

# 2050 LAND USE POLICY PLAN

Public comment summary

January 2025



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

# Regional vision

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 wellbeing.

### **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.



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## Public comment period

The Metropolitan Council accepted public comments from August 15 through October 7 through various channels, including email, phone, mail, recorded message, an online comment portal, and a public hearing on September 25. During that time, approximately 2,000 total comments were received from approximately 500 organizations and individuals. Specifically, the draft Land Use Policy Plan received approximately 500 comments from 45 cities, three counties, four non-governmental organizations, two townships, one state agency, one federal agency, and 42 residents of the region.

For individuals who commented on the draft Land Use Policy Plan and provided voluntary demographic data, the following data are available:

### Gender

- 59% identified themselves as men
- 34% as women
- 7% preferred not to answer.

### Age

- 18-24: 8%
- 25-34: 19%
- 35-44: 27%
- 45-54: 8%
- 55-64: 27%
- 65-74: 11%

## Summary of feedback

### Selected quotes

“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. Specifically land use and transportation. The County's role in land use is limited to shore land areas in the unincorporated areas of the County. We retained this role to protect our valuable water resources and related ecosystems. We also protect high value habitat through our Land and Water Legacy Program. The County supports the Council's policy to direct growth away from sensitive ecosystems and water sources and the policy to identify natural systems to protect and restore.”

“We support the recognition of the role food systems plays in climate resiliency. We appreciate the scope that the actions in this policy contain.”

“Overall development strategy. Carver County generally supports many of the land use goals included in the policy plan. Most goals align well with goals included in the County's 2040 and earlier Comprehensive Plans. In particular, the intention to maintain the agricultural use and character of the rural area until urban development and infrastructure are ready to grow.”

“We strongly support the policies to:

1. Require municipalities to allow at least 4 units/acre within the MUSA,
2. Require municipalities to allow diverse housing types on all residential land, and
3. Carefully plan expanded areas where higher density housing near transit stops and existing or planned businesses are permitted.”

## Major themes

### *Growth management*

- Supportive of the broadening of rural and agricultural policies.
- Appreciated clarity on MUSA expansion and supportive language for areas with orderly annexation agreements.
- While supportive of flexibility, clarification on what that means was commonly requested along with clarification on implementation.
- Minimum density requirements in Suburban Edge areas were the most received area of concern/ opposition.
- Few comments on minimum density requirements for other community designations, around transit station areas, or for affordable housing.

### *Transportation*

- Strong support for the coordination of land use and transportation planning to achieve regional goals, especially by improving quality of life and reducing vehicle miles traveled and greenhouse gas emissions.
- Many comments focused on how to achieve the intent of the policy, rather than questioning the rationale of the policy.
- Clarification of the intent or application of policies and actions.
- Concern that all of the policies and actions applied to every community.
- Some concerns about increasing required densities (from 3 to 4 u/a) would overwhelm local roads.
- Concerns about funding availability for transportation infrastructure.

### *Community well-being and safety*

- Strong support for providing local public spaces that are vibrant, accessible, safe, and broadly appealing.
- Strong support for providing local public spaces that are vibrant, accessible, safe, and broadly appealing.
- Desire for Met Council funding support to improve public places and enhance amenities

### *Natural systems*

- Support for prioritizing the protection, enhancement, and restoration of natural systems.
- Interest on what is meant by natural system corridors and specifics on how to achieve policies.
- Concern that accommodating density means foregoing natural systems protections or that protecting corridors would constitute a "taking" in some cases.

### *Housing*

- Consistent focus on the need for diverse housing options to address affordability and accessibility challenges.
- Acknowledge importance of equitable access to housing and economic opportunities for marginalized communities.
- Concern about policies requiring multiple housing types within single land use categories and tension between regional policy and local autonomy.
- Opportunity to provide more practical guidance including clear definitions and funding mechanisms.

### *Equity*

- Support for equity related policies and Met Council's commitment to achieving equitable outcomes.



- Clarification on expectation to implement equity related policies by local governments
- Opportunity to provide technical assistance to encourage curiosity from questions like “What does that look like?”

### *Climate Change*

- Strong support for the mitigation adaptation commitments, especially from local govts and energy non-governmental organizations.
- Positive reaction to inclusion of food security/access
- Clarification on terminology, like the phrase “nature-based solutions.” Clarification on requirements to dedicate financial resources to complete climate work.
- Local governments requested support for this new body of work

### *Economic Well-being*

- Acknowledgement of the importance of addressing economic equity but questions about the lack of legal authority to implement in the private sector.
- Concerns about resources or capacity to implement initiatives effectively, esp. where there may be a limited local regulatory role.
- Questions about engagement requirements in the comp plan process.
- Need for clearer, more specific policy language to ensure practical implementation and alignment with local capacities.

### **Proposed revisions**

Proposed revisions to the 2050 Land Use Policy Plan include:

1. Updated Community Designations
2. Added clarity for commitment to a balanced and flexible approach to administrative guidelines
3. Added clarity for Orderly Annexation Area policies
4. Added Roles and Responsibilities Section
5. Added Implementation Section outlining at a high level, technical assistance and funding resources for local comprehensive planning.
6. Clarifications related to area descriptions, roles and responsibilities, terms
7. Removing duplicative actions

## **Public comment data**

The following section provides a full output of all the public comments received during the formal public comment period for the Land Use Policy Plan.

### **Online portal participants**

There were approximately 40 people who participated in the Land Use Policy Plan topics on the online portal. Thirty-two provided their names:

Anthony Albright  
 Jamie Banken  
 Austin Bell  
 Andrew Boucher  
 Valentine Cadieux  
 Sophia Curran-Moore  
 Christopher Danner  
 Lynn Diaz  
 Ann Dwenger  
 David Fashant

Catherine Fleming  
 Sara Haggerty  
 Matthew Hallet  
 Franklin Hotzel  
 Jeffrey Johnson  
 Kara Komoto  
 Linus Langer  
 Todd Larson  
 William Markert  
 Charlie Meyers

Malachi Moser  
 Kenny Niemeyer  
 Andrea Ostergaard  
 Clara Sandberg  
 Emily Smoak  
 Lia Spaniolo  
 Soren Stevenson  
 Bill Tiedemann  
 Sara Van Asten  
 Jonathan Vlaming

**Data from online comment portal**

**Full Land Use Policy Plan**

**Question: Which land use policies align with your community's and/or organization's priorities?**

<p>Anoka, Champlin, Dayton.</p>	<p>Comment noted.</p>
<p>To be truthful, none. You have no business telling cities how to plan their cities development and land use. It is up to the city to do this.</p>	<p>While the Met Council provides the guidance to manage growth and development in the region per Minn. Stat. 473.145, local governments determine their local priorities. Maintaining community character is a common priority of local governments. To do that, the City of Credit River determines where and when growth happens, within the regional planning framework required by state statute.</p>
<p>P1: Incorporating Indigenous approaches, values, and practices in management of land and water sources                  P2(A1): Accommodate orderly and economical regional growth through efficient land use practices to reduce the cost of infrastructure expansion                  P4: Encourage redevelopment, infill, and adaptive reuse as part of development priorities                  P1. Maximize opportunities for residential growth and supportive commercial growth in areas with mixed land uses that offer multiple travel choices.                  P3. Support community-led planning and anti-displacement efforts to ensure community cohesion during change resulting from public investments and market demand, at all scales of development.                  P4: Plan for and build an interconnected system of local streets, pedestrian, and bicycle facilities that prioritize the individual experience in planning for transit, bicycling, walking, and rolling.                  P6. Prioritize the preservation, restoration, and enhancement of environmental and natural systems near transportation features and areas where transit is available                  P1. Prioritize planning policies and practices that support mixed-use development, walkable neighborhoods, easy access to transit, and enhanced connectivity through biking and other sustainable transportation options.                  P2. Revitalize and strengthen communities at the neighborhood level by planning and maintaining public spaces for community gatherings to foster a sense of belonging and ownership.                  P4. Protect and preserve historic and cultural assets to enhance community heritage and identity in alignment with the unique needs of each community.                  P5. Incorporate universal design principles that consider the needs of all community members of various cultural backgrounds, age groups, languages, abilities, and gender identities.</p>	<p>As part of the comprehensive planning process, the Metropolitan Council provides cities with technical assistance and best practices to help meet these goals. The Metropolitan Council is committed to an inclusive, and sustainable economy that values businesses owned by people of color and immigrants and is resilient to the effects of climate change. Cities are encouraged to engage with Tribal nations and underrepresented communities in the planning process to ensure diverse voices are heard. We are here to support local governments in developing plans that promote sustainable industries and equitable economic growth, ensuring that all communities have access to economic resources.</p>

P2. Establish and connect natural systems corridors through land use, water resources, and conservation planning.

P3. Prioritize the protection, restoration, and enhancement of natural systems in overburdened communities to build local resilience.

P5. Utilize planning and development processes to enhance wildlife habitat and pollinator plantings, including native and climate adaptive species, across land and water.

P1. Allow for more than one housing type within residential land use categories to encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people.

P3. Prioritize a variety of housing types across all income levels close to local destinations including neighborhood centers, public parks, transit nodes where applicable, and community gathering spaces.

P1. Take ownership of past harms, provide transparent communication, and hold all government partners accountable to plans and actions. Communities should hold the Met Council accountable to action on these issues.

P2. Prioritize engagement with underrepresented populations to collaboratively develop equitable and inclusive land use planning policies and programs that reflect diverse perspectives and lifestyles, steering away from imposing norms derived solely from dominant culture and class values

P3. Promote equitable development and distribution of public investments to benefit communities disproportionately harmed by past and present policies and land use planning practices to eliminate racial disparities and discrimination.

P4. Center the American Indian experience in decision-making and implement the actions included the Met Council's land, water, and people commitments. Acknowledge and value the work of the American Indian Advisory Council established as part of Imagine 2050 policy development through implementation of the actions and commitments recommended from their work.

P1. Reduce greenhouse gas emissions in the region to achieve the emissions reduction goal in state statutes.

P2. Support local planning decisions to restore, enhance, and maintain the urban tree canopy.

P3. Incentivize urban design and development that maximizes renewable energy readiness and enhances energy efficiency, especially for energy-burdened households.

P5. Support integration of climate adaptation measures into development to prepare for current and projected climate impacts on our region.

P6. Partner with American Indian and overburdened communities to collaborate on climate solutions.

P7. Integrate local food systems and land use planning



<p>to build community resilience, access to healthy food, and food security.</p> <p>P1. Support efforts to keep the region attractive and affordable for residents, visitors, and businesses.</p> <p>P2. Support industries that directly contribute to addressing climate change and promoting environmental sustainability</p> <p>P3. Value and promote a just economy through the economic growth and wellbeing of Black communities, American Indians, people of color, immigrants, and people of all ages and abilities in the region through equitable access to economic resources.</p> <p>P4. Advance economic equity and wellbeing in historically underserved communities by fostering growth of small and local businesses, entrepreneurship, and diverse industries in all places.</p>	
<p>In general, my priorities align with the goals and policies in the proposal. I am passionate about climate justice, public transportation, affordable housing, and education, all of which are addressed in the proposal.</p> <p>In particular, I believe that renewable energy is very important. I believe that the government’s goal of Net Zero by 2050 is not ambitious enough. Given the urgency of the climate crisis, we need to compensate for the lack of action taken by industries governments. It would be better if we achieved Net Zero by at least 2040 and then became carbon negative. Objective 7&gt;P4 calls for the construction of solar power, which aligns with my priorities. I hope that the Council will ensure that the solar panels are strategically placed in areas with ample sunlight to maximize efficiency. I also am a strong supporter of prioritizing solar on schools and other community buildings, as it sets a good example that is visible to the community. Objective 1&gt;P3&gt;A3 notes that solar on fertile land should be avoided, which I agree with, as we need the fertile land to grow food for the community. I hope that when the Council discourages solar on fertile land, they provide alternatives, such as moving the solar project to a more suitable place or using wind power. I was surprised that wind power was not mentioned at all in the proposal, because wind power is a clean energy resource that I believe could be implemented more, especially on fertile lands where solar is not ideal.</p> <p>I also agree that green industries should be supported, as mentioned in Objective 4&gt;P2. It is important to fully research industries that one supports, as greenwashing is prevalent. In addition to supporting green industries, it is important to divest from high carbon industries, such as fossil fuel and oil. A carbon tax on large corporations may be a place to start. The tax money could be used to fund reusable energy initiatives.</p> <p>I agree that more green spaces with trees and native plants should be a priority, as stated in Objective 3&gt;P3. I hope that the Council will prioritize implementing this greenery in heat islands, such as communities in North and South Minneapolis, the communities that are most</p>	<p>The comments here focus on many areas. For climate, the commenter states that the State's net zero emissions goal by 2050 is not aggressive enough. Council staff agrees that we should do all that we can to reduce emissions; however, given the wholesale need to transition to a clean energy economy, the Council upholds and re-affirms the State's goal. We acknowledge that such a goal will not stave off many of the effects of climate change, but we have to acknowledge the time needed for a wholesale market, social, and technological transition away from fossil fuels. Wind energy is not explicitly called out within the policies, but commitments to renewable energy strategies are detailed within Objective 7; this would include wind as a renewable energy source.</p> <p>While land owners and local governments are ultimately responsible for decisions relating to the location of solar panels, Imagine 2050 encourages cities to allow solar panels in underutilized areas and in areas were it is complementary to existing uses. The Metropolitan Council also provides technical assistance to help local governments reduce barriers to solar developments and identify areas that are well suited for locating these developments.</p> <p>The Metropolitan Council understands urban agriculture to be an umbrella term for a wide variety of activities including hydroponics, aquaponics, and large- and small-scale crop production. While local zoning codes ultimately determine which of these forms of urban agriculture are permitted on a given parcel, Imagine 2050 encourages the use of these local food systems to help address areas of food insecurity.</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.</p>

affected by the climate crisis and would most benefit from more greenery and shade. Similarly, Objective 3>A5 calls for living streets with trees, which I agree with, and should be prioritized in heat islands.

I agree that native and climate-resilient plants are important, as mentioned in Objective 4>P5. This should be especially implemented in areas covered with non-native grass and along riverbanks and lakeshores. I have noticed that there is a lot of non-native grass in the Twin Cities area, such as in parks and along freeways, which is an unproductive use of the land. Where possible, non-native grass should be replaced with clover, native tall prairie grass, native wildflowers such as black-eyed susan's and coneflowers, milkweed, or other native and climate resilient plants. It is important to prioritize a tall native/resilient plant barrier along riverbanks and lakeshores because it protects the water from trash and other harms. It also serves as a food source for aquatic life. To protect the native plants that are planted, it is important to remove invasive species, such as buckthorn and zebra mussels. I thought it was strange that invasive species removal was not mentioned in the proposal. If we are to plant native plants, we must also remove the invasive ones. It is also a good idea to discourage the use of fertilizers and harmful pesticides, something that was not mentioned in the proposal. Many people use fertilizers and pesticides on their lawns, which kill pollinators and run off into bodies of water, harming native plants and disrupting the ecosystem.

I am in agreement that urban agriculture is important, as supported by Objective 3>P3>A4, Objective 4>P5>A3, and Objective 7>P7. I hope that food deserts will be prioritized in these efforts, such as low-income communities in Minneapolis, because they have the greatest need for access to healthy foods. I agree that urban farms and community gardens are good approaches, but in addition, I believe that hydroponics and green roofs should be considered. Hydroponics are water-efficient, and green roofs are great at reducing carbon emissions, because they simultaneously insulate buildings and absorb carbon.

Incorporating Indigenous wisdom is in alignment with my priorities. I was happy to see that Objective 1>A3 and Objective 4>P3 focus on collaboration with Indigenous people and centering their perspective. I hope that the tribes and tribal governments involved will be compensated for the time they invest. I also think it is important to expand Indigenous access to their original lands. One place to start would be ensuring that all enrolled tribal members have free access to all parks, including state and national parks. Also, with pre-approval, Indigenous people should be able to live and build on public land that was historically theirs.

The community is in need of equitable and affordable housing, which the proposal successfully addresses in Objective 5 and Objective 6. The proposal lists historical

events that contributed to housing inequity. However, the construction of freeways through Black and low-income neighborhoods is not mentioned, which I believe is an important thing to consider. For instance, the construction of freeways in St. Paul divided historically Black neighborhoods, exacerbating economic inequities. In addition to building affordable housing and taking other measures to reduce homelessness, it is also important to build infrastructure that supports people who are currently unhoused. Much of our infrastructure has been purposefully created to reduce the quality of life of unhoused people. In the Twin Cities, for example, I have seen many benches with barriers down the middle. It is important to support and create homeless shelters, implement benches that are comfortable for sleeping, and allow overnight camping in more public spaces. Educating the community about these issues is important, as stated in Objective 1>A3 and Objective 4>P3. I am glad that education is part of the proposal. Perhaps partnering with local schools would be a good place to start.

*Question: What questions do we need to ask about the long-range future of the region?*

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. The Dayton population estimates is off, this affecting road studies and improvements needed in both Dayton, Champlin and Anoka to sustain the population growth. I travel between Dayton and Anoka everyday and the traffic is worse then it was when I lived in Crystal. I think the 4 housing units per acre minimum for the suburban edge makes sense as it'll increase the number of affordable single family units by forcing new builds on 1/4 lots much like the one I grew up in. This would increase affordability for many people making less then 100k per year and making home ownership a reality. It'll also encourage starter homes to be built which the market is drastically lacking.

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. 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.

Credit River, where I live, is rural, and its citizens want to keep it rural.. You have the northern 1/2 of our city becoming suburban edge when we don't want that designation. We are for open space, large lots, preserving the natural beauty we have today. No one wants us to look like Savage. You should keep the northern third of Credit River as diversified rural. I'd rather have Savage annex the four areas where you have designated emerging suburban edge so we didn't have to bring sewer into Credit River. No one wants it.

While the Met Council provides the guidance to manage growth and development in the region per Minn. Stat. 473.145, local governments determine their local priorities. Maintaining community character is a common priority of local governments. To do that, the City of Credit River determines where and when growth happens, within the regional planning framework required by state statute. The City requested the provision of regional wastewater service in several neighborhoods where there were failing on-site sewer systems and no alternatives but to connect to regional wastewater service to address negative environmental impacts, and potential public health impacts for homeowners in those neighborhoods. Where regional wastewater services are provided, there are minimum density

	<p>requirements to ensure there is efficient use and economical provision of regional investments, as required by state law. Minimum density requirements are implemented to not only ensure that infrastructure investments are economical, but also that the regional goals in Imagine 2050 are achieved. A modest increase in minimum density requirements from previous plans not only increases the efficiency of regional wastewater infrastructure and investments, but it also ensures more efficient use of land supply, reduces pressure on agricultural lands, decreases the impact of development on natural systems, and helps achieve state-wide and regional requirements to address climate change.</p>
<p>How is the Met Council going to support counties and cities in implementing their 2050 policies? Specifically in addressing current and historical discrimination against marginalized populations through housing, access to public services and infrastructure, and with respect to the American Indian experience.</p> <p>What tools need to be provided to local officials across the Twin Cities in order to combat NIMBY efforts amongst Planning Commissioners and City Council members?</p> <p>Are there funding mechanisms that the Met Council should support for cities and counties to implement the land use policies?</p>	<p>As part of the comprehensive planning process, the Metropolitan Council provides cities with technical assistance and best practices to help meet these goals. The Metropolitan Council is committed to an inclusive, and sustainable economy that values businesses owned by people of color and immigrants and is resilient to the effects of climate change. Cities are encouraged to engage with Tribal nations and underrepresented communities in the planning process to ensure diverse voices are heard. We are here to support local governments in developing plans that promote sustainable industries and equitable economic growth, ensuring that all communities have access to economic resources.</p>
<p>I have two questions that I feel were not fully addressed by the proposal. One is, how do we farm in a sustainable way while still providing enough healthy food for everyone? I think that crop rotation, a greater variety of crops, and more plant-based foods are important. The Council should encourage farmers to be as efficient as possible and to protect soil health, and provide them with resources to do so. Soil is living. It absorbs more carbon than trees and it is very important to protect it.</p> <p>My other question is about policing and the justice system. How can we reform our justice system? Objective 3&gt;P1 mentions using the environment to prevent crime. I believe this could be expanded upon further. We should spend less funds on the police and more funds on measures that prevent crime, such as poverty reduction and mental health support. We also need to improve conditions in prisons and use rehabilitation/mental health centers instead of prisons when possible. This may not be in the wheelhouse of the Met Council, but just putting it out there.</p> <p>Objective 3&gt;P5&gt;A3 mentions safety measures around schools. To me, this line in the proposal is vague, as it is unclear which measures are being referring to. Perhaps metal detectors and secure entrances would be helpful in making schools more safe. However, I do not support police in schools, as they contribute to the school to prison pipeline.</p>	<p>The comments here focus on many areas. For climate, the commenter states that the State's net zero emissions goal by 2050 is not aggressive enough. Council staff agrees that we should do all that we can to reduce emissions; however, given the wholesale need to transition to a clean energy economy, the Council upholds and re-affirms the State's goal. We acknowledge that such a goal will not stave off many of the effects of climate change, but we have to acknowledge the time needed for a wholesale market, social, and technological transition away from fossil fuels. Wind energy is not explicitly called out within the policies, but commitments to renewable energy strategies are detailed within Objective 7; this would include wind as a renewable energy source.</p> <p>While land owners and local governments are ultimately responsible for decisions relating to the location of solar panels, Imagine 2050 encourages cities to allow solar panels in underutilized areas and in areas were it is complementary to existing uses. The Metropolitan Council also provides technical assistance to help local governments reduce barriers to solar developments and identify areas that are well suited for locating these developments.</p> <p>The Metropolitan Council understands urban agriculture to be an umbrella term for a wide variety</p>

	<p>of activities including hydroponics, aquaponics, and large- and small-scale crop production. While local zoning codes ultimately determine which of these forms of urban agriculture are permitted on a given parcel, Imagine 2050 encourages the use of these local food systems to help address areas of food insecurity.</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.</p>
<p>The policy is currently premised on: The Twin Cities region will continue to grow, but at a slower pace than in previous decades. Our region will gain 657,000 residents between 2020 and 2050, bringing the region's total population to 3,820,000. Though the region's population grew 11% between 2010 and 2020, growth rates of 6% to 7.5% per decade are expected through 2050.</p> <p>Question: Do population projections for the region allow for climate-driven state-to-state migration? Historical models are not a reliable indicator of state-to-state migration expected over the next 2 decades because they do not account for the impacts of climate change. As business and agriculture leave the western and southern states and move toward the great lakes, people will follow. Climate scientists predict the great lakes region will be a climate refuge area. How are we preparing for that change?</p>	<p>Within our macrodemographic model, migration to the Twin Cities metro is mainly determined by labor market and workforce demand, but can be adjusted up or down with added-on assumptions. At this time, we have already boosted our domestic migration expectations with Matt Hauer's 2015 – 2100 projections of subnational, metro-to-metro migration in response to sea-level rise (SLR). here: <a href="https://www.nature.com/articles/nclimate3271.epdf">https://www.nature.com/articles/nclimate3271.epdf</a></p> <p>This is factored into the Met Council forecast. However, it also is a minimal impact, as Hauer expects the overwhelming majority of population displacement AFTER 2050 and expects most relocation to happen over shorter distances from the coasts.</p> <p>If available, we would use forecasts of long-term population displacement from Southwest US water shortages and southern extreme heat. Those will be powerful motivators – and may precede the domestic migration from SLR. However, we do not find any other subnational projections available now in academic or practitioner literature. We would use reputable and defensible forecasts of changing metro-to-metro (or state-to-state) migration if such forecast sets existed.</p>

*Question: What perspectives do we need to prioritize?*

<p>Affordable single family housing new builds in up and coming areas while supporting the much needed transportation issues in the North West Metro like Dayton, Champlin, Anoka and Ramsey.</p> <p>The needs and benefits of the many outweighs the wants and desires of the few. Dayton is the only hold up for a transportation network between Hwy 10 and I94 which would be a benefit to the whole 7 county Metro and reduce vehicle emissions by reducing travel.</p>	
<p>You should let cities decide their own planning and density. Credit Rive is a rural community and we want to preserve that. It is not Met Council's statutory responsibility to dictate what density we want. Your suburban edge density minimum of 4 is horrible - this is worse than the 3-5 you currently dictate. People in Credit River DO NOT want this.</p>	<p>The comments here focus primarily on official controls that would and can be adopted at the local government scale. The Met Council can encourage new technologies related to urban farming, natural systems integration, and interconnectivity, but local governments will be making such commitments through the local comprehensive plans and official controls (zoning). The Met Council will continue to encourage new approaches to stored carbon and water quality, but these approaches are typically</p>



	delivered through our technical assistance programs, not through policies/actions within Imagine 2050, as such policies/actions are higher level and 'tone' setting for local government consideration.
Native American and marginalized communities; workforce and trade professionals; the development community; entrepreneurs; homeowners, landlords, and tenants; local and county government professionals.	Cities are encouraged to engage with Tribal nations and underrepresented communities in the planning process to ensure diverse voices are heard. We are here to support local governments in developing plans that promote sustainable industries and equitable economic growth, ensuring that all communities have access to economic resources.
BIPOC and low-income	Comment acknowledged.

**Question: *What in your experience or perspective drives your view on this?***

Working in a city that I cannot afford to live in and the unknown on when I'll get to work and home. On a day with minimal traffic I can get to work in 8 minutes, my longest trip has been 42 minutes so far. It regularly takes me 20+ minutes to get home. Anoka and Champlin infrastructure cannot handle the traffic loads and are both essentially fully developed and will not be able to build affordable single family homes to help Minnesotans afford home ownership, especially in the North West region which leaves Dayton with the ability to solve several issues the state faces.	Comment noted.
I speak to Credit River residents. We don't want light rail or bus service either. We are rural community and want to keep it that way.	Comment noted.
I am a City Planner for a fully developed city and grew up in Greater MN, I have seen firsthand how selective enforcement of the Met Council's goals/policies puts a greater strain on communities that take the Met Council's plans seriously.	Comment noted.
I am a young person from an inner suburb of Minneapolis, so the future of the Twin Cities area is important to me. Overall, I think this is a great proposal and would bring positive change to the community.	Comment noted.

**Land Use objectives**

**Question: *How well do you feel these objectives support the future you'd like to see?***

	Very well	Somewhat well	Neutral	Somewhat unwell	Not well at all
Respect the relationship with land and water as a foundation for regional growth	57%	33%	10%	0%	0%
Maximize opportunities for growth in places well-served by transit, bicycle, and pedestrian infrastructure	61%	14%	14%	4%	7%
Establish vibrant, inclusive, connected, and safe communities for people to live, work, and recreate in	62%	10%	17%	4%	7%

Prioritize land use and development activities that protect, restore, and enhance natural systems at all scales	54%	18%	21%	7%	0%
Ensure that people in all types of communities find housing opportunities that align with their needs	54%	18%	18%	3%	7%
Remedy past and present discriminatory land use practices	43%	25%	21%	4%	7%
Implement land use and development practices that reduce greenhouse gas emissions, embed climate adaptation, and create resilient communities	57%	14%	14%	11%	4%
Support the economic wellbeing of our region and its communities	37%	22%	30%	7%	4%

*Question: What could we do to strengthen or add to these objectives?*

We need denser housing and fast, convenient and humane public transportation to support it	Comment noted.
You are using an equity lens that enhances quality of life for all, thank you.	Comment noted.
Considering land use policies that supports strengthening local and resilient food systems, my thoughts for additions and edits to the following policies: Land Use Objective 1 (Policy 3) A5: Add: "Encourage sustainable models for shared, long-term use for food & fiber production (e.g. incubator farms, community farms) Land Use Objective 7 Policy 7: A2 Add: Create dedicated and functional publicly accessible spaces for food aggregation (e.g. food hubs), processing (e.g. commercial kitchens, butchering) and distribution (e.g. farmer markets, meal deliveries). Making sure necessary shelter and utilities are available in these spaces (restrooms, electricity, water, cold storage). Land Use Objective 7 Policy 7: A3 Add: Change local ordinances and reduce barriers for residents to grow food and native plantings in front yards, along boulevards and other maintained landscapes. Land Use Objective 7 Policy 7: A5 Existing language could be better phrased this way: "Focus resources to food insecure locations as determined through assessments of food safety net system (e.g. SNAP, food shelves, free and reduced lunch programs) "	Comment noted.
I assume there is still a fair amount of undeveloped land in the metro area. I think it would be good to use some for small farms, so healthy food is readily available. We should be planting insect-friendly plants along roadways, and also to clean air, provide wind and noise buffers, etc. on highways. I think the U.S. and MN need to protect our land and water from corporate ownership and use abuse. (excessive use of water, fracking, etc.) I also think we shouldn't let our natural resources be owned by foreign interests. Have more testing, so we don't end up with more water and soil and air contaminated by businesses. Encourage efficient electric appliances - ex. induction instead of gas stoves to reduce use of non-renewable resources. Make solar	Comment noted

