imagine 2050 identifies 5 shared regional goals. The Council conducted a scenarios analysis to evaluate how effective different policies were at advancing those five regional goals. Strategies around density and compact development were shown to be most effective at advancing those regional goals. That being said, the Met Council is also charged with planning for the orderly and economical development of the region, and with being good stewards of the public investments in the regional systems. Making the best use of the investments that the public has made in those systems is foundational to the regional planning process.</p>
City of Lino Lakes	<p>Thank you for the opportunity to meet and discuss the draft Imagine 2050 Development Guide and the preliminary 2050 population and household forecasts. The City appreciates the work that has been undertaken to draft the Imagine Plan and recognizes the complexity involved with addressing the long-term needs of the metropolitan area.</p>	<p>Thank you for your comment.</p>

Commenting Organization	Comment	Response
City of Lino Lakes	As a general point there are several action items throughout the policy plans where it is unclear what the impact on communities will be and what will be required. The City of Lino Lakes discourages requirements to adopt specific policies and ordinance to meet policy plans goals and actions. We encourage the Metropolitan Council to allow communities to determine what is best for their community to meet the intent of the goals and action items.	Thank you for your comment. We have updated Imagine 2050 to more clearly distinguish between what is required and what is encouraged.
City of Medina	Appreciation for Collaborative Process – The Medina City Council appreciates the significant time and effort that Metropolitan Council staff has spent collaborating with City staff through various working groups and focus groups in preparation of drafting Imagine 2050 and the efforts put into drafting such substantial documents. Continued collaboration is imperative to ensure that planning and implementation serves the interests of City residents.	We appreciate your review of the policies in Imagine 2050 and collaboration as part of the development of the plan. We look forward to working on implementation in the coming years.
City of Minneapolis	Thank you for the opportunity to comment on the Metropolitan Council’s draft Imagine 2050 policy documents. We appreciate the work of the Metropolitan Council staff that developed the draft plan. We commend you on drafting a strong and comprehensive document that takes steps to address racial and economic inequities, clearly identifies the region’s strengths and challenges, and sets the stage for improved integration of food systems in associated plans.	We appreciate your review of the policies in Imagine 2050 and look forward to collaborating with you on implementation in the coming years.

Commenting Organization	Comment	Response
City of Minneapolis	<p>Thank you for the opportunity to comment on the Metropolitan Council’s draft Imagine 2050 policy documents. We appreciate the work of the Metropolitan Council staff that developed the draft plan. We commend you on drafting a strong and comprehensive document that addresses racial inequities, clearly identifies the region’s strengths and challenges, and sets the stage for growth in a manner that will serve the region well.</p> <p>Attached to this letter are a series of comments developed by staff for you to consider as you refine the regional vision, land use, and housing documents. We are particularly interested in our collective work on displacement, making sure investments align with the regional vision and goals, ensuring development happens in a manner that is consistent with those investments, and addressing barriers to creating housing. Please reach out if you have any questions. We look forward to reviewing system statements next year and working in partnership with the Metropolitan Council on our next comprehensive planning process shortly thereafter.</p>	<p>We appreciate your review of the policies in Imagine 2050 and look forward to working on implementation in the coming years.</p>
City of Minneapolis	<p>Page 4: The narrative and data supporting the section on the “Landscape of the Region” is helpful – good baseline information to ground further policy discussion.</p>	<p>Thank you for your comment. We are glad that you find the content useful information.</p>
City of Minneapolis	<p>Pages 11 and 12: “We live in a warming, wetter region.” Additional data that supports policy guidance might be useful here. Acknowledging the Met Council’s need to tie this topic to areas directly under its influence, addressing climate change as a regional goal could use more specifics/data on the elements of concern. Perhaps it is covered later in the document, but what are the outcomes we are trying to avoid? What are the inevitable outcomes we need to prepare for? How should this show up in regional investments and local plans?</p>	<p>Additional data regarding changes in the climate that we are already experiencing, as well as further goal and policy direction, is contained in the regional goal “We lead on addressing climate change” as well as within each of the policy chapters where there are specific climate-related impacts.</p>
City of Minneapolis	<p>Page 23: It would be helpful to have a resource that you could direct readers to about the engagement that is mentioned that was done to inform the vision, values, and goals. I can see the engagement update item from the November 2023 council meeting, but including a summary of some kind in the policy document or as an appendix would be useful as we start working on our own engagement efforts.</p>	<p>Thank you for your comment. We intend a consolidated public engagement report for the entirety of Imagine 2050 that can be referred to going forward. We have a number of reports that have been prepared along the way and agree with the value of consolidating that information</p>

Commenting Organization	Comment	Response
City of Minneapolis	Page 25: The narrative on “patterns of historical injustices” appears to be very thorough – well done, helpful context setting.	Thank you. We are glad that you find the information useful.
City of Minneapolis	Page 31: The equity framework is great as well – it could be useful to know how the Met Council is planning to operationalize the framework by sharing a process/outcome example. Would be helpful to see a demonstration (something like this probably already exists) of a program the Met Council administers where these commitments are operationalized.	We have revised the equity framework section to include an example of how the Council applied the Community-Centered Engagement Framework during this planning cycle..
City of Minneapolis	Pages 42 through 44: As we are all still exploring how best to address displacement, the content on pages 42 through 44 is incredibly useful. It would be great if it could take the next step in identifying specifics about strategies that directly impact displacement – not just conceptual outlines, values, and goals. Guidance and leadership from the Met Council in this way would be helpful in preparing us for our next comp plan update. The research and best practices might not be well established on the topic, but we should start defining those practices more clearly together.	Comment noted. As Met Council builds on the Anti-Displacement Framework and strategies and implements this work, we will work with communities on specifics and desired impact on communities. We appreciate Minneapolis' interest in and partnership here.
City of Minneapolis	Page 46: This helps to answer some of the questions raised above about Page 23 content, but a summary of the engagement done to prepare these draft documents would be great – perhaps these are found in the individual policy topic documents. The actions on Page 47 are great, would suggest supplementing with ways to hold the agency and its partners accountable for making decisions that reflect the values described in this section.	Thank you for your comment. As noted in your previous comment, we intend a consolidated public engagement report for the entirety of Imagine 2050 that can be referred to going forward.
City of Minneapolis	Page 51: Glad to see such detailed attention paid to health and safety.	Thank you for your comment.
City of Minneapolis	Page 79: Noting that the natural systems info is helpful and might be a good framework for cities to use in addressing environmental concerns.	We are glad to hear that you find this information helpful.

Commenting Organization	Comment	Response
City of Minneapolis	<p>Page 66: Work from home is mentioned, would be useful to explore the fiscal impacts in more detail. The statement about reimagining our downtowns is great, but also touting/exploring/analyzing benefits such as a potential to reduce the burden (and spending) on our freeway system as an effect of telework would be good. Then more directly tie this issue to the next section regarding leading on climate change.</p>	<p>The Travel Demand Management Investment Plan includes a detailed description of the value telework can provide to our region, including reduced wear and capacity demands on highways. See pages 4-9 of that section.</p>
City of Minneapolis	<p>Regional Goals: "...feel welcome, included, and empowered." While empowered may make sense colloquially, it does not align with avenues of public participation that are often possible or practical for local agencies.</p>	<p>Thank you for your comment. The inclusion of the word "empowered" in this goal is not limited to public participation in civic activities, but rather more broadly refers to agency every resident feels to direct the outcomes in their lives.</p>
City of Minneapolis	<p>Regional Goals: "...protect habitat and ensure a high quality of life for the people..." While this is a document written to center the human experience in the region, this assumes the only value in habitat protection is for use and enjoyment of human beings. This disregards or ignores any inherent value in our natural world and systems and implies that we must protect and restore the environment solely for what we can extract from it. While this comment may err philosophical, the sentiment aligns with the core value of stewardship - creating a world where all beings are thriving and free. This includes non-human residents who share our region.</p>	<p>The Met Council intentionally moved away from a 'natural resources' framing for Imagine 2050 in order to focus on the interconnectedness of the natural, built, and human world and the need to recognize the intrinsic value of natural systems outside of the services they provide for human needs. This policy framing was intentional and a direct response to engagement efforts, where Council staff heard a lot from natural systems advocates, professionals, and local residents about the need to focus on biodiversity value, connectivity, kinship with nature, and the need for protection, restoration, and enhancement of natural systems.</p>
City of Minnetrista	<p>As the Mayor of Minnetrista, I am writing to express our concerns regarding the proposed shift in density requirements in the Imagine 2050 Housing Policy Plan, which raises the minimum density from 3 units per acre to 4 units per acre. Minnetrista, being on the exurban fringe of the Twin Cities, is uniquely positioned with vast open spaces and low-density housing, primarily single-family homes, which align with the current market demand in our community. The proposed changes could have significant negative impacts on our city's growth and development potential.</p> <p>While we understand and support the Metropolitan Council's broader goals of addressing regional housing needs, we believe that the Imagine 2050 Housing Policy Plan must account for the unique circumstances of exurban and rural communities. Imposing a one-size-fits-all density requirement will have unintended consequences for cities like Minnetrista.</p>	<p>Minn. Stat 473.145 requires the Met Council to plan for the orderly and economical development of the region. Land use policies that manage the region's planned land supply like supporting compact development, redevelopment, and infill, establishing criteria for expanding the Metropolitan Urban Service Area (MUSA), as well as adjusting density minimums all work in concert to help manage growth and development in urban, suburban, and rural areas of the region. The Met Council has a statutory responsibility to continue implementing the Metropolitan Land Planning Act, which also includes new statutory requirements to address climate change. While not the only tool in addressing climate impacts in the region, density and land use policy are tools, and we have to use every tool available if we are to meet the legislative requirement for Net Zero by 2050. This creates a pathway to achieve that requirement.</p>