<p>available and affordable. You need to have minibuses or something, so that people in the suburbs can go somewhere besides downtown. They need to be able to go to the doctor, the grocery store, etc.</p>	
<p>Create a strict urban growth boundary and prevent sprawl. Incentivize and force cities in the urban core and first ring suburbs to grow more dense. Prevent private development near water bodies.</p>	<p>Comment noted. The Met Council will provide technical assistance to local governments to promote housing quality, as described in the draft plan text.</p>
<p>We need to include language about efficiency and effectiveness of land use. Ag land that is not productive should not remain ag land. Chronic polluters among developers should be blacklisted.</p>	<p>Comment noted. While Met Council does not determine LIHTC allocation plans, the Draft 2050 Housing Policy Plan equips communities to plan for affordable housing development to meet needs in all communities.</p>
<p>Leave our community alone. Credit River does not need to be a hugely developed suburb. Let's us keep our wells and septic, let us keep our property lines and large acreage lots. Quit building large scale housing developments. Property in this area should be a minimum of 2 acres lots.</p>	
<p>support small scale agriculture and protect agricultural land use.</p>	
<p>I would like to see a greater focus on limiting sprawl into exurbs and rural communities. This is a likely effect of some of the policies above, but I think it would be good to explicitly call out in the priorities. The Twin Cities continues to see a lot of growth in communities that are heavily car-dependent and lack the resources present in the urban core, presenting a barrier to the goals outlined here.</p>	<p>Land use policies that manage the region's planned land supply like establishing criteria for expanding the Metropolitan Urban Service Area (MUSA), supporting compact development, redevelopment, and infill, 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 appropriate for each community type.</p>
<p>Don't except any Federal money Don't rely on federal funding</p>	<p>Comment noted.</p>
<p>The framework is good. Met Council is a vital regional asset. Keep working closely with units of government - city and county, to gain their trust and support. Public opinion is against the Council frequently but support can be drawn from successful work within regional government. A tight focus on transportation; BRT and lightrail is good. Safety and service should be mantras. The 494/694 belt should be largely adhered to, in my opinion. There is plenty of room for healthy, liveable infill. Work with regional park systems to enhance green space where new housing comes in. Please resist the pressure to please everyone. Exurban development is NOT the Met Council's purview. Keep up the good work! Chins up! Also, Green Line extension through SW suburbs is going to be a big success. This is a very well thought out and well designed route. Kudos to Peter McGlaugjlin and all those design engineers from back when.</p>	<p>Thank you for your supportive comments.</p>
<p>All of these objectives are most easily achieved by implementing mixed use zoning across the metro area, removing parking minimums, and creating a green belt of park/agricultural land around the current edge of the metro. Having to drive for work/goods/services is the largest impediment to a healthy, equitable, and green future!</p>	<p>Zoning is a local regulatory tool used to implement comprehensive plans. The Metropolitan Council does not have the authority to regulate mixed use zoning or parking minimums at a local or regional scale. Minn. Stat. 473.858 does require zoning to conform with the adopted local comprehensive plan so a municipality may choose to use tools like those</p>

	mentioned, if they wish. The Council supports implementation of comprehensive plans through technical assistance, tools, resources, and grant programs like the Livable Communities Act programs, which can include support for zoning ordinance updates.
<p>Current economic directives are contrary to many of your documented goals, i.e. subjecting land and possible development to the "highest and best use" litmus test where urban agriculture always loses. There should be a "community garden" on each city block. The ability of a community to grow their own food is empowering while providing access to healthy food options for said community. Green space reduces violence and inspires pride in the community. Additionally, respect for the land must be mirrored in specific actions and values that reflect that respect. The mighty Mississippi River has not been given the respect it deserves even though we are at its headwaters and are responsible for setting the tone for the rest of the states that utilize her waters.</p>	<p>The Metropolitan Council recognizes the significant land access challenges that Urban Agriculture faces, as well as the benefits it brings to communities. For this reason, the proposed regional development guide includes numerous policies designed to support and promote this land use and staff is proposing including additional language regarding the long-term use of land within developed communities for agricultural purposes. The relevant policies are: Objective 1, Policy 3, Action 4; Objective 3; Policy 3, Actions 1 and 4; and Objective 7, Policy 7, Actions 2 through 4. These policies are designed to encourage a holistic approach to land use where cities factor community benefit into their determinations of highest and best use; however, local governments have land use authority and are responsible for navigating the complex decision making that goes into how individual parcels are developed.</p>
<p>Objective 1, P3, A3 - Discouraging solar development on prime farmland or farmland of statewide importance should be the default guidance. But I think an exception could be made for "agrivoltaics," i.e. solar developments that also allow for agricultural production on the land. Objective 7, P4 does seem to address the idea of encouraging "co-location."</p>	<p>Regarding Objective 1, P3, A3 from the public comment version of the Land use Policy Chapter: having received comments from various stakeholders and community partners on this item, Metropolitan Council staff is proposing to remove this action. We agree that the intention of keeping prime farmland in productive use is adequately covered by other actions within this policy, and that techniques like agrivoltaics allow for the co-existence of solar and agriculture.</p>

*Question: Did you find anything about these objectives confusing?*

<p>I'm not sure if I understand why you want to maximize growth where there is infrastructure. Do you just mean not keep building out in the boondocks? Because, I don't think you want to create something too densely populated, that is all concrete and buildings like downtown.</p> <p>#4 sounds nice, but is not realistic - development by its nature is not going to restore or enhance nature. They can try to create/preserve some natural amenities, but they obviously are going to also destroy some if they are building.</p>	<p>There are many comments here about livability, natural systems, and economics. The Met Council functions as a regional governing body that can set policies in these areas at the regional scale for local governments to consider at the local level. Many of the comments here focus on municipal authorities through local official controls. The Met Council's commitments across many policy areas support the comments presented here, but it will ultimately, in most cases, be the local governments that enact change at the neighborhood level to affect quality of life and amenities locally. The Met Council's goals and the objectives that flow from them largely support the comments detailed here, and we will continue to work with municipalities to enact policies and strategies at the local level to enhance livability for the region.</p>
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<p>"Remedy past and present discriminatory land use practices" feels too vague. Like it's asking about reconnecting communities, without just saying it. It just feels too broad based on the work that's being done.</p>	<p>The Land Use Policy Objective #6 language ("remedy past and present discriminatory land use practices") sets the intention for the policies and actions that follow, which are more specific. This objective works to implement the Met Council's Equity Framework and acknowledge regional disparities while setting actions to how the Met Council and local governments can change the way they do their work to effect change in meaningful ways.</p>
<p>I was unsure what you meant by economic health. Did you mean, "how much are you willing to compromise environmental health for profit" or did you mean "how important is connectivity to jobs and municipal finance important to you"?</p>	<p>The Met Council aims to promote the economic wellbeing of the Twin Cities region by addressing systemic racial disparities, fostering economic resilience, and ensuring a thriving future for all residents. Despite the region's strong economic assets, persistent inequities in employment, poverty, income, and homeownership threaten long-term stability. The Council prioritizes building an inclusive economy through robust partnerships across governments, businesses, nonprofits, and community organizations to address workforce challenges and the impacts of climate change.</p>
<p>No, though others will. They should be worded more plainly with fewer buzz words.</p>	<p>Comment noted</p>
<p>The statements are nice, but what is actual action going to look like? Are roads going to be narrowed or speed limits slowed? Are corner shops going to be legal so we don't have to drive to get groceries? Our whole metro has been built around a system that is unhealthy, inequitable, and destroying the planet. The system has to be re-designed for people--not cars, and not businesses.</p>	<p>The five regional goals set the Council in motion to address the commenter's frustrations. Imagine 2050 then sets regional commitments in place, to be matched by local commitments in comprehensive plan updates which contain more specific local information. All this adds up to the rules by which specific roads, stores, homes, and places for people appear. It is a long process. Met Council encourages you to stay involved throughout.</p>
<p>some of your directives are double-edged swords and require each land development decision to be well thought out with pros/cons, long and short-term problems identified/documentated with mediation options noted. Financial concerns should not always be the primary driver nor the primary solution. Zoning laws, city vs state conflicts and the squeaky wheel always getting the grease should be revisited to ensure ALL community voices are heard and considered. Allowing new voices and opinions will be critical. It's way past time to get away from the usual-suspects...i.e. giving funds to the same old organizations and group who remain impotent, complacent and irrelevant in the current environment.</p>	<p>The Metropolitan Council recognizes the significant land access challenges that Urban Agriculture faces, as well as the benefits it brings to communities. For this reason, the proposed regional development guide includes numerous policies designed to support and promote this land use and staff is proposing including additional language regarding the long-term use of land within developed communities for agricultural purposes. The relevant policies are: Objective 1, Policy 3, Action 4; Objective 3; Policy 3, Actions 1 and 4; and, Objective 7, Policy 7, Actions 2 through 4. These policies are designed to encourage a holistic approach to land use where cities factor community benefit into their determinations of highest and best use; however, local governments have land use authority and are responsible for navigating the complex decision making that goes into how individual parcels are developed.</p>

*Question: Additional thoughts?*

<p>We should have programs that teach people how to garden, compost, raise chickens, do rain gardens, plant</p>	<p>There are many comments here about livability, natural systems, and economics. The Met Council</p>
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<p>beneficial plants. We can provide inexpensive trees to plant. Provide food scrap pickup. Allow minimal use of plastic bags and find ways to recycle them. Maybe support rooftop gardens and patios for apartments. Encourage walkable cities and some superblocs or pedestrian only streets. Provide sidewalks in suburbs. I think safe communities is critical. Too many of the neighborhoods and close-in suburbs where there is affordable housing are not safe. There needs to be more affordable housing, but also some kind of housing with services for homeless, those with mental health issues, etc. I think zoning needs to be changed to allow for smaller homes and smaller lots in suburbs. (or ADUs, etc.) I think you could lead on this, by developing guidelines for ADUs and tiny homes clusters, etc. Figure out how to build them and provide permitted plans free of charge. You can also allow very small businesses in residential areas - maybe a coffee shop with an apartment above, etc. Maybe make residents pay a small fee and have communities clear sidewalks, because it often takes owners a while to shovel the snow. Lakeshore and parks should have multiple public access points so it is not controlled by private landowners. You need safeguards for multifamily dwellings. Some, to protect rights (i.e. not allowed to put political signs in your window), and stringent ones for financial abuses. Someone I know in a townhouse said a person in their management company stole \$700,000 from their fund, and the company has no insurance to replace it. (They complained to the BBB, who did not put it on their site so they still have an A+ rating.) The state needs more safeguards.</p>	<p>functions as a regional governing body that can set policies in these areas at the regional scale for local governments to consider at the local level. Many of the comments here focus on municipal authorities through local official controls. The Met Council's commitments across many policy areas support the comments presented here, but it will ultimately, in most cases, be the local governments that enact change at the neighborhood level to affect quality of life and amenities locally. The Met Council's goals and the objectives that flow from them largely support the comments detailed here, and we will continue to work with municipalities to enact policies and strategies at the local level to enhance livability for the region.</p>
<p>Do not expand your reach beyond the 7 counties.</p>	<p>The Met Council's authority is defined within the Metropolitan Land Planning Act and does not extend beyond the 7 counties with the exception of the Met Council's role as the federal Metropolitan Planning Organization for transportation purposes. That does not apply to comprehensive planning requirements, however.</p>
<p>Actual actions I hope to see in the plan:  1. Implement mixed-use zoning throughout the metro  2. De-prioritize car infrastructure and access to encourage movement towards transit/walking/biking  3. Create green belt to preserve access to natural/agriculture land where most people in the state live  4. Remove parking minimums</p>	<p>The five regional goals set the Council in motion to address the commenter's frustrations. Imagine 2050 then sets regional commitments in place, to be matched by local commitments in comprehensive plan updates which contain more specific local information. All this adds up to the rules by which specific roads, stores, homes, and places for people appear. It is a long process. Met Council encourages you to stay involved throughout.</p>
<p>Thank you for including Objective 1, P3. Protecting farmland from premature development is critical for the Metro region's future food security. Agriculture also contributes to the region's economic diversity and, with the right conservation practices, the region's climate resiliency. Thank you also for including community gardens and urban agriculture in Objective 3, P2 and P3. These are important land uses in higher-density population areas for food security, community building,</p>	<p>Regarding Objective 1, P3, A3 from the public comment version of the Land use Policy Chapter: having received comments from various stakeholders and community partners on this item, Metropolitan Council staff is proposing to remove this action. We agree that the intention of keeping prime farmland in productive use is adequately covered by other actions within this policy, and that</p>

and green space. Finally, thank you for including Objective 7, P7. Urban planning has guided development for 3 of our 4 human needs for decades - air, water, and shelter. But more could be done to guide development for our 4th need - food. A1-A5 are a great start for integrating food system planning into the Metro's regional planning.	techniques like agrivoltaics allow for the co-existence of solar and agriculture.
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**Objective 1: Respect the relationship with land and water as a foundation for regional growth**

*Question: How well do you feel this policy and these actions support the future you'd like to see?*

Average rating across policies under this objective:

Very well	Somewhat well	Neutral	Somewhat unwell	Not well at all
49%	17%	24%	5%	5%

**Objective 2: Maximize opportunities for growth in places well-served by transit, bicycle, and pedestrian infrastructure.**

*Question: How well do you feel this policy and these actions support the future you'd like to see?*

Average rating across policies under this objective:

Very well	Somewhat well	Neutral	Somewhat unwell	Not well at all
35%	31%	25%	3%	6%

**Objective 3: Establish vibrant, inclusive, connected, and safe communities for people to live, work, and recreate in.**

*Question: How well do you feel this policy and these actions support the future you'd like to see?*

Average rating across policies under this objective:

Very well	Somewhat well	Neutral	Somewhat unwell	Not well at all
42%	41%	8%	2%	7%

**Objective 4: Prioritize land use and development activities that protect, restore, and enhance natural systems at all scales**

*Question: How well do you feel this policy and these actions support the future you'd like to see?*

Average rating across policies under this objective:

Very well	Somewhat well	Neutral	Somewhat unwell	Not well at all
39%	44%	8%	0%	9%

**Objective 5: Ensure that people in all types of communities find housing opportunities that align with their needs**

*Question: How well do you feel this policy and these actions support the future you'd like to see?*

There were only a handful of respondents to this question. Respondents were split between saying the elements supported their future vision for the region very well or somewhat well, or they were neutral. One respondent to each item identified them as supporting their future vision not at all well.

**Objective 6: Remedy past and present discriminatory land use practices**

*Question: How well do you feel this policy and these actions support the future you'd like to see?*

There were only a handful of respondents to this question. Respondents were split between saying the elements supported their future vision for the region very well or somewhat well, or they were neutral. One respondent to each item identified them as supporting their future vision not at all well.

**Objective 7: Implement land use and development practices that reduce greenhouse gas emissions, embed climate adaptation, and create resilient communities**

*Question: How well do you feel this policy and these actions support the future you'd like to see?*

Average rating across policies under this objective:

Very well	Somewhat well	Neutral	Somewhat unwell	Not well at all
43%	35%	13%	6%	3%

**Objective 8: Support the economic wellbeing of our region and its communities**

*Question: How well do you feel this policy and these actions support the future you'd like to see?*

Average rating across policies under this objective:

Very well	Somewhat well	Neutral	Somewhat unwell	Not well at all
25%	17%	2%	31%	25%

### 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.

Comment	Response
Jeannie Bowers (email)	
<p>I have been a resident in my home in Greenwood for 55 years.            We have a small city with 600 plus residents, fully developed.            We are totally opposed to your Council's requiring higher density for our fully developed small city.            Our Mayor, Tom Fletcher, sent Your Council stating valid issues regarding our small city.            Please eliminate and respect our Mayor who represents residents of Greenwood.</p>	<p>The City of Greenwood is proposed to be a Suburban Edge community designation which requires a minimum of 4 units per acre. This is actually less than the required density in the previous regional development guide.</p>
Robert Brown (email)	
<p>2050 City Density Proposal            Greenwood is a very small and essentially fully developed city with what are already excessive property taxes. There is only one possible location currently available for new development and it should be used to generate the highest possible tax revenue. Affordable housing does not accomplish that. I generally support the need for more affordable housing but the City of Greenwood is a poor candidate for such development.</p>	<p>We understand that increases to density for the Land Guided for Affordable Housing (LGAH) requirement can be difficult to accommodate, especially for smaller cities who are not anticipating much growth. The Met Council has worked to increase flexibility for cities to meet this requirement, especially for smaller cities. Met Council will provide an alternative compliance option for cities with a limited anticipated growth, such as the City of Greenwood, defined as a Future Need allocation of less than 20 units. More specifics on this requirement will be communicated with the city directly.</p>
Asa Stansfield (public hearing)	
<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>

Comment	Response
Downtown area - big transition! What is next. How are we going to reimagine the downtowns to be vital + vibrant! Keep mass transit moving forward.	Thank you for your comment. While those issues are largely managed by the cities, we are partnering with cities to make sure our regional services meet long-term needs.
Less car dependency, more bikes, more natural native plants, increased housing density for greater open space - less expansion to farmland.	Thank you for your comment.
Every corner a pollinator corner. More walkability. We saved our commercial district. You have to have a variety of building sizes. Traffic slow down. Trees! Trees! Trees! Resilience needs very much micro-scale w/water storage. They can also create safety plans at the neighborhood level.	Thank you for your comment. Imagine 2050 highlights many of these considerations, and our technical assistance programs provide tools to help communities plan around many of these topics.
More feeling of community and safety, less crime and theft. More walkable and transit friendly community. Better public transit. More frequent. safer. More affordable housing. Safer housing. Help for those with drug and alcohol issues	Thank you for your comment. Several policies in Imagine 2050 - namely around transit, transportation, housing, and land use - address the items you raise.
Less cars More mixed use development More native plants + trees, less grass increased water health	Thank you for your comment. A number of policies in Imagine 2050 point to the suggestions you offer.
Better parks, better transit, better schools, better trails, better lakes, better houses better stores, better jobs better food for a better region	Thank you for your comment.
places for rural and urban types of living access to schools by walking and biking	Thank you for your comment.
Walking distance to schools and parks and downtown	Thank you for your comment. Several portions of Imagine 2050 support walkability.
Rent control apartments, more affordable housing, more co-op, grocery stores, more parks, more transportation, options and more affordable, transportation options, less pollution, equal rights for everyone more art in the community,	Thank you for your comment.

### 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.



Comment	Response
<b>Carver County</b>	
<p>Overall development strategy. Carver County generally supports many of the land use goals included in the policy plan. Most goals align well with goals included in the County’s 2040 and earlier Comprehensive Plans. In particular, the intention to maintain the agricultural use and character of the rural area until urban development and infrastructure are ready to grow.</p>	<p>Thank you for your support.</p>
<p>Figure 1 Generalized Land Use composition. The map indicates large areas of “undeveloped” land use. Many of these areas represent unbuildable areas due to wetlands, steep slopes, etc. It is recommended that the map follow many of the objectives, policies, and actions identified in the land use section. These mention the importance of maintaining natural systems and not developing these sensitive areas (particularly in Objective 4). Adding a land use that identifies these areas more clearly and reflects goals would clarify the objective between “undevelopable land” that is excluded from land capacity and land that could or would be developed. An option would be to add another figure that depicts areas identified in Objective 4. Carver County recommends amending Figure 1 or adding another figure to show the location of sensitive areas or natural systems within areas identified as undevelopable.</p>	<p>Figure 1 is amended to include a footnote about mapped "Undeveloped" areas and how they do not necessarily represent developable land. The Met Council is developing a technical assistance package that will provide a framework around natural systems planning and help communities identify, prioritize, and develop strategies, such as mapping and planning around sensitive areas.</p>
<p>Figure 2 2050 Community Designations. The map and subsequent descriptions do not match County land use policy. Laketown Township is designated as “Diversified Rural” while the rest of the townships in Carver County are identified as “Agricultural”. There is no distinction in the County Comprehensive Plan between any of the Townships and there has not been since the 1970’s. The latest 2040 plan identifies all townships as agricultural and allow for the same zoning designation and land use housing density choices (1/40 or 4/40). Having only Laketown designated differently is confusing and does not impact any action steps that would be taken by the County in implementing the Comp Plan. The only difference is that Laketown Twp. has several “201” community sewer systems, which do not impact current policy or zoning. If the Met Council intends to have a different policy in providing sewage infrastructure, and that affects the land use designation, it should be spelled out in the policy document more clearly. Carver County recommends changing Laketown Township to “Agricultural” or expanding on sewage infrastructure policy.</p>	<p>While Community Designations were updated for the Imagine 2050 process, none of the Community Designations in the Rural Service Area were changed from their Thrive designations. If interested, the methodology and process is described in materials available on the Council's website. The foundational factors in the analysis are described in the Land Use Policy document in the Community Designations section. Laketown Township is identified as a Diversified Rural community because of the Orderly Annexation Agreement with its neighboring communities, whose comprehensive plans guide its future land use pattern.</p>

Comment	Response
<p>Table 2 Overall Density expectations by community designation and service area. The table does not accurately reflect long-standing County policy which has a base density of 1/40 but allows townships to choose certain incentive options up to 4/40. This policy has been in place since the 1980's and has been an effective way to protect natural areas and utilize non-prime ag land. By stating the density as "maximum allowed", it conflicts with approved County land use policy. Carver County recommends amending the table to include 4/40 in Agricultural areas as an incentive tool.</p>	<p>The Community Designations and density requirements for the Rural Service Areas, which include Rural Residential, Diversified Rural, and Agricultural reflected in Table 2 did not change from Thrive MSP 2040 expectations, which included a maximum density for Agricultural communities of 1 unit per 40 acres. The 1/40 maximum density has been the Council's planning expectation for Agricultural communities for several decennial plans so as to protect long-term agricultural uses and support enrollment in programs like the Metropolitan Agricultural Preserves Program.</p>
<p>Objective 4 Prioritize land use and development activities that protect, restore, and enhance natural systems at all scales. P1, A2 &amp; P2, A1 seem like similar action steps and the difference between them is unclear. P1, A2 also needs more detail and examples as it is unclear what is expected of the County in Township areas. Does a broad land use policy of limiting development to 1/40 or 4/40 suffice or are more specific regulations anticipated? While it seems the County policies generally follow and support this effort, more specifics are needed before support of this action step can occur. P5, A3 create similar questions and comments as above. What is the requirement for the County in "creating interconnected networks..." Carver County recommends adding clarifying language to these action steps.</p>	<p>The Council is developing a technical assistance package to assist communities with planning for natural systems and developing strategies, including preliminary inventorying and identifying potential corridors. However, any requirements for comprehensive plans will be broader than specific strategies.</p>
<p>P5, A8 states that the County should allocate dedicated funding to support the action. More clarity is needed here about the requirements. Creating incentive policies is one thing, but finding local funds to tackle climate solutions is potentially a big lift for local government. Many of these actions steps seem better suited for regional or state implementation. Carver County recommends removing the inventory, strategies, and funding requirement or adding significant clarifying language in these action steps.</p>	<p>The Met Council will clarify this action so that it does not read as a requirement to allocate dedicated funds to implement this action. There will be a requirement to commit to adaptation-related climate actions in the local comprehensive plans, Minn. Stat. § 473.859, subd. 7 Climate Mitigation and Adaptation also 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>

Comment	Response
<p>Objective 7 Implement land use and development practices that reduce greenhouse gas emissions, embed climate adaptation, and create resilient communities. P1, A6 &amp; A7 have new requirements around greenhouse gas emissions that are very vague and could place the County in a difficult situation to meet. Many questions result from this action step: What does the inventory include?, How are projections made? Why is the County getting into this level of detail? How is the County involved in the whole range of land uses that generate greenhouse gases? What kind of strategies from a land use perspective would address the results of an inventory? Is an overall lower density land use policy strategy enough?</p>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has developed a GHG inventory and strategy planning tool for local government, scaled at the local level, for use to make meaningful commitments on GHG reductions. The Met Council will provide technical assistance on how to use this tool. 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 also 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>
<b>City of Andover</b>	
<p>Create a power sharing structure to partner with American Indian organizations and community members in planning processes. This appears to cause additional review, time and cost for development ultimately born on the end user of a property which will increase housing costs.</p>	<p>The Met Council encourages partnership with American Indian and community members in planning processes. According to Minnesota Statute 473.145 Development Guide, "The comprehensive development guide must recognize and encompass physical, social, or economic needs of the metropolitan area..." Historically, planning has excluded and discriminated against marginalized group. As so, we must proceed with planning and policy though an equity lens to ensure all residents, in particular Black, American Indian, and residents of colors, are part of our processes to ensure their physical, social, and economic needs are met.</p>

Comment	Response
<p>Greenhouse gas emissions inventory and projections generated from activity and plan for strategies that reduce or naturally sequester greenhouse gas emissions. This would be a significant undertaking for the City of Andover and would be done at great expense. How are Greenhouse gas emissions inventories conducted? Who conducts them? There is not enough information here for the City to contemplate potential policy actions or effectively comment on the plan.</p>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has developed a GHG inventory and strategy planning tool for local government, scaled at the local level, for use to make meaningful commitments on GHG reductions. The Met Council will provide technical assistance on how to use this tool. 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 also 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>Restore, enhance, maintain urban tree canopy. Andover is part of the Anoka Sand Plain. Tree preservation and planting policies should take into account that portions of the region were previously prairie and with flora and fauna not necessarily compatible with a forested landscape. Tree planting locations can also impact city infrastructure.</p>	<p>The Met Council will take this into consideration in creation of minimum requirements and technical assistance related to this policy and set of actions.</p>

Comment	Response
<p>Develop policy incentives and allocate dedicated funding to support adoption of nature based climate adaption solutions. Where do the additional resources come from? This has the potential to increase housing costs.</p>	<p>Nature based solutions are sustainable approaches that utilize natural ecosystems and biodiversity to address various environmental, social, and economic challenges. Examples of this could be using Cottonwood trees to clean contaminated soil. It could include planning for dual purpose uses to deal with localized flooding - for instance, designing a frisbee golf course with native planting and low-lying areas that can be designed to flood when local road networks are overwhelmed with water. It means using landscaping practices to remove chloride from the soil or clean the air. These examples can be implemented on large or small scales. Nature-based solutions are one possible climate adaptation solution. New climate requirements have not yet been established but we look forward to working with local government partners as they are developed. They will be included in the Local Planning Handbook update planned for release in late 2025.</p> <p>Cities will not be required to allocate funding to these efforts. The Met Council provides technical assistance, tools and resources, and financial assistance to eligible communities via Planning Assistance Grants and direct technical assistance through the Sector Representative Program.</p>
<p>Diversity Equity and Inclusion (DEi) measures. Cities do not have legal authority to require these initiatives in the private sector. These goals may be well intended, however, • Cities do not have the legal authority to implement these policies at the local level. Many Cities do not provide social service programs, this typically falls to a County or State level of government or nonprofits.</p>	<p>As part of the comprehensive planning process, the Met Council provides cities with technical assistance and best practices to help meet these goals. The Met Council is committed to an inclusive, and sustainable economy that values businesses owned by people of color and immigrants and is resilient to the effects of climate change. Cities are encouraged to engage with tribal nations and underrepresented communities in the planning process to ensure diverse voices are heard. We are here to support local governments in developing plans that promote sustainable industries and equitable economic growth, ensuring that all communities have access to economic resources.</p>
<p>Promote equitable development and distribution of public investments. Andover maintains and evaluates public investments yearly and includes them in the CIP. Will the city still be able to evaluate roadways as they do now or will income have to be included?</p>	<p>The Met Council encourages equitable development and distribution of public investments to create an inclusive and equitable region. As part of the comprehensive planning process, the Met Council will provide local government units with technical assistance and best practices to help meet these goals.</p>



Comment	Response
<p>Partner with Just Deeds to discharge racially restrictive covenants. Cities don't typically review deeds of properties.</p>	<p>The Met Council is committed to creating an inclusive and equitable region. As an example, a local government could partner with or support Just Deeds to discharge racially restrictive covenants to take ownership, acknowledge, and remedy past harms as one avenue of many. There are other efforts as well that could work to alleviate past harms still evident in our built environment like examining local processes which create barriers, revising local controls which reinforce exclusionary practices, or changing existing governmental systems which perpetuate inequities. We encourage local governments, communities, and regional partners to work together to address inequities throughout the region. To aid in this, the Met Council has established an Equity Framework as well as supportive frameworks related to environmental justice, anti-displacement, and community-centered engagement as a means to start community conversations about what actions might be of most importance to your city. As part of the comprehensive planning process, the Met Council will provide local government units with technical assistance and best practices to help meet these goals.</p>
<p>Take ownership of past harms. City of Andover is suggesting the change in language from "Take ownership" to "Acknowledge" past harms.</p>	<p>While we thank the City for its suggestion, the term "take ownership" was an intentional word choice as this asserts accountability of past harms with the intention of taking action to remedy those harms.</p>
<p>Support ADU's in MUSA. Construction of ADU's would reduce homes in other parts of our community by taking away from sanitary sewer capacity.</p>	<p>This suggestion is consistent with Met Council land use policy where communities within the MUSA must allow for more than one housing type within residential land use categories to encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people.</p>
<p>Establish wildlife friendly development standards. Wildlife regulations already exist in the development process.</p>	<p>Some wildlife regulations exist at federal and state levels. This policy is about planning for natural systems corridors and developing strategies, and lists wildlife-friendly development standards as one example strategy (which would be within the purview of the local agency).</p>
<p>Identification (mapping) then protecting the confidentiality of locations. Identifying specific burial grounds, even if done confidentially, should not be the role of the City as it is already the responsibility of other agencies such as the State Historic Preservation Office (SHPO). These agencies comment on development plans when appropriate and keep record of them. It is the City of Andover's understanding that even if mapped, this information is not to be shared with Met Council.</p>	<p>Language will be revised to clarify intent and roles.</p>

Comment	Response
<p>Incorporate universal design. Universal design is not a well defined concept that is difficult to achieve on a City wide basis. What does the Met Council expect from universal design?</p>	<p>Universal Design does not have prescriptive requirements; it can be approached in many ways that are responsive to community character, needs, and interests. Local governments 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 practices.</p>
<p>Identification (mapping) then protecting the confidentiality of locations. Identifying specific burial grounds, even if done confidentially, should not be the role of the City as it is already the responsibility of other agencies such as the State Historic Preservation Office (SHPO). These agencies comment on development plans when appropriate and keep record of them. It is the City of Andover's understanding that even if mapped, this information is not to be shared with Met Council.</p>	<p>The language has been revised to clarify the intent to: "Identify historic and cultural assets except where Federal and State policies protect the confidentiality of sensitive sites, such as American Indian burial mounds." An historic element is required to be part of the land use plan in local comprehensive plans per Minn. Stat. §473.859 Subd. 2b. The Met Council will review this as part of the comprehensive plan review process.</p>
<p>Incorporate universal design. Universal design is not a well defined concept that is difficult to achieve on a City wide basis. What does the Met Council expect from universal design?</p>	<p>Universal Design is a concept in which products and environments are designed to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design. It aims to make the built environment inclusive, accommodating diverse needs and preferences, including those of individuals with disabilities, older adults, children, and people with temporary or situational impairments. A more equitable and inclusive community for all is the aim so that everyone feels welcome in public spaces.</p>
<p>Adopt Living Streets Policy and integrate into zoning ordinances. Living streets policies do not make sense in newer communities where streets already have to meet new stormwater requirements and have relatively low traffic volumes on their residential streets. This policy would increase cost of road construction improvements, long term maintenance and replacement costs and housing</p>	<p>Communities are encouraged to consider Living Streets policies and principles but will not be required to adopt them. Language will be clarified to make the intent clear.</p>
<p>Anti Displacement Policies. Uncertain in what this means, or pertains to. Anti Displacement policies are presumed to increase costs associated with development. It will either reduce return on investment as properties remain as is, or increase costs as policies would not only pay property owners but will also pay those occupying the spaces (renters). Overall this policy will increase end prices such as future housing.</p>	<p>The Met Council encourages mitigating inequitable consequences of investments in neighborhoods to ensure community members can benefit from those improvements. The Met Council will use the Anti-Displacement Framework to ensure investments, policies, and planning in overburdened communities, which include Black communities, American Indian, and communities of color do not face inequitable consequences or displacement. While advised and encouraged, there isn't a requirement for local governments to use the Anti-Displacement Framework.</p>

Comment	Response
<p>Directing growth away from sensitive ecosystems &amp; water sources. Can these areas then be deducted from the Net density calculations?</p>	<p>The City can net these areas out now, if they are protected or removed from development by local ordinance. The Met Council publishes its adopted guidelines on how to calculate net residential density on the Local Planning Handbook site here:  <a href="https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx">https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx</a>  The Met Council will 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 Imagine 2050 is adopted. This is planned to be a part of the implementation work plan. However, any changes made to provide local flexibility must be consistent with regional goals.</p>
<p>Update land use guidance and regulations to incentivize de-paving in infill and redevelopment opportunities. Andover does not have transit. The requirement would remove local control by advocating for development with less parking, even though there is not suitable transportation alternative in our community.</p>	<p>The language was revised to clarify that de-paving policies are not required and only encouraged.</p>
<p>Change building code to allow for hoopouses and similar agricultural structures. The hoopouses in particular are not allowed in Andover. Local experience has been that hoopouses are used by residents to park vehicles and not used for agricultural activities by residents.</p>	<p>The Met Council agrees that individual communities are the best equipped to balance the tensions that can arise between agriculture, preservation, and residential land uses. These actions are not envisioned as usurping the role that zoning codes play in balancing those needs, but rather as opening up options for some communities to permit additional agricultural activity in desired locations.</p>
<p>Change definition of "Farm" to expand benefits to smaller farmsteads (less than 10 acres). What are the "benefits" referred to here? Changing "farm" can cause conflicts with suburban life and increased conflicts between neighborhoods. This requirement wants to expand benefits of farming to smaller homesteads (less than 10 acres), however, the proposed density restriction for Rural Residential does not allow smaller homesteads. These requirements appear to conflict with each other.</p>	<p>Met Council policy does generally discourage the creation of smaller parcels within the Rural Service Area; however, our engagement activities with food producers in both rural and urban environments revealed that there are a significant number of farms currently operating on parcels that are smaller than 10 acres in size. These farms play an important role in the region and would benefit from being able to enroll in programs such as "Green Acres".</p>

Comment	Response
<p>Allowing multiple housing types in land use categories. City of Andover's local sanitary sewer system is limited in capacity. Providing for multiple dwellings reduces other units/households on other properties. Met Council density calculations do not provide credit for increased density within land use categories until development occurs.</p>	<p>Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p>
<p>Increase in density for Affordable Housing. City of Andover may run into existing capacity within the existing local sanitary sewer system. Option 2 appears to possibly raise some legal questions on the possibility of guiding property in this manner.</p>	<p>Cities may select Option 2 or Option 1. For more details please refer to Section 4 of the Housing Policy Plan in the portion titled "Land Guided for Affordable Housing". These options both refer to the minimum densities of the land uses that can be counted towards the Land Guided for Affordable Housing (LGAH) requirement. No individual properties are expected to be identified. The City of Andover is currently guiding land uses with minimum densities of 8, 12 and 20 units per acre. These land uses give the city flexibility in using either Option 1 or Option 2 to meet their LGAH requirement. The Met Council will reach out to engage with the city directly in how they can meet this requirement.</p>
<p>Rural Residential. Met Council identifies this will no longer be consistent with Imagine 2050. If Andover has to reduce their MUSA the only option would be to allow for one home per 10 acres. This reduces the overall development potential of our community, and increases housing costs. This change will also reduce the value of property within our community that some families view as being their retirement or life savings.</p>	<p>This remains unchanged from Thrive MSP 2040 policies, albeit clarified for implementation purposes. The Rural Residential Community Designation was not permitted to be expanded in Thrive, with few exceptions. It is not required that Andover reduce their 2040 MUSA, that is a local decision. Options for all planning decisions can be explored with assistance of your Sector Representative and the Local Planning Assistance team as the City advances into the 2050 planning process.</p>

Comment	Response
<p>Calculating Land Capacity. Areas within the 100 year floodplain boundary are already protected by local ordinances and federal regulations in most Cities. Floodplain should be added to the areas to be excluded when calculating land capacity.</p>	<p>Areas that are protected from development by local ordinances are already permitted to be netted out of density calculations including floodplains, steep slopes, and bluffs, among any other areas protected or removed from development by local ordinances. The Met Council publishes its adopted guidelines on how to calculate net residential density on the Local Planning Handbook site here: <a href="https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx">https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx</a></p>
<p>Met Council Evaluation of MUSA Expansion. Limitations on expansion of MUSA's will create additional growth into other communities. Limitations on expansion will cause land values to increase. Cities have no control over when private property owners will make land available for development or market conditions, therefore, just because a piece of land may be developable doesn't mean it will be developed. Met Council Language itself indicates "Analysis shows that there is more than adequate land supply within the current MUSA boundary to accommodate the 2050 regional growth forecasts." Page 4, Line 8 indicates "MUSA shows that the region has more than 100 years' worth of land supply". This will also increase housing costs.</p>	<p>The Met Council is directed to plan for the orderly and economical development of the region, including effective stewardship of regional infrastructure investments to support regional growth and administering the requirements of the Metropolitan Land Planning Act. Imagine 2050 continues many of the policies and practices of past regional plans regarding setting density standards and staging of development in 10-year increments, in addition to refining and responding to changing market conditions, which help the Met Council to carry out its legislative directive. We understand the uncertainty of knowing when a certain property owner might want to sell or when there might be the next economic recession. All of these factors are considered both in our forecasts and in how we support local governments in developing their local comprehensive plans. The Met Council is committed to continually assessing the availability of land within the MUSA to ensure a 20-year rolling land supply to avoid the impacts that you have noted.</p>
<p>Establishment of an American Indian Advisory Council with Authority. It would appear as though this would be another entity that would have authority over development. This would more than likely add additional review, time to the development process and ultimately increase costs to the end user of a property thereby increasing housing costs.</p>	<p>The inclusion of indigenous perspectives in land management not only acknowledges the ancestral Dakota lands over which the seven-county region sits, but the inclusion of this work as a land use policy establishes a role for American Indian communities in land management decision-making with the Met Council. This is not a requirement for local governments, but instead relates to areas of Met Council influence or ownership like the regional parks system and where local governments are interested in incorporating this perspective. The Met Council has established an American Indian Advisory Council to advise on this planned Met Council work and will be collaborating with the American Indian communities in the region.</p>
<p>The most concerning of these is the Metropolitan Council's proposal to increase planned minimum net density requirements from 3 to 4 units per acre in the City of Andover. Since the City of Andover was incorporated in</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,</p>

Comment	Response
<p>1974, Andover has been considered the "end of line" as we are located on the far northern extent of where sanitary service is available in the Twin Cities and is only served by one Metropolitan Council interceptor for the entire community.</p> <p>The MUSA in Andover once was much smaller than it is today, and over time it has expanded along with local infrastructure to accommodate new neighborhoods. As Andover has grown, the City has maximized local infrastructure related to sewer capacity to accommodate additional density and pushed the limit on what could be sewer within the City. The City of Andover has also been using a lower maximum potential daily wastewater flow of 225 gallons per day than Met Councils 274 gallons per day. An increase to 4 units per acre vs 3 units per acre will create a burden on the existing infrastructure and the local system is not able to accommodate the flows that would be generated from this. It is also critical to note that the City of Andover does not use a peaking factor on commercial properties. The costs to accommodate a density of 4 units per acre are not feasible as the remaining land for development would require significant replacement of existing sanitary sewer lines.</p> <p>The City of Andover has sanitary sewer lines at depths of 25 to 30 feet. In order to safely replace sanitary sewer lines at depths of 25 to 30 feet, significant impacts to existing residents would occur. Due to the depth, future maintenance/replacement of the sanitary lines, lining would occur versus digging up and replacing the lines. Even if larger lines were to be installed the costs associated with oversizing would be on the City as there are few benefitting properties. Lining of the sanitary lines provides a safer, convenient, and more affordable option to our residents. Similar to oversizing existing sanitary sewer lines, utilization of force mains would not be an affordable option, as this too comes at a cost with fewer benefitting properties and additional long term maintenance. The City of Andover's current sanitary sewer plan is utilizing bypass, and lift stations in order to maximize capacity within the system to allow for growth and support the MUSA we have today and providing for 3 units per acre.</p> <p>Additionally, the plan should also reference and provide for less housing density in areas protected by exiting State Laws relative to Shoreland and Scenic River District programs. It is unrealistic to plan for dense development to occur in these areas as it is prohibited by State Law.</p>	<p>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. 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. 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 cannot comment specifically on the current local system capacity situation within the City of Andover, other than to point out that in other communities that were less dense originally when local or regional sewer was first offered and provided, through time, they have developed and redeveloped into more dense residential land use patterns. This evolutionary change within these communities often requires additional investments in infrastructure (water, sewer, streets). The regional wastewater system includes in its design consideration flow generation rates that would accommodate residential densities greater than the 3 units per acre as required under Thrive MSP 2040. Also, regionally speaking, the Council has determined that the average annual "wastewater" discharge from a residential unit is 60,000 gallons or less. This equates to an average flow per household of about 165 gallons per day. At 4 units per acre, this would result in approximately 660 gallons per acre. The Metropolitan Council assumes a generation rate for residential land areas of 800 gallons per day average in its design assumptions.</p>



Comment	Response
<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>
<p><b>City of Belle Plaine</b></p>	
<p>Density and Housing. We firmly acknowledge the need for additional dwellings including those at prices responsive to each citizen's needs. We support the Metro Council's objective to respect the relationship with land and water as a foundation for regional growth. We support the Metro Council's objective to ensure people in all types of communities find housing opportunities that align with their needs. We encourage the Council to expand suppleness within certain policies so as to ignite housing production from the bottom-up.</p>	<p>Thank you for your supportive comments. We look forward to continuing to work with you towards these goals.</p>

Comment	Response
<p>The existence of every dwelling begins with a financial calculation based on risk involved in producing a return. The creation of every dwelling is a hyper-local activity at the neighborhood scale. The point of entry is through a local government office where the initial phone call is often 'do you think this could get approved'. Approval is through a myriad of micro processes and major decision points with plentiful off ramps on which developers may exit when the risk calculation turns unfavorable. Whether or not housing is likely to be approved or an off-ramp taken is decided in a local government environment shaped by elected officials with hyper-local accountability at the neighborhood level. We are proud to have created a responsive environment where over half of the dwellings created in the past ten years are attached, missing-middle, and multiple family units rather than one family dwellings. We are proud the density of units added over the past ten years well exceeds Metro Council's minimum density. We are proud we have the most affordable housing in Scott County. We have done this through intensive thoughtful collaboration helping to 'fit' each development to a specific physical site in a manner both responsive to neighborhoods and profitable for developers. It has not been easy to create this environment and it can change in a flash.</p>	<p>The Met 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 shape policies that support equitable and inclusive communities.</p>
<p>Policies and actions contained under Objective #1, in aggregate, order the form (density, staging, type of housing allowed, etc) and pace (rigid decision-making at local level regarding sequence of parcel take down) in top-down directive manner. This is without regard ever-changing variables including: economic conditions, what is feasible (what can get approved), what the market wants/will bear (what consumers want to buy &amp; development costs inputs, including accelerated land prices due to constricted supply), or current property owner mindset (this parcel is made of gold, we will never sell). The fact is circumstances can and do change and the burden of regional policy restrictions should ideally be responsive, resilient and accommodate change without adding process and cost.</p>	<p>The Met Council is directed to plan for the orderly and economical development of the region, including effective stewardship of regional infrastructure investments to support regional growth and administering the requirements of the Metropolitan Land Planning Act. Objective 1 continues many of the policies and practices of past regional plans regarding setting density standards and staging of development in 10-year increments, in addition to refining and responding to changing market conditions, which help the Met Council to carry out its legislative directive. We understand the uncertainty of knowing when a certain property owner might want to sell or when there might be the next economic recession. All of these factors are considered both in our forecasts and in how we support local governments in developing their local comprehensive plans.</p>

Comment	Response
<p>Adding rigid 'teeth' to density standards, requiring local jurisdictions to make increasingly constrictive assumptions about what land is going to develop when, forcing local zoning district change which has been the subject of discussion at the legislature, controlling sewer expansion permits, and making comprehensive plan amendments the only route to accommodate change are headwinds for housing development. We can plan all we want but the bottom line is our plan will likely not unfold as expected. Wouldn't a flexible, inexpensive, discussion-based administrative mediation process promoting development flexibility, collaboration and information exchange between local governments and Metro Council better respond to the unique nature of individual developments while maintaining Council's policy interests?</p>	<p>The Met Council is directed to plan for the orderly and economical development of the region, including effective stewardship of regional infrastructure investments to support regional growth and administering the requirements of the Metropolitan Land Planning Act. The Land Use Policy Chapter continues many of the policies and practices of past regional plans in addition to refining approaches and responding to changing market conditions, which help the Met Council to carry out its legislative directive. We understand that policy changes have impacts on communities as they turn to their local planning process.</p> <p>The policies from Thrive were not proposed to change for the Rural Service Area communities, like Belle Plaine. Many of the flexible approaches like using a community-wide average net residential density, are also carried forward from Thrive. While the Met Council provides the guidance to manage growth and development in the region per Minn. Stat. 473.145, local governments determine their local priorities. Local governments determine where and when growth happens, including the type and intensity of land uses, within the regional planning framework required by state statute. This approach in flexibility has not changed from Thrive MSP 2040 to Imagine 2050.</p> <p>We 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 implementation in the coming years as well as supporting local governments through technical assistance, tools, and funding resources to aid in the planning process. We also agree that collaboration and continued conversation is needed as we turn toward implementation and consider conditions as they may change over time.</p>

Comment	Response
<p>Regulatory Burden and Cost of Implementation. Several actions proposed appear to place additional reporting and regulatory directives on local governments. For example, establishing another monitoring program (redevelopment), further reporting on building permits, requiring local jurisdictions update parking regulations, requiring greenhouse gas emissions inventories &amp; projections, requiring development and funding of policy incentives supporting nature based climate adaptation solutions, requiring streamlining of local processes, requiring adoption living streets policies, required tracking/monitoring of residential and commercial components in mixed use districts, and incorporation of placemaking initiatives.</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 and direct technical assistance through the Sector Representative Program. 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> <p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to 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 also 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><b>City of Bethel</b></p>	
<p>Increase of Affordable Housing Minimum Density (Objective 1, Policy 2, Action 4). The 2040 land use plan allowed areas at 8 unit per acre minimum to meet the affordable housing goal. Imagine 2050 increases this minimum to a minimum of 10 units per acre. The City of Bethel is a largely developed community and has limited space to allow for this type of development. Increasing the density will make this more difficult to accommodate.</p>	<p>The Met Council has worked to increase flexibility for cities to meet this requirement, especially for smaller cities. Met Council will recommend providing an alternative compliance option for cities with a limited anticipated growth, defined as a Future Need allocation of less than 20 units. More specifics on this requirement will be communicated with the city directly.</p>

Comment	Response
<p>Housing Type Directive (Objective 5, P1, A1). The City of Bethel objects to the requirement placed on cities to allow for more than one housing type within residential land use categories. The City has limited sewer capacity and makes land use decisions based on this finite amount of capacity. The City cannot accommodate every single family house being converted into more than one unit.</p>	<p>This requirement will only apply to communities within the MUSA. For clarity, the City is not required to redevelop existing developments to meet minimum density requirements. Rather, the City is required to plan for a community-wide average net residential density only for areas that are planned to accommodate forecasted growth. Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p>
<p><b>City of Birchwood Village</b></p>	

Comment	Response
<p>Re: Proposed Classification of Birchwood Village in Draft 2050 Land Use Plan</p> <p>To whom it may concern,</p> <p>I am writing on behalf of the Birchwood Village City Council regarding the proposed, “urban edge,” designation of Birchwood Village in the Draft Imagine 2050 Land Use Plan. The City was contacted by our District 11 Representative, Gail Cederberg, who said that she believed that the reclassification from, “suburban,” to, “urban edge,” was perhaps not appropriate and that the City should discuss the matter and formally advise you on its position.</p> <p>This letter is to inform you that in the September 10th, 2024 Birchwood Village City Council meeting the Council passed the following Resolution: On a Motion made by Mayor Ford, seconded by Councilmember Hankins, it was resolved to: Object to the reclassification of the City of Birchwood Village from suburban to urban edge in the Draft 2050 Policy Land Use Plan; that the City retain its suburban classification; and that the City provide this as it position and, “public comment,” on the proposed designation. The Motion carried by unanimous vote.</p>	<p>The Met Council concurs that the Suburban community designation is more consistent with the City's current development patterns and we have made this change in Imagine 2050.</p>
<p><b>City of Blaine</b></p>	



Comment	Response
<p>The Community Designation section of the 2050 Land Use Policy describes the Suburban and Suburban Edge community designations. The City firmly believes that Blaine would more accurately be assigned a Suburban Edge community for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The Suburban designation specifies that the communities were developed during the housing expansions of the 1980s and 1990s while Suburban Edge were developed after the 1990s. The median year built for single family attached and detached units in Blaine is 1998 and 48% of single family attached and detached units were built in 2000 or later. There are approximately 700 platted single family or townhome lots with homes started in 2024 or are unbuilt.</li> <li>2. Suburban communities include small amounts of undeveloped land while suburban edge communities feature extensive undeveloped land. Blaine has over 750 acres of vacant developable land for low to medium density residential uses in the 2040 comprehensive plan. This does not include areas with existing lots sized under 5 acres with existing homes, which are expected to develop more slowly due to the extensive land assemblage required or 5-10 acre tracts surrounded by developed neighborhoods.</li> <li>3. Blaine has been in the top ten communities for new housing starts over the past decade, similar to Maple Grove, Woodbury, and Lakeville, which are all designated as Suburban Edge. Typical housing starts over the last decade have been over 300 permits per year, with 2021 and 2022 housing starts each exceeding any prior year after the great recession. This pattern shows continued housing growth consistent with the suburban edge community designation.</li> <li>4. Like other Suburban Edge communities, land expected to develop over the next planning period is primarily greenfield development with significant environmental hurdles including wetlands, floodplain, and rare plants that are less commonly found on the infill sites typical of development in Suburban communities. A large portion of the land expected to develop over the next planning period is not currently served by sewer and water, similar to other Suburban Edge communities.</li> </ol>	<p>The Met Council concurs that the Suburban Edge community designation is more consistent with the City's current development patterns and we have made this change in Imagine 2050.</p>
<p>Overall, the number of objectives that suggest an additional task as part of the comprehensive plan is too high. While well intentioned, this will result in an unwieldy comprehensive plan and reduce the thoughtfulness of responses to the objectives. Comprehensive plans are a more effective tool when the objectives contained within them is achievable to implement.</p>	<p>We appreciate your review of the policies in Imagine 2050 and understand that it can be a lot to review. 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.</p>

Comment	Response
<p>Compliance with the minimum net density should reflect the full range of densities allowed within a land use category, since a community that allows 12 to 60 units per acre in a high density residential land use category is providing for greater density than one that limits that land to 12 to 25 units per acre. We request that the performance- based approach to compliance with minimum densities allow for the midpoint of a density range to be used to demonstrate compliance, particularly in a community that has shown through plat monitoring a track record of approving projects that meet or exceed the midpoint density.</p>	<p>This section has been restructured, but language has been added to consider positive past planning outcomes and innovative local initiatives which have supported regional goals. Following adoption of Imagine 2050, as part of the implementation work plan, the Met Council will collaborate with local government partners to update the Met Council's administrative guidelines and procedures. We will note your comments for that work ahead and look forward to future collaboration on these items.</p>
<p>Any requirement for a Complete Streets or Living Streets policy should recognize the cost vs benefit relationship for adding infrastructure in developed neighborhoods, particularly on low traffic streets. While communities benefit from the addition of dedicated pedestrian infrastructure on some roads, the cost of retrofitting sidewalks on low traffic streets substantial and is unlikely to be equivalent to the benefit, and many residents oppose the installation of sidewalks adjacent to their property on lower traffic streets. Additionally, recognition of maintenance concerns for green infrastructure such as curb cut rain gardens and tree boxes should be provided since many smaller communities lack the staff, expertise or equipment to properly maintain this infrastructure. The City recommends the language regarding Living Streets in the Land Use Policy Plan be modified to soften this requirement to match the language around Complete Streets in the Transportation Policy Plan.</p>	<p>Communities are encouraged to consider Living Streets policies and principles but will not be required to adopt them. Language will be clarified to make the intent clear.</p>

Comment	Response
<p>Clarity on the climate reporting requirement is needed and the City requests this requirement be reviewed to determine the cost to the local government (in terms of staff time, consultant time, as well as direct expenditures). The City would not oppose reporting requirements similar in scale to the Regional Housing Policy and Production Survey. Any reporting more onerous than that would be beyond the limits of available staff. Efforts should be taken by the Met Council to reduce the burden of reporting through prepopulating data and calculations.</p>	<p>Thank you for this comment and details on the level of reporting that is manageable for Blaine. We want to continue to explore ways to reduce this burden for City staff, so this type of feedback continues to be helpful. When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to 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 also 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>
<b>City of Bloomington</b>	
<p>Demographics Reporting. The Draft Land Use Policy document and other Metropolitan Council communications consistently use the terms “region” and “metropolitan area” to refer to just seven of the counties in what the U.S. Census Bureau recognizes as a fifteen- county metropolitan area. This approach causes problems as the media frequently carries forward seven county data and reports it as metropolitan area data, which severely underreports the demographics of the Twin Cities region and negatively impacts economic development efforts. For example, in 2020, the population of the Minneapolis- St. Paul-Bloomington Metropolitan Statistical Area (MSA) was 3.69 million whereas the population of the seven-county Metropolitan Council jurisdiction was 3.16 million. Between the Metropolitan Council misreporting metropolitan area demographics and the media carrying that forward, even widely used artificial intelligence sources such as Gemini now significantly and inaccurately underreport the population of the Minneapolis-St. Paul-Bloomington MSA. Bloomington requests that Land Use Policy Plan references to regional or metropolitan area demographics accurately report data for the full fifteen-county MSA with the same data for the seven-county Metropolitan Council jurisdiction in parantheses.</p>	<p>Metropolitan Council's authority and responsibilities are defined in state law. Minnesota Statutes section 473.121 defines "metropolitan area" as the seven counties served by the Metropolitan Council. In some of its research reports and finance reports, the Council does report statistics for the larger 15-counties area and clearly identifies those as describing the "metropolitan statistical area."</p>

Comment	Response
<p>Acknowledging a Wider Region. Imagine 2050 would benefit from additional discussion of the interrelationship of the Metropolitan Council's seven-county jurisdiction with the portions of the metropolitan area that lie outside of that jurisdiction. Bloomington encourages the Metropolitan Council to modify its policy plans to provide:</p> <ul style="list-style-type: none"> <li>• an overview of growth in the border counties;</li> <li>• an overview of the extent to which border county residents are tied to the seven county area through transportation, employment and services;</li> <li>• a discussion of the reasons why growth has leapfrogged to these areas;</li> <li>• a seven-county vs. border county household, population, and employment comparison historically, today, and as forecast for the future;</li> <li>• the impact of border county growth on regional systems, particularly the transportation system;</li> <li>• the opportunities and challenges for seven-county/border county cooperation; and, the potential long term impacts of the Legislature's intent to continue its current definition of a seven county regional planning area.</li> </ul>	<p>Metropolitan Council's authority and responsibilities are defined in state law. Minnesota Statutes section 473.121 defines "metropolitan area" as the seven counties served by the Metropolitan Council. [DESCRIBE MPO JURISDICTION AND RESPONSIBILITIES?]</p> <p>Recognizing there is significant movement of people and materials in and through the Twin Cities, the 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). These projections 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> <p>The Council is interested in the potential for inter-county or inter-regional cooperation and pursuit of shared opportunities, but the Council's partnership or involvement, beyond its defined service areas, is not as a policy-setter. If requested or directed by the Governor or Legislature, the Council can act as a convener, facilitator or coordinator; there are recent examples of the Council in such roles. Otherwise, if another agency or organization was to initiate the study that the commenter suggests, Council staff could provide research and technical assistance.</p>

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Comment	Response
<p>Infrastructure Needs. A focus of the Land Use Policy Plan is establishing the minimum densities that cities must use to guide future growth. The single largest constraint for built-out cities like Bloomington to redevelop in a denser fashion is infrastructure capacity. In cities like Bloomington, vital infrastructure such as the sanitary sewer system was designed in the 1950s and 60s with limited capacity for future growth. Redeveloping at higher densities requires replacing that infrastructure at great cost. To help cities add density, Bloomington requests that the Metropolitan Council Policy Plans acknowledge the relationship between increased density and expanding infrastructure and suggest resources for cities that need to expand infrastructure. Bloomington also requests Metropolitan Council leadership on future legislative efforts to incentivize cities to increase density and affordable housing through state infrastructure funding assistance.</p>	<p>Density policies address the form/design of growth, not the quantity of growth. A modest increase in minimum densities does not require the City to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land. Compact development patterns can also help the City achieve its desired goals of preserving open spaces and natural systems by ensuring these areas are protected from development. Further, density is not the driver of increasing cost for local urban services. Growth is the primary factor that increases the cost for services in a community, through the reinvestment in and 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. More compact development patterns are one way to manage costs and keep expenditures down. One of the purposes of the regional and local planning processes is to identify what is needed to support expected growth in the region, including capital investments across the range of local and regional infrastructure.</p> <p>The City's local planning decisions are evaluated with each decennial planning cycle and reviewed for conformance to regional system plans, consistency with regional policy, and compatibility with the plans of adjacent and affected jurisdictions, as required by the Metropolitan Land Planning Act (Minn. Stat. Ch. 473). This has not changed. Options for all planning decisions can be explored with assistance of your Sector Representative and the Local Planning Assistance team as the City advances into the 2050 planning process.</p>
<p><b>City of Brooklyn Park</b></p>	
<p>The draft Imagine 2050 Land Use Policy Plan makes it clear that equity and environmental justice are priorities. In support of historically marginalized or vulnerable communities the City of Brooklyn Park would like to highlight the following policies as strategically important for addressing the region's inequities:</p>	<p>We have responded to each bullet point in the City's letter individually in other comments. However, we appreciate the City's support for the connection between environmental justice and equity.</p>
<p>Objective 2, Policy 3: Support community-led planning and anti-displacement efforts to ensure community cohesion during change resulting from public investments and market demand, at all scales of development. This is particularly important as the Blue Line Extension moves towards implementation in Brooklyn Park.</p>	<p>The Met Council concurs that this policy is strategically important for addressing the region's inequities and appreciates the importance of this policy to the City. The Met Council appreciates your supportive comments.</p>



Comment	Response
Objective 3, Policy 2: Revitalize and strengthen communities at the neighborhood level by planning and maintaining public spaces for community gatherings to foster a sense of belonging and ownership.	The Met Council agrees that this policy is strategically important for addressing the region’s inequities and appreciates your support.
Objective 4, Policy 3: Prioritize the protection, restoration, and enhancement of natural systems in overburdened communities to build local resilience. This is particularly important given the historic inequities in the metro region.	The Met Council agrees that this policy is strategically important for addressing the region’s inequities and appreciates your support.
Objective 5: Ensure that people in all types of communities find housing opportunities that align with their needs.	The Met Council is committed to fostering sustainable land use practices and expanding housing choices, including more infill, redevelopment and diverse housing types, to meet the needs of our growing region. We agree that this policy is strategically important for addressing the region’s inequities and appreciate your support.
Objective 6: Remedy past and present discriminatory land use practices. While environmental justice is discussed in this objective, policies related to addressing inequitable exposure to environmental harms are suggested additions.	Noted. We revised the Objective narrative and Policy 3, A4 to reflect a clearer connection to addressing inequitable exposure to environmental harms.
Objective 7: Implement land use and development practices that reduce greenhouse gas emissions, embed climate adaptation, and create resilient communities.	The Met Council agrees that this policy is strategically important for addressing the region’s inequities and appreciates your support.
Objective 8, Policy 4: Advance economic equity and wellbeing in historically underserved communities by fostering growth of small and local businesses, entrepreneurship, and diverse industries in all places.	The Met Council is committed to an inclusive, and sustainable economy that values businesses owned by people of color and immigrants and is resilient to the effects of climate change. Cities are encouraged to engage with tribal nations and underrepresented communities in the planning process to ensure diverse voices are heard. We are here to support local governments in developing plans that promote sustainable industries and equitable economic growth, ensuring that all communities have access to economic resources. We agree that this policy is strategically important for addressing the region’s inequities and appreciate your support.
Objective 3, Policy 3: Prioritize and plan for creation and preservation of green public spaces in developed areas. This is particularly important given the historic inequities in the metro region.	Green public spaces are an important environmental and social amenity in all types of communities. The Met Council agrees that this is strategically important for addressing the region’s inequities and appreciates your support.