Commenting Organization	Comment	Response
	<p>We urge the Council to reconsider the 4-unit-per-acre requirement and to adopt a more flexible approach that allows communities to tailor their housing policies to local conditions. By doing so, the Council can ensure that the 2050 Housing Policy Plan promotes sustainable growth across the entire metropolitan region, without stifling the potential of cities like Minnetrista.</p> <p>Thank you for the opportunity to provide these comments. We look forward to further discussions with the Metropolitan Council to create a housing policy plan that meets the needs of all communities within the region.</p>	<p>Further, density policies address the form/design of growth, not the quantity of growth. A modest increase in minimum densities does not require local governments to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land. Where there are concerns about the amount of forecasted growth, the Met Council works in collaboration with the local government to come to agreement on the appropriate forecast.</p> <p>Additionally, the density policy proposal reflects the average densities already planned in each community designation. Both local government comprehensive planning and local market conditions informed the density analysis. Changes to minimum requirements were proposed because it is evident that efficient use of land contributes to a higher level of efficiency for the regional system and generally, the cost of additional services per household is lower when the land area per household is smaller. More compact development patterns are one way to manage costs and keep expenditures down.</p> <p>We also acknowledge and understand that flexibility is an important part of the planning process, and the Met Council is committed to working with local government partners on any proposed changes that may be made to administrative guidelines to reflect policies in Imagine 2050. The Met Council plans to review its guidelines and administrative practices after the adoption of Imagine 2050. Any changes to net density calculation guidelines, or programs which rely on density calculations, must be approved by the Met Council after adoption and any changes made to provide local flexibility must be consistent with regional goals. We look forward to working with local government partners as this work begins.</p>
City of Newport	<p>While many of Newport's goals are aligned with the Metropolitan Council's regional policy, changes made in the Imagine 2050 planning process will impact Newport.</p>	<p>We appreciate your review of the policies in Imagine 2050 and look forward to working on implementation in the coming years. We understand that policy changes have impacts on communities as they turn to their local planning process. The Council is committed to supporting local governments through technical assistance, tools, and funding resources to aid in that process.</p>



Commenting Organization	Comment	Response
City of Oak Grove	Oak Grove embraces conservation-mindedness of this plan. Appreciates the collaborative process for this plan, especially in contrast to the past time. Values natural space and surface water. Appreciates rural community designation. Concerns about how density would be implemented, but willing to chat about it. Integrating trail infrastructure and connection with roadways. Protect, restore, and enhance natural systems - invested in new natural access trails through woods and prairie lands. Affordability of housing - affordability after people live there, all phases/stages of life.	Thank you for your comments. We appreciate your review of the draft policies and look forward to continued collaboration as we move toward implementation.
City of Oak Grove	The City of Oak Grove understands the Metropolitan Council is seeking comment on its Imagine 2050 the draft regional development guide and recognize the need to establish policy foundation for the region's land use, housing, transportation, water resources, and parks. However, as these policies affect local governments across the metro region, and the City believes it is important for the Council to be mindful when considering new policies that could have burden local governments. As the region and communities plan for the future, we want to ensure that goals and policies implemented by the Council allow the City of Oak Grove to remain a well-planned, rural residential community.	Comment noted.
City of Oak Grove	The City of Oak Grove appreciates the Metropolitan Council's willingness to accept and consider these comments as part of the Imagine 2050 planning process. We would expect to offer more input as this process continues.	We appreciate your review of the policies in Imagine 2050 and look forward to working with you on implementation in the coming years.
City of Prior Lake	The City of Prior Lake appreciates the opportunity to review and comment on the proposed Imagine 2050 Regional Development Guide and Policy Plans. I would also like to recognize and thank our Sector Representative, MacKenzie Young-Walters, for his communication and willingness to answer questions and discuss our concerns throughout the Imagine 2050 review and comment period.	Thank you for your kind words and supportive comments.

Commenting Organization	Comment	Response
City of Prior Lake	<p>The City of Prior Lake feels much of the proposed policy language is far too general and requires clarification for the city to provide definitive comments. Our concern with vague policy statements is how they may be interpreted and enforced which poses a significant risk for delay or denial of development proposals in the future if not clarified. Language throughout “encourages” or “discourages” certain items and should be clarified. A specific example is encouraging the preservation of land identified as prime agricultural soils from use other than agricultural production areas. Will the policies be written in such a way that they are truly encouraging or discouraging, or will they ultimately be interpreted as requirements and prohibitions? It is not clear if this policy will prohibit development of land identified as prime agricultural soils.</p>	<p>Thank you for your comment. We have made some clarifications in the document and encourage further discussion throughout the implementation process.</p>
City of Prior Lake	<p>The City of Prior Lake appreciates the opportunity to review and comment on the proposed Imagine 2050 Regional Development Guide and Policy Plans. I would also like to recognize and thank our Sector Representative, MacKenzie Young-Walters, for his communication and willingness to answer questions and discuss our concerns throughout the Imagine 2050 review and comment period.</p>	<p>Thank you, MacKenzie has appreciated Prior Lake's collaborative approach to Imagine 2050.</p>
City of Richfield	<p>Thank you for the opportunity to review and comment on the comprehensive vision for our region: Imagine 2050. There are many wonderful initiatives in this document that we support and are actively working toward or have adopted in Richfield. However, the document itself feels like the proverbial spaghetti thrown at the wall, including an enormous list of “action items” that go beyond the statutory authority of the Metropolitan Council. Imagine 2050 is exceptionally long and delves into far greater detail than a regional long-range plan that purports to set out a “policy foundation” should. The message and intent are significantly clouded and diluted by the sheer volume of the document.</p> <p>For clarity, this letter is intended to highlight our primary concerns with the document as a whole; our specific questions and comments regarding the individual sections are included as an attachment.</p> <p>Imagine 2050 states that “local comprehensive plans should be clear, transparent policy documents...” but the Imagine</p>	<p>The Council is directed to plan for the orderly and economical development of the region as stated in Minn. Stat. 473.145, including effective stewardship of regional infrastructure investments to support regional growth and administering the requirements of the Metropolitan Land Planning Act. The Land Use Chapter continues many of the policies and practices of past regional plans, in addition to responding to new regional goals and statutory responsibilities all directed toward carrying out the Met Council's legislative directive.</p> <p>There are several areas where we acknowledge that additional clarity is required and where we will make adjustments to identify if an item is required or not. For example, communities are encouraged to consider Living Streets policies and principles, but are not required to adopt them. Likewise, with incentivizing de-paving, this is a consideration for local governments, not a requirement. Language will be revised to make the intent clear.</p>