Comment	Response
<p><b>City of Carver</b></p> <p>Through the 2040 Comprehensive Planning process it was challenging to identify what was suggested as best practice vs. what was required. Clarity throughout would help us focus on the information you are looking for.</p> <p>Carver is classified as a suburban edge community. Though our 2040 Comprehensive Plan would meet the required density of 4 units per acre, the proposed increase to density requirements limits local control. Our planning and density could hinge on a high-density project entering our market to increase overall density from around 3 units per acre to 4. In drafting the 2040 Comprehensive Plan, we were able to forecast 103 units of multi family housing units with a project with the Carver County Community Development Agency. We were able to forecast this based on planning that was completed in 2010 and 2015. Moving into the 2050 planning process, we do not currently have a multifamily project as defined and planned for in our growth area. This leads to some uncertainty that we will hit densities required.</p> <p>Carver would advocate for low density residentially guided property to be developed as single-family homes or duplexes. The addition of townhomes into all residential districts makes the relationship between the Comprehensive Plan and our zoning code challenging. People buying property at the edge of a development can understand low density housing as an idea.. but I do not believe this would include townhomes for most people. This will lead to challenging conversations with residents about proposed projects adjacent to their homes and neighborhoods. City Staff does not have the capacity, training, or tools to complete greenhouse gas inventories. We partner with State and Federal experts to complete this work and would advocate to continue these relationships. As always, the City of Carver advocates for increased local control and hope the Metropolitan Council will continue dialogue throughout this process to ensure success of all communities within the region.</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 additional clarity, the final document will provide a summary of policies and action by community designation. 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> <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> <p>Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which may have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all</p>

Comment	Response
	<p>aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p> <p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has a GHG inventory and strategy planning tool that communities can use to make meaningful commitments on GHG reductions. The Council will provide technical assistance on how to use this tool.</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 also 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><b>City of Centerville</b></p>	
<p>Fully built out communities - additional changes will impact infrastructure costs. Asking for exemption with less than 100 acres. "Missing in the middle" bill in the legislature - would like attention to that, assuming it doesn't impact the Met Council. We think the Met Council is very effective and well received. Density - incentivize redevelopment.</p>	<p>We appreciate the supportive comments. The Met Council will review its guidelines and administrative practices after the adoption of Imagine 2050. This is part of the implementation work plan. Changes under consideration include flexibility that supports infill and redevelopment. The Met Council does not typically utilize "exemptions" as a means of flexibility. Also, any changes made to provide local flexibility must be consistent with regional goals. We do look forward to collaborating with local government partners as this work begins.</p> <p>Regarding legislative initiatives, the we understand that there is interest at the legislature in solving for some of the very same issues the regional plan discusses. The draft plan is 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>
<p><b>City of Chaska</b></p>	

Comment	Response
<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. 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. 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>

Comment	Response
<p>The 2040 Land Use Policy Plan designated the City of Chaska as a Suburban Edge community which required a minimum density requirement range of 3-5 units per acre. Aligning with the 2040 regional plan, Chaska's current 2040 Comprehensive Plan plans for an overall net density to meet a minimum of 3.01 units per acre and allows for densities much higher to develop.</p> <p>In practice, Chaska's residential land use districts allow for densities higher than 3 units per acre. New and existing development has generally exceeded this minimum threshold. According to Metropolitan Council's data, Chaska's actual development density is at 3.61 units per acre, although that calculation does not include development data for 2014-2018 and 2021-2023. Accounting for the years missing from the Met Council's dataset, city staff has confirmed that new development has followed a pattern in line with Chaska's existing comprehensive plan and development pattern.</p>	<p>Thank you for your supportive and clarifying comments about the City's development pattern. It would be helpful to have the City's data to add to the Plat Monitoring Program to ensure that the City is receiving the credit it deserves in its density calculations and in its successful developments. We look forward to working with the City as we go into the 2025 reporting cycle.</p>
<p>The Imagine 2050 plan places a density requirement of 4 units per acre on Suburban Edge communities, which Chaska is categorized as. The policy ties the density requirement to expansion of the Metropolitan Urban Service Area (known as MUSA sewer services). The policy does clarify that Met Council's evaluation of community density will look at the city's density performance as a whole and not a single neighborhood. This allows for cities to plan for areas that provide a diverse array of densities from multi-family to small lot, to large lot across the community so long as the broader target of 4 units per acre is met.</p> <p>Chaska's current development patterns demonstrate that meeting the Met Council's increased density requirement of 4 units per acre would require a higher density than the City's demonstrated growth pattern. While Chaska's low density residential guidance allows for developments of 2-5 units per acre in the 2040 Comprehensive Plan, since 2020 the market average has developed just over 3 units per acre. This means the Met Council's increased requirement of 4 units per acre is above what the market has provided to this point.</p> <p>City staff believe it is important for the Metropolitan Council to recognize the market dynamics that the City of Chaska has experienced in its development to this point when setting density requirements.</p>	<p>Th City correctly understands its ability to apply a community-wide average net residential density to accommodate both lower and higher density developments. The Met Council's forecasts modeling, community designation analysis, and density analysis, among others, all considered local market trends prior to making the policy recommendations in Imagine 2050. The Met Council also heard support for more density and housing opportunities from the development community. We understand the local market trends in communities throughout the region. Imagine 2050 makes clear the commitment to fostering sustainable land use practices and expanding housing choices, including more infill, redevelopment, and diverse housing types, to meet the needs of our growing region and to shape policies that support equitable and inclusive communities.</p> <p>Please note that the Met Council provides technical assistance, tools and resources, and financial assistance to eligible communities via Planning Assistance Grants, and direct planning support via the Sector Representative Program. 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. We look forward to working with the city throughout the 2050 planning process.</p>

Comment	Response
<p>City staff want to ensure that the regional policy doesn't prevent realization of Chaska's long-standing goal of creating a greenbelt. Chaska's greenbelt land use policy was originally developed in the 1990's with the 2000 Comprehensive Plan and was updated in 2006 to include conservation residential and conservation business campus development. The long-standing policy has been to allow for rural residential uses along the city's edge at 4 units per 40 acres to preserve the rural feel and unique identity of this community as development meets our borders. Alternatively, Chaska has a conservation development policy in the greenbelt area which allows for one unit per gross acre to be developed on one third of the gross site, or 3 units per developed acre. Importantly, the area south of 82nd street, north of the TC&amp;W railroad and bifurcated by McKnight Road will need to be evaluated for MUSA expansion as part of the 2050 Comprehensive Plan update.</p> <p>City staff believe it is important that the Metropolitan Council recognize Chaska's longstanding greenbelt policy that advances the city's objective to preserve its unique community identity, preserve sensitive natural resources, and allow for development within these areas.</p>	<p>The planning approach in Imagine 2050 supports compact, dense development that accommodates growth on a smaller footprint thereby allowing more land to be protected for natural system preservation. Natural system preservation and accommodating density do not need to be mutually exclusive. The Met Council's current adopted guidelines for the implementation of minimum net residential density requirements is based on a community-wide average, not individual developments. This allows the City to plan for areas of both high and low density land uses (and everything in between). This practice is not recommended to be changed.</p> <p>The City's local planning decisions are evaluated with each decennial planning cycle and reviewed for conformance to regional system plans, consistency with regional policy, and compatibility with the plans of adjacent and affected jurisdictions, as required by the Metropolitan Land Planning Act (Minn. Stat. §473). This has not changed.</p>



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<p>Objective 7 of the Land Use Policy Plan sets policies and actions directed at local government to, “use and develop practices that reduce greenhouse gas emissions, embed climate adaptation, and create resilient communities.” In many ways the City of Chaska is supportive of and pursues actions to protect our natural resources, encourage efficient use of shared systems like water and electricity, and ensure resilience to meet changes in weather patterns and more frequent extreme climate events. In fact, being an environmentally conscious city is among the City Council’s strategic priorities. Additionally, the City of Chaska is held accountable by a number of state and federal agencies who have mandates related to climate and resource management.</p> <p>Objective 7 within Imagine 2050 assigns local responsibility for policies to reduce greenhouse gas emissions, incentivize urban design and development that maximizes renewable energy readiness, and encourages solar panel installations in underutilized land areas, support climate adaptation measures, and integrate local food systems and land use planning. Within these policies, there are many actions to which local governments are assigned responsibility however these actions lack clarity as to whether they are viewed as requirements by the Met Council or suggested best practices. Furthermore, if action steps are considered requirements the plan does not clearly articulate under what authority the Met Council intends to enforce the requirements or support communities in achieving success with their implementation.</p> <p>For example Policy 1 (P1), Action 6 (A6) states, “local governments must include in their comprehensive plans a greenhouse gas emissions inventory and projections generated from activity within the local government’s jurisdiction and covers the range of applicable emissions sectors.” In another example P1, A7 states, “local governments must plan for strategies that reduce or naturally sequester greenhouse gas emissions.” These two actions, assuming they are requirements, appear to require local governments to track and measure greenhouse gas emissions across public and private activities and also actively assume responsibility for their reduction across sectors. While the City of Chaska agrees that greenhouse gas reduction is an important goal worthy of partnership across public and private organizations, the City of Chaska does not serve the role of measuring and tracking emissions or regulating emissions.</p>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has developed a GHG inventory and strategy planning tool for local government, scaled at the local level, for use to make meaningful commitments on GHG reductions. The Met Council will provide technical assistance on how to use this tool.</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 also 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>

Comment	Response
<p>The City of Chaska requests the Metropolitan Council to clearly articulate its expectations of local communities by defining requirements as opposed to recommendations in its regional plan. When assigning requirements to local communities, the Metropolitan Council needs to clearly articulate the authority under which it is making the assignment. When assigning requirements to local communities, the Metropolitan Council needs to reflect the regulatory role of cities within the larger ecosystem of government agencies. When assigning new requirements to local communities, the Metropolitan Council needs to clearly articulate how it intends to support communities in implementation both financially and technically.</p>	
<p><b>City of Corcoran</b></p>	
<p>Objective 1: Respect the relationship with land and water as a foundation for regional growth.  Policy 1: “Incorporate Indigenous approaches, values, and practices in management of land and water sources.”  The local government action is “Encourage more broad application of American Indian land and water management practices at the individual, neighborhood, community, and regional level.”  City staff questions/comments include:  1. What does this mean for Corcoran?  a. Corcoran is a farming community. The practices utilized within the community are based on the conditions of the soil. The soil conditions are challenging as the soil is heavy with clay.  2. What are American Indian land and water management practices?  3. How will the City be expected to reconcile any tension between the Metropolitan Council’s goals for denser development with American Indian land and water management policies?  4. It says that this is “encouraged” what, if any, objective measure will be used to evaluate the local comprehensive plans for conformance with regional systems?</p>	<p>The inclusion of indigenous perspectives in land management not only acknowledges the ancestral Dakota lands over which the seven-county region sits, but the inclusion of this work as a land use policy establishes a role for American Indian communities in land management decision-making with the Met Council. This is not a requirement for local governments, thus not a conformance issue, but instead relates to areas of Council influence or ownership like the regional parks system and where local governments are interested in incorporating this perspective like open space, natural system, and local parks. The Met Council has established an American Indian Advisory Council to advise on this work and will be collaborating with the American Indian communities in the region. Also, the Met Council does not plan on re-creating resources which already exist. However, if there are region-specific issues and opportunities, the Met Council commits to ensuring that educational resources are available.</p>

Comment	Response
<p>Policy 2: Accommodate orderly and economical regional growth through efficient land use practices to reduce the cost of infrastructure expansion and service improvements.</p> <p>Action 2 says that the Metropolitan Council will use a rolling land supply analysis to evaluate requests to connect a new area within an already served municipality to the regional wastewater system. This appears to be separate from a wastewater capacity issue and more of a discretionary tool for the Metropolitan Council.</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. How will this be implemented? There are six criteria listed in the document and the criteria seem to limit local discretion. For example, the local government must show that the planned area is consistent with the density policy for the community designation. <ol style="list-style-type: none"> <li>a. Does this mean that if sewer permit is requested for a phase 2 of an approved development and that phase is 2.75 units per acre (upa) where 4 upa is the goal for the community designation, a sewer permit could be denied by the Metropolitan Council even if the community overall is meeting or exceeding density goals?</li> <li>b. Does this mean if the City has areas where they are allowing lower density to be averaged out with higher density areas in the City that the lower density areas will not qualify for a sewer permit?</li> <li>c. Does this apply if land is moved up in a staging area but is already in the MUSA? Would the Metropolitan Council deny a comprehensive plan amendment to modify the staging areas if the development is less than 4 upa if the City was meeting the density goal overall?</li> <li>d. Does this apply only if new land is proposed to be added to the MUSA? How will the existing 2040 MUSA area be evaluated?</li> </ol> </li> </ol>	<p>MUSA expansion criteria allows the Met Council to ensure that there is adequate land supply to accommodate the region's forecasted growth without having an oversupply that leads to premature infrastructure investments. It is a mechanism used by the Met Council to manage the orderly and economical development of the region, as directed by the Metropolitan Land Planning Act (Minn. Stat. §473). The Met Council does not intend to modify the 2040 MUSA, except as requested to be modified by local governments during their 2050 planning process. The 2050 MUSA will be determined for areas where growth had not previously been planned at a regional or local scale, through the local planning process.</p> <p>The Council will use a rolling land supply analysis based on established criteria currently identified on page 19 under Objective 1, Policy 2, Action 2 in the Land Use Chapter as part of its review of proposed 2050 MUSA areas. After a comprehensive plan is authorized, if staging needs to be moved up in anticipation of development sooner than expected, this is reviewed as a comprehensive plan amendment. The Met Council's current adopted guidelines for the implementation of minimum net residential density requirements is based on a community-wide average, not individual developments. This allows the City to plan for areas of both high and low density land uses (and everything in between). The Met Council will review its guidelines and administrative practices after the adoption of Imagine 2050, but this practice is not recommended to be changed as part of that review. Many of the comments provided refer to these administrative review guidelines. Sewer permits are regulated, in part, through Minn. Stat. §473.513 which requires consistency with the local comprehensive plan. This has not changed.</p>

Action 3 would require a minimum average density of 4 units per acre. City staff questions/comments include:

1. Increasing the minimum density from 3 to 4 units per acre is going to be politically challenging in many cities, and there is no evidence to show that this will accomplish the Metropolitan Council's stated goals.
2. What has the average density been reported as in the Plat Monitoring program? If we are already meeting the 4 units per acre in practice, why make the change?
3. How will the 4 units per acre be calculated?
  - a. There is some language to suggest that past development will be used to show compliance. Is this only on undeveloped land in the MUSA? Will existing lots and homes be exempted from this calculation like it was in the 2040 Comprehensive Plan?
  - b. Will the Metropolitan Council consider allowing the City to deduct areas of negotiated tree preservation/open space areas on private property from the net density calculations? For example, the City of Corcoran now requires a buffer yard easement for many developments that is required to be placed within a conservation easement in favor of the City. These easements will not allow public access but do require landscaping in perpetuity to ensure proper transitions between different intensities of development. Additionally, the City negotiates additional tree preservation and open space with developers through the PUD process. These areas are not required by Code, but the expectation is that these areas be preserved in perpetuity in order to be in compliance with the approvals of the development. Since they are privately owned areas not protected by ordinance, they cannot be deducted from the net density calculation.
  - c. If more flexibility to allow areas as discussed above to be deducted from the calculations when meeting other land management goals of the region, this could influence the amount of local resistance to move from 3 units per acre to 4 units per acre.

The Plat Monitoring Program tracks and monitors residential development patterns on the region's developing edge to assess the available land supply in participating communities and monitor the density of new development for consistency with Met Council policies. Between 2009 when the City joined the Program and 2023, the City has an average net residential density of 3.3 units per acre, consistent with current regional policy. More information can be found on the Met Council website at: <https://metro council.org/Communities/Planning/Local-Planning-Assistance/Plat-Monitoring-Program.aspx>. While the communities participating in Plat Monitoring have collectively reported an average net density of 3.94 units per acre, that number includes a handful of communities with Suburban designations as well as small number of Suburban Edge/Emerging Suburban Edge Communities that are significantly exceeding their minimum density requirements. Of the 21 Emerging Suburban Edge communities enrolled in the program a third are developing at less than 3 units per acre according to submitted plat monitoring data. The Met Council's current adopted guidelines for the implementation of minimum net residential density requirements is based on a community-wide average, not individual developments or existing neighborhoods. This allows the City to plan for areas of both high and low density land uses (and everything in between). In the 2050 Plans, the Met Council will review densities in all areas planned to accommodate forecasted growth in the planning period. The Met Council publishes its adopted guidelines on how to calculate net residential density on the Local Planning Handbook site here: <https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx>. The Met Council will 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 Imagine 2050 is adopted. This is planned to be a part of the implementation work plan. Changes under consideration (albeit not all-inclusive) include allowing permanent public easements to be netted out and reducing the look-back period for those enrolled in the Plat Monitoring Program. Stormwater management areas will also be evaluated and clarified as part of the update process. However, privately owned greenspace does not provide the protection from development which public open space areas provide nor the level of responsibility for its maintenance that local governments ensure. Any changes made to provide local flexibility must be consistent with regional goals. The Met Council looks forward to working with all local government partners as these programs and guidelines are evaluated.

Comment	Response
<p>Action 4 would change how opportunities for affordable housing are provided. Cities have two options:</p> <ol style="list-style-type: none"> <li>1. Guide sufficient land at a minimum density of 10 units/acre to meet the city or township's total Future Need.</li> <li>2. Guide sufficient land at a minimum density of 12 units/acre to meet the city or township's Future Need for 30% AMI or less and a minimum density of 8 units per acre to meet the Future Need at 31-60% AMI.</li> </ol> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. The 2040 land use plan allowed areas at 8 units per acre minimum to meet the affordable housing goal. Density alone does not lead to affordable housing and the document provides no empirical evidence to show that this increased density will result in more affordable housing. It could be argued that this will not create more affordable housing and that higher density housing opportunities are limited due to our geographic location and that high density housing demand is now and is expected to remain limited.</li> </ol>	<p>The draft 2050 Housing Policy Plan does recognize that density is not the only tool for the creation of affordable housing and has made modifications to increase the flexibility of the Land Guided for Affordable Housing (LGAH) requirement in Section 4 of the 2050 Housing Policy Plan in order to reflect this reality. However, Section 4 of the Housing Policy Plan does provide evidence that affordable housing is much more likely to be built at higher densities. According to Minn. Stat. 473.859, comprehensive plans must use land use planning to promote the availability of land to meet low and moderate income housing. This land must be available at densities high enough to accommodate low and moderate income housing, not necessarily required to be developed as affordable housing.</p>

Comment	Response
<p>Action 6 is to “allow for more than one housing type in land use categories with residential uses”.</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. The City’s Rural/Ag Residential land use category is limited to agricultural and single-family residential uses. Would accessory dwelling units within this area satisfy this action? Additional housing types such as duplexes, townhomes, etc., would not be appropriate in this area and would contradict with the 1 in 10 density limit set by the Metropolitan Council.</li> <li>2. The Metropolitan Council should be reminded that the land use plan is a policy document that does not list allowed uses. The land use plan provides general descriptions of land use categories, but the City uses the zoning ordinance to identify allowed uses in each zoning district. There may be several zoning districts that correspond to a particular land use category and the zoning district, not the land use category, will determine uses. A low-density residential district will have one or more corresponding zoning districts with several uses, including potentially different types of residential, institutional, or essential services that are not identified in the land use plan. This has recently become a point of conflict with Metropolitan Council staff and the difference between broad land use categories and the implementation tools in the Zoning Ordinance should be clarified. Where uses are consistent with the adopted zoning ordinance standards (which are consistent with adopted land use), the Metropolitan Council should not be withholding sewer permits.</li> </ol>	<p>Land Use Objective 1, Policy 2, Action 6 will only apply to communities within the MUSA. The policy language will be updated. Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. We agree that local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. As you know, Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This has not changed. As part of 2040 Plans, in the checklist of minimum requirements all land use categories were required to "include types of allowed uses and the minimum and maximum densities ('the allowable density range') for all categories that allow residential uses. Allowed uses should include a description of allowable housing types such as single family, detached, duplexes, townhomes, etc." This is not proposed to change and can be reconciled as part of the City's 2050 planning process. Broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Sewer permits are regulated, in part, through Minn. Stat. §473.513 which requires consistency with the local comprehensive plan. This has not changed.</p>
<p>Policy 5 is focused on protection of natural systems including groundwater and says that growth must consider water supply constraints. The policy statement and related action plans provide little guidance.</p>	<p>The roles and responsibilities have been clarified throughout the land use chapter and a new section has been added at the end of the land use policy chapter as well. Since the Met Council develops regional forecasts for population, households, and employment (growth), we will consider water supply constraints as part of that modeling and analysis. However, in local water supply plans, the local government must adequately demonstrate the availability of clean, safe drinking water in areas where forecasted growth will be accommodated.</p>



Comment	Response
<p>Action 6 says “Amendments to local water supply plans are needed when changes exceed the Metropolitan Council-adopted threshold for change which will be established through updated guidelines for comprehensive plan amendments. Consideration of a percentage of change similar to local forecast changes may be used.”</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. When will cities see these updated guidelines so that we can provide feedback?</li> </ol>	<p>As mentioned in the policy language, guidelines will be established for comprehensive plan amendments. That would apply to 2050 Plans and so would be part of the implementation work plan after the local comprehensive planning process largely concludes. As a reminder, local comprehensive plans are due to the Met Council on December 31, 2028. Amendments to those 2050 Plans would follow and would guide the timeline for these guidelines. Staff are continually coordinating with the DNR and other partners and will do the same for the implementation of Imagine 2050.</p>
<p>Objective 2: Maximize opportunities for growth in places well-served by transit, bicycle, and pedestrian infrastructure.</p> <p>Policy 1: Maximize opportunities for residential growth and supportive commercial growth in areas with mixed land uses that offer multiple travel choices.</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. This is another opportunity to use the PUD to allow mixed use developments through a PUD and blend the land uses on the site without a burdensome and unnecessary comprehensive plan amendment.</li> </ol>	<p>Specific development controls such as Planned Unit Development (PUD) ordinances are the authority of the local government. As a reminder, Minn. Stat. §473.858 does require zoning and subdivision ordinances (local controls) to conform with the adopted local comprehensive plan.</p>
<p>Policy 4 related to interconnected systems of streets, pedestrian and bicycle facilities includes action item 3 to “include market studies in local implementation strategies and priorities”.</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. Market studies are typically done for a development project by the developer and requiring a market study would be an unnecessary burden on many projects.</li> </ol>	<p>Including market studies is a suggestion; not all projects would warrant a market study. Language has been clarified to reflect that this is not a requirement. However, examining the potential demand for various kinds of transportation investments could be done as comprehensive planning and infrastructure planning proceed. Here municipalities are encouraged to evaluate options for local pedestrian, bike, and rolling infrastructure that could increase local use and reduce overall VMT, while enhancing local quality of life. This encourages municipalities to think a little beyond current assumptions.</p>

Comment	Response
<p>Objective 3: Establish vibrant, inclusive, connected, and safe communities for people to live, work, and recreate in.</p> <p>Policy 1. Prioritize planning policies and practices that support mixed-use development, walkable neighborhoods, easy access to transit, and enhanced connectivity through biking and other sustainable transportation options.</p> <p>Action 5 - Adopt a Living Streets policy in the land use plan and integrate this policy into zoning ordinances, transportation plans, and development regulations to ensure its consistent application in all projects and street redesigns.</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. Is this mandatory?</li> <li>2. If yes, will funding be provided by the Metropolitan Council to local governments for this effort?</li> </ol>	<p>Communities are encouraged to consider Living Streets policies and principles but will not be required to adopt them. Language will be clarified to make the intent clear.</p>
<p>Action 7 - Track and monitor both residential and commercial components in mixed-use districts and develop guidelines to assess the extent of residential diversity within the districts. If local governments use large mixed-use districts, they must establish a precise methodology for tracking and monitoring uses for effective evaluation of system impacts and regional trends.</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. How is a “large mixed-use district” defined?</li> <li>2. What are “system impacts and regional trends” and how would they be measured?</li> <li>3. City staff noted several areas where mixed use developments are pushed for within 2050 Imagine. However, developers working with the City are consistently saying mixed-use development is not financially feasible. Staff continues to push for mixed-use development where it is guided for in the City’s comprehensive plan, but the realities of the market and financing may make this challenging to implement. <ol style="list-style-type: none"> <li>a. Is this action looking to reduce flexibility between the ratio of residential and commercial uses within mixed use areas? If so, this could make the development of mixed-use neighborhoods even more challenging – particularly for communities still establishing enough rooftops to support commercial uses. This is further complicated with commercial development responding to post-COVID market trends.</li> </ol> </li> </ol>	<p>Mixed-use areas look different across the region, depending on the local context and market. From a regional perspective, it remains important to understand the land use mix in each community and its impact on regional systems and policies. With input from communities, the Met Council will prepare guidelines and resources for communities to measure the mix of land uses within their mixed-use areas. These resources and guidelines will accompany the Local Planning Handbook to be released in late 2025.</p>

Comment	Response
<p>Policy 4 – Protect and preserve historic and cultural assets to enhance community heritage and identity in alignment with the unique needs of each community.</p> <p>Action 4 - Local governments must develop policies to protect and preserve historic and cultural assets and should additionally adopt culturally expansive ordinances to further enhance restoration and preservation efforts.</p> <p>City staff questions/comments include:  1. What is a culturally expansive ordinance? Are there examples of what this ordinance would look like?</p>	<p>The Action statement describes culturally expansive ordinances as those that may "... include provisions related to language access, cultural celebrations, religious practices, heritage preservation, and other aspects of cultural expression and identity." Communities are encouraged to consider adopting this type of ordinance but will not be required to adopt them. Language will be clarified to make the intent clear. In addition, the Met Council will continue to support local governments through technical assistance, tools, and funding resources to aid in the local planning process.</p>
<p>Objective 6: Remedy past and present discriminatory land use practices.</p> <p>Policy 1 -Take ownership of past harms, provide transparent communication, and hold all government partners accountable to plans and actions. Communities should hold the Metropolitan Council accountable to action on these issues. (Metropolitan Council)</p> <p>Action 4 - Acknowledge inequities and disparities that exist within local jurisdictions and across the region and identify strategies to address them.</p> <p>City staff questions/comments include:  1. What does this look like?</p>	<p>The Met Council is committed to creating an inclusive and equitable region. As part of the comprehensive planning process, the Met Council will provide local government units with technical assistance and best practices to help meet these goals. As an example, a local government could partner with or support Just Deeds to discharge racially restrictive covenants to take ownership, acknowledge, and remedy past harms as one avenue of many. There are other efforts as well that could work to alleviate past harms still evident in our built environment like examining local processes which create barriers, revising local controls which reinforce exclusionary practices, or changing existing governmental systems which perpetuate inequities. We encourage local governments, communities, and regional partners to work together to address inequities throughout the region. To aid in this, the Met Council has established an Equity Framework as well as supportive frameworks related to environmental justice, anti-displacement, and community-centered engagement as a means to start community conversations about what actions might be of most importance to your city.</p>

Comment	Response
<p>Objective 7: Implement land use and development practices that reduce greenhouse gas emissions, embed climate adaptation, and create resilient communities.</p> <p>Policy 1. Reduce greenhouse gas emissions in the region to achieve the emissions reduction goal in state statutes. (Metropolitan Council/Local Government)</p> <p>Action 1. Establish regional climate change strategies with state, regional, and local partners including setting regional emissions reductions targets for the different emissions sectors and actions to accomplish those goals. (Metropolitan Council/Local Government)</p> <p>Action2. Update and maintain the Metropolitan Council’s Climate Action Work Plan on a regular cycle and dedicate resources to the operational climate action plan implementation. (Metropolitan Council/Local Government)</p> <p>Action 6. Local governments must include in their comprehensive plans a greenhouse gas emissions inventory and projections generated from activity within the local government’s jurisdiction and covers the range of applicable emissions sectors.</p> <p>Action 7. Local governments must plan for strategies that reduce or naturally sequester greenhouse gas emissions.</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. Is the City now expected to include a climate action plan in the 2050 Comprehensive Plan? <ol style="list-style-type: none"> <li>a. If so, what are the minimum standards/expectations?</li> <li>b. Is funding from the Metropolitan Council available for this effort?</li> </ol> </li> <li>2. Will additional criteria be provided to cities for review?</li> <li>3. Is the greenhouse gas emissions inventory and projections information required to be in the land use chapter or can it be in the community background chapter?</li> </ol>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has developed a GHG inventory and strategy planning tool for local government, scaled at the local level, for use to make meaningful commitments on GHG reductions. The Met Council will provide technical assistance on how to use this tool. 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 also 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. The Council will not be requiring that cities include a Climate Action Plan in their local comprehensive plans. The Met Council will consider GreenStep membership as a possible method of meeting minimum climate requirements. Minimum requirements have not yet been established and will be part of the Local Planning Handbook update planned for release in late 2025. We will be collaborating with local governments throughout the process.</p>
<p>Policy 2. Support local planning decisions to restore, enhance, and maintain the urban tree canopy. (Metropolitan Council)</p> <p>Action 3. Implement tree planting, preservation, and maintenance initiatives at the local level. The Metropolitan Council will provide technical assistance, training, and resources to support local governments and residents. (Metropolitan Council/Local Government)</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. Are cities now required to adopt a tree preservation ordinance? Is funding from the Metropolitan Council available for this effort?</li> </ol>	<p>The Met Council is not requiring local governments to adopt a tree preservation ordinance. However, the Met Council may set minimum requirements for local governments to adopt tree canopy commitments in their local comprehensive plans.</p>

Comment	Response
<p>Policy 5. Support integration of climate adaptation measures into development to prepare for current and projected climate impacts on our region.</p> <p>Action 7. Ensure that new construction projects and existing infrastructure upgrades prioritize the incorporation of nature-based solutions to reduce the likelihood and intensity of potential climate impacts. (Metropolitan Council/Local Government)</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. What are nature-based solutions?</li> <li>2. How will cities establish standards to ensure compliance?</li> </ol>	<p>Nature based solutions are sustainable approaches that utilize natural ecosystems and biodiversity to address various environmental, social, and economic challenges. Examples of this could be using Cottonwood trees to clean contaminated soil. It could include planning for dual purpose uses to deal with localized flooding - for instance, designing a frisbee golf course with native planting and low-lying areas that can be designed to flood when local road networks are overwhelmed with water. It means using landscaping practices to remove chloride from the soil or clean the air. These are just some examples, but there are many examples available. The language will be revised so that it does not read as a requirement to allocate dedicated funds to implement this action. There will be a requirement to commit to adaptation-related climate actions in the local comprehensive plans, Minn. Stat. § 473.859, subd. 7 Climate mitigation and adaptation also 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>Action 8. Develop policy incentives and allocate dedicated funding to support the adoption of nature-based climate adaptation solutions at the local level.</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. Is this a requirement? Is funding from the Metropolitan Council available for this effort?</li> <li>2. Are there examples of what this looks like?</li> </ol>	<p>The Council will change this action so that it does not read as a requirement to allocate dedicated funds to implement this action. There will be a requirement to commit to adaptation-related climate actions in the local comprehensive plans. Minn. Stat. § 473.859, subd. 7 Climate mitigation and adaptation also 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>Policy 6. Partner with American Indian and overburdened communities to collaborate on climate solutions. (Metropolitan Council)</p> <p>Action 3. Co-create regionally actionable climate solutions with Tribal Nations, American Indian communities, and underrepresented communities. (Metropolitan Council/Local Government)</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. What does this look like? Are there examples available to cities?</li> <li>2. What is the City's role?</li> <li>3. How would it be incorporated into the land use chapter?</li> </ol>	<p>For each policy and action, there is a tag for "Met Council" or "Local Government" or both as appropriate. The text has been revised to make clear that these are commitments that the Met Council is making to work with new partners on climate action at the regional scale. The Met Council will convene regularly on climate action, and we will welcome local governments to those discussions.</p>

Comment	Response
<p>Policy 7. Integrate local food systems and land use planning to build community resilience, access to healthy food, and food security. (Metropolitan Council/Local Government)</p> <p>Action 2. Support farm-to-table initiatives and local food markets, facilitating direct connections between producers and consumers and promoting regional food systems. (Metropolitan Council/Local Government)</p> <p>Action 3. Implement supportive urban agriculture policies to designate areas for community gardens and urban farms, streamline permitting processes and provide incentives to remove barriers to food-growing spaces on public and private land. (Local Government)</p> <p>Action 4. Partner with immigrant groups, Tribal Nations, and American Indian communities to establish, or join, coalitions that address urban agriculture and harvesting that respects cultures and spiritual practice. (Metropolitan Council/Local Government)</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. Is this a requirement to adopt new agriculture policies or a suggestion of something to consider when developing the plan?</li> <li>2. This feels like a potential implementation task after adoption of the comprehensive plan. What is expected to be incorporated into the plan?</li> </ol>	<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. Minimum requirements have not yet been established and will be released with the Local Planning Handbook update planned for release in late 2025. We look forward to collaborating with local governments during that process. However, in line with State statute, the Met Council may require local governments to make commitments related to food systems planning and would develop technical assistance to help communities to make meaningful commitments which match community vision.</p>
<p>Objective 8: Support the economic wellbeing of our region and its communities.</p> <p>Policy 2. Support industries that directly contribute to addressing climate change and promoting environmental sustainability. (Metropolitan Council/Local Government)</p> <p>Policy 3. Value and promote a just economy through the economic growth and wellbeing of Black communities, American Indians, people of color, immigrants, and people of all ages and abilities in the region through equitable access to economic resources. (Metropolitan Council/Local Government)</p> <p>City staff questions/comments include:</p> <ol style="list-style-type: none"> <li>1. What is required of cities as part the comprehensive planning process?</li> </ol>	<p>As part of the comprehensive planning process, the Met Council provides cities with technical assistance and best practices to help meet these goals. The Met Council is committed to an inclusive, and sustainable economy that values businesses owned by people of color and immigrants and is resilient to the effects of climate change. Local governments are encouraged to engage with Tribal nations and underrepresented communities in the planning process to ensure diverse voices are heard. We are here to support local governments in developing plans that to promote sustainable industries and equitable economic growth, ensuring that all communities have access to economic resources.</p>
<p><b>City of Cottage Grove</b></p>	



Comment	Response
<p>Objective 1, Policy 2, Action 3 - Minimum Average Net Density Imagine 2050 proposes an increase in minimum residential density from 3.0 units per acre to 4.0 units per acre. The increase in minimum density is a large shift from previous plans and does not take into consideration the unique characteristics of individual communities. The City of Cottage Grove's planned and focused growth area consists of a vast array of land topography, terrain and unique characteristics. These unique existing attributes create challenges for development and often require developers to fit into the landscape rather fit the landscape to their housing and a greater density is not always realistic. Cottage Grove agrees to the real demand for a great diversity in housing across the region however, we recognize housing demand, market, and developer interest are unique to each community within the seven-county metropolitan area and the density demand in Cottage Grove is not the same scale as communities with greater populations, jobs, transit, etc. This is indicated in the definition of a Suburban Edge Community identifying these communities as having " ... extensive undeveloped land planned for low to medium residential densities ... " (Pg. 12). The City objects to the proposed minimum density change from 3.0 units per acre to 4.0 units per acre - a one-size fits all policy is not practical.</p>	<p>The Met Council acknowledges that a one-size fits-all approach to regional policy would not account for the various planning needs throughout the region. In Imagine 2050, the Met Council established eight different community types including Urban, Urban Edge, Suburban, and Suburban Edge designations for municipalities within the MUSA, like Cottage Grove. The minimum density ranges for these communities vary from 24 units per acre (u/a) in Urban areas; 14 u/a in Urban Edge; 7 u/a in Suburban; and 4 u/a in Suburban Edge communities. Further, Rural Centers (small towns outside of the MUSA with local wastewater treatment plants) also have minimum density expectations of 3 units per acre. The rural and agricultural designations outside the MUSA include Diversified Rural, Rural Residential, and Agricultural which support maximum densities to ensure that development pressures don't impede on the agricultural economy in the region. This is a regional approach that acknowledges the diversity of community types, patterns of development, local market trends, and current local plans already in place. Compact development patterns accommodate growth on a smaller footprint, using less land, and so may further these City goals. Preserving natural systems and accommodating density do not need to be mutually exclusive. We understand that policy changes have impacts on communities as they turn to their local planning process. The Met Council is committed to supporting local governments through technical assistance, tools, and funding resources to aid in that process.</p>
<p>Objective 1, Policy 2, Action 1-Compact Development The City objects to the proposed compact development proposed to preserve land, increase public investment, and protect natural resources and climate. Taking into consideration local housing markets, developer interest, and unique land attributes, the proposed reduces developer creativity, and reducing the ability for diversification of housing supply and options. The City of Cottage Grove is deeply concerned with provisions within the Plan, specifically under the Land Use Objective, Policy 5 which the city feels broadly preempts city zoning and land use authority, removes public input in residential development processes, and lacks consideration for how cities use zoning and land use to ensure the health, safety, and welfare for residents and scale infrastructure to support new housing density.</p>	<p>Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. We agree that local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p>

Comment	Response
<p>Objective 1, Policy 2, Action 2 - New Connections to Regional Sewer System</p> <p>With unique developable areas requiring creative development design in Cottage Grove, single family development will be challenging to meet the average 4.0 unit per acre density. This objective then limits diversity of housing and requiring new connections to meet the minimum density likely limits the ability for unique development opportunities. The City objects to the policy if the intent is to allow connection for only those development projects meeting the proposed minimum average net residential density.</p>	<p>The commenter seems to be referring to a part of the density analysis report related to new connections to the regional sewer system meeting minimum density requirements for the community designation. As part of the analysis and evaluation completed to inform policy development, many approaches were considered, but not all approaches evaluated were recommended for inclusion in the policy language. The referenced approach is not included in the land use policy language. Objective 1, Policy 2, Action 2 relates to the use of a rolling land supply and proposes MUSA expansion criteria.</p>

Comment	Response
<p>Objective 5, Policy 1- Housing Opportunities 'Missing Middle' Addressing housing affordability and availability is a statewide issue however, a one size fits all approach does not fix the problem as cities across Minnesota are unique with distinct, local housing needs, public infrastructure capacity, public services and safety availabilities and funding resources. Objective 5, Policy 1 would allow a multitude of housing types on a single family residential lot while most cities do not have the infrastructure including water, stormwater, and sewer systems to support the additional density in these residential guided areas. The proposed action does not consider who is responsible for the cost of upsizing infrastructure and long-term maintenance passing the burden to the local taxpayers. The proposed actions replace existing zoning and land use authorities with an overly broad and rigid framework that eliminates the ability for cities to account for local characteristics and to be responsive to local conditions. Cities across the region have implemented innovative changes at the local level with community engagement to address their individual zoning and land use ordinances, provide local resources to ensure affordability, and create opportunities for new development across the housing spectrum. For these reasons the City urges adjustment of the actions under this policy.</p>	<p>The Met Council acknowledges that a one-size fits-all approach to regional policy would not account for the various planning needs throughout the region. For example, in Imagine 2050, the Met Council established eight different community designations to account for different policy approaches.</p> <p>Density policies address the form/design of growth, not the quantity of growth. A modest increase in minimum densities does not require the City to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land. Further, density is not the driver of increasing cost for local urban services. 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. More compact development patterns is one way to manage costs and keep expenditures down.</p> <p>Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p> <p>As part of 2040 Plans, in the checklist of minimum requirements all land use categories were required to "include types of allowed uses and the minimum and maximum densities ('the allowable density range') for all categories that allow residential uses. Allowed uses should include a description of allowable housing types such as single family, detached, duplexes, townhomes, etc." This is not proposed to change and if missing in the 2040 Plan, can be reconciled as part of the City's 2050 planning process.</p>

Comment	Response
<p><b>City of Credit River</b></p>	
<p>The City of Credit River thanks you for the opportunity to review and comment on the IMAGINE 2050 plan. We want the City of Credit River to remain a well-planned, rural residential community. In this letter our Council would like to share some common themes that have been expressed by our residents and local officials in reviewing the draft IMAGINE 2050 plan.</p> <p>The City also notes that several of the proposed housing policies appear to stem from failed legislative efforts during the 2024 Legislative session. Specifically, much of the density increase requirements echo the 'Missing Middle Housing' bills, which were not passed last session. These proposals, which focus on increasing density and affordability mandates, are being reintroduced through the Metropolitan Council's housing policy plan, despite their failure to gain legislative support.</p>	<p>Regarding legislative initiatives, the Met Council is charged 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>
<p>The CURRENT regional policy plans do not show a plan to expand transit services into the City. The City does not have the current infrastructure capabilities to provide any expansion opportunities, and we would not support expansion into the City or policies that would enable that approach in the next ten years.</p> <p>In this regard, Specifically, Objective 2 of the 2050 Plan offers to “Maximize opportunities for growth in places well served-by transit, bicycle and pedestrian infrastructure”. This is quite an exclusive matter to communities that are prepared for that transportation infrastructure and want rapid expansion of such. This is not Credit River, yet all communities should be supported by the Metropolitan Council with guided growth decisions tailored to their individual needs rather than a tunnel vision focus of transit-oriented development – which in most cases is not possible nor fundable. Recall the METROPOLITAN COUNCIL gutted funding for local transit (or “last-stop” transit) many years ago only to focus on inner-ring areas and far-flung commuter lines.</p>	<p>The Met Council recognizes the variety of local communities in the region. Local governments at every level of development can work on their development patterns. For smaller jurisdictions without transit, a focus on walkability, bike-ability, and development that supports local trips may be the most achievable outcome, and can make the community a great place to live. This policy is not restricted to those with access to transit services.</p>
<p>Community Designations: The proposed designation change in the northern portion of Credit River to Suburban Edge and an increase of four units per acre is patently unacceptable. We request and expect to keep it designated Diversified Rural. We state this as the potential sanitary sewer extension is not fully developed nor funded, and thus any shift to Suburban Edge is a drastic, premature and costly to the City and even its current residents. The City already has a significant challenge reaching</p>	<p>The City requested the provision of regional wastewater service in several neighborhoods where there were failing on-site sewer systems and no alternatives but to connect to regional wastewater service to address negative environmental impacts, and potential public health impacts for homeowners in those neighborhoods. Where regional wastewater services are provided, there are minimum density requirements to ensure there is efficient use and economical provision of regional investments, as</p>

Comment	Response
<p>the 3 units per acre requirement of Diversified Rural, and strongly requests the Metropolitan Council to reconsider this change and the minimum density requirement; unless of course the COUNCIL would like to pay for all the costs both direct, indirect, short and long term impacts associated with this ill-guided decision.</p> <p>In addition, how were these Community Designations identified? The City of Savage which is fully built out has the same designation as the northern part of Credit River which is not fully built out and has completely different local controls and land use character. The community designation should reasonably reflect the true character of the City, within a reasonable time horizon and not bankrupt the City to meet some unreasonable goal.</p> <p>So, in opposition to the classification change, the City offers the following comments:</p> <p>Objective 1, Policy 2, Action 3 (Residential Density Requirements and Policy Standards) states:</p> <p>Measure minimum net density by taking the minimum number of planned housing units and dividing by the net acreage. Net acreage does not include land covered by wetlands, shoreland setbacks and easements, water bodies, public parks and trails, public open space, public and institutional buildings, arterial road rights-of-way, and other undevelopable acres identified in or protected by local ordinances such as steep slopes. This applies to local governments within the MUSA and Rural Center communities.</p> <p>The City challenges the Council to reevaluate the land area types excluded to determine net acreage. While the land area types noted above may be reasonable to remove, the City asserts there are other land area types that might also be removed from the gross acreage as they, too, are undevelopable lands. Any land area for which a regulatory agency's rule has restricted the land's ability to be used for actual housing should be excluded.</p> <p>For example, reasonably sized local roadways should be considered given they are needed to access residences but cannot be constructed upon. Additionally, sizes of stormwater treatment areas are based on other agency regulatory agencies (watersheds and WMOs) and site-specific conditions. While the City acknowledges the land area needed for a stormwater treatment areas is developable land area, the land cannot be developed upon. Furthermore, storm water treatments in areas of poor soils may need to be enlarged to be able to adequately meet the volume and infiltration needs, thereby reducing the actual developable area. Lastly, any natural resource buffers and setbacks imposed by local</p>	<p>required by state law. Minimum density requirements are implemented to not only ensure that infrastructure investments are economical, but also that the regional goals in Imagine 2050 are achieved.</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. Met Council discussed the community designation with Savage, and in the final land use policy Savage is designated as Suburban in the final policy language, which corrects the different character that Credit River mentioned. This often happens during the planning process.</p> <p>Regarding net residential density calculations, areas protected or removed from development by local ordinance are already allowed to be netted out of the calculation. The Met Council will 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 Imagine 2050 is adopted. This is planned to be a part of the implementation work plan. Changes under consideration (albeit not all-inclusive) include allowing permanent public easements to be netted out and reducing the look-back period for those enrolled in the Plat Monitoring Program. Stormwater management areas will also be evaluated and clarified as part of the update process. However, any changes made to provide local flexibility must be consistent with regional goals. The Met Council publishes its adopted guidelines on how to calculate net residential density on the Local Planning Handbook site here: <a href="https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx">https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx</a></p> <p>Regarding the practical feasibility of demand and development in land use policy, the City is not required to do that study or analysis. Instead, the Met Council, during the review of local comprehensive plans, will implement a data-based approach using UrbanSim, a real estate market simulation model. This is the same model used to develop the local forecast set.</p>

Comment	Response
<p>governments or other regulatory agency should be considered eligible to be netted out.</p> <p>Objective 1, Policy 2, Action 5 states (Residential Density Requirements and Policy Standards) states:  Evaluate the practical feasibility of demand and development to ensure that both the intensity (density range) and location of planned developments are practical. Local governments need to plan land uses that are realistically marketable and serviceable within the planning period, focusing on plausibility and long-term viability. This helps prevent the overestimation of development outcomes, thereby reducing the risk of underutilized infrastructure, inefficient land management, and implausible planned densities. This differentiates between what is merely allowed and what is plausible, providing a realistic framework for land use planning. Along with the Council, the City of Credit River is required to plan for 30 years of growth and development. However, many factors affect how the community will grow and develop in that timeframe. Requesting local governments to forecast plausible consumer needs in the planning decades is an unreasonable expectation and the City is not in support of this requirement. Plausible demand forecasting is a complex and expensive task and could result in a City's inability to quickly adjust to changing market demands and could result in unnecessary and even more complex local comprehensive plan amendments.</p>	
<p>Action Items:  Several actions proposed in this policy plan look to place additional reporting and regulatory directives on local governments and is plain folly to believe that Local Units of Government can afford to monitor and perform as such.  Some of these include establishing another monitoring program (redevelopment), further reporting on building permits, requiring local jurisdictions to update parking regulations, requiring greenhouse gas emissions inventories and projections, requiring development and funding of policy incentives supporting nature based climate adaptation solutions, requiring streamlining of local processes, requiring adoption living streets policies, required tracking/monitoring of residential and commercial components in mixed use districts, and incorporation of placemaking initiatives.  We will plainly tell you that none of these will occur (unless the Metropolitan Council would like to pay for these) and so...then what happens?  Some language is attempted to be softened by incorporating modifiers</p>	<p>Minn. Stat 473.145 requires the Met Council to plan for the orderly and economical development of the region, including effective stewardship of regional infrastructure investments to support regional growth and administering the requirements of the Metropolitan Land Planning Act. The Land Use Policy Chapter continues many of the policies and practices of past regional plans in addition to refining approaches and responding to changing market conditions, which help the Met Council to carry out its legislative directive. Local governments are statutorily required to update their local comprehensive plans to conform to regional system plans, to be consistent with regional policy, and to be compatible with the plans of adjacent and affected jurisdictions.  As it relates to redevelopment monitoring, that is a Met Council responsibility as indicated in the identifier following the proposed action. Communities already provide information on annual building permits and this is an existing source of information. For items like parking regulations, living streets programs, streamlining of local processes, and placemaking initiatives, these are local decisions and we have clarified that language that it was not intended to be a requirement.</p>



Comment	Response
<p>such as ‘consider’ or ‘examine.’            We are however not relieved by such terminology as past actions by the Metropolitan Council quickly turn to demands. And so, these requirements put significant financial and resource burden on the City of Credit River and all cities. Our City does not have the bandwidth to take on these additional reporting directives and will not prioritize them when budgeting.            We will plainly tell you that none of these will occur (unless the Metropolitan Council would like to pay for these) and so...then what happens?            Objective 7 Policy, 1, Action 6: offers that Local governments must include in their comprehensive plans a greenhouse gas emissions inventory and projections generated from activity within the local government’s jurisdiction and covers the range of applicable emissions sectors. While the City understands the need to better understand greenhouse gas emission, inventory and projection analysis of this nature can pose a burden on local governments such as the City of Credit River who do not have the resources available to conduct this analysis. Should the Council implement this action item, the Council shall provide direct financial assistance to local governments and provide technical data to achieve this component of their individual comprehensive plans.            We will plainly tell you that none of these will occur (unless the Metropolitan Council would like to pay for these) and so...then what happens?</p>	<p>Mixed-use areas look different across the region, depending on the local context and market. From a regional perspective, it remains important to understand the land use mix in each community and its impact on regional systems and policies. With input from communities, the Met Council will prepare guidelines and resources for communities to measure the mix of land uses within mixed-use areas, if there are any. These resources and guidelines will accompany the Local Planning Handbook update to be released in late 2025.            When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has a GHG inventory and strategy planning tool that communities can use to make meaningful commitments on GHG reductions. The Met Council will provide technical assistance on how to use this tool.            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 also 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.            We understand that policy changes have impacts on communities as they turn to their local planning process. 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.</p>

Comment	Response
<p><b>Growth:</b> According to the most recent local population, household, and employment forecasts released this summer by the Metropolitan Council, the City of Credit River is projected to grow to a population of 6,427 by 2050 a 17 percent increase in the next 30 years compared to the 11 % growth rate in THRIVE 2040. This is a notable increase in the past 10 years especially given that the projections show a decrease in Scott County’s growth rate. Therefore, we would very much like to be provided the data that offers support for this significant increase in forecasts in population, households and employment that is now being incorporated into Imagine 2050; or in short please prove out your forecasts with reasonable facts.</p>	<p>A letter from the Mayor and City Council Members of Credit River asks for explanation of why the Credit River forecast amounts to +560 households during 2020 – 2050; and expresses that Met Council should “prove out your forecasts with reasonable facts.”</p> <p>The proposed forecast is not a result Met Council can demonstrate with modeling; our model suggested a lesser amount of growth. Still, in deference to the City’s planning, we acceded to a 2040 households level that is the same as in the City’s last plan update; we add on another decade at the same rate of decadal gain, resulting in 2,380 households level in 2050. This was very much influenced by the City’s own request for the higher forecast, per City Administrator Cathy Reynolds letter, 2/26/2024. We are willing to consider a higher number if the City can demonstrate its readiness.</p> <p>As City officials are now retracting the request for the higher forecast, Met Council will instead revert to the model-produced forecast: 1,970 households in 2030; 2,090 in 2040; 2,200 households in 2050.</p>
<p><b>Streamlining the Comprehensive Plan Process:</b> The City understands the need for comprehensive planning, but it can be resource intensive and costly. One size approach for Plan contents does not fit all when it comes to the content within a city’s comprehensive plan. We ask the Metropolitan Council to consider aligning the needs with smaller communities and how we can affordably develop and submit a reasonable Plan. We, and many other cities will also begin to inquire if the METROPOLITAN COUNCIL is plainly overreaching its statutory authority.</p>	<p>The Met Council acknowledges that a one-size fits-all approach to regional policy would not account for the various planning needs throughout the region. In Imagine 2050, the Met Council established eight different community types including Urban, Urban Edge, Suburban, and Suburban Edge designations within the MUSA. The minimum density ranges for these communities vary from 24 units per acre (u/a) in Urban areas; 14 u/a in Urban Edge; 7 u/a in Suburban; and 4 u/a in Suburban Edge communities. Further, Rural Centers (small towns outside of the MUSA with local wastewater treatment plants) also have minimum density expectations of 3 units per acre. The rural and agricultural designations outside the MUSA include Diversified Rural, Rural Residential, and Agricultural which support maximum densities to ensure that development pressures don’t impede on the agricultural economy in the region. This is a regional approach that acknowledges the diversity of community types, patterns of development, local market trends, and current local plans already in place.</p> <p>Where requirements are identified, the Met Council provides technical assistance, tools and resources, and financial assistance to eligible communities via Planning Assistance Grants and direct technical assistance through the Sector Representative Program. 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>

Comment	Response
<p><b>City of Crystal</b></p> <p>Density  On page 20 of the Land Use chapter, it states that density does not include “arterial rights-of-way”. I assume this is principal, not minor, arterials?  On page 21 of the Land Use chapter, it states that the minimum density within ½ mile of an LRT station is 35 units per acre. For Crystal, does this mean that the city is required to reject any redevelopment proposal for a specific property that does not meet this density requirement?  In order to encourage the construction of larger apartments (i.e, 3 or 4 bedrooms), could larger apartment units be counted as more than one unit? For example:  4 bedrooms = 1.5 units  3 bedrooms – 1.25 units  2 bedrooms or smaller = 1 unit</p>	<p>Net density calculations currently exclude "arterial roads that are part of the metropolitan highway system," which includes both principal and minor arterials. The Met Council publishes its current adopted guidelines on the Local Planning Handbook at <a href="https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx">https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx</a>.</p> <p>The Met Council's current adopted guidelines for the implementation of minimum net residential density requirements is based on a community-wide average, not individual developments. This allows the City the flexibility to plan for accommodating forecasted growth in areas of both higher and lower density land uses within station areas. Current adopted station area planning guidelines are on the Met Council's website here: <a href="https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Density-and-Activity-Near-Transit.aspx">https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Density-and-Activity-Near-Transit.aspx</a>. This flexibility has not changed since Thrive MSP 2040.</p> <p>The Met Council defines a housing unit in the same way as the Census Bureau's guidelines, for consistency. More information is posted on the Met Council's website here: <a href="https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Housing-Unit-vs-Group-Quarter.aspx">https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Housing-Unit-vs-Group-Quarter.aspx</a></p> <p>The Met Council will review its guidelines and administrative practices after the adoption of Imagine 2050 and looks forward to working with local government partners as part of that effort.</p>
<p><b>City of Dayton</b></p>	

Comment	Response
<p>The City Council objects to the increase in minimum Residential Net Density from 3 dwelling units per acre, to 4 dwelling units per acre.<sup>1</sup> Higher density is more appropriate near areas with supportive infrastructure, which Dayton does not have.<sup>2 3</sup> Further, higher density results in increased impervious surface area, conflicting with several policies related to preserving the environment.</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. Compact development patterns can also help the City achieve its desired goals of preserving open spaces and natural systems by ensuring these areas are protected from development. Further, density is not the driver of increasing cost for local urban services. 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. More compact development patterns is one way to manage costs and keep expenditures down. Also, compact, dense development accommodates growth on a smaller footprint than less dense development, thereby allowing more land to be protected for natural ecosystem functions. The Met Council's Scenario Planning analysis that was completed for Imagine 2050 identified that dispersed development patterns pose a higher threat of natural systems loss, fragmentation, and species loss than compact development patterns. Preserving natural systems and accommodating density do not need to be mutually exclusive.</p>

Comment	Response
<p>The Planning Commission objects to the increase in minimum Residential Net Density from 3 dwelling units per acre, to 4 dwelling units per acre. The Commission is supportive of a variety of housing types and lot sizes, but is sensitive to market constraints that may not support higher density.<sup>5</sup> In order to obtain an average net density of 4 du/acre per decade, the city would “bank density” by guiding land for high density in certain areas to allow lower density elsewhere. The Commission is concerned that if the higher density is built first (“banked”), the Metcouncil will change its rules during the 2060 Comprehensive Plan cycle (e.g. from 4du p/acre to 7) prior land being subdivided for lower density.</p>	<p>We understand the local market trends in communities throughout the region. The Met Council's forecasts modeling, community designation analysis, and density analysis, among others, all considered local market trends prior to making the policy recommendations in Imagine 2050. The Met Council also heard support for more density and housing opportunities from the development community. Imagine 2050 makes clear the commitment to fostering sustainable land use practices and expanding housing choices, including more infill, redevelopment, and diverse housing types, to meet the needs of our growing region and to shape policies that support equitable and inclusive communities. As the City indicates, the Met Council's current adopted guidelines for the implementation of minimum net residential density requirements is based on a community-wide average, not individual developments. This allows the City to plan for areas of both high and low density land uses (and everything in between). The Met Council will review its guidelines and administrative practices after the adoption of Imagine 2050, but this practice is not recommended to be changed as part of that review. We understand that policy changes have impacts on communities. The Met Council is committed to supporting local governments through technical assistance, tools, and funding resources to aid in that process. We appreciate your review of the policies in Imagine 2050 and look forward to working on implementation in the coming years.</p>
<p>The Planning Commission acknowledges that there is conflicting opinions amongst landowners in support and in opposition to increased density. For example, many rural residents oppose development because of the nuisance more people bring, while many rural landowners support development because of the increase in their land value (70% difference between sewered and unsewered land value).</p>	<p>Thank you for your comment. The Met Council strives to foster an inclusive and balanced approach to regional planning that acknowledges the diversity of community types, patterns of development, local market trends, and current local plans already in place. We look forward to ongoing partnership as the planning process continues.</p>
<p>The city is supportive of the flexible application of density.<sup>6</sup> The City's challenge in writing the 2050 Comprehensive Plan will be “how to fit” characteristics of Rural Center (Historic Village), Diversified Rural (Mississippi &amp; Crow river corridors, greenbelt around the Village), and creating the regulatory framework to establish a new town center such that Dayton is economically self- sustaining and not an extension of Maple Grove and Rogers.<sup>7</sup> All of Dayton is designated Suburban Edge. While the city is opposed to an increase in net density, density flexibility avoids cookie-cutter development.</p>	<p>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 reflect policies in Imagine 2050. Changes to administrative guidelines or programs must be approved by the Met Council after Imagine 2050 is adopted. This is planned to be a part of the implementation work plan. Any changes made to provide local flexibility must be consistent with regional goals. The Met Council looks forward to working with local governments through the update/review of those guidelines.</p>

Comment	Response
<p>In order to comply with 4 du/acre net density, there's an option for large lots to include conservation easements (excluded from net density calculations<sup>8</sup>). Under this option, woodland and wetland upland buffers would be preserved (buffers larger than otherwise required), at a cost of restrictive covenants.<sup>9 10</sup> In practice, we've experienced homeowners not understanding conservation easements or failing to recognize their existence at the time of purchase or acknowledging but disagreeing with their purpose (birds don't pay property taxes). Point being, there are conflicting values in land preservation.</p>	<p>We agree. There are many aspects of land management which are challenging. In fact, this is the reason for some of the Met Council's approaches to net density calculations as it relates to public ownership of open space/green space. Public ownership ensures protection from development and provides a level of responsibility for its preservation and maintenance that cannot be guaranteed through private ownership. We appreciate your acknowledgement of those tensions.</p>
<p>The City Council objects to the increase in minimum Residential Net Density from 3 dwelling units per acre, to 4 dwelling units per acre.<sup>1</sup> Higher density is more appropriate near areas with supportive infrastructure, which Dayton does not have.<sup>2 3</sup> Further, higher density results in increased impervious surface area, conflicting with several policies related to preserving the environment.</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. Compact development patterns can also help the City achieve its desired goals of preserving open spaces and natural systems by ensuring these areas are protected from development. Further, density is not the driver of increasing cost for local urban services. 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. More compact development patterns is one way to manage costs and keep expenditures down. Also, compact, dense development accommodates growth on a smaller footprint than less dense development, thereby allowing more land to be protected for natural ecosystem functions. The Met Council's Scenario Planning analysis that was completed for Imagine 2050 identified that dispersed development patterns pose a higher threat of natural systems loss, fragmentation, and species loss than compact development patterns. Preserving natural systems and accommodating density do not need to be mutually exclusive.</p>



Comment	Response
<p><b>City of Dellwood</b></p>	
<p>Community Designation. The City of Dellwood has been designated as a “Diversified Rural” community in the draft Imagine 2050 document. This designation is identified as being 1 unit per 10 acres.</p> <p>The City of Dellwood has a traditional development pattern that is 1 – 3 acre lots located on the shores of White Bear Lake. The City has no public sewer or water. The City’s 2040 Comprehensive Plan identified a development pattern throughout most of the City as being 1 unit per 2.5 acres.</p> <p>The City of Dellwood believes that this approved development pattern would be more of a fit with the Rural Residential designation. The City is extremely inconsistent with the density requirements of the Diversified Rural designation but is in conformance with the Rural Residential designation. The City requests a change in this designation.</p>	<p>The Met Council's policy regarding the Rural Residential Community Designation remains unchanged from Thrive MSP 2040 policies, albeit clarified for implementation purposes. The Rural Residential Community Designation was not permitted to be expanded in Thrive, with few exceptions. The City's 2040 Plan was consistent with this approach where existing rural residential areas were limited and all new development in the city was guided at densities of 1/10. The City's designation remains Diversified Rural, the same as in Thrive. Options for all planning decisions can be explored with assistance of your Sector Representative and the Local Planning Assistance team as the City advances into the 2050 planning process.</p>
<p>Housing Type Directive (Objective 5, P1, A1). The City of Dellwood objects to the requirement placed on cities to allow for more than one housing type within residential land use categories. As stated above, the City is on septic and has smaller lot sizes. Having multiple unit properties will lead to the need for additional septic areas, which the City needs to prioritize for replacement of existing septic systems.</p>	<p>For clarity, the City is not required to redevelop existing developments to meet minimum density requirements. Rather, the City is required to plan for a community-wide average net residential density only for areas that are planned to accommodate forecasted growth. Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p>
<p><b>City of Eden Prairie</b></p>	

Comment	Response
<p>The draft 2050 Land Use Policy plan clearly recognizes the unique characteristics that exist in communities across the region and the authority of each community to determine how to best meet its local goals. Community designations is one tool that the policy uses to address this variety. Understanding that the land use objectives are applicable to all local governments, the policy and action steps that are identified in the draft would be very challenging for a community to meet all or even a majority of those listed. It would be helpful if there was more guidance given as to which policy and action steps are intended to apply to which community designations or other local characteristics. Clearer expectations from the Met Council will lead to a more productive preparation of local Comprehensive Plans. For example, allowing for more than one housing type in residential land use categories in communities that are fully developed are unlikely to yield significant impacts in the short term. Cities with little to no vacant land should not be expected to produce a variety of housing types on already developed properties but rather should be expected to provide a variety of housing types throughout the community.</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. Adjustments were made to each policy and action to add clarity of roles for the Met Council or the local government. A new section was added to the policy chapter about roles and responsibilities. Language will be revised for clarity.</p> <p>Local governments are not required to reguide existing neighborhoods, only to identify where they plan to accommodate the City's forecasted growth which may include already planned development, infill, redevelopment, and/or new development. Residential land use categories which allow more than one housing type encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Minn. Stat. §473.858, subd. 1 does require local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p>
<p>The City is supportive of a minimum average density requirement that is calculated on a City wide basis rather than on individual development projects. This supports the flexibility needed at the local level to address geographic and neighborhood considerations and site developments in a manner that align with local features.</p>	<p>We appreciate your support. You are correct in that the Met Council's current adopted guidelines for the implementation of minimum net residential density requirements is based on a community-wide average, not individual developments. The City understands that this allows the City to plan for areas of both high and low density land uses (and everything in between). The Met Council will review its guidelines and administrative practices after the adoption of Imagine 2050, but this practice is not recommended to be changed as part of that review. We look forward to continued partnership as the process moves into local comprehensive plan updates and we begin rolling out technical assistance, tools, and resources to support local governments in that work.</p>

Comment	Response
<p>The draft policy document includes a minimum density requirement for affordable housing need. Further consideration should be given to the reality that increased density on its own does not explicitly equate to affordability. The City has taken multiple measures to pursue and promote increased housing affordability and will continue to leverage those tools through the development review process.</p>	<p>Comment noted. Section 4 of the Housing Policy Plan states the following "Guiding land use is only part of the solution for creating affordable housing development opportunities. To incentivize the adoption of policy that facilitates the creation of new affordable housing units, local governments will have the opportunity to apply a credit towards their overall Future Need number and reduce their Land Guided for Affordable Housing obligation." This text aims to acknowledge that density is only a part of the solution for affordable housing creation and to make our Land Guided for Affordable Housing (LGAH) requirement both more flexible and closer aligned with actual development of affordable housing by providing a credit towards LGAH for affordable housing development policies.</p>
<p>The land use draft includes considerable policy and action items related to water resources that extend beyond those outlined in the water policy draft. The inconsistency between policy documents does not provide clear guidance to communities on expectations for Comprehensive Plan preparation.</p>	<p>The Council's land use and water policy teams have coordinated on policy development for Imagine 2050, recognizing that there are land use actions that can influence water and that water needs can support planned land use. Additionally, the Land Use Policy Chapter now includes a new section regarding roles and responsibilities and identifying how requirements versus areas of encouragement are identified. Also, the Met Council will provide a checklist of minimum requirements for every community as part of the Local Planning Handbook update which will be launched in late 2025. Where requirements are identified, the Met Council provides technical assistance, tools and resources, and financial assistance to eligible communities via Planning Assistance Grants and direct technical assistance through the Sector Representative Program.</p>
<p>Policy and action items related to community gathering spaces include specific programming and design expectations that are within the purview of the local government rather than Metropolitan Council. It would be helpful to understand the expectation of Met Council on the action items.</p>	<p>The action items identified for planning and maintaining public spaces are encouraged and illustrative but not required. Language will be clarified to make the intent clear.</p>