Commenting Organization	Comment	Response
	<p>2050 document itself is full of confusing and ambiguous language. What is an “action item”? Is it a mandate to be reflected in local plans? With 174 “action items” in the Land Use section alone, it is unclear how a community could produce a clear and transparent document that our community members would be able to read and comprehend, or that staff would reference. Richfield is supportive of the Metropolitan Council’s outreach efforts, but this document seems to include every idea that has been shared with you as an “action item.”</p> <p>The general ambiguity between what is encouraged versus required, or whose responsibility each action is, will lead to miscommunication and misunderstandings as we prepare—and the Council reviews—our comprehensive plan.</p> <p>Ambiguous language greatly increases concerns that an individual Council reviewer may interpret requirements differently than local staff and community members.</p> <p>Imagine 2050 is intended to set a policy foundation for several systems. It is then the responsibility of individual cities to develop local policies and implementation plans that are consistent with this foundation in a way that also addresses the unique considerations of their community. Imagine 2050 goes into such specificity (e.g. “Adopt a Living Streets Policy,” “Update land use guidance and regulations to incentivize de-paving...”), it seems that the Metropolitan Council is seeking to prescribe every aspect of local plans. This severely discounts any public engagement we would undertake ourselves as part of our comprehensive planning process and assumes that the Council knows better than the local community.</p> <p>In addition to an over-reach in authority, we find a lack of sufficient explanation in many areas. Fiscal implications statements, where required, appear to be missing. Imagine 2050 seems to take local finances for granted, putting a significant number of actions that require funding on cities as a lead agency, without discussion of adequate additional funding to cover the costs. Finally, Imagine 2050 would be greatly improved by better differentiation between urban/urban edge goals and actions versus suburban/rural.</p> <p>We empathize with the enormity of guiding the entire region but would encourage a deeper dive into the areas of Metropolitan Council authority, and an abandonment of the extraneous efforts in this document. Partnership between</p>	<p>Additionally, adjustments will be made to add clarity of roles for the Met Council or the local government. Please note, where requirements are identified, the Met Council provides technical assistance, tools and resources, and financial assistance to eligible communities via Planning Assistance Grants. These resources alleviate some, but not all of the impact to local governments from the decennial planning process, and they are intended to assist meet minimum planning requirements to the extent possible.</p>

Commenting Organization	Comment	Response
	<p>communities and the Council, specifically in the areas of technical assistance, best practices, implementation ideas etc. is valuable for the region. However, attempting to include all of this in a single document obscures the vision, goals, and policies that this document should highlight.</p> <p>Overall Comments</p> <ul style="list-style-type: none"> <li>§ Exceeds statutory authority</li> <li>§ Unfunded mandates</li> <li>§ Ambiguous and unclear language</li> <li>§ Imposes Met Council opinions over local expertise</li> <li>§ Dismisses local public engagement efforts</li> <li>§ Critical editing required to clarify intent and message</li> </ul>	
City of Rogers	<p>Under the first goal: Our region is equitable and inclusive: it states: racial inequities and injustices experienced by historically marginalized communities have been eliminated. I would recommend amending the wording to read: racial inequities and injustices being experienced. The way it currently reads gives the impression that the past is being eliminated. It is important to recognize that these items took place so we can continue to recognize the impact and work to create a more equitable region moving forward.</p>	<p>The regional goal identifies the future that we aim to have, one without inequities and injustices. We agree that recognizing the past is important as part of the context setting that we discuss in our equity framework. Additional language has been added under the "Patterns of historical injustices" section that describes the importance that you highlight.</p>
City of Savage	<p>On behalf of the City of Savage, I am writing to thank you for the opportunity to review and comment on the Imagine 2050 Regional Development Guide and set of Policy Plans. We all share a vested interest in ensuring the Twin Cities metropolitan area remains a great place to live, work, raise a family and do business. In this letter, I would like to share some concerns in reviewing Imagine 2050.</p>	<p>Thank you for your feedback.</p>
City of Savage	<p>First, the Plan calls for more burden to be placed on local governments due to increased reporting and mandated policies. Many communities do not have the staff and resources to comply with these mandates. If these are required, the cost will be passed on to residents. Examples include asking for year-round maintenance of trails or reporting pedestrian and bicycle activity.</p>	<p>Comment noted.</p>

Commenting Organization	Comment	Response
City of Savage	Imagine 2050 also adds to the complexity of development, when we have been trying to make the development process easier. The Policy Plans call for adding more time to the process of development, which will make it more difficult and expensive. Examples include freezing comprehensive plan amendments, while the City's new comprehensive plan is under consideration and not reviewing amendments until an environmental review is completed.	Comment noted.
City of Savage	Lastly, the City of Savage supports the Metropolitan Council's regional approach to development, but we feel much of the rhetoric of Imagine 2050 reaches beyond how this region should develop.	Comment noted.
City of Shakopee	The Met Council's 2040-2050 plan underscores the need for a restructuring of its authority. By extending the Council's reach beyond the Minnesota Land Planning Act, they risk bypassing established regulations through vague visions. Each city possesses unique characteristics and challenges that cannot be adequately addressed with a one-size-fits-all approach.	Comment noted.

Commenting Organization	Comment	Response
City of Shakopee	<p>The Met Council should focus on alleviating the financial burdens on the very households it claims to support in terms of affordability. The expansion of regulatory vision not only raises costs for both existing and new housing, but also complicates matters with an expensive, under-utilized light rail system that competes directly with roadways crucial for transporting goods and services - an essential aspect of many local economies. In contrast, bus rapid transit (BRT) offers a more cost-effective and flexible solution that can adapt to changing route needs. BRT also provides for additional revenue opportunities during special events.</p>	<p>The Met Council supports housing development in a variety of ways, one of which is by supporting more compact growth. Growth is the primary factor that increases the cost for services in a community, through the extension of roads, public infrastructure, and public services. Generally, the cost of additional services per household is lower when the land area per household is smaller. A more compact development pattern is one way to manage costs and keep expenditures down.</p> <p>Transitway investments are generally planned by local partners, usually by counties in collaboration with cities and transit providers. These projects go through a rigorous planning process with defined goals and objectives to identify the investment that is preferred by local partners, including substantial public engagement. These steps are all conducted prior to inclusion in the region's long-range plan. The Met Council is committed to providing reliable and coordinated transportation resources throughout the metro region. The Transit Investment Plan describes the region's planned investments in high-capacity transit, which include many bus rapid transit services and related infrastructure. This Transportation Policy Plan also incorporated the Met Council's transitway advancement policy, which will strengthen the Met Council's role in developing transitways with our local partners.</p>
City of Shorewood	<p>Cultural Connection and Well-Being Imagine 2050 includes several requirements for Comprehensive Plans to establish and actively use tools that support mental health services, job training programs and education support. This is not feasible for the City of Shorewood to incorporate into its comprehensive plan as the City does not have the capacity, resources, and/or staff expertise in these areas to provide or ensure the provision of such services. Additionally, none of these service areas are typically within the scope of municipal governments in Minnesota.</p>	<p>To clarify, Imagine 2050 encourages communities to align transportation access to health, education, and workforce development services, not to directly provide those services. We also encourage communities to consider other ways of supporting mental health, such as for planning for green space and parks within your community.</p>

Commenting Organization	Comment	Response
City of Shorewood	<p><b>Appeals Process</b>  The Metropolitan Council should consider an appeals process. This process would allow for cities to have the opportunity to speak directly with the Community Development Committee or Metropolitan Council Board when Met Council staff and cities have a different interpretation on what is needed for comprehensive plan amendments, and/or disagreements on policy interpretations for Comprehensive Plan requirements. At this time a city has no formal action to take when Met Council staff and City staff have differing opinions regarding a policy interpretation or application. At the local level, if a resident and staff have a disagreement on interpretation of an ordinance or policy, those residents have the opportunity to bring their concerns forward to groups like the Planning Commission or City Council as part of a public process. This type of process seems like it would be central to the Met Council's goals of equity and accountability identified in Imagine 2050 and would allow for a more open and transparent process for cities to engage with the Met Council.</p>	<p>The Met Council adopts administrative guidelines which implement the comprehensive plan and plan amendment processes, including identifying required information in applications and expectations for minimum planning requirements to ensure consistent application in all communities throughout the region. The staff role is to ensure that applications contain the necessary materials required under the law and consistent with these guidelines and requirements, especially as it relates to ensuring that staff can adequately evaluate plans and plan amendments for their conformance with system plans and consistency with Council policy. This staff review of applications is modeled after city planning application review, in which completeness determinations made by staff following prescribed guidelines. Met Council staff do not have the authority to waive or vary from these guidelines when reviewing applications and where information may be needed to review for conformance with system plans, consistency with regional policy, or compatibility with plans of affected jurisdictions, as required by the Metropolitan Land Planning Act. In these instances, the City may contact their Council member or attend any Met Council or Committee meeting and request to speak. There is not a mechanism for appeal and a process is not under consideration given these other avenues of connection with Met Council members.</p>

Commenting Organization	Comment	Response
City of Shorewood	<p>Shoreland Regulations            Imagine 2050 should recognize that there are existing state laws that restrict housing density within Shoreland areas. These restrictions generally apply to areas located within 1,000 ft of a lake, which encompasses large areas of the City of Shorewood.</p>	<p>The Met Council supports and implements requirements across all programs the DNR mentions and does not expect communities to accommodate growth in areas that are protected by ordinance or undevelopable because of a multitude of reasons. Net acreage does not include land covered by wetlands, water bodies, public parks and trails, public open space, arterial road rights-of-way, and other undevelopable acres identified in or protected by local ordinances. Communities that believe they are unable to accommodate the growth forecasted for them because of environmental constraints, can contact Met Council staff and revisit their local forecasts. Also, density, at any intensity, and natural systems protection can be mutually beneficial. Compact, dense development accommodates growth on a smaller footprint than less dense development, thereby allowing more land to be protected for natural ecosystem functions. We have updated the Natural Systems goals to reflect all of the state regulatory programs that limit density around lakes and rivers in the metro area.</p>
City of Spring Lake Park	<p>Thank you for the opportunity for the City of Spring Lake Park to comment of the draft Imagine 2050 Plan. The City has appreciated working with Metropolitan Council staff, particularly our sector representative Mr. Wojchik, to learn more about the Imagine 2050 Plan and how it will impact the City.</p>	<p>We appreciate your review of the policies in Imagine 2050 and look forward to working with you on implementation in the coming years.</p>



Commenting Organization	Comment	Response
City of Spring Lake Park	<p>Climate Chapter Implementation: With the introduction of the new climate chapter, as required by the MN Legislature's recent amendment to the Metropolitan Land Planning Act (Minn. Stat. §§ 473.851 - 473.871), we ask the Metropolitan Council to allow cities flexibility in achieving climate goals. We believe there is a significant opportunity to use the Minnesota GreenStep Cities program as a model for guiding local governments in meeting these objectives while considering their unique circumstances and capacities.</p>	<p>When it comes to some of the climate commitments in the policies and actions, some of these are expectations for local governments and some are expectations for Met Council. In most cases, where a minimum requirement is added for local governments, for instance in the area of climate action, that requirement for local governments will be supported by Met Council technical assistance and resources.</p> <p>Minn Stat. § 473.859, subd. 2 Land use plan now requires GHG inventory information along with strategies to reduce emissions in the local planning process. Minn. Stat. § 473.859, subd. 7 Climate mitigation and adaptation includes new requirements for local governments in the areas of climate mitigation and adaptation. Any such new requirements would be supported by Met Council technical assistance.</p> <p>The Council will not be requiring that cities include a Climate Action Plan in their local comprehensive plans. The Council will consider GreenStep membership as a possible method of meeting minimum climate requirements.</p>
City of Spring Lake Park	<p>Thank you for the opportunity for the City of Spring Lake Park to comment of the draft Imagine 2050 Plan. The City has appreciated working with Metropolitan Council staff, particularly our sector representative Mr. Wojchik, to learn more about the Imagine 2050 Plan and how it will impact the City.</p>	<p>Thank you for your kind words.</p>
City of Spring Lake Park	<p>We appreciate the Metropolitan Council's ongoing efforts to address the diverse needs of communities across the region, including smaller, fully developed cities like Spring Lake Park. Our city remains committed to fostering growth and sustainability while maintaining the unique character of our community. We hope that the points raised in this letter will be considered carefully, as they reflect the perspectives and concerns of our residents.</p> <p>Thank you for your attention to these matters. We look forward to continued collaboration with the Metropolitan Council as we work together to achieve the shared goals of equity, resilience, and sustainability for the future of the region.</p>	<p>We appreciate your partnership. Thank you for your feedback.</p>

Commenting Organization	Comment	Response
City of Victoria	<p>The City of Victoria generally aligns with many of the Met Council's policies, particularly in relation to planned growth, environmental protection, and affordable housing. However, from a policy standpoint, we have strong concerns that the current frameworks lack the necessary tools for effective implementation over time. We urge the Met Council to consider strengthening the policies, particularly concerning the availability of long-term solutions and flexibility for localities to adapt to evolving conditions and needs.</p> <p>Thank you for the opportunity to provide input. We look forward to continuing our collaboration with the Metropolitan Council and hope that these concerns can be addressed in a way that enables cities like Victoria to effectively meet regional goals while maintaining the integrity of our community's vision.</p>	Thank you for your feedback.
City of Woodbury	<p>The Imagine 2050 Plan notes that the Council will take a stronger approach if necessary, regarding climate change, but does not provide any specifics for what such approach might look like. More thought and detail on this initiative is needed.</p>	<p>The Met Council is bound by the State's Climate Goals, and therefore the State's climate targets are also those of the Met Council. The Met Council laid out three Climate commitments under the Climate Goal in Imagine 2050. Given that this goal is cross-cutting, all the Met Council system and policy plan chapters that form Imagine 2050 have Climate commitments within them. This includes land use, transportation, regional parks and trails, water, and housing chapters. The Met Council will endeavor to consolidate all of these commitments into a single source for the public to easily understand and access.</p>

Commenting Organization	Comment	Response
City of Woodbury	The City of Woodbury has identified Environmental Stewardship as a strategic initiative. The City is preparing to adopt an Environmental Stewardship Plan in late 2024, and the Imagine 2050 Plan, and all required Comprehensive Plans, should acknowledge and credit the work of these locally led initiatives when evaluating future system requirements versus establishing rigid requirements and redundant work efforts.	The Met Council appreciates this effort and will work towards acknowledgement of local efforts as a means to meet minimum requirements in climate and natural systems minimum requirements to avoid duplication and redundancy in the work. There may be instances where a City can meet requirements via reference to other relevant work. However, conformance to system plans, consistency with regional policy, and compatibility with plans of adjacent and affected jurisdictions are reviewed as part of the local comprehensive plan review process. The City's checklist of minimum planning requirements for its local comprehensive plan will be released with the update to the Local Planning Handbook in late 2025. The Met Council looks forward to continuing to coordinate with local governments as these resources are developed.
City of Woodbury	The City of Woodbury requests a focus on innovation and information sharing as part of future policy work by the Metropolitan Council. Sharing local success stories and best practices is a major value add as it relates to environmental policy.	This comment is appreciated. The Met Council has been asked to convene more readily on issues like climate and natural systems. We shared stories during the 2040 technical assistance cycle, and we will continue to do so. We will also endeavor to gather local governments together around difficult, multijurisdictional issues to pool efforts, work efficiently, and avoid duplication.
City of Woodbury	The Imagine 2050 Plan establishes robust goals and desired outcomes but, in most cases, does not identify the implementation roadmap. The City of Woodbury reserves a significant portion of our comments until the implementation plans and system statements are provided for evaluation.	Thank you for your comment. We recognize the complexity of achieving regional goals and the variety of actors and partners across the region that are important to success in those goals. The policy chapters outline objectives, policies, and actions that the Council can undertake, that we encourage and support local governments in leading, and additional partnerships we wish to build or strengthen to advance those regional goals.

Commenting Organization	Comment	Response
City of Woodbury	<p>The Imagine 2050 Plan has a significant number of goals and forward-looking statements. When evaluating the plan, it is nearly impossible to discern what portions of the plan will create a requirement/ obligation and what portions are aspirational. This ambiguity makes commenting on a document of this length challenging. In several places the term incentivize is used. The Council should not create plan requirements that obligate financial allocation of local resources to meet plan elements. In several places the term support is used. It is difficult to comment on these statements without understanding if the Council intends on requiring communities to support initiatives or if the Council is providing best practices in a facilitative role.</p>	<p>We recognize the importance of providing additional clarity in the plan and have proposed revisions in the policy chapters to provide that clarity. In addition, local comprehensive plan requirements will be further detailed in the Council's Local Planning Handbook, which is planned for an update to support the 2050 round of local comprehensive planning.</p>
City of Woodbury	<p>The City of Woodbury appreciates the opportunity to comment on the Draft Imagine 2050 Policy Plans. The City looks forward to continuing its partnership with the Metropolitan Council ("Council") to make the Twin Cities area a prosperous, equitable and resilient region with abundant opportunities for all to live, work and thrive. Below is a brief summary of review comments of your draft plan. This letter is not intended as an exhaustive list of all the City of Woodbury's comments and the City reserves the right to provide additional comments as additional context, interpretation and implementation steps are provided. We look forward to meeting with the Metropolitan Council leadership and staff to further discuss these points and others throughout the continued open and transparent process.</p>	<p>Thank you for your feedback. We appreciate your partnership.</p>