Comment	Response
<p>Policy and action items are included that extend beyond land use development and delve into support and social services, healthcare and recreational amenities. These items are best practices that the City already implements as a service organization through its commitment to resident quality of life.</p>	<p>We support and acknowledge the City's commitment to its residents. The regional development guide also "must recognize and encompass physical, social, or economic needs of the metropolitan area..." according to Minn. Stat. §473.145. Historically, planning has excluded and discriminated against marginalized groups. As so, we must proceed with planning and policy though an equity lens to ensure all residents, particularly Black, American Indian, and residents of colors, are part of our processes to ensure their physical, social, and economic needs are met as outlined in statute. We look forward to continuing to collaborate with you on this work.</p>
<p><b>City of Elko New Market</b></p>	
<p>Requiring rigid staging of development within the 2050 growth area is problematic. The City supports a more flexible approach to development within the 2050 planning area. Cities cannot predict or control when landowners may want to sell their land. Prestaging growth by decade limits the City's ability to respond to individual property owner decisions and would necessitate Comp Plan amendments to address continually changing landscape of property owner decisions. In a community of our size, if you determine which individual properties can and cannot develop, within which decade windows, it significantly reduces the City's ability to grow, provide housing and jobs. The staging will also inflate the price of land in some areas while holding other land hostage from development.</p>	<p>Staging growth by decade is a practice long-held in regional planning and has not changed from Thrive MSP 2040 requirements. The Met Council is directed to plan for the orderly and economical development of the region, including effective stewardship of regional infrastructure investments to support regional growth and administering the requirements of the Metropolitan Land Planning Act. The Land Use Policy Chapter continues many of the policies and practices of past regional plans regarding setting density standards and staging of development in 10-year increments, in addition to refining and responding to changing market conditions, which help the Met Council to carry out its legislative directive. We understand the uncertainty of knowing when a certain property owner might want to sell or when there might be the next economic recession. All of these factors are considered both in our forecasts and in how we support local governments in developing their local comprehensive plans.</p>

Comment	Response
<p>Land Use Objective 1, Policy No. 2, Action Item A7(i) states that “Local governments may only plan for areas within their municipal boundaries unless an orderly annexation agreement authorizes another jurisdiction to assume planning authority.....Local planning that encompasses areas outside of jurisdictional authority will not be considered as part of the Met Council’s review and authorization of local comprehensive plans.”</p> <p>Although an urban growth / preservation area has been established by Scott County comprehensive planning and zoning that corresponds with the City’s 2040 growth boundary, the City of Elko New Market does not have a master Orderly Annexation Agreement in place with the surrounding (New Market) township. The City believes it has a responsibility and authority to plan for orderly development, despite the absence of an Orderly Annexation Agreement. In fact, both the City’s 2030 and 2040 Plans were adopted absent of a master Orderly Annexation Agreement.</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 the 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> <p>The Met Council has permitted local governments to indicate "for planning purposes only" areas outside of their municipal boundaries, but these areas are not included in the Met Council’s authorization to implement the local plan nor are these areas included in density calculations or land supply analysis. Forecasted growth is required to be accommodated in areas where the City has planning authority.</p>
<p>Land Use Objective 3, Policy 1, Action Item A5 requires cities to adopt a Living Streets policy and integrate into zoning ordinances. Living streets include rain gardens, bike lanes, boulevard trees, trails, and sidewalks within rights of way. Implementation of this policy will have significant financial impact on cities Public Works maintenance budgets, requiring an increase in staff for the City of Elko New Market. This requirement will also have a direct impact on the feasibility and cost of residential, commercial and industrial development.</p>	<p>Communities are encouraged to consider Living Streets policies and principles but will not be required to adopt them. Language will be clarified to make the intent clear.</p>

Comment	Response
<p>Land Use Objective 3, Policy 2 – “Revitalize and strengthen communities at the neighborhood level by planning and maintaining public spaces for community gatherings to foster a sense of belonging and ownership.” Several action items are listed under this action item that have significant financial implications for local governments. While the City of Elko New Market supports the sentiment of the policy statement, we have concerns regarding the requirement for local governments to “create and maintain free accessible public gathering spaces and community gardens”. This policy creates an unfunded mandate for the City in general.</p>	<p>The action items identified for planning and maintaining public spaces are encouraged and illustrative but not required. Language will be clarified to make the intent clear.</p>
<p>Land Use Objective 4. While the City of Elko New Market supports the Objective to prioritize land use and development activities that protect, restore and enhance natural systems at all scales, in practice this may be difficult to implement. While protection of wetlands is easy to implement based on state and federal regulations that are in place, identification and protection of “natural system corridors” will be more challenging. Cities will need more direction on the Council expectations.” The City is also concerned that such regulations will constitute a “taking” in some circumstances, since mapped natural habitat corridors contained vast amounts of land. There is no legal mechanism currently in place to allow cities to protect natural area corridors, short of outright acquisition.</p>	<p>Noted. The Council is developing a technical assistance package that will provide a framework around natural systems planning and help communities identify, prioritize, and develop strategies, such as corridor planning.</p>
<p>Land Use Objective 7, Policy 1 requires local governments to include in their comprehensive plans a greenhouse gas emissions inventory and projections generated from activity within the local government’s jurisdiction, and that local governments must plan for strategies that reduce or naturally sequester greenhouse gas emissions. The expectation of this Objective is unclear and there are questions about how this would be practically implemented. What exactly is the expectation for small rural cities such as Elko New Market related to this policy? This policy creates an unfunded mandate for our small community.</p>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has a GHG inventory and strategy planning tool that communities can use to make meaningful commitments on GHG reductions. The Council will provide technical assistance on how to use this tool.</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 also 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>



Comment	Response
<p>Land Use Objective 7, Policy 3 states that the Met Council will establish a target percentage of a local governments energy needs to be met by sustainable energy. It goes on to state that local governments must implement renewable energy programs to support renewable energy deployment, especially for energy-burdened households. The expectation of this Objective is unclear and there are questions about how this would be practically implemented. Please provide a real-life example of the Council's intention with this policy. Since the City is not in the business of providing energy to consumers, we need to understand the Met Council's expectation in this regard.</p>	<p>In response to comments, the Met Council is considering revisions to this policy to instead require establishment of local renewable energy and energy efficiency strategies and incentives. Further, the Met Council will not require cities to provide financial incentives for the deployment of renewable energy. However, a city can incentivize deployment of renewable energy through means that are not necessarily financial; this could be through official controls, like updated zoning ordinances, etc. Please note that minimum requirements for comprehensive planning will follow adoption of Imagine 2050 as part of the Local Planning Handbook update planned for launch in late 2025. We look forward to working with local governments as the process turns to local comprehensive planning.</p>
<p>Land Use Objective 7, Policy 5 states that local governments must ensure that new construction projects and existing infrastructure upgrades prioritize the incorporation of nature-based solutions to reduce the likelihood and intensity of potential climate impacts. The expectation of this Objective is unclear and there are questions about how this would be practically implemented. Please provide examples of nature-based solutions so that the City understands this requirement. This policy goes on to say that local governments must develop policy incentives and allocate dedicated funding to support the adoption of nature-based climate adaptation solutions. This is an unfunded mandate that will place financial burden on small rural communities such as Elko New Market who have limited staff and financial resources.</p>	<p>Nature based solutions are sustainable approaches that utilize natural ecosystems and biodiversity to address various environmental, social, and economic challenges. Examples of this could be using Cottonwood trees to clean contaminated soil. It could include planning for dual purpose uses to deal with localized flooding - for instance, designing a frisbee golf course with native planting and low-lying areas that can be designed to flood when local road networks are overwhelmed with water. It means using landscaping practices to remove chloride from the soil or clean the air. These examples can be implemented on large or small scales. Nature-based solutions are one possible climate adaptation solution. New climate requirements have not yet been established but we look forward to working with local government partners as they are developed. They will be included in the Local Planning Handbook update planned for release in late 2025.</p> <p>Policy 5 was recommended to be deleted because of its operational nature more closely related to implementation. Further, communities are not required to allocate dedicated funding for nature-based solutions. The language has been updated to an expectation to develop policies and strategies to address human, built, and social vulnerabilities at the local level.</p>

Comment	Response
<p>There appear to be several unfunded mandates in the Land Use Policy Plan that will have a significant impact on staffing and financial resources of the City. Please consider the effects of such mandates on small rural communities with already constrained staffing and financial resources.</p>	<p>Minn. Stat. §473.145 directs the Met Council to guide “the orderly and economical development, both public and private, of the metropolitan area...,” 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 regarding setting density standards and staging of development, in addition to refining goals and updating regional direction to respond to changing global and national issues as well as local market conditions, which help the Council to carry out its legislative directive. 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>
<p><b>City of Empire</b></p>	
<p>Community Designation Maps (Agricultural): Please update the Community Designation Map references to Empire Township. Empire became a city in 2023.</p>	<p>This change has been made. Thank you for ensuring that references to the City are correct.</p>
<p>Guiding Growth and Development section discusses "compact development". It would be helpful if there was a common definition of "compact development". While we think we understand what this means, it could mean different things to different community types. Having your frame of reference would provide clarity to assist with managing expectations.</p>	<p>Compact development does represent different forms in different communities. What Minneapolis considers compact will not be what Stillwater, or Plymouth, or Empire considers compact. The minimum density requirements try to shape the expectations of what compact development could look like in each community designation. Even with minimum density expectations, each community's built form will vary. As part of the Local Planning Handbook, the Met Council will provide visual resources to help communities through this conversation.</p>

Comment	Response
<p>Objective 1, Policy P2, Action 2: There is discussion about a look-back period and past performance meeting density expectations. What is the look-back period? Is it 5 years? 10 years? Entire planning cycle? The city is concerned about providing opportunities for development that is viable in the market. Certainly, in recent times, the market has been favorable towards higher density developments. What if conditions change in the future? How does this plan account for future flexibility needed with policies and regulations to meet market conditions?</p> <p>Also, will such a look-back period apply at any time or just when reviewing MUSA extensions? There was and has been discussions from Met Council staff about an ongoing look-back period. We have asked for and not received clarity on this. The City of Empire is opposed to a look-back period that is prior to adoption of the 2050 Plan.</p>	<p>In Objective 1, Policy 2, Action 2, Item v, the lookback period is referring to the Plat Monitoring Program which is the current mechanism by which we track development performance compared to planned densities. Currently, the Plat Monitoring Program looks back to the start of the program (2000) or tracks all development since the local government began participating in the program. Empire has been participating since 2000, even when there are no plats to report. We are currently reviewing changes to the Plat Monitoring Program to consider reducing the look-back period for those enrolled in the Plat Monitoring Program to better reflect current market conditions and development preferences, while still incorporating enough data points to average out short-term changes in market conditions. Staff is currently exploring the impacts of different look-back periods on communities and is committed to making sure that any changes to the program does not cause communities to become inconsistent with regional policy. We also agree that any assessment of performance should be linked to the comprehensive planning requirements that were in place at the time. Any changes to the Plat Monitoring Program's look back period would apply to all performance-based flexibility and credits associated with the program, not just MUSA extensions.</p>

Comment	Response
<p>Objective 1, Policy 2, Action 3: Density and Community Types. Empire is considered Suburban Edge in areas served by public utilities and Agricultural in all other rural areas. Densities are increasing from 3 to 4 units per acre from the 2040 planning period. Density remains the same at 1 per 40 acres in the agricultural areas. There is limited opportunity to have large lot rural development in the proposed plan. With a Diversified Rural or Rural Residential, the density is 1 per 10 acres. A large part of the appeal for residents to move to Empire is because of the rural character. Not having large lot rural development (1 per 3-5 acres) will likely result in leapfrog of development to outlying counties and it will significantly drive up the cost of what development rights do remain on agricultural preserved parcels. It seems there is a better way to plan for shorter term large-lot development that could allow for future subdivision and development when utilities are available. This could allow for a variety of housing types that people want to live in, in community types they want to live in.</p> <p>iii. The Met Council should consider excluding privately held open space and stormwater ponds from density calculations. Private open space (i.e. accessible to only property owners of a Homeowner's Association) helps cities to have more open space, which helps the environment, and reduces the maintenance costs of cities for those private parks and open spaces. It is highly unlikely that HOA property would be converted to development. Additionally, stormwater ponds are required and the land areas to account for them are unbuildable. Those areas should also be excluded from density calculations.</p> <p>v. What is meant by "practical feasibility" of demand? How will this be evaluated? By whom? And under what criteria?</p> <p>vi. What is meant by performance-based flexibility when it comes to density? What are the performance standards? And what type or degree of flexibility may be granted and when? Cities have tools for flexibility written into ordinances. Similarly, the Met Council should be clear on what flexibility may be granted, what the criteria are, and what the process will be. This flexibility should be reasonable and designed to meet the objectives of the Met Council, the local communities, and the market.</p>	<p>Empire has unique features in the community, including large publicly owned natural areas, as well as a mix of other rural uses, in addition to the areas served by wastewater treatment. As part of the 2050 planning process, the Met Council is committed to working with the community to consider potential changes to the Community Designation that appropriately fits the City's landscape and advances regional goals. 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 reflect policies in Imagine 2050. Any changes to net density calculation guidelines or programs which rely on density calculations must be approved by the Met Council after Imagine 2050 is adopted. This is planned to be a part of the implementation work plan. Changes under consideration (albeit not all-inclusive) include allowing permanent public easements to be netted out and reducing the look-back period for those enrolled in the Plat Monitoring Program. Met Council staff agree that stormwater management areas need to be evaluated and clarified as part of the update process, too. However, privately owned greenspace does not provide the protection from development which public open space areas provide nor the level of responsibility for its maintenance that local governments ensure. The Met Council will work with local governments as this implementation task moves forward. Any changes made to provide local flexibility must be consistent with regional goals.</p> <p>Regarding the practical feasibility of demand and development in land use policy, the City is not required to do that study or analysis. Instead, the Met Council, during the review of local comprehensive plans, will implement a data-based approach using UrbanSim, a real estate market simulation model. This is the same model used to develop the local forecast set.</p>

Comment	Response
<p>Objective 5, Policy P1, A2: The expectation for a local government to educate residents about any particular housing type is not appropriate. (The provision is stating that local government should educate residents about manufactured and modular housing). How does the Met Council intend to enforce this policy? A city should not be preferring any one type of housing over another or trying to influence a consumer's personal decision. While zoning can allow for a variety of housing types, to be required to proactively educate residents on private and personal decision seems out of line of local government purview.</p>	<p>The Metropolitan Council understands the importance of local autonomy in housing education efforts. Rather than enforcing specific actions, the Met Council provides technical assistance and resources to help cities support a variety of housing options, including manufactured and modular housing. Our aim is to offer guidance and best practices, allowing cities to tailor their approach based on their community's needs and priorities, rather than requiring any specific outreach or education.</p>
<p>Objective 5, Policy P1, A5: What is meant by "locally-led" development initiatives? Who is leading this? And how are "gentrifying neighborhoods" defined?</p>	<p>The Metropolitan Council understands the importance of local autonomy in housing education efforts. Rather than enforcing specific actions, the Council provides technical assistance and resources to help cities support a variety of housing options. Our aim is to offer guidance and best practices, allowing cities to tailor their approach based on their community's needs and priorities.</p>

Comment	Response
<p>Objective 7, Policy P1, A6/A7: Local governments are required to provide greenhouse gas emissions inventory and protections as well as reductions/sequester. What resources (financial or technical) will the Metropolitan Council be providing to assist with this mandate? What criteria are required in the 2050 Comp Plans for local government? Is there a specific target or goal that must be met and over what period of time? It seems counterintuitive to increase density while trying to decrease greenhouse gas emissions.</p>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has a GHG inventory and strategy planning tool that communities can use to make meaningful commitments on GHG reductions. The Met Council will provide technical assistance on how to use this tool.</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 also 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>Peer-reviewed research and the Council's own analysis show that compact growth produces lower GHG emissions than dispersed growth, no matter how much the region grows. This is due to reduced reliance on infrastructure extensions and less vehicle miles traveled. Other actions to reduce travel-related emissions are possible such as planning for more interconnected neighborhoods, planning for local destinations that reduce trip length, and supporting non-automobile travel by biking, walking, and rolling infrastructure, for example.</p>
<p>Community Designation Maps (Agricultural): Please update the Community Designation Map references to Empire Township. Empire became a city in 2023.</p>	<p>This change has been made. Thank you for ensuring that references to the City are correct.</p>



Comment	Response
<p>What will be the process for Comp Plan Amendments in the future? There have been some frustrations with submittals being declared incomplete by staff, when submittals are complete, but contain unagreeable information. It is up to the policy makers, not staff to determine if they are agreeable to an application or not. Additionally, the Metropolitan Council should be conscientious of the requirements to update sections of a Comp Plan that have no relevancy on the outcome of a project. When cities review planning applications, they are accepted as complete even if the information is not agreeable or correct. Cities work diligently with their applicants to limit the bureaucracy of government and get a resolution or decision within a very reasonable amount of time. The longer projects are held up in government process the more expensive they become directly and indirectly. Cities are being held to high standards to assist with development efficiencies and affordability and the Met Council can also do their part by improving efficiencies on the Comp Plan Amendment Process.</p>	<p>The comprehensive plan amendment process and criteria for review are adopted by the Met Council. Staff implement the guidelines and do that consistently across all communities in the region. It is the Met Council's responsibility to review any changes to an authorized plan for conformance to regional system plans, consistency with regional policy, and compatibility with the plans of adjacent and affected jurisdictions, as required by the Metropolitan Land Planning Act (Minn. Stat. §473). This has not changed. The Met Council does strive for continuous improvements. We acknowledge that plan development includes a lot of process and while we try to ensure that it's as seamless as possible, we have to also carry out the statutory responsibilities set in statute. Assistance from your Sector Representative and the Local Planning Assistance team is available as the City advances into the 2050 planning process.</p>
<p>Community Designation Maps (Agricultural): Please update the Community Designation Map references to Empire Township. Empire became a city in 2023.</p>	
<p><b>City of Forest Lake</b></p>	

Comment	Response
<p>The Draft 2050 Land Use Policy plan marks a notable change for the City, whose currently predominant community classification, Emerging Suburban, is proposed to be eliminated. By changing the City's classification from Emerging Suburban to Suburban Edge, the City will be required to have an overall minimum density increase from 3 units per acre to 4 units per acre. While one single housing unit per acre increase may seem nominal, this presents a challenge for the City. So, in opposition to the classification change, the City offers the following comments:</p> <p>Objective 1, Policy 2, Action 3 (Residential Density Requirements and Policy Standards)</p> <ul style="list-style-type: none"> <li>• iii. Measure minimum net density by taking the minimum number of planned housing units and dividing by the net acreage. 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 such as steep slopes. This applies to local governments within the MUSA and Rural Center communities.</li> </ul> <p>The City challenges the Council to reevaluate the land area types excluded to determine net acreage. While the land area types noted above are reasonable to remove, the City asserts there are other land area types that should also be removed from the gross acreage as they, too, are undevelopable lands. Any land area for which a regulatory agency's rule has restricted the land's ability to be used for actual housing should be excluded. For example, reasonably sized local roadways should be considered given they are needed to access residences but cannot be constructed upon. Additionally, sizes of stormwater treatment areas are based on other agency regulatory agencies (watersheds and WMOs) and site-specific conditions. While the City acknowledges the land area needed for a stormwater treatment areas is developable land area, the land cannot be developed upon. Furthermore, storm water treatments in areas of poor soils may need to be enlarged to be able to adequately meet the volume and infiltration needs, thereby reducing the actual developable area. Lastly, any natural resource buffers and setbacks imposed by local governments or other regulatory agency should be considered eligible to be netted out.</p>	<p>Community designations are analyzed during each decennial planning process and updated, renamed, and reassigned as needed for regional policy application and to reflect a local government's evolving development pattern and built form. For example, prior to Thrive's adoption, Emerging Suburban Edge was not a community designation. In Imagine 2050, Emerging Suburban Edge is not being eliminated, but rather, the analysis determined that policies applied to the two Thrive designations of Emerging Suburban Edge and Suburban Edge were highly similar and repetitive. To simplify, it was determined that four Urban Service Area designations were appropriate.</p> <p>The Met Council publishes its adopted guidelines on how to calculate net residential density on the Local Planning Handbook site here: <a href="https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx">https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx</a>. Areas protected or removed from development by local ordinance can already be netted out. However, any changes to net density calculation guidelines or programs which rely on density calculations must be approved by the Met Council after Imagine 2050 is adopted. This is planned to be a part of the implementation work plan. Changes under consideration (albeit not all-inclusive) include allowing permanent public easements to be netted out and reducing the look-back period for those enrolled in the Plat Monitoring Program. Met Council staff agree that stormwater management areas need to be evaluated and clarified as part of the update process, although recommendations will be determined by future study. Additionally, any changes made to provide local flexibility must be consistent with regional goals. The Met Council looks forward to working with local government partners as part of these updates.</p>

Comment	Response
<p>v. Evaluate the practical feasibility of demand and development to ensure that both the intensity (density range) and location of planned developments are practical. Local governments need to plan land uses that are realistically marketable within the planning period, focusing on plausibility and long-term viability. This helps prevent the overestimation of development outcomes, thereby reducing the risk of underutilized infrastructure, inefficient land management, and implausible planned densities. This differentiates between what is merely allowed and what is plausible, providing a realistic framework for land use planning. Along with the Council, the City of Forest Lake is required to plan for 30 years of growth and development. However, many factors affect how the community will actually grow and develop in that timeframe. Requesting local governments forecast plausible consumer needs in the planning decades is an unreasonable expectation and the City is not in support of this requirement. Plausible demand forecasting could result in a City's inability to quickly adjust to changing market demands and could result in unnecessary and more complex local comprehensive plan amendments.</p>	<p>Regarding the practical feasibility of demand and development in land use policy, the City is not required to do that study or analysis. Instead, the Met Council, during the review of local comprehensive plans, will implement a data-based approach using UrbanSim, a real estate market simulation model. This is the same model used to develop the local forecast set. The language has been clarified to identify the different roles for the Met Council and Local Government in this requirement.</p>
<p>vi. Use a programmatic and performance-based approach to flexible application of density requirements to support local implementation of regional goals. The structure and requirements where flexibility may be acceptable must not jeopardize conformance with regional system plans or consistency with Met Council policies. Past plans and actions including regional goal and regional policy consistency, existing development patterns, plat monitoring data, adopted plans and ordinances as well as other relevant data may be used to determine eligibility. Criteria will be established in partnership with local governments and other regional stakeholders as part of the implementation work plan. The City of Forest Lake, with much of its existing built environment having been developed near/shortly after the turn of the last century has many areas that contain significantly more density than other areas of the City. Additionally, many of these areas are prime for redevelopment. The City appreciates the Council's consideration of density compliance flexibility.</p>	<p>Thank you for your comment. This language has been updated and clarified to emphasize the Met Council's commitment to a balanced and flexible approach to implementation. The Met Council will work with local government partners throughout the update of implementation guidelines and looks forward to continuing to work with the City on these efforts.</p>

Comment	Response
<p>Objective? Policy, 1, Action 6: Local governments must include in their comprehensive plans a greenhouse gas emissions inventory and projections generated from activity within the local government's jurisdiction and covers the range of applicable emissions sectors. While the City understands the need to better understand greenhouse gas emission, inventory and projection analysis of this nature can pose a burden on local governments such as Forest Lake who may not have the resources available to conduct this analysis. Should the Council implement this action item, the Council should provide direct financial assistance to local governments or provide technical data to achieve this component of their individual comprehensive plans.</p>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to 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 also 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><b>City of Greenwood</b></p>	

Comment	Response
<p>The City of Greenwood's key comment on the draft Land Use Policy is that the Density Expectations for Suburban Edge Communities such as Greenwood should be removed from the Policy. The City of Greenwood starts with the basic principle that land use, zoning, and density decisions should be left to the local government and not set by the Met Council unless there are clear, well thought out, and generally accepted overriding regional benefits. This is particularly the case in smaller fully developed communities such as Greenwood where options for increasing density are limited and arbitrary requirements will result in inappropriate developments in neighborhoods where they do not fit or belong.</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. Further, density policies address the form/design of growth, not the quantity of growth. A modest increase in minimum density requirements throughout different community designations 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>Finally, in Thrive MSP 2040, the City was designated as a Suburban community with a minimum net residential density of 5 units per acre. In Imagine 2050, the City is designated as a Suburban Edge community with a proposed minimum net residential density of 4 units per acre. Typically, communities are not moved to a designation with a reduced level of expectation but the Met Council has agreed to this in several communities like Greenwood. This change acknowledges the City's development pattern.</p>
<p>In addition to not meeting the above tests, the proposed Suburban Edge density requirements fundamentally conflict with and contradict the key objectives of the 2050 plans as presented by Metropolitan Council staff to Metro Cities Committees.</p>	<p>The density policies have not changed since they were presented to the communities referenced here. As presented in those meetings, the Council conducted the density analysis report including findings from the scenarios planning analysis. The density analysis report findings are available on our website at: <a href="https://metro council.org/Planning/Imagine-2050/Density-Report-Imagine-2050-May-2024.aspx">https://metro council.org/Planning/Imagine-2050/Density-Report-Imagine-2050-May-2024.aspx</a></p>

Comment	Response
<p>First: Lisa Barajas Executive Director of Community Development for the Met Council stated at a Metro Cities Committee meeting that reducing greenhouse gas emissions was a critical element of the 2050 plan. She further stated that the national research has shown that increased density in Suburban Edge Communities such as Greenwood would further support the greenhouse gas emissions reduction goal and was accordingly a necessary component of the 2050 plan. The most relevant research source that she provided on Greenwoods request was How Zoning Affects Greenhouse Gas Emissions   FutureVU: Sustainability   Vanderbilt University. The primary research paper that this article references is “Climate Zoning” by Christopher Serkin from the Notre Dame Law Review (2024). The synopsis of “Climate Zoning” succinctly states:</p> <p>“As the urgency of the climate crisis becomes increasingly apparent, many local governments are adopting land use regulations aimed at minimizing greenhouse gas (GHG) emissions. The emerging approaches call for loosening zoning restrictions to unlock greater density and for strict new green building codes. This Article argues that both approaches are appropriate in some places but not in others. Not all density is created equal, and compact multifamily housing at the urban fringe may actually increase GHG emissions.”</p> <p>Put another way the research provided by Executive Director Barajas indicates that mandating higher densities in Suburban Edge communities will actually increase rather than decrease metro area greenhouse gas emissions.</p>	<p>The Council is not requiring local governments to build multi-family housing in the suburban edge. The Council has modeled that a more compact development pattern across the region does reduce emissions. While the Council is proposing density increases, that is a communitywide calculation, so communities like Greenwood can decide where to build at what densities to achieve an overall communitywide density of 4 units per acre. A number of journal articles and research papers were cited that in aggregate call for a comprehensive look at the landscape. This approach is a consistent message throughout Imagine 2050 on reducing our emissions: that no one tool alone will solve the issue, but that all tools must be used, even those that make incremental change. Increasing density is one of those tools. As is discussed in Imagine 2050, how communities design neighborhoods, plan for nearby destinations, and support other ways of moving around a community are examples of other tools that together can make a meaningful difference.</p>



Comment	Response
<p>Second: Metro Transit’s proposed Network Now vision, which Greenwood supports, has a focus on increasing transit frequencies and reducing transit travel times in higher density corridors and areas to make the transit experience more frictionless, increase ridership, and better serve metro area residents in core areas that have the potential to support these services and vision. It goes without saying that transit is most effective in dense areas and Greenwood agrees with Executive Director Barajas’s statement at a Metro Cities Committee meeting that it is very important to focus on increasing density in high transit service areas to reduce per rider greenhouse gas emissions.</p> <p>Greenwood would add that this will also help to justify the large capital and operating investments in high frequency transit service corridors. Greenwood and our neighboring communities have not had scheduled transit service since the start of the pandemic, and we have no indication that we are on Metro Transit’s radar for its Network Now high frequency transit service. Thus, density requirements for Suburban Edge communities that in effect encourage movement from higher density high transit service areas are counterproductive and run contrary to the need to encourage increased density in high level transit service areas. This is particularly the case given the fact that transit ridership is still at only about 60% of 2018 pre-pandemic levels despite Metro Transit’s substantial investments in transit infrastructure including BRT services.</p>	<p>Proposed changes in community-wide density expectations do not have a singular purpose; rather, proposed densities advance all of the regional goals in Imagine 2050 as one of many tools to achieve those goals. The key findings of the Council’s scenarios analysis are described in the section titled "Considering the implications of different scenarios in policy development" in the Land Use Policy, indicating that more compact scenarios better situate the region for advancing all five regional goals.</p>

Comment	Response
<p>Third: the need to make efficient use of its wastewater infrastructure investment is a frequently cited by Metropolitan Council staff in support of Density requirements including at Metro Cities Committee meetings. In 2025 the Metropolitan Council's average per Residential Equivalent Unit (REU) wastewater charge will likely be a bit less than \$300. A cursory review of Metropolitan Council budget data indicates that the majority of this cost is incurred in the wastewater treatment plants so the ballpark transport portion of the cost is likely in the \$125 range. Greenwood's understanding is that the maintenance and replacement costs of wastewater transport pipe and systems in Urban and Urban Edge areas can be double to triple the costs in the Suburban Edge because of the constraints from working in dense, highly developed areas that make access to large wastewater pipes very time consuming and expensive. Thus, it is quite likely that that Metropolitan Council's transport costs for Suburban Edge Communities' wastewater are actually lower than the estimated average \$125 per residence per year cost. More importantly any differences in per residence transport costs for Suburban Edge communities such as Greenwood are not significant enough in size to be used to support density expectations as so doing can reasonably be compared to the tail wagging the dog. Going forward the City of Greenwood suggests that it would be helpful for the Metropolitan Council use its accounting and engineering data to provide estimates of transport costs by Community Designation.</p>	<p>Regarding the concern related to the potential impact on regional wastewater system capacity that increasing the minimum residential density from 3 to 4 units per acre, regional wastewater system design assumptions use flow generation rates that reflect development density's greater than the flow typically generated by 3 unit per acre development. Therefore, regionally speaking, an increase in 1 unit per acre in residential densities will generally not adversely impact system capacity in the regional wastewater system. Part of the decennial planning process is intended to identify areas where both local and regional system improvements may be needed as well as changes to development staging, adjustments to growth forecasts, analysis of available land supply, and more. As local governments initiate their planning efforts, the Met Council technical staff and Sector Representatives are available to offer assistance.</p> <p>Additionally, 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.</p>

Comment	Response
<p>Fourth: The City of Greenwood is also concerned that the increased Suburban Edge density requirements will put pressure on the Minnesota DOT to expand State Highway 7, which runs East to West through our city. Per MNDOT's Area Engineer Highway 7 is becoming increasingly capacity constrained and they have already used all of the less invasive options in their toolkit such as traffic light timing to add capacity. Met Council density requirements for already growing Suburban Edge communities along Highway 7 will certainly increase pressure on MNDOT to implement major and invasive roadway infrastructure improvements that will potentially have significant encroachments into our city.</p>	<p>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. 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.</p> <p>The Imagine 2050 Transportation Policy Plan includes policies for how major highway projects are to be considered for future investments in the region. Policy 26A outlines a hierarchy for investments on the regional highway system which identifies roadway capacity increases as the lowest for consideration on that hierarchy. The Met Council works with MnDOT to coordinate the implementation of the highway policies and actions and Highway Investment Plan to assess corridor needs. MnDOT is currently leading a study on Highway 7: <a href="https://talk.dot.state.mn.us/hwy7study">https://talk.dot.state.mn.us/hwy7study</a>.</p>
<p><b>City of Hugo</b></p>	
<p>The City of Hugo's community designations for Imagine 2050 are Suburban Edge and Diversified Rural. The City of Hugo agrees with these designations.</p>	<p>Thank you for your supportive comment.</p>

Comment	Response
<p>The Suburban Edge community designations have been meeting the minimum density requirement with development that has been constructed. Although Hugo meets the minimum density requirements it has been difficult to achieve because the land in the City includes many protected natural resources, floodplains, shoreland overlays, and drainage ways. The minimum density requirement in Imagine 2050 is proposed to be 4 units per net acre. The City of Hugo believes this will increase the difficulty to accomplish the minimum densities. Furthermore, the City is in the northeast groundwater management area and water supply in this area is being evaluated with the White Bear Lake Comprehensive Plan that the Metropolitan Council is administering. The plan is evaluating impacts to ground water and there is an ongoing question on whether ground water supply can support growth in the area. We have also been planning our sewer and water infrastructure to accommodate 3 units per acre overall and have not completed the analysis on if additional density is feasible. The City believes increasing density in Hugo is premature because it would require us to plan for increased density without knowing the outcome of the plan or understanding if our system can accommodate.</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. 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. For communities in the White Bear Lake analysis area, forecasts were held steady at or reduced from Thrive forecasts. No additional growth was forecasted for these areas because of the recognized uncertainty. 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>We recognize that many communities have sensitive natural areas and we encourage protection of natural systems from development. Development and protection of natural systems do not have to be mutually exclusive. Also, many of these areas are not included in density calculations. 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.</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 Met Council is committed to supporting local governments through technical assistance, tools, and funding resources to aid in that process.</p>

Comment	Response
<p>Its unclear how the Metropolitan Council will require communities to meet their density requirements by decade rather than over the planning horizon. It will be very important to provide guidance on what will be required since this is proposed to be a change from the last comprehensive cycle. We hope it does not require us to plan for specific residential land uses where they may not be appropriate.</p>	<p>The Met Council will identify required actions in the Checklist of Minimum Requirements to be provided to each community in late 2025. The Local Planning Handbook will provide specific expectations for each minimum requirement and how to meet it, including tools, maps, templates, and resources appropriate to each item. We understand that policy changes have impacts on communities as they turn to their local planning process. As mentioned, where requirements are identified, the Met Council provides technical assistance, tools and resources, and financial assistance to eligible communities via Planning Assistance Grants and direct technical assistance through the Sector Representative Program.</p>
<p>The policy plan states that local governments must include in their comprehensive plans a greenhouse gas emissions inventory and projections generated from activity within the local government's jurisdiction. Furthermore, local governments must plan for strategies to reduce greenhouse gas emissions. We encourage the Metropolitan Council to provide technical assistance with the inventory and projections.</p>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has a GHG inventory and strategy planning tool that communities can use to make meaningful commitments on GHG reductions. The Met Council will provide technical assistance on how to use this tool. 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 also 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 addition to the Metropolitan Council proposing higher densities in the Suburban Edge communities, the fixed-route transit line through Hugo has been removed from policy plans. The City of Hugo does not have existing or planned transit services. There are not transit services to support increased density. Therefore, the proposed increased density will result in increased automobile trips since the majority of residents will travel by cars. This may increase the greenhouse gas emissions within the community. This would not be in alignment with the action items to reduce greenhouse gas emissions in the community.</p>	<p>Peer-reviewed research and the Council's own analysis show that compact growth produces lower GHG emissions than dispersed growth, no matter how much the region grows. While transit services are one strategy to support lower GHG emissions, other actions to reduce travel-related emissions are possible such as planning for more interconnected neighborhoods, planning for local destinations that reduce trip length, and supporting non-automobile travel by biking, walking, and rolling infrastructure, for example.</p>
<p><b>City of Independence</b></p>	

Comment	Response
<p>The plan also notes that there will no longer be flexibility to allow cities to grow organically utilizing market drivers and orderly development patterns.</p>	<p>It is unclear to what language the commenter is referring. The Met Council is directed to plan for the orderly and economical development of the region, including effective stewardship of regional infrastructure investments to support regional growth and administering the requirements of the Metropolitan Land Planning Act. The Land Use Policy Chapter continues many of the policies and practices of past regional plans regarding setting density standards and staging of development in 10-year increments, in addition to refining and responding to changing market conditions, which help the Met Council to carry out its legislative directive.</p>
<p>The plan appears to promote a “one size fits all” approach to regional and local development that will impose significant impacts and costs on local cities, school districts, watershed districts, etc. to develop, implement and administer plans.</p>	<p>The Met Council acknowledges that a one-size fits-all approach to regional policy would not account for the various planning needs throughout the region. In Imagine 2050, the Met Council established eight different community types including Urban, Urban Edge, Suburban, and Suburban Edge designations within the MUSA. The minimum density ranges for these communities vary from 24 units per acre (u/a) in Urban areas; 14 u/a in Urban Edge; 7 u/a in Suburban; and 4 u/a in Suburban Edge communities. Further, Rural Centers (small towns outside of the MUSA with local wastewater treatment plants) also have minimum density expectations of 3 units per acre. The rural and agricultural designations outside the MUSA include Diversified Rural, Rural Residential, and Agricultural which support maximum densities to ensure that development pressures do not impinge on the agricultural economy in the region. This is a regional approach that acknowledges the diversity of community types, patterns of development, local market trends, and current local plans already in place.</p>



Comment	Response
<p>There is minimal consideration in the plan for the local impacts relating to development of the prescribed densities without having adequate and necessary services (i.e., medical, grocery, employment, school districts, parks, public transportation).</p>	<p>Density policies address the form/design of growth, not the quantity of growth. A modest increase in minimum densities does not require the City to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land. Compact development patterns can also help the City achieve its desired goals of preserving open spaces and natural systems by ensuring these areas are protected from development. Further, density is not the driver of increasing cost for local urban services. 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. More compact development patterns is one way to manage costs and keep expenditures down. Some of the other items the commenter mentions (medical, grocery, schools, parks) are items that the Council recognizes are an important part of neighborhoods and cities. The Council supports local planning efforts to plan for the types of places and services near to places that people live.</p>
<p>The elimination of density averaging across an individual community will reinforce poor planning and design practices. This will promote design that is based on achieving prescribed densities without consideration for all other aspects of design and planning (i.e., location, surrounding land use, adequate public facilities, services, proximity to parks, services, public transportation, jobs, etc).</p>	<p>It's unclear what the commenter is referring to, but it is possible that they are referring to an approach analyzed in the Density Analysis Report which considered requiring new connections to the regional system to meet minimum density requirements for its community designation. This was analyzed but was not recommended and did not move forward after discussions with local governments and policymakers. This approach was not included in any draft Imagine 2050 policies. The Met Council's current adopted guidelines for the implementation of minimum net residential density requirements is based on a community-wide average. This allows the City to plan for areas of both high and low density land uses (and everything in between). Minimum density requirements apply to all areas where the City is planning to accommodate their forecasted growth. For example, an apartment complex with a higher density can balance out a single-family residential development with lower density so long as the average across the city within the planning decade is at least 4 units per acre. This allows local governments to plan for a diversity of housing types across their community. The Met Council will review its guidelines and administrative practices after the adoption of Imagine 2050, but this practice is not recommended to be changed as part of that review.</p>

Comment	Response
<p>Independence urges the Metropolitan Council to revise the draft 2050 Regional Development Plan to promote local governance by individual communities. This includes flexibility in determining where different land uses can occur within the community based on a more in depth understanding of all pertinent factors.</p>	<p>While the Met Council provides the guidance to manage growth and development in the region per Minn. Stat. 473.145, local governments determine their local priorities. Local governments determine where and when growth happens, including the type and intensity of land uses, within the regional planning framework required by state statute. This approach in flexibility has not changed from Thrive MSP 2040 to Imagine 2050.</p>
<p>The plan appears to be disjointed with a wide array of conflicting concepts. Much of the plan is also based on the premise that density should continue to be used as the controlling metric for planning even though it is noted that this approach has historically and continues to be unsuccessful. Prescribed density leads to significant design and development problems not being considered in this draft. The plan also notes that there will be local flexibility to determine which areas within a city are best suited for various densities; however, the plan emphasizes that local control will be severally throttled, and the Metropolitan Council will extend additional oversight of local planning to ensure conformance.</p>	<p>Minn. Stat 473.145 requires the Met Council to plan for the orderly and economical development of the region including effective stewardship of regional infrastructure investments to support regional growth and administering the requirements of the Metropolitan Land Planning Act. Land use policy continues many of the policies and practices of past regional plans regarding setting density standards and staging of development in 10-year increments, in addition to refining and responding to changing market conditions, which help the Met Council to carry out its legislative directive. All of these factors are considered both in our forecasts and in how we support local governments in developing their local comprehensive plans.</p>
<p><b>City of Inver Grove Heights</b></p>	

Minimum Average Net Density (Objective 1, Policy 2, Action 3)

Imagine 2050 proposes an expected increase in the minimum residential density requirement. Inver Grove Heights is designated as a Suburban Edge community. According to Imagine 2050, the minimum average net residential density for communities designated as such is proposed to increase from 3.0 units per acre to

4.0 units per acre. This increased density is a dramatic shift from previous, regional planning policy. It also is an exercise on paper, not in consideration of the physical attributes of a community.

The hilly and rolling terrain of Inver Grove Heights, notably the Northwest Area - our planned and focused growth area - presents obstacles for development design. That terrain often results in developers having to fit housing into the landscape versus landscaping around housing. In other words, greater density housing is not always realistic, and this change in regional policy puts cities at risk of being non-compliant with their Comprehensive Plans.

This Policy also assumes the market, housing demand and developer interest are the same in communities across the region. - but they are not. We do not dispute the demand for greater density of housing in some portions of the Twin Cities. However, in places such as Inver Grove Heights, the market and developer emphasis remains focused on lower density developments. The market and demand for higher density housing in Inver Grove Heights is not at the same scale as communities with greater populations, jobs, transit, etc. Furthermore, the definition of Suburban Edge specifically identifies these communities as having "...extensive undeveloped land planned for low to medium residential densities..." (Pg. 12).

City Response: The City objects to the proposed change in the minimum average net density for communities designated as Suburban Edge from 3.0 units per acre to 4.0 units per acre. This one-size-fits-all policy approach is not practical.

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. 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.

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.

The Met Council acknowledges that a one-size fits-all approach to regional policy would not account for the various planning needs throughout the region. In Imagine 2050, the Met Council established eight different community types including Urban, Urban Edge, Suburban, and Suburban Edge designations within the MUSA. The minimum density ranges for these communities vary from 24 units per acre (u/a) in Urban areas; 14 u/a in Urban Edge; 7 u/a in Suburban; and 4 u/a in Suburban Edge communities. Further, Rural Centers also have minimum density expectations of 3 units per acre. The rural and agricultural designations outside the MUSA include Diversified Rural, Rural Residential, and Agricultural which support maximum densities to ensure that development pressures don't impede on the agricultural economy in the region. This is a regional approach that acknowledges the diversity of community types,

Comment	Response
<p>Compact Development (Objective 1, Policy 2, Action 1)  Imagine 2050 evaluated different growth scenarios, from business-as-usual to low and high growth, based on compact or more dispersed development patterns. The resulting policy is to accommodate growth through more compact development. The stated benefits of compact development include land preservation, public investment, natural resource protection and climate. However, the proposed increased minimum net density combined with the expectation of compact development is without consideration of local housing markets, developer interest, and physical land attributes (i.e. topography).  City Response: The City objects to any policy requiring compact development. Such requirements threaten the flexibility of development and developer creativity, create potential conflicts with the housing market in terms of localized housing demand, and may require the City to focus on only certain types of housing, resulting in less diversification of its housing supply and fewer housing options for all persons.</p>	<p>patterns of development, local market trends, and current local plans already in place.</p> <p>Density policies address the form/design of growth, not the quantity of growth. A modestly more compact development pattern does not require the City to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land. Compact development patterns can help the City achieve other goals as well, like preserving open spaces and natural systems by ensuring these areas are protected from development.  We understand the local market trends in communities throughout the region. The Met Council's forecasts modeling, community designation analysis, and density analysis, among others, all considered local market trends prior to making the policy recommendations in Imagine 2050. The Met Council also heard support for more density and housing opportunities from the development community. Imagine 2050 makes clear the commitment to fostering sustainable land use practices and expanding housing choices, including more infill, redevelopment, and diverse housing types, to meet the needs of our growing region and to shape policies that support equitable and inclusive communities.  Additionally, the City already has areas of both higher and lower density land uses that contribute to its character. The Met Council still implements a community-wide average for achieving minimum densities. This flexible approach allows the City to plan for a diversity of housing types that ensures that the City's low density neighborhoods can continue to be a part of the local landscape. While we will review guidelines and administrative practices after the adoption of Imagine 2050, this practice is not recommended to be changed as part of that review.</p>

Comment	Response
<p>New Connections to Regional Sewer System (Objective 1, Policy 2, Action 2)</p> <p>In addition to its increased density expectation, the System Statement discusses various policy approaches to implement density requirements, including requiring new connections to the regional system to meet minimum density requirements. If the focus of any minimum density requirement is based on the average net density in development areas, then the potential policy of requiring all "new connections" to meet that minimum density is likely in conflict with average net density.</p> <p>For example: Assuming a minimum average net density of 4.0 units per acre is adopted, a new individual, single-family residential development with a proposed density of 3.0 units per net acre would not be authorized to connect as that development, and resulting "new connections," would not comply with the minimum required, even if that Low Density Residential land use is part of area average calculation for minimum density. The assumption of this example is that Low Density Residential area, and related density range, is part of an adopted Comprehensive Plan and within the MUSA.</p> <p>City Response: The Metropolitan Council is asked to clarify the intent of the "new connections" policy and its relationship to individual developments and the minimum average net density. The City would object to this policy if the intent is as described in the example above, whereby every new, individual development would need to meet the adopted minimum average net residential density.</p>	<p>Thank you for the comment. Many approaches were analyzed during the policy development process, one of which was requiring new connections to the regional system to meet minimum density requirements. However, after discussions with local governments and policymakers, this approach was not recommended and is not included in Imagine 2050 policies. The Met Council will continue to apply density requirements using a community-wide average net residential density calculation. Minimum density requirements apply to all areas that the City is planning to accommodate their forecasted growth. For example, an apartment complex with a higher density can balance out a single-family residential development with lower density so long as the average across the city within the planning decade is at least 4 units per acre. This allows local governments to plan for a diversity of housing types across their community.</p>

Comment	Response
<p>Net Residential Density (Objective 1, Policy 2, Action 3) Imagine 2050 states the measure of minimum net density is determined by taking the minimum number of housing units and dividing that by the net developable acreage (Subp. iii, Pg.20). This equation is the driver of establishing the minimum average net density. However, cities are unable to determine net density through their Comprehensive Plan as planning focuses on the gross acreage of a community. In their long-range planning documents, cities are not specifically identifying those things that are excluded from the landscape to determine net acreage of a specific parcel or area; those exclusions and related calculations occur during the development process. In other words, cities cannot calculate their net density. The terms "units per acre" and "units per net acre" are also used interchangeably throughout the entire Imagine 2050 document, yet they are not the same.</p> <p>City Response: The City seeks clarification as to whether the minimum density required for Imagine 2050 is based on the gross acreage for a development area or net acreage. If the latter, the Metropolitan Council needs to provide clarification as to what factors it proposes to use in determining net acreage.</p>	<p>The Met Council has always required the use of net acres to calculate a community's net residential density calculations in local planning, not gross acres. The Met Council publishes its adopted guidelines on how to calculate net residential density on the Local Planning Handbook site here: <a href="https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx">https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx</a></p> <p>The Met Council will 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 Imagine 2050 is adopted. This is planned to be a part of the implementation work plan. Changes under consideration (albeit not all-inclusive) include allowing permanent public easements to be netted out and reducing the look-back period for those enrolled in the Plat Monitoring Program. Stormwater management areas will also be evaluated and clarified as part of the update process. However, any changes made to provide local flexibility must be consistent with regional goals. The Met Council looks forward to working with local government partners as part of this update process.</p>
<p>Future Affordable Housing Need (Objective 1, Policy 2, Action 4) Imagine 2050 shows an affordable housing allotment for Inver Grove Heights of 528 units - 256 units at 30% or less AMI, 210 units between 31% to 50% AMI, and 62 units at 51% to 60% AMI. The associated Policy statement regarding Future Affordable Housing Need identifies two (2) options requiring cities to guide land:</p> <ol style="list-style-type: none"> <li>1. at a minimum density of 10 units per acre to meet the Future Need, or</li> <li>2. at a minimum density of 12 units per acre to meet the future need for 30% AMI or less and a minimum density of 8 units per acre at 31% to 60% AMI.</li> </ol> <p>City Response: The Metropolitan Council is asked to clarify if the City must select Option 1 or 2, and also clarify if Option 1 requires a land use category that starts at a 10 unit per acre minimum, or if the City is required to have a land use category that is inclusive of 10 units per acre.</p>	<p>The City may select Option 1 OR Option 2. Option 1 requires a land use with a 10 unit per acre minimum, so that starts at 10 units per acre.</p>

Comment	Response
<p>Greenhouse Gas Emissions (Objective 7, Policy 1, Action 7)  Imagine 2050 states local governments must plan for strategies that reduce or naturally sequester greenhouse gas emissions. (Pg. 36)  City Response: The Metropolitan Council is asked to clarify this and any similar policy and action statements requiring cities to perform tasks not commensurate with city government. As such, the City does not have staff expertise in this area.</p>	<p>When it comes to some of the climate commitments in the policies/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 min requirement for local governments would tend to be supported by Met Council technical assistance and resources. 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 also 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>Renewable Energy Readiness (Objective 7, Policy 3)  Imagine 2050 states local governments should incentivize developments that maximize renewable energy readiness and enhance energy efficiency. (Pg. 36)  City Response: The City objects to any requirements that obligate the City to consider or provide financial incentives. The City does not have staff expertise in this area. As such, the City would look to other agency partners to provide development for such technical and financial assistance to developers.</p>	<p>The City will not be asked or required to provide financial assistance to implement these actions. Incentives could take the form of other means of support to maximize renewable energy readiness through, for example, official controls and permitting. Policy language has been revised for clarity.</p> <p>When it comes to some of the climate commitments in the policies/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 min requirement for local governments would tend to be supported by Met Council technical assistance and resources. 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 also 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><b>City of Jordan</b></p>	



Comment	Response
<p>Objective 1, Policy 2, Action 2v:            The policy contemplates use of a 'look-back period' for achieved density expectations. The specific look back period or the criteria by which the look back period will be determined should be specified. A 10 year look back period (to the previous comprehensive plan cycle) appears reasonable.</p>	<p>In Objective 1, Policy 2, Action 2, Item v, the lookback period is referring to the Plat Monitoring Program which is the current mechanism by which we track development performance compared to planned densities. Currently, the Plat Monitoring Program either looks back to the start of the program (2000) or tracks all development since the local government began participating in the program. We are currently reviewing changes to the Plat Monitoring Program to consider reducing the look-back period for those enrolled in the Plat Monitoring Program to better reflect current market conditions and development preferences, while still incorporating enough data points to average out short-term changes in market conditions. Staff is currently exploring the impacts of different look-back periods on communities and is committed to making sure that any changes to the program do not cause communities to become inconsistent with regional policy. Any assessment of performance will be linked to the comprehensive planning requirements that were in place at the time.</p>

Comment	Response
<p>Objective 1, Policy 2, Action 3: Density and Community Types.</p> <p>As a "Rural Center", while Jordan's minimum average net densities are proposed to remain at 3 units per acre (from the 2040 planning period), there remains limited opportunity to have low density "Rural Center" development in the proposed plan. Jordan, like other Rural Centers, is not connected to the urban or suburban core of services and as a result the City needs to allow development flexibility for its residents and for the services it provides to the local population.</p> <p>With these needs in mind, the City offers the following more specific feedback:</p> <p>iii. The Met Council policies should exclude privately held open space from density calculations. Excluding this from the calculation would eliminate penalties for creation of private open space (accessible to a Homeowner's Association for example). This in turn would effectively create more open space, which reduces impact on the environment and reduces the public maintenance costs for parks and open spaces. In addition, the exclusion of storm water basins should be considered along with the other listed water feature exclusions. These storm water areas are necessary to construct sustainable infrastructure needs of a community. Also, like public parks and trails and arterial roadways, these storm water basins are areas rendered undevelopable.</p> <p>v. What is meant by "practical feasibility" of demand? How will this be evaluated? By whom and under what criteria?</p> <p>vi. What is meant by performance-based flexibility when it comes to density? What are the performance standards? And what type or degree of flexibility may be granted and when? Cities have tools for flexibility written into ordinances. Similarly, the Met Council should be clear on what flexibility may be granted, what the criteria are, and what the process will be. This flexibility should be reasonable and designed to meet the objectives of the Met Council and the local communities.</p>	<p>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 reflect policies in Imagine 2050. The Met Council will 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 Imagine 2050 is adopted. This is planned to be a part of the implementation work plan. Changes under consideration (albeit not all-inclusive) include allowing permanent public easements to be netted out and reducing the look-back period for those enrolled in the Plat Monitoring Program. Met Council staff agree that stormwater management areas need to be evaluated and clarified as part of the update process, too. However, privately owned greenspace does not provide the protection from development which public open space areas provide nor the level of responsibility for its maintenance that local governments ensure. Any changes made to provide local flexibility must be consistent with regional goals.</p> <p>Regarding the practical feasibility of demand and development in land use policy, the City is not required to do that study or analysis. Instead, the Met Council, during the review of local comprehensive plans, will implement a data-based approach using UrbanSim, a real estate market simulation model. This is the same model used to develop the local forecast set. Clarification of the roles and responsibilities attributed to that policy will be added.</p>

Comment	Response
<p>Objective 1, Policy 2, Action 3vii.  The City of Jordan strongly supports discouraging higher density development in rural areas prior to extension of urban surfaces to ensure the orderly development of the region. The policy and action should be strengthened further to recognize the challenges facing local governments across the region seeking to establish realistic and reasonable orderly annexation agreements (OAAs). Where OAAs cannot be established to clearly define the local governments' consensus on planned land use intensity, the strength and application of Met Council policies may be the only element standing in the way of preventing disorderly development. Rural Center Service Areas are largely based on existing city limits and future limits prescribed in OAAs. Where no OAA exists between local governments, the Met Council policies should prescribe maximum allowable densities - particularly in the areas beyond the Rural Service Area - at relatively low density until such time local government consensus is reached. Application of such policies should encourage establishment of OAAs (consistent with Objective 2, Policy 2, Action 7) to best define local government opinion of land use across the region which in turn can best facilitate right sized infrastructure planning. In the meantime, until OAAs are established, it will similarly require orderly development outward from Rural Centers.</p>	<p>Encouraging orderly annexation agreements is consistent with Met Council policy. 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>
<p>Objective 1, Policy 2, Action 3viii.  The City of Jordan strongly agrees with this policy. Areas with environmental sensitivity should be protected against rural development until such time urbanized infrastructure is provided. Urbanized infrastructure has greatly reduced potential for damage to the environment than rural development lacking urbanized, public infrastructure. Privately owned, individual systems are more susceptible to leaks and contamination over the long term.</p>	<p>Thank you for your supportive comments.</p>

Comment	Response
<p>Objective 2, Policy 2, A7:  The City of Jordan strongly agrees with the encouragement of OAAs between Rural Centers and adjacent townships to encourage planned and orderly development. Paring with "Objective 1, Policy 2, Action 3vii" the policies should acknowledge in place sewer infrastructure's ability to serve currently rural / agricultural areas by limiting interim densities in both areas serviceable by extensions of in-place sanitary sewer and those areas planned to be services by OAAs. The policies must work in concert with and support each other. Objective 2, Policy 2, Action 7 on its own, suffices to encourage OAAs only matching the planning horizon without regard for what may come beyond that duration. The policy needs to be more careful so as not to indirectly encourage rural disorderly development just beyond 20-year growth boundaries.</p> <p>In the winter of 2023-24 the City of Jordan and Sand Creek Township could not come to terms regarding development of an area in the township as a long-term development of the Rural Center community during a Comprehensive Plan Amendment process that was approved by the Met Council. The Met Council's support for urbanized orderly extension of public infrastructure was sought by the City of Jordan. More specifically, the City encouraged Met Council denial of a Scott County Comprehensive Plan Amendment to protect the long-term viability of growth and development of Rural Center communities. However, the Met Council did not decide to utilize this policy and instead chose to approve the disorderly rural development. Scott County and Sand Creek Township later entered into a development agreement which will require a majority vote of future individual property owners as to whether they prefer to urbanize in the future or remain on individual rural septic systems. These property owners, who will otherwise receive the same transportation system benefits and other benefits associated with their location in the region, have been given a future option as to whether to equitably participate in paying their fair share toward establishing a sustainable region and protecting the environment for rural development with inadequate urban services. If the Met Council is to sincerely encourage OAAs and orderly development of the region, it must be more stringent in application of these policies as written through regulation of policies</p>	<p>The specific instances cited in this comment point to the importance of aligning policies and interpreting them. Language has been refined to reflect this input.</p>

Comment	Response
<p>Objective 1, Policy 2, Action 3vii and Objective 2, Policy 2, Action 7. At time of the aforementioned comprehensive plan approvals, some at the Met Council suggested it lacked the ability to deny the comprehensive plan amendment it was faced with. If this is true, the Met Council truly needs to establish policies through the Imagine 2050 process which will enable it to execute on its policies through which public consensus is currently being reached. The orderly development of the region depends on it.</p>	<p>The Met Council is aware of the ongoing concerns of Rural Center communities as they look towards long-term growth yet 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> <p>The Met Council does not have approval or denial authority as it relates to comprehensive plan review. According to Minn. Stat. §473.175, "the Met Council may require a local governmental unit to modify any comprehensive plan or part thereof if, upon the adoption of findings and a resolution, the council concludes that the plan is more likely than not to have a substantial impact on or contain a substantial departure from metropolitan system plans." This is called the plan modification process and as outlined in statute is only applicable in specific circumstances. We are restrained to the authority established in state law.</p> <p>The Met Council has included additional language supporting Rural Centers and other communities with Orderly Annexation Agreements. Additionally, we have added language to discourage unincorporated areas surrounding Rural Centers from encouraging a development pattern inconsistent with the provision of future urban services. To the extent possible, we have included policy language to address the City's concerns.</p>

Comment	Response
<p>Objective 5, Policy 1, AS:  It is unclear what is meant by "locally-led" development initiatives. It is unclear who would be making investments, nor whether those investments are financial or otherwise, or who would be leading this effort. The policy notes that it would be enacted by the local government. The City of Jordan has limited resources, it is not receiving taxpayer funding intended at this time to make these investments, nor as the City been issued financial resources from other entities to make such investments, and as such cannot support such investments. Increased specificity of the policy is recommended and if additional resources are intended of local governments across the region, the Met Council should communicate more specifically what is proposed by the policy.</p>	<p>The Metropolitan Council understands the importance of local autonomy in housing education efforts. Rather than enforcing specific actions, the Council provides technical assistance and resources to help cities support a variety of housing options. Our aim is to offer guidance and best practices, allowing cities to tailor their approach based on their community's needs and priorities. Communities may choose to explore a variety of options such as small businesses during redevelopment, implementing inclusionary zoning policies or involving historically underserved or underrepresented groups in the development process through intentional engagement. Technical assistance may include best practices, local case studies and/or model ordinances which will allow cities to tailor their approach based on their community's needs and priorities. We have added examples to the policy language to help clarify.</p>

Comment	Response
<p>Objective 7, Policy 1, A6/A7: The policy specifies that local governments must provide a greenhouse gas emissions inventory and protections as well as reductions/sequester. The scope of policy is wide ranging as written and could be construed to imply both public and private sources of GHG emissions within the local governments jurisdiction. The City sees multiple issues with this arrangement:</p> <ol style="list-style-type: none"> <li>1. The City has limited resources (financial and technical) to complete this new inventory. If this is to be required, the Met Council should procure and distribute the necessary funding to local governments to comply with this Met Council policy.</li> <li>2. There are no effective means for true measurement of GHG emissions at the broad scale specified across the entire local government jurisdiction. Estimation of GHG emissions could be completed. To estimate GHG emissions, numerous assumptions coupled with regionally available data regarding land use and traffic would be key tools to complete the exercise. To harmonize the assumptions utilized, such an estimation exercise would best be done at the regional level (by the Met Council itself) if this estimate was desired.</li> <li>3. The policy clearly articulates the downfalls of climate change. It also specifies the impact on stormwater management considerations and tree canopy preservation/protection. Last. action A7 suggests strategies to reduce/sequester GHG emissions need to be planned locally. However, there is no specified tie between the estimation of GHG generated within the jurisdiction and that reduced/sequestered. The estimation therefore has not specific function aside from trivial value. The City is not suggesting a direct tie between estimation and mitigation be net zero on a 'per local government jurisdiction' basis, merely noting the estimation function at local government level serves little function. The Met Council should not delegate the estimation of public/private GHG emissions to individual cities as an unfunded mandate. The reduction and sequestration of GHGs is assuredly a problem for everyone to address, though the regional solution should not be sourced primarily through local government agencies. The state and federal governments are best equipped through policy development and distribution of associated funding as appropriate to assure everyone addresses the problem.</li> </ol>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has a GHG inventory and strategy planning tool that communities can use to make meaningful commitments on GHG reductions. The Met Council will provide technical assistance on how to use this tool.</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 also 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><b>City of Lakeville</b></p>	



Comment	Response
<p>A rolling 20-year analysis is to be used to evaluate requests to connect a new area to the regional wastewater system. Our interpretation of this policy is that such analysis is to be the basis of evaluating requests to amend a local Comprehensive Plan to expand the Municipal Urban Service Area to include areas not addressed within the Comprehensive Plan for the planning period. Lakeville has used a staged approach to MUSA expansion to provide sufficient land supply to meet market demands and avoid constraining growth while promoting efficient investment in infrastructure. We believe that the Metropolitan Council policy regarding the rolling land analysis is consistent with Lakeville's current approach to staged MUSA expansion. Lakeville does however look for opportunities to annex land in cooperation with the township abutting the industrial park. When this occurs a MUSA expansion will be necessary to encourage future development and support the city's and region's growth and job creation.</p>	<p>Our intentions seems to be aligned with the City's planning practice. We look forward to collaboration as we work to develop specific guidelines in the future. As developments or other changes requiring a comprehensive plan amendment come up, please feel free to contact your Sector Rep for specific guidance in the meantime.</p>
<p>The minimum average density for new development in Suburban Edge communities is to be increased from 3.0 dwelling units per acre to 4.0 dwelling units per acre. The calculation of the density within the City is determined dividing the minimum number of planned housing units the net acreage. Net acreage does not include land covered by wetlands, water bodies, stormwater basins in public ownership, public parks and trails, public open space, arterial road rights-of-way, and other undevelopable acres identified in or protected by local ordinances such as steep slopes. It may be problematic to meet a new goal of 4.0 dwelling units due to natural resources, topography, etc of remaining developable land. Met Council should clarify if this only on undeveloped land in the MUSA? How will this change result in accomplishing Met Council stated goals? Met Council should define what is the actual purpose of this change? What has the average density been reported in the plat monitoring program?</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. 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>The Met Council's current adopted guidelines for the implementation of minimum net residential density requirements is based on a community-wide average. This allows the City to plan for areas of both high and low</p>