Commenting Organization	Comment	Response
Dakota County	<p>On behalf of the Dakota County Board of Commissioners, thank you for the opportunity to comment on the draft Imagine 2050 Policy Plans for the Metropolitan Region. This letter includes comments on the draft 2050 Transportation Policy Plan, the draft 2050 Parks Policy Plan, and the draft 2050 Water Policy Plan.</p> <p>The 2050 Regional Parks and Trails Policy Plan provides the framework needed for the regional park implementing agencies to manage and improve the metropolitan regional park system and guides regional park investments that are important to the citizens of Dakota County.</p> <p>The plan provides goals and strategies related to wastewater, water supply and surface water planning, management and operation. All of these issues are important issues to the citizens of Dakota County.</p> <p>Roughly 96% of households in Dakota County are served by a wastewater treatment facility. The remaining 4% of households have subsurface treatment systems (SSTS), systems that require maintenance and a cost-effective means for disposal.</p> <p>About 95% of Dakota County's water supply is from groundwater. Several municipalities within Dakota County are in the top 20 groundwater-based water suppliers in Minnesota. In addition, Dakota County is among the highest users of agricultural irrigation groundwater in Minnesota.</p> <p>Thank you for your consideration. We appreciate your attention to these comments and look forward to working with you towards final versions of the Imagine 2050 Policy Plans that will best serve the needs of the Twin Cities region through 2050.</p>	<p>Thank you for your review of the draft Imagine 2050. We look forward to continued partnership and collaboration as we turn toward implementation.</p>
Freshwater	<p>We appreciate the four core values of stewardship, accountability, leadership, and equity. One area to highlight further within these values is partnerships and the collaboration needed to achieve the goals of the plan. Partnerships with other agencies, utilities, community members, etc.</p>	<p>We agree on the importance of collaboration and partnership, which you will find interwoven in the Regional Values as well as throughout Imagine 2050.</p>
Freshwater	<p>Another point to drive within these goals is to balance economic development while also meeting existing ecosystem and community needs.</p>	<p>Comment noted.</p>

Commenting Organization	Comment	Response
Freshwater	We commend the Met Council for the development of this comprehensive plan that prioritizes plain language in an easy-to-follow, uniform format. These qualities encourage the use of the plan as a reference document for the metro area and a blueprint for other states to model after.	Thank you for your feedback.
Freshwater	To encourage public comment and digestibility, offering multiple ways to view the plan is important, however, we felt that breaking apart the plan impacted the ability of reviewers to see the full picture of the Water Policy Plan and how all aspects are interconnected, which appeared counterintuitive to the purpose of the plan. Similarly, the feedback portions integrated into the website only allowed certain comments as determined by the prompts. While accessible, they were limiting.	We appreciate this feedback.
Metro Cities	Metro Cities monitors Met Council activities and engages with local government members to align policy expectations where Met Council and local government policies intersect. Cities are one of the Met Council's primary constituencies. Metro Cities appreciates engagement and partnership on Imagine 2050, appreciates strengths and challenges, and ways addressed in the plan. Keenly interested in maintaining resilience for the region and all people who live here. Full comments will likely refer to land use, housing, and density requirements and expectations. 2018 comprehensive plan process did raise concerns about suggestions vs. requirements, Met Council vs. city roles, etc.	Thank you for your partnership. We appreciate this feedback.

Commenting Organization	Comment	Response
Metro Cities	<p>The Association of Metropolitan Municipalities (Metro Cities) represents the shared interests of cities in the seven-county metropolitan region at the state and regional levels of government. Cities in the metropolitan area play fundamental roles in the implementation of regional policies, as regional and local growth are primarily managed through city comprehensive plans and public services.</p> <p>Metro Cities' role in monitoring and responding to policymaking activities of the Metropolitan Council was a primary reason for the association's establishment in 1974. Metro Cities also works to foster collaborative working relationships between city and regional officials.</p> <p>Metro Cities greatly appreciates the ongoing outreach and engagement by Metropolitan Council members and staff with Metro Cities and metropolitan city officials, as the regional guide is developed.</p> <p>Metro Cities' review of Imagine 2050 focuses on the intersection of regional and local policies, functions, and responsibilities and the overall effects and implications of regional policies for metropolitan cities.</p>	<p>We appreciate your partnership in integrating local government voices into the policy development process for Imagine 2050. We also appreciate your review of the policies in Imagine 2050 and look forward to continued collaboration with Metro Cities in the coming years.</p>
Metro Cities	<p>Metro Cities appreciates the work of Metropolitan Council members and staff on the guide, and the vision of a dynamic and resilient region articulated in Imagine 2050. The guide and policies also emphasize the need for coordination, collaboration, and information sharing. Metro Cities strongly supports this emphasis.</p>	<p>Thank you for your comment.</p>
Metro Cities	<p>Policy documents include an array of requirements for local comprehensive plans. Policies also contain recommendations and suggestions for local plans. Metro Cities requests that requirements for local plans be clearly delineated and distinct from recommendations, in formal policy documents.</p>	<p>There are several areas where we acknowledge that additional clarity is required. We will make adjustments to more clearly identify if an item is required or not; provide a summary of policies and action by community designation; and clarify roles and responsibilities. Where there are policies and actions that are encouraged by the Met Council, the intention is to provide supportive regional policy language to assist local governments where needed and provide guiding on best practices. While adjustments will be made to the existing policy documents, additional guidance, resources, and support for the local planning process will be provided through the Local Planning Handbook and other technical assistance.</p>

Commenting Organization	Comment	Response
Metro Cities	In a similar vein, several policies describe local actions the Metropolitan Council will 'support' in local plans. Statements of this type imply that the Council will weigh in on local plans beyond its review and comment role in reviewing plans for conformity and consistency with regional systems and policies. These types of statements seem more appropriate for the local planning handbook and other technical assistance and guidance to local officials. Otherwise, Metro Cities is concerned that their inclusion in policy documents could be perceived as a Council requirement.	The Council will review content to better clarify areas where requirements and recommendations may be unclear. "Support" actions often refer to tools, resources, or other technical assistance that the Council will provide to aid local governments who wish to advance those actions.
Metro Cities	Policy documents begin with a plethora of background information and data, with policy objectives explained elsewhere in documents. Actual policy objectives should feature at the front of the policy documents. This would dramatically improve readability and transparency, rather than forcing the reader to hunt for this content.	We understand that the combination of several policy plans into a comprehensive development guide can make objectives and policies more difficult to find. Because different chapters of Imagine 2050 respond to different state and federal requirements, we have organized content accordingly. The Council will develop plan guides, web pages, and reporting documents to aid readers in accessing the content in different ways such as policies and objectives or by goal areas, as we move into implementation.
Metro Cities	Metro Cities has concerns about the lack of any consistent structure among policy documents, which would greatly enhance readability, as well as a high level of duplicative language between plans, which makes it more challenging to discern specific objectives for each of the policies.	The chapters of the plan each contain Objectives, Policies, and Actions. We recognize that differing structures among the chapters can hinder readability. The Council will consider other aids for the final published document to aid readers in navigation.



Commenting Organization	Comment	Response
Metro Cities	<p>Metro Cities appreciates the opportunity to provide comments on the regional guide and policy documents, including feedback, questions and concerns on specific policies.</p> <p>Metro Cities' comments reflect the association's policies relating to Metropolitan Council's policymaking and requirements for metropolitan cities that flow from regional policies. Metro Cities, and city officials throughout the region, take a keen interest in regional policymaking due to the nexus of regional and local planning and service delivery. Metro Cities recognizes the role of the Metropolitan Council in providing regional systems that are most effectively and efficiently provided on a regional scale and opposes requirements that would attempt to exceed the Metropolitan Council's traditional and existing role and authority.</p> <p>Metro Cities staff works day to day with the members and staff of the Metropolitan Council on many issues for which there is close intersection of regional and local responsibilities and appreciates the ongoing communication and collaboration by the Council.</p> <p>As the guide and policies continue to receive review and modification, Metro Cities appreciates the Council's close attention to the intersections of regional and local roles as well as the Council's continued work with Metro Cities and metropolitan city officials on these documents.</p>	Thank you for your feedback. We appreciate your partnership.

Commenting Organization	Comment	Response
Metropolitan Council American Indian Advisory Council	The Council will work to increase regional understanding of the American Indian communities, including historical and contemporary environmental injustices faced by the American Indian communities to address community concerns and maximize direct community benefits for the future.	<p>The Environmental Justice (EJ) Framework implementation in Met Council policy and process is stewarded through the Met Council EJ Taskforce, a cross-divisional team of technical experts in a research, climate policy, sustainability, and more. The EJ Taskforce will support the Met Council in creating regional training opportunities around American Indian communities, with particular focus from the EJ Taskforce on historical and contemporary environmental injustices faced by the American Indian communities in the region. The EJ Taskforce will support in providing educational resources, and accessible, clear, relevant data around environmental injustices faced by American Indian and overburdened communities.</p> <p>The Met Council will also continue ongoing community-centered engagement and relationship building with American Indian communities, including through the American Indian Advisory Council. The Met Council continues its commitment to uplifting and centering American Indian perspectives in its work, including climate and engagement related work.</p>
Metropolitan Council American Indian Advisory Council	The Council will ensure that it produces data and metrics that are clear, accessible, and relevant to the American Indian communities and be accountable to its commitments.	Each policy area and goals will have associated metrics. The Environmental Justice (EJ) Framework implementation in Met Council policy and process is stewarded through the Met Council EJ Taskforce, a cross-divisional team of technical experts in a research, climate policy, sustainability, and more. The EJ Taskforce will use an EJ lens to review policy metrics for accessibility, relevancy, and clarity to American Indian communities, as well as other overburdened communities. As part of the EJ Taskforce work plan, the Met Council will collaborate with overburdened communities, including the American Indian Advisory Council, to incorporate feedback and co-create data and metrics that are clear, accessible, and relevant.

Commenting Organization	Comment	Response
Metropolitan Council American Indian Advisory Council	Policy and Operational Commitment: The Met Council (Council) will adopt an overarching Tribal relations policy that includes a recognition of history and impact, a commitment to staffing and resources to adequately partner with tribes and American Indian communities, a commitment to organizational education, a current Tribal consultation and American Indian community engagement policy, and support for organizational change to implement the commitments throughout the region.	
Metropolitan Council American Indian Advisory Council	Acknowledgment 1. As a responsible government agency, the Council will lead in publicly recognizing the genocide and displacement that American Indian communities survived and continue to endure. a. The Advisory Council is drafting a Land, Water, and People Acknowledgement Statement for the Met Council and to include in Imagine 2050. b. The Advisory Council encourages the Met Council to understand the value of a statement is to increase recognition of the seven-county region as Dakota land and promote action.	
Metropolitan Council American Indian Advisory Council	The Council will work to increase American Indian staff representation across all divisions and specifically hire and support Tribal Liaison(s) to work with Tribal nations and American Indian partners in new and meaningful relationships.	
Metropolitan Council American Indian Advisory Council	The Council will work in partnership with American Indian organizations and leaders to develop regional tools, resources, and guidelines to mitigate the volume of individual requests received by American Indian organizations. Topics include, but are not limited to, restoring or developing indigenous place names and land management practices.	
Metropolitan Council American Indian Advisory Council	The Council will create a reparative action fund to finance mitigation measures for known and acknowledged past harms to the environment, to Indigenous communities, to Black communities, and communities of color unjustly harmed by past local or Council actions.	

Commenting Organization	Comment	Response
Metropolitan Council American Indian Advisory Council	<p>Organizational Education</p> <ol style="list-style-type: none"> <li>1. The Council will develop a required internal Tribal relations training program and expectations and support for staff to engage in ongoing learning and action.</li> <li>2. The Council will work with partners to explore development of a regional Tribal Relations training course that would be available to local government staff and regional leaders.</li> </ol>	
Metropolitan Council American Indian Advisory Council	The Council will update its Tribal consultation policy to require robust and proactive engagement with Tribal governments and relevant community organizations, following best practices and international rights for indigenous peoples. The policy will be easily accessible, include expectations for engagement beyond consultation, and establish guidance for conflict resolution.	
Metropolitan Council American Indian Advisory Council	In support of consultation and proactive engagement, the Council will provide funding for Tribes to conduct their own site analysis in advance of and throughout large construction projects.	
Metropolitan Council American Indian Advisory Council	The Council will consider convening a permanent tribal relations body to support relationship building within transportation and transit projects and operations to ensure American Indian community knowledge and perspectives inform decisions and practices.	
Metropolitan Council American Indian Advisory Council	The Council will consider formalizing American Indian representation on the Council itself as well as through advisory councils and committees.	
Metropolitan Council American Indian Advisory Council	In partnership with the Governor's office, the Council will consider requesting the addition of new district seats to represent the American Indian peoples of the region.	

Commenting Organization	Comment	Response
Metropolitan Council American Indian Advisory Council	The Council will establish a permanent American Indian Advisory Council to continue to guide Council activities and hold the Council accountable to its commitments. The Council will continue to support the Advisory Council in its current form on an interim basis to develop an implementation strategy for commitments adopted as part of Imagine 2050.	
Metropolitan Council American Indian Advisory Council	The Council will work to restructure its relationship with urban American Indian organizations by establishing formal relationships (i.e., Memorandum of Understanding, or other structure) to provide ongoing engagement, resources, and support for the American Indian communities in the region as it relates to the Council's work.	
Metropolitan Council American Indian Advisory Council	The Council will update its real estate policy for the disposition of Council-owned land to prioritize partnership with and the needs of Tribal nations and American Indian communities. If opportunities to return land arise, the four Dakota tribes of Minnesota must be involved and consulted.	
Metropolitan Council American Indian Advisory Council	Regional Policy Commitments The Council will adopt policies supporting the wellbeing of Indigenous communities as a part of the regional development guide, affirming the priorities of the American Indian Advisory Council.	

<p>MN350</p>	<p>One aspect missing from the Imagine 2050 plan is food. The Climate Action Work Plan states that it is the responsibility of the Environmental Justice Task Force to create communities where residents can “live in a clean, safe environment and have a healthy quality of life.” If this is to be the case, it is crucial that food justice is woven into various aspects of the plan. Minnesotans facing health issues from food insecurity, agricultural pollution, and chemical food enhancers deserve a plan that will put their dietary health first. The MN350 Food Justice Team believes that aspects of the Imagine 2050 Plan should incorporate factors such as community gardens in parks, public transportation to grocery stores, and affordable housing outside of food deserts.</p>	<p>Food systems planning is an important component of climate action because it enhances community resilience. Minn. Stat. § 473.859, subd. 7 Climate Mitigation and Adaptation requires new minimum requirements for local governments in the areas of climate mitigation and adaptation. Any such new requirements would be supported by Met Council technical assistance.</p> <p>In line with State statute, the Council may require local governments to make commitments related to food systems planning. The Council would develop technical assistance to help communities to make meaningful commitments which match community vision.</p> <p>Imagine 2050 includes food justice related policies in both the Land Use and Transportation policies. Land Use Objective 7, Policy 7 includes 5 Actions focused on food access and food security. Council staff heard from local food advocates and residents about the need for food policy within the land use plan of Imagine 2050, and we include this policy and set of actions to address some of those needs.</p> <p>Met Council will likely be expecting a commitment to supporting food systems planning within the local comprehensive plans. This can be through commitments to local ordinance changes to encourage more local food production through encouragement on incentives towards urban farming, or the same for small scale producers' sale of locally sourced produce to residents.</p> <p>The Transportation Policy Plan Overview chapter discusses transportation connecting us to the places and people we need to live our lives. Transportation supports health by providing access to a wide range of needs and services, which includes affordable, fresh, and culturally appropriate food. This chapter of the Transportation Policy Plan acknowledges that lack of access to destinations can result in insufficient amounts of nutritious foods. Specific policy actions in the Transportation Policy Plan related to food systems include:</p> <p>Transportation Policy Plan 13I - Provide multimodal connections to essential destinations, including cultural and social community gathering places and grocery stores</p> <p>Transportation Policy Plan 13K - Define, inventory, and map essential destinations to aid local and regional partners to connect communities to destinations and improve public health outcomes. Expand accessibility analyses to include essential destinations when defined and inventoried.</p> <p>In addition to these elements of the Transportation Policy Plan, Metro Transit's bus service planning processes address</p>
--------------	--	--

food access in the following ways:

- Local bus routes work together to connect people to activity centers and commercial corridors, which often include grocery stores.
- Grocery stores as end-of-line anchors can be good service design because they are useful to riders (shoppers and employees) as well as operations (restrooms, turnarounds, layovers).
- Access to affordable grocers, including big box stores, can be useful to more riders than access to more expensive specialty grocers.
- Grocery stores, especially in suburban locations, are not always designed with robust pedestrian access in mind (e.g. missing or inadequate sidewalks, large parking lots that widen the distance between store entrances and the street). Stores are often served by bus stops on the street, which in some cases could require significant walking/rolling to the front doors; otherwise providing front-door access to a grocer can require deviating into a shopping center which requires more travel time than a route might have available.
- Recent closures of grocery stores, including in North Minneapolis, Brooklyn Center, and Brooklyn Park, impact riders and in one instance impacts operations. Our transit network makes it possible in many cases for riders to access alternative grocers, but we also plan for opportunities to improve or expand grocery access in order to meet evolving transit market needs.
- Metro micro provides on-demand, point to point microtransit service within a 5.5 square mile zone in North Minneapolis. Rides on micro cost the same as express fare, and micro accepts all Metro Transit passes and discounts including \$1 Transit Assistance Program fare. Cub Foods is the top destination in the zone, and riders have the convenience of getting picked up and dropped off at the front entrance. The zone also includes multiple food shelves and a former ALDI, where locally-owned Colonial Market is anticipated to open later this year. As micro expands to new pilot zones over the next several years, starting with Roseville and Woodbury areas in 2025, service boundaries will be developed with consideration for access to healthy, affordable food.