Comment	Response
	<p>density land uses (and everything in between). In the 2050 Plans, the Met Council will review densities in all areas planned to accommodate forecasted growth in the planning period. The Met Council will review its guidelines and administrative practices after the adoption of Imagine 2050, but this practice is not recommended to be changed as part of that review. Any changes made to provide local flexibility must be consistent with regional goals. The Met Council looks forward to working with all local government partners as these programs and guidelines are evaluated.</p> <p>Finally, Lakeville's net residential density based on the Plat Monitoring date between 2000 and 2023 is 3.55 units per acre which indicates that the City is developing at higher densities than the current regional policy of 3 units per acre. Additionally, we are currently reviewing changes to the Plat Monitoring Program. Reducing the look-back period for those enrolled in the Plat Monitoring Program, can better reflect current market conditions and development preferences (i.e. for example, between 2019-2023 Lakeville has developed at 4.2 units per acre). Staff is currently exploring the impacts of different look-back periods on communities and is committed to making sure that any changes to the program do not cause communities to become inconsistent with regional policy. We also agree that any assessment of performance should be linked to the comprehensive planning requirements that were in place at the time.</p>

Comment	Response
<p>The regional land use chapter also states that the City must plan for a minimum number of acres to be developed at 10.0 dwelling units per acre in order to provide for construction of the number of affordable housing units allocated to the City for the 2030 to 2040 planning period. The 2040 Lakeville Comprehensive Plan was required to identify sufficient land supply for affordable housing units at 9.0 dwelling units per acre. The regional land use chapter does provide the option to satisfy the affordable housing by planning necessary acreage at 12.0 dwelling units per acre for the housing units required to meet 30 percent or less Average Median Income and acreage at 8.0 dwelling units per acre to meet the housing needs for households at 31 percent to 60 percent Average Median Income. Met Council should clarify that the city can chose which option it wants to implement.</p> <p>The 2050 Comprehensive Plan update will need to include an evaluation of potential density increases in remaining undeveloped areas of Lakeville to comply with the increased overall minimum residential density requirement. We would also note that increasing the required overall density residential density less than 10 years after adoption of the 2040 Lakeville Comprehensive Plan is complicated by the fact that plans for infrastructure have been based upon and constructed in accordance with the prior 2040 Land Use Plan. Arbitrarily requiring an increase in density across the declining supply of undeveloped land in Lakeville may have unintended consequences or may not be feasible from a service standpoint.</p>	<p>The City is correct that they may choose which path to meeting its affordable housing need it wishes. This is indicated in Table 3 in the land use chapter which refers the reader to Section 4 of the Housing Policy Plan for more information (Section 4 under Land Guided for Affordable Housing). In both Table 3 of the Land Use Policy chapter and in Section 4 of the Housing Policy Plan, the choices are labeled Option 1 and Option 2. This same approach to providing options was also employed during the 2040 planning cycle.</p> <p>Secondly, the City is required to guide land at the minimum overall community-wide density expectations for its Community Designation to support its forecasted growth which does not limit the City to only undeveloped areas. It is important to note that 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>Finally, comprehensive plans which are required to respond to updated regional system and policy plans are always updated every 10 years, as required by state statute.</p>

Comment	Response
<p>Density ranges for residential land use categories are to allow for more than one potential housing type. One point that is important to address is the fact the comp plan is a policy document that does not list allowed uses. The land use plan provides general description of land use categories and then the city uses the zoning ordinance to identify allowed uses in each zoning district. There may be several zoning districts that correspond to a particular land use category and the zoning district, not the land use, will determine uses. With a potential increase to a minimum of 4.0 units per acre, it may be necessary to expand the types of dwelling units within this land use categories (through zoning) in some areas of low density in areas of future development where infrastructure planning may be able to accommodate the increase, rather than within existing single-family areas. Another option could be to include ADU's as an choice for the existing single family home areas and then look to other areas where new development could accommodate twinhomes/duplexes. The city may also consider more broad designation of RST-2, Residential Single and Two Family Dwelling Districts as part of implementation of the 2050 Lakeville Comprehensive Plan.</p>	<p>Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. We agree that local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. As you know, Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This has not changed. As part of 2040 Plans, in the checklist of minimum requirements all land use categories were required to "include types of allowed uses and the minimum and maximum densities ('the allowable density range') for all categories that allow residential uses. Allowed uses should include a description of allowable housing types such as single family, detached, duplexes, townhomes, etc." This is not proposed to change and if missing in the 2040 Plan, can be reconciled as part of the City's 2050 planning process. Broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Also, the Met Council supports implementation of ADUs within the MUSA. While this is a local decision, it is consistent with the goals and policies in Imagine 2050.</p>
<p>A Living Streets Policy is to be incorporated within the 2050 Land Use Plan (as well as Transportation Plan) at provide for multiple modes of transportation and reduce environmental impacts. This can be viewed as reasonable policy direction to provide for enhancements for walking or rolling, improve safety and security of streets, calm traffic, reduce street costs, and improve aesthetics. Met Council should clarify if this is a new mandatory requirement. If so, will funding be provided?</p>	<p>Communities are encouraged to consider Living Streets policies and principles but will not be required to adopt them. Language will be clarified to make the intent clear.</p>

Comment	Response
<p>The Imagine 2050 land use chapter calls for expanded allowance for modular homes in single-family districts, cooperative housing, and multigenerational housing options. Our experience in other communities is that modular housing (as distinct from manufactured housing) can result in a higher quality, durable, and sustainable dwelling versus a site-built building due to greater controls at the point of construction. This should be a policy discussion as part the 2050 Lakeville Comprehensive Plan update process.</p>	<p>The Metropolitan Council is committed to fostering sustainable land use practices and expanding housing choices, including more infill, redevelopment and diverse housing types, to meet the needs of our growing region. The Council provides technical assistance and resources to help cities support a variety of housing options, including manufactured and modular housing. Our aim is to offer guidance and best practices, allowing cities to tailor their approach based on their community’s needs and priorities.</p>
<p>The Imagine 2050 land use chapter includes an objective to remedy past and present discriminatory land use practices. This is mainly to be accomplished through public outreach and ensuring that development policies, practices, and decisions are applied equitably. We do not see a significant concern with this objective as it pertains to the 2050 Lakeville Comprehensive Plan, but we do acknowledge that this approach extends further into social justice areas than a more pragmatic approach to comprehensive planning that falls within the statutory authority of the Met Council.</p>	<p>According to Minnesota Statute 473.145 Development Guide, "The comprehensive development guide must recognize and encompass physical, social, or economic needs of the metropolitan area..." Historically, planning has excluded and discriminated against marginalized groups. As so, we must proceed with planning and policy through an equity lens to ensure all residents, in particular Black, American Indian, and residents of colors, are part of our processes to ensure their physical, social, and economic needs are met and as outlined in statute.</p>

Comment	Response
<p>The Imagine 2050 land use chapter outlines an objective to implement land use and development practices that reduce greenhouse gas emissions, embed climate adaptation, and create resilient communities. For local governments, there is a requirement to provide a greenhouse gas emissions inventory and projections generated from activity within the local government’s jurisdiction and covers the range of applicable emissions sectors. Local governments must also plan for strategies that reduce or naturally sequester greenhouse gas emissions. This objective appears to be a work in progress as the Imagine 2050 land use chapter outlines the following actions yet to occur:</p> <p>Explore and pursue funding opportunities for climate initiatives at the state and federal level as new opportunities emerge.</p> <ul style="list-style-type: none"> <li>- Identify local climate planning needs and emerging goals with local partners to establish 2050 climate planning requirements in alignment with state statutes. Develop and provide needs-based technical assistance to local governments.</li> <li>- Establish performance metrics and evaluate implementation measures for climate reporting at both the local and regional scales and provide regular public progress reports.</li> <li>- Met Council should clarify if this is a requirement to include a climate action plan in the 2050 plan? If so, what are the minimum standards and expectations? Will funding be provided for this new requirement?</li> </ul>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has a GHG inventory and strategy planning tool that communities can use to make meaningful commitments on GHG reductions. The Met Council will provide technical assistance on how to use this tool.</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 also 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>The Met Council does not require a Climate Action Plan for local governments, though the Met Council will encourage local governments to adopt such plans. The Met Council recognizes that not all communities have the capacity, time, funding, or political will to adopt a Climate Action Plan, so this will not be a requirement. A checklist of minimum requirements for local comprehensive plans will provide more specific direction to each municipality and will be provided with the Local Planning Handbook update set to launch in late 2025.</p>
<p>In the area of renewable energy, the Imagine 2050 land use chapter calls for incentivizing urban design and development that maximizes renewable energy readiness and enhances energy efficiency, especially for energy-burdened households. The action items include establishing a target percentage of a local government’s energy needs to be met by sustainable energy that, as of now, appears undefined. The city objects to any requirements that obligate the city to consider or provide financial incentives.</p>	<p>The Met Council will not require cities to provide financial incentives for the deployment of renewable energy. A city can incentivize deployment of renewable energy through means that are not necessarily financial; this could be through official controls, like updated zoning ordinances, etc. Minn. Stat. § 473.859, subd. 7 Climate Mitigation and Adaptation also 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. As resources and tools are further developed for local planning purposes, we look forward to ongoing collaboration with local governments to help meet these new planning requirements.</p>

Comment	Response
<p>A policy applicable to both Metropolitan Council and local government is stated to value and promote a just economy through the economic growth and wellbeing of Black communities, American Indians, people of color, immigrants, and people of all ages and abilities in the region through equitable access to economic resources. Such social services as outlined as action items under this policy has traditionally been beyond the scope of Lakeville’s community development efforts.</p>	<p>As part of the comprehensive planning process, the Met Council provides cities with technical assistance and best practices to help meet these goals. The Met Council is committed to an inclusive, and sustainable economy that values businesses owned by people of color and immigrants and is resilient to the effects of climate change. Cities are encouraged to engage with Tribal nations and underrepresented communities in the planning process to ensure diverse voices are heard. We are here to support local governments in developing plans that promote sustainable industries and equitable economic growth, ensuring that all communities have access to economic resources.</p>
<p>Lakeville remains designated as a Suburban Edge community based on having extensive undeveloped areas planned for low to medium density residential land uses.</p>	<p>Lakeville's Community Designation in Imagine 2050 is Suburban Edge. Correct.</p>
<p><b>City of Lilydale</b></p>	
<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>



Comment	Response
<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>
<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. 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. 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>

Comment	Response
<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>
<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>
<p><b>City of Lino Lakes</b></p>	

Comment	Response
<p>To acknowledge and address differences and needs between cities in the metro area, the Metropolitan Council has developed community designations or classifications. These classifications are then used to group cities with similar characteristics. Regional plan requirements or actions are then adjusted to reflect these different categories. Under the existing 2040 plan there are 5 sewerer community designations of which Lino Lakes is included in the Emerging Suburban Edge category. This designation was intended to recognize the unique characteristic of communities in the early stages of transitioning into urbanized levels of development.</p> <p>Under Imagine 2050, the categories have been condensed to four sewerer designations. The Emerging Suburban Edge category has been eliminated and Lino Lakes has been incorporated into the Suburban Edge category. In doing so, opportunities to differentiate between communities in various stages of growth are eliminated and a one shoe fits all approach becomes more apparent. Lino Lakes would now share the same designation as more fully developed communities like Maple Grove, Shakopee, and Woodbury.</p>	<p>The Met Council acknowledges that a one-size fits-all approach to regional policy would not account for the various planning needs throughout the region. A year long analysis of Community Designations was conducted in 2022 with local government partners, the Met Council's Land Use Advisory Committee, and other regional stakeholders. In addition, preliminary drafts of revised Community Designations were distributed to all local governments for comment during that effort. At that time, the prevailing recommendation was that there were not significant differences between policies which applied to Suburban Edge and Emerging Suburban Edge communities. The recommendation endorsed by the Met Council was to move forward with four Urban Service Area designations and four Rural Service Area designations. This is a regional approach that acknowledges the diversity of community types, patterns of development, local market trends, and current local plans already in place. We understand that policy changes have impacts on communities as they turn to their local planning process. The Met Council is committed to supporting local governments through technical assistance, tools, and funding resources to aid in that process.</p>
<p>Land Use Policy Plan, Policy 2, Action 3, Residential Density Requirements,</p> <p>Since the preparation of the 2020 Plan, started in 1998, the Metropolitan Council has required a minimum average residential development density of 3.0 units per acre in Lino Lakes. The purpose of the requirement has been to ensure efficient and financially sustainable use of the region's sanitary sewer infrastructure. While challenging, from both cultural and physical characteristics of the area, we have successfully met this requirement over the past 25 years. The City's trunk sanitary sewer system has been designed to accommodate this density both now and through full build out of the community.</p> <p>Under the Imagine 2050 plan it is proposed to raise this density to 4.0 units/acre average. Staff has not found anything in the document that supports this change from a financial perspective or evidence that it will accomplish stated goals. Responses regarding protection of open space and maximizing efficiency of the existing infrastructure system fail to recognize the City's long standing emphasis on preservation of natural resources. This potential change creates several issues:</p> <ul style="list-style-type: none"> <li>• This represents a 33.33% increase in residential density across the City.</li> <li>• The local sanitary system was not designed for and may not be able to accommodate the increase density and flows. This may lead to premature replacement and unplanned local infrastructure costs.</li> </ul>	<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. 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</p>

Comment	Response
<ul style="list-style-type: none"> <li>• Increased density does not in itself preserve open space and natural resources. It just adds more units per acre. It is not clear in the plan whether downstream regional systems can accommodate this increase and larger ultimate population.</li> <li>• This potentially will put an even greater strain on the area’s water supply as we attempt to accommodate the density change.</li> <li>• It is unclear how this average density will be calculated in both the comprehensive plan and actual development.</li> <li>• Lino Lakes is at the end of the line of four sewer interceptors and a trunk sewer line operated by White Bear Township. Regional sewers are not proposed to extend through or service any new areas outside of Lino Lakes.</li> <li>• The draft Wastewater System Plan (pg. 12) notes that the Northeast Area (including Lino Lakes) has the potential to generate flows that slightly exceed the capacity of interceptors servicing this area.</li> <li>• Met Council is not proposing any significant transit investments for the area to support higher densities.</li> <li>• The draft Lino Lakes population and housing forecasts propose a slight reduction from existing 2030 &amp; 2040 forecasts which have already been planned for. The proposed increase in density will require an unnecessary and costly modification to the City’s Comprehensive Plan.</li> </ul>	<p>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 as well as to advance all five of the region goals in Imagine 2050.</p>

Comment	Response
<p>Land Use Policy Plan, Policy 2, A4 Affordable Housing Density Requirements</p> <p>Metropolitan Council is responsible for ensuring the local communities accommodate their share of the regions affordable housing need. The City’s proposed Affordable Housing need for 2031-2040 is estimated at 450 units. Communities are required to guide enough land at a minimum density to accommodate the housing number.</p> <p>The proposed plan would change how opportunities for affordable housing are provided. Cities have two options:</p> <ol style="list-style-type: none"> <li>1. Guide sufficient land at a minimum density of 10 units/acre to meet the city or township’s total Future Need.</li> <li>2. Guide sufficient land at a minimum density of 12 units/acre to meet the city or township’s Future Need for 30% AMI or less and a minimum density of 8 units per acre to meet the Future Need at 31-60% AMI.</li> </ol> <p>The 2040 land use plan allowed areas at 8 units per acre minimum to meet the affordable housing goal. Density alone does not lead to affordable housing and the document provides no empirical evidence to show that this increased density will result in more affordable housing in Lino Lakes. It could be argued that this will not create more affordable housing and that higher density housing opportunities in Lino Lakes are limited due to our geographic location and that high density housing demand is now and is expected to remain limited.</p>	<p>The draft 2050 Housing Policy Plan does recognize that density is not the only tool for the creation of affordable housing and has made modifications to increase the flexibility of the Land Guided for Affordable Housing (LGAH) requirement in Section 4 of the 2050 Housing Policy Plan in order to reflect this reality. However, Section 4 of the Housing Policy Plan does provide evidence that affordable housing is much more likely to be built at higher densities. According to Minn. Stat. 473.859, comprehensive plans must use land use planning to promote the availability of land to meet low and moderate income housing. This land must be available at densities high enough to accommodate low and moderate income housing, not necessarily required to be developed as affordable housing.</p>
<p>Land Use Policy Objective 3, Policy 1, A1-A8.</p> <p>Policy 1 relates to prioritizing planning policies and practices that support mixed-use development, walkable neighborhoods, easy access to transit, and enhanced connectivity through biking and other sustainable transportation options. While the City is supportive of this policy, we are concerned with how the action items will be implemented.</p> <p>There are eight local government action items listed under this policy, five of which appear to be mandatory requirements. Only two include the word “Consider”. If mandatory, will Metropolitan Council provide funding to local governments to complete these efforts?</p>	<p>Language will be adjusted to clarify intent, to differentiate between elements that are required and those that are encouraged, as well as to clarify the respective roles of the Met Council and local governments. Where requirements are identified, the Met Council will provide technical assistance, tools and resources, as well as planning assistance grants to eligible communities.</p>
<p><b>City of Long Lake</b></p>	

Comment	Response
<p>Subject: [EXTERNAL] Long Lake Designation as Urban Edge</p> <p>As a Long Lake resident and a commissioner on the City's Planning Commission, I was aghast when finding out that Met Council listed our city as an Urban Edge community in the Imagine 2050 plan. In no way do I see Long Lake as even remotely capable of adhering to the regulations stipulated in the Imagine 2050 plan without a substantial amount of undue hardship on most if not all residents.</p> <p>We are an established community with almost no greenfield locations for new construction, therefore existing lots that have been established for generations would need to be subdivided to comply. The result would be a destruction of the rural, suburban life that the citizens of this community cherish. It would also create a completely disjointed housing community and cause fraying within our community.</p> <p>The additional density would also put pressures on existing roadways and intersections that are incapable of handling. We essentially have one way in to our town and one way out of our town, and adding substantially more cars to this infrastructure would make maneuvering throughout the town nearly impossible and thus rendering the town incapacitated. This same roadway is utilized extensively by the Orono community, thereby severely hampering that City's citizens from traveling into and out of their dwellings, and therefore negatively affecting their quality of life.</p> <p>Our heritage in this community has always been one of a rural mindset, which is a draw to most of its inhabitants. Heavy-handed government regulations implemented to reach a goal just to reach that goal and not be concerned about the long-term ramifications on the community, infrastructure and future potential of a small town can only be described as destructive in nature. The Met Council is welcome to visit us in Long Lake and explore the town and it will be quite obvious that in no way is this town suited to handle the Urban Edge designation.</p>	<p>The Met Council agrees to make a change the City's Community Designation to Suburban, recognizing that the change would be an increase not resulting from the updates to the community designations analysis, but also a change upwards to a new community designation. We have made this change in Imagine 2050.</p> <p>For clarity, the City is not required to redevelop existing developments to meet minimum density requirements. Rather, the City is required to plan for a community-wide average net residential density only for areas that are planned to accommodate forecasted growth. In addition, the City's planned net residential density in its 2040 Plan is 12.5 units per acre indicating that the City has a planned density exceeding the Suburban designation, and actually much closer to the densities for the Urban Edge designation. This level of planning was one of the factors that led to the original designation in Imagine 2050.</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 the City to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land.</p>

Comment	Response
<p>I am a member of the Long Lake Planning Commission. I was shocked to hear that we have been designated "Urban Edge" by the met council and can only imagine that someone made a very big mistake.</p> <p>Long Lake is a small 1800 person community that is nearly completely developed within city boundaries with mostly modest, older single family homes. We do not have even a transit road through town any longer and have very little meaningful connectivity through many parts of town. Your designation would change our zoning and land use in ways that would fundamentally alter our town that are not respectful to our focus on access to nature or the character of the town.</p> <p>I respectfully ask that you reconsider and change us back to suburban as we were designated in Thrive 2040.</p>	<p>The Met Council concurs that the Suburban community designation is more consistent with the City's current development patterns and we has made this change in Imagine 2050.</p>



Comment	Response
<p>Long Lake Community Designation - Urban Edge</p> <p>The City strongly objects to this designation and requests that Long Lake be changed back to the "Suburban" designation that it held in Thrive 2040. It is simply unattainable for future development in Long Lake to meet the density threshold required for "Urban Edge" communities. Urban Edge (pg. 11): "These cities are characterized by growth that occurred just before the economic downturn of 1973-1974, which contributes to their transitional character between dense urban cores and more spread-out suburban areas. Similar to Urban areas, they experience rapid growth and redevelopment at high densities, have high job densities as well, and offer good access to transit, supported by their relatively high street connectivity. Urban Edge areas face similar urban challenges, such as managing increased surface temperatures and safeguarding drinking water quality, which requires tailored environmental and infrastructural solutions."</p> <p>The median year that a home in Long Lake was built is 1972. This is not consistent with the urban edge designation. Long Lake does not have a dense urban core or high job densities. The only transit route in Long Lake is being discontinued, and good street connectivity is hindered by Highway 12 running through the community. Long Lake is situated much further out from the majority of the other "Urban Edge" communities and is surrounded by "Suburban" and "Suburban Edge" communities. We feel strongly that Long Lake does not fit the "Urban Edge" category and should be designated as "Suburban".</p> <p>Suburban (pg. 12): "Developed during the housing expansions of the 1980s and 1990s, Suburban areas are primarily residential, featuring auto-oriented, medium-density housing developments. These areas are mainly designed with expansive subdivisions that prioritize vehicle access and exhibit limited intersection density, which affects the efficiency of public transit. Additionally, these jurisdictions often include small amounts of undeveloped land, providing opportunities for future development or green space conservation. Many Suburban areas also feature park-and-ride facilities to enhance connectivity to larger transit networks, supporting commuter needs. As these areas continue to grow, they face challenges such as rising surface temperatures and strains on local water supplies, emphasizing the importance of integrated resource management strategies."</p> <p>The City of Long Lake is much more consistent with the description above for "Suburban" communities.</p>	<p>The Met Council concurs that the Suburban community designation is more consistent with the City's current development patterns and we have made this change in Imagine 2050.</p>

Comment	Response
<p>Minimum Average Net Density for Suburban Communities (Land Use Policy, Objective 1, P2, A3) The City objects to the proposed change in the minimum average net density for communities designated as Suburban from 5 to 7 dwelling units per acre. Imagine 2050 proposes an expected increase in the minimum residential density requirement. We are requesting that Long Lake will be redesignated as a Suburban community, as it was for Thrive 2040. According to Imagine 2050, the minimum average net residential density for communities designated as Suburban is proposed to increase from 5 units per acre to 7 units per acre. This increased density is a dramatic shift from the previous density requirement in Thrive MSP 2040. Long Lake is a fully developed lake community with very limited greenfield development opportunities. The 2020 decade brought one medium and two high density projects to Long Lake.</p> <p>This development leaves the City with very little land for new and redevelopment. Lack of substantial additional available land for higher density projects will make it extremely difficult for the City to balance lower density infill development with the proposed increased average density of 7 units per acre. In summary, the new density requirement fails to take into consideration local development and public improvement patterns, lot size and their location adjacent to a DNR protected body of water. It will be difficult for this community to meet the density requirement in Imagine 2050. Please reconsider increasing the density requirement for Suburban communities.</p>	<p>The Met Council has agreed that the Suburban community designation is more consistent with the City's current development patterns and we have made this change. The minimum density expectation currently recommended in the draft policy language is 7 units per acre. The City's current planned average minimum density in the adopted local comprehensive plan is 12.5 units per acre. Average minimum density requirements only apply to all areas guided to support forecasted growth within the planning period. The City's 2050 decade household forecasts are proposed to be 880 households, which adds 40 households over the planning period from the Thrive 2040 household forecast of 840 households. If the City believes that the forecast is incorrect, Met Council staff are available to discuss revisions to the forecast.</p>

Comment	Response
<p>Housing Type Directive (Objective 5, PI, AI) The City objects to the requirement placed on cities to allow for more than one housing type within residential land use categories. Imagine 2050 includes a requirement that will force cities to allow more than one type of housing within residential land use categories to encourage mixed-income developments, diversity of housing types within neighborhoods and broader access to housing for more people. While the issues that this policy is trying to address are important, this requirement does not consider the nature of the community, the land values of properties around the lake, and the ability for cities to decide which types of development are appropriate in the community. Additionally, this policy would likely result in zoning changes, which are a hyper-local decision, and the City opposes any such regulation that would infringe upon its right to make such decisions. Additionally on the opposite end of this, it is not possible to construct another type of housing beyond apartments at a high density.</p>	<p>Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p> <p>As part of 2040 Plans, in the checklist of minimum requirements all land use categories were required to "include types of allowed uses and the minimum and maximum densities ('the allowable density range') for all categories that allow residential uses. Allowed uses should include a description of allowable housing types such as single family, detached, duplexes, townhomes, etc." This is not proposed to change and if missing in the 2040 Plan, can be reconciled as part of the City's 2050 planning process.</p>

Comment	Response
<p>Subject: [EXTERNAL] Long Lake Designation as Urban Edge</p> <p>As a Long Lake resident and a commissioner on the City's Planning Commission, I was aghast when finding out that Met Council listed our city as an Urban Edge community in the Imagine 2050 plan. In no way do I see Long Lake as even remotely capable of adhering to the regulations stipulated in the Imagine 2050 plan without a substantial amount of undue hardship on most if not all residents.</p> <p>We are an established community with almost no greenfield locations for new construction, therefore existing lots that have been established for generations would need to be subdivided to comply. The result would be a destruction of the rural, suburban life that the citizens of this community cherish. It would also create a completely disjointed housing community and cause fraying within our community.</p> <p>The additional density would also put pressures on existing roadways and intersections that are incapable of handling. We essentially have one way in to our town and one way out of our town, and adding substantially more cars to this infrastructure would make maneuvering throughout the town nearly impossible and thus rendering the town incapacitated. This same roadway is utilized extensively by the Orono community, thereby severely hampering that City's citizens from traveling into and out of their dwellings, and therefore negatively affecting their quality of life.</p> <p>Our heritage in this community has always been one of a rural mindset, which is a draw to most of its inhabitants. Heavy-handed government regulations implemented to reach a goal just to reach that goal and not be concerned about the long-term ramifications on the community, infrastructure and future potential of a small town can only be described as destructive in nature. The Met Council is welcome to visit us in Long Lake and explore the town and it will be quite obvious that in no way is this town suited to handle the Urban Edge designation.</p>	<p>The Met Council agrees to make a change the City's Community Designation to Suburban, recognizing that the change would be an increase not resulting from the updates to the community designations analysis, but also a change upwards to a new community designation. We have made this change in Imagine 2050.</p> <p>For clarity, the City is not required to redevelop existing developments to meet minimum density requirements. Rather, the City is required to plan for a community-wide average net residential density only for areas that are planned to accommodate forecasted growth. In addition, the City's planned net residential density in its 2040 Plan is 12.5 units per acre indicating that the City has a planned density exceeding the Suburban designation, and actually much closer to the densities for the Urban Edge designation. This level of planning was one of the factors that led to the original designation in Imagine 2050.</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 the City to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land.</p>
<p><b>City of Loretto</b></p>	

Comment	Response
<p>Increase of Affordable Housing Minimum Density (Objective 1, Policy 2, Action 4).            The 2040 land use plan allowed areas at 8 unit per acre minimum to meet the affordable housing goal. Imagine 2050 increases this minimum to a minimum of 10 units per acre.            The City of Loretto guided property that met this density requirement in the previous plan. The increase of density for affordable housing minimums will result in a development pattern more difficult for Loretto to provide.</p>	<p>We understand that increases to density for the Land Guided for Affordable Housing (LGAH) requirement can be difficult to accommodate, especially for smaller cities who are not anticipating much growth such as Loretto. The Met Council has worked to increase flexibility for cities to meet this requirement, especially for smaller cities. Met Council will recommend providing an alternative compliance option for cities with a limited anticipated growth, defined as a Future Need allocation of less than 20 units. More specifics on this requirement will be communicated with the city directly.</p>
<p>Adjust Parking Requirements (Objective 2, Policy 4, Action 7). The City of Loretto seeks to keep its policies regarding parking a local matter. Smaller communities, such as Loretto, do not have the municipal infrastructure to handle snow removal and other operations in a manner in which cars are parked on the street at all times.</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>
<p>Housing Type Directive (Objective 5, P1, A1). The City of Loretto objects to the requirement placed on cities to allow for more than one housing type within residential land use categories. Balancing of densities to meet Met Council requirements can be made more simple by the low end and the high end being isolated into specific types of development. Keeping land use categories to one housing type also interfaces easily with the City's zoning regulations. This change would result in the City needing to completely restructure the entire community zoning policies.</p>	<p>Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p>

Comment	Response
<p>Density Standards for Suburban Communities. The Metropolitan Council proposes to increase the minimum density standards for Suburban communities to 7 units per acre. The City of Loretto had difficulty meeting the prior density requirements due to the limited amount of developable land and the existing development patterns found within the City. The City is surrounded by land that is designated as Diversified Rural and is not connected to any other urban areas. It would be preferable for the City to be designated as Suburban Edge or Rural Center, as that would be a better fit. Similar cities to Loretto are St. Bonifacius (Suburban Edge) and Bethel (Rural Center). These cities are all individual small town sites surrounded by other communities.</p>	<p>As discussed with your Sector Representative, the Met Council agrees and has changed the City's Community Designation to Suburban Edge in Imagine 2050.</p>
<b>City of Mahtomedi</b>	
<p>Minimum Average Net Density for Suburban Communities (Land Use Policy, Objective 1, P2, A3) The City objects to the proposed change in the minimum average net density for communities designated as Suburban from 5 to 7 dwelling units per acre. Imagine 2050 proposes an expected increase in the minimum residential density requirement. Mahtomedi is designated as a Suburban community. According to Imagine 2050, the minimum average net residential density for communities designated as Suburban is proposed to increase from 5 units per acre to 7 units per acre. This increased density is a dramatic shift from the previous density requirement in Thrive MSP 2040. Mahtomedi is a fully developed lake community with very limited greenfield development opportunities. Most residential development opportunities are associated with minor subdivisions resulting in two or three lots. The 2020 decade brought two high density multifamily projects to Mahtomedi, that allowed the City to balance out to the required average density of 5 units per acre. Lack of substantial additional available land for higher density projects will make it extremely difficult for the City to balance lower density infill development with the proposed increased average density of 7 units per acre. In summary, the new density requirement fails to take into consideration local development and public improvement patterns, lot size and their location adjacent to a DNR protected body of water. It will be difficult for this community to meet the density requirement in Imagine 2050. Please reconsider increasing the density requirement for Suburban communities.</p>	<p>The City is currently planning at a density of 6.65 units per acre and its 2050 household population remains the same as its 2040 forecast. The 2050 Plan will only need to identify where the City plans to accommodate forecasted growth which may include infill, redevelopment, new development, and/or already planned but as of yet undeveloped areas. 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. We look forward to working with the City throughout the 2050 planning process.</p>

Comment	Response
<p><b>City of Maple Grove</b></p>	
<p>Regarding the density policy decisions:  Policy #1, Increase minimum density requirements: Is this looking at all residentially guided land or is the lowest minimum a community can have in their lowest density residential category? Maple Grove continues to request that density calculations be based on actual average densities that have ample empirical evidence through the plat monitoring program. Basing regional decision making on the unrealistic expectation that all development will come in at the lowest possible density may create unrealistic system-wide assumptions.</p>	<p>The Met Council's current adopted guidelines for the implementation of minimum net residential density requirements is based on a community-wide average and applies to all areas of the City where its planning to accommodate its forecasted growth within the planning period. This allows the City to plan for areas of both high and low density land uses (and everything in between). We understand that Maple Grove maintains a strong performance in the Plat Monitoring Program currently developing at 5.19 units per acre between 2023 and 2000 when the Program started. A regional approach to net density requirements is necessary for consistent application of regional policy with all communities. Those communities participating in the Plat Monitoring Program only represent