The Environmental Justice (EJ) Framework implementation in Met Council policy and process is stewarded through the Met Council EJ Taskforce, a cross-divisional team of technical experts in a research, climate policy, sustainability, and more. The EJ Taskforce will support these policies with the lens of the EJ Framework.

Commenting Organization	Comment	Response
MN350	<p>We are excited to take this opportunity to provide comments on the draft Imagine 2050 Policy Plan. Minnesota 350 (MN350) is a people-powered organization working to transition to a just-clean energy future. We have several different campaigns we lead and engage with. Those campaigns are: Clean Transportation, Food Justice, Transit Justice/Anti-Displacement, Missing and Murdered Indigenous Relatives (MMIR) and our C4 Policy work. Through these campaigns, we engage with community and mobilize folks around the issues that are directly impacting them in their environments. Each campaign's progress also leads to advocacy and change to related policies and legislature. MN350's work prioritizes frontline communities, those most impacted by climate change and the perpetuation of environmental injustices. Our organizers have in-depth field experience, engaging with communities who have been historically marginalized and disenfranchised.</p>	<p>Thank you for your comment.</p>
MN350	<p>We are excited to continue seeing the efforts put forth by the Metropolitan Council as they create more opportunities for input from community members, stakeholders, and organizations that work directly with the communities the Imagine 2050 plan prioritizes. We appreciate the opportunity to provide insight and comment on key issues affecting frontline, and metro communities across the state of Minnesota.</p>	<p>Thank you for your comment. We appreciate your engagement in the regional planning process.</p>
National Park Service	<p>Support for Vision and Goals  We fully support the Land Use Policy's commitment to compact growth and environmental stewardship, which resonates with NRRRA's efforts to balance sustainable development with the preservation of the river's unique natural and cultural assets. We are also in support of the Parks and Trails Policy's focus on increasing equitable access to parks and open spaces, particularly for underserved communities. The vision of expanding natural systems protections and integrating more open space into the regional framework will undoubtedly strengthen the region's ecological health.</p>	<p>We appreciate your support and shared goals. We look forward to continued collaboration to advance this vision.</p>



Commenting Organization	Comment	Response
National Park Service	The Mississippi National River and Recreation Area (NRRA) is pleased to provide comment for vision and goals of the Draft Imagine 2050 Policy Plan and commends the Metropolitan Council for its emphasis on envisioning an equitable, resilient, and sustainable future for the Twin Cities region. The Land Use Policy, Parks and Trails Policy, and Water Policy Plan closely align with NRRA's mission to protect and enhance the Mississippi River's natural, historical, recreational, cultural, scenic, scientific, and economic resources.	We appreciate your review of the policies in Imagine 2050 and look forward to collaborating with you on implementation in the coming years.
National Park Service	Overall, the Draft Imagine 2050 Policy Plan sets a forward-thinking path for the Twin Cities. By enhancing alternative transportation networks, and emphasizing the Mississippi National Water Trail and unique visual resources of the river, aligning potential new river crossings with the Mississippi NRRA Comprehensive Management Plan policy, and strategically acquiring and protecting lands as open space and parks, the Plan will not only promote sustainable and equitable growth but also safeguard the Mississippi River's national significance as a vital natural and cultural resource for future generations.	Thank you for your comment.
Neighbors for More Neighbors	Neighbors for More Neighbors is an organization that supports secure and abundant homes for everyone in the Twin Cities. Overall, we would like to offer strong and qualified support to the goals and policies described in the current Housing, Land Use, and Transportation drafts of Imagine 2050.	Thank you for your comment and we appreciate your support for Imagine 2050.
Neighbors for More Neighbors	Imagine 2050 rightly recognizes we cannot address the environmental and social issues of the 2030s and 2040s with the land use and housing policies of the 1920s and 1960s. Those policies have created a metropolitan area which, to quote the document, is "fully developed" in one important sense: the outer bounds of our urbanized area have been defined. We support the vision of Imagine 2050 to allow future population and household growth to occur within the existing boundaries of the urbanized area. To realize this vision, it is important for municipalities to relax the significant constraints they have placed on housing choices and options in the Twin Cities.	Thank you for your comments.

Commenting Organization	Comment	Response
Scott County	<p>The Scott County Board wants to emphasize strong concerns regarding the following:</p> <ul style="list-style-type: none"> <li>• The Vision, Values and Goals introduction is very disappointing. This is a vibrant region that has historically had strong planning and capital investments. We have the 14th largest metropolitan economy and that is due to a strong highway system that moves goods and services, vibrant parks and activities for all seasons, and a continuum of housing from entry to senior and urban to rural. It is why people choose to start businesses, work, and live here. That should be the foundation of this plan and foundation for the future. This chapter should focus more on the positive foundation of this region. This part of the plan is also too long and adds little value for local governments who need to utilize this plan.</li> <li>• The 2050 Plan has become long and onerous. The plan is repetitive and hard for small agencies to even manage reading let alone comment on. It reaches far beyond the purpose of a regional system plan, which is the coordination of the metropolitan highway system, regional park preservation and planning, and long-term sanitary sewer operations.</li> <li>• The Plan further asserts Metropolitan Council authority and erodes the decisionmaking powers of local governments.</li> <li>• The Plan prioritizes special interests rather than the 3.2 million people that rely on this Plan for livability and economic prosperity who are best represented by their elected local governments.</li> <li>• Some of the studies are indicative of predetermined outcomes rather than impartial evaluations of current conditions. For example, the title of the Metropolitan Highway Harm Study implies a predetermined outcome. The metropolitan highway system, which connects our region to the rest of the state and the nation, is critical to our economic viability.</li> <li>• How were Community Designations identified? For example, Jackson Township, which is mostly rural in nature, is categorized as Suburban Edge. This is the same categorization for the City of Savage, which is fully built out. These designations are critical when cities compete for housing and transportation funding and must reflect the true character of the community.</li> <li>• There is no mention of the preservation of park land for growing communities in this Plan. The County Board recently</li> </ul>	<p>We have updated the introduction section (Landscape of the Region) to highlight the strengths of region and the successes of the region's coordination of planning together. The Council is tasked with creating a long range plan for the orderly and economical development of the region and is directed to consider a broad range of issues under statute. We have revised the introduction to include the full statutory text of guidance for the development guide.</p> <p>The Transportation chapter discusses the benefits of the highway system for accessibility and mobility for people and freight, and identifies multiple studies, completed and upcoming, to further identify the benefits of the highway system. The Freeway Harms Study is a first-of-its-kind comprehensive study that will systematically define and measure the externalities caused by the highway system, including both positive and negative impacts, and identify opportunities and best practices to minimize and mitigate negative impacts.</p> <p>Community Designations were updated for the Imagine 2050 process. The methodology and process is described in materials available on the Council's website. They foundational factors in the analysis are described in the Land Use Policy document in the Community Designations section. Jackson Township is identified as a Suburban Edge community because of the Orderly Annexation Agreement with the City of Shakopee, whose comprehensive plan guides its future land use pattern.</p> <p>The Parks Chapter of the Regional Development Guide prioritizes the protection and enjoyment of regional parks and trails throughout the region. Additionally, Council staff remain actively engaged with Scott County staff assisting in the acquisition and protection of Scott County regional parks and trails land.</p> <p>The Met Council's analysis of available land supply within the 2040 MUSA shows that under currently planned land uses in approved plans that there is sufficient land to support 2050 forecasted growth with additional room to grow beyond that. However, the language will be adjusted to focus on land supply availability within the planning horizon. While that doesn't change the facts around land supply availability, it is helpful to understand how this impacts local conversations. The Met Council is committed to continually assessing the</p>

Commenting Organization	Comment	Response
	<p>met with the Chair of the Metropolitan Council, the Regional Administrator, and our two members to specifically raise a concern regarding this critical topic and has also raised with parks staff for the past year.</p> <ul style="list-style-type: none"> <li>• The Plan shows the Metropolitan Urban Service Area (MUSA) boundary is adequate for 100 years. The County Board is seriously concerned about the impacts of this statement as it will lead to increased housing costs and will encourage leapfrog development outside the metropolitan planning area.</li> </ul>	<p>availability of land within the MUSA to ensure a 20-year rolling land supply to avoid the impacts that you have noted.</p>
Scott County	<p>In the section of this planning document on the Metropolitan Council's role in addressing climate change, the Board notes the following paragraph: "Landfills, waste-to-energy facilities, composting and recycling strategies for the region are overseen by the Minnesota Pollution Control Agency. As such, Imagine 2050 does not focus on policies and actions that reduce solid waste-related emissions and instead defers to the MPCA's plan." This Board believes that decisions being made by local units of government to close waste-to-energy facilities, move organic waste from one county to another, and truck solid waste to landfills across the metropolitan area is a regional issue—a regional emissions issue in particular—that may need the Metropolitan Council's attention in future planning cycles, similar to its current role in housing (even though this is not a statutory system under the Council's authority). This Board will welcome conversations with the Metropolitan Council and the Minnesota Pollution Control Agency (MPCA) on ways to better plan for and coordinate the movement and management of solid waste in our region.</p>	<p>The commenter's comment on the need to convene on this issue is something the Met Council would be open to coordinating, between internal Council work units (land use and transportation) and external partners (counties, cities, and waste management). Council staff have made an addition to Land Use Obj 7 (Climate), Policy 1 (Mitigation) to include the need to collaborate with counties, local governments, and transportation authorities to reduce greenhouse gas emissions associated with waste management.</p>
Scott County	<p>It is notable that while much discussion in this document is given to equity, inclusion, and historical and environmental injustice issues to inform the regional policy plans and infrastructure investments, there is no focused discussion on the overall aging of the region's population and how that demographic shift informs regional policy plans and infrastructure investments.</p>	<p>The needs of a growing aging population and accessibility for those with disabilities are embedded in and have informed the policy areas, and we agree that more pronounced discussion up front is valuable. Revisions have been made to the Landscape of the Region section of Imagine 2050, as well as in other parts on both aging and disability.</p>

Commenting Organization	Comment	Response
Twin Cities Housing Alliance	<p>Thank you for the opportunity to comment on the Draft Imagine 2050 plan for an equitable and resilient future. The Twin Cities Housing Alliance (TCHA) is a collaborative network dedicated to addressing the housing challenges and strengthening community vitality in the Twin Cities region. Our network of over 90 experienced housing professionals advocate for policies to create a more affordable, equitable, economically vital, and environmentally sustainable future for the Twin Cities community.</p>	<p>We appreciate your review of the policies in Imagine 2050 and look forward to collaborating with you on implementation in the coming years.</p>
Washington County	<p>On behalf of the Washington County Board of Commissioners thank you for the opportunity to review and comment on the draft Imagine 2050 Policy Plan. This plan will serve as the long-range plan for the next 20 years for land use, housing, transportation, regional parks, and water in the 7-county metropolitan area.</p> <p>As a growing county with over 260,000 residents and landscapes that range from urban to suburban to rural, we are encouraged to see the draft Imagine 2050 clearly emphasizes the cross-functional work of natural systems, public health, safety, climate change, equity, and well-being. The Metropolitan Council's values are aligned with the County's recently adopted core values of caring, collaborative, equitable, ethical, fiscally responsible, responsive, and sustainable.</p> <p>The development of Imagine 2050 is beginning of the 2050 Comprehensive Plan process for the Twin Cities region. The county is appreciative of the opportunity for elected officials and staff to participate in the development of each individual policy plan. Washington County looks forward to continuing to collaborate with the Metropolitan Council as well as the region to implement policies and guidelines to build a stronger region.</p> <p>Washington County has reviewed the draft Imagine 2050 Policy Plan and comments for each policy plan are attached. Thank you again for the opportunity to review and comment.</p>	<p>We appreciate your review of the policies in Imagine 2050 and collaboration as part of the development of the plan. We look forward to working on implementation in the coming years.</p>
Washington County	<p>Washington County is pleased to see objectives, policies and actions woven throughout Imagine 2050 and the various Policy Plans that recognize the connection between the built environment (land use, transportation, access to food, parks, and housing) and opportunities for health.</p>	<p>We appreciate your review of the policies in Imagine 2050 and look forward to working on implementation in the coming years.</p>

Commenting Organization	Comment	Response
Washington County	<p><b>Equity</b>            In the Partner actions, we encourage the Council to participate and partner with the Homeownership Opportunity Alliance as they are already convening a regional group of people and organizations actively working to reduce the homeownership disparity gap.</p>	Comment noted.
Washington County	<p><b>Stability</b>            In the Provide actions, we appreciate the inclusion of an action that prioritizes developments that incorporate supportive services for allocating project-based vouchers; however, this may have unintended consequences. We are seeing a number of supportive housing providers struggle to fund the ongoing supportive services. We are seeing non-profit providers reduce services in order to survive. The requirement has to also come with secured and long-term funding to be successful. In addition, Washington County is at a disadvantage as the allocation of Housing Choice Vouchers is less per capita than any other county in Minnesota. We encourage Metro HRA to continue offering project-based vouchers within the jurisdiction of Washington County.</p>	Comment noted, the Housing Policy Plan outlines a commitment to continue to provide Project Based Vouchers, especially for developments with support services under Objective 3 in the Provide section.
Washington County	<p><b>Options to Own and Rent</b></p> <ul style="list-style-type: none"> <li>• Within the Provide actions, we strongly support the action of exploring financial support or other resources to reduce SAC charges for deeply affordable housing units. The CDA has been developing its own policies and funding resources to incent developers to include deeply affordable units (30% of the Area Median Income). We have found that it takes a significant amount of subsidy to make the rents pencil out. Anything the Council can do to incentivize or reduce costs for deeply affordable housing would be helpful.</li> <li>• This Housing Policy Plan acts as a jobs strategy for many communities. Many of the jobs available in Washington County will only be filled by employees within a short commuting distance. We encourage Metropolitan Council to look at how their investments in transit, transportation, and water boost and hinder the ability to meet the future affordable housing need as well as the ability to grow, build, and sustain strong communities.</li> </ul>	Thank you for your comment. The HPP strives to provide assistance through programming as well as financial resources (such as SAC fee reductions alongside other affordable housing grants) to help provide subsidy and reduce barriers to constructing affordable housing across the region, recognizing the specific need to prioritize assistance for deeply affordable housing. Objective 2 Actions commit to, in partnership with Environmental Services, updating the SAC reduction policy to reflect publicly subsidized affordable housing developments, and explore changes for deeply affordable housing projects.

Commenting Organization	Comment	Response
Washington County	<p>Geographic Choice:</p> <ul style="list-style-type: none"> <li>• Within the Provide actions, we would encourage Metropolitan Council to consider offering LCA program funding for deeply affordable housing outside of Minnesota Housing's RFP process. For example, developers who utilize private activity, tax exempt bonds with 4% Low Income Tax Credits as their primary financing will generally have relatively small funding gaps. The timing of the bonding applications and 120 day closing deadline do not align well with the super RFP timelines.</li> <li>• Within the Plan actions, we would encourage Metropolitan Council to consider other factors beyond high density residential land guidance to demonstrate plans for meeting a local allocation of Future Affordable Housing Need. Some Washington County communities have infrastructure limitations which cannot support higher densities. We have witnessed how land guided and zoned for high densities did not result in affordable residential units.</li> </ul>	<p>Thank you for these suggestions. We will continue to offer funding for housing development outside of the RFP process (with the current exception of our LHIA program). We will also develop a system for attributing credit for cities and townships who have successfully adopted affordable housing development policy, as defined by Met Council, towards meeting their requirement for eligible land guided for affordable housing.</p>



390 Robert Street North  
Saint Paul, MN 55101-1805

651-602-1000  
TTY 651-291-0904  
[public.info@metc.state.mn.us](mailto:public.info@metc.state.mn.us)  
[metro council.org/imagine2050](http://metro council.org/imagine2050)

**IMAGINE  
2050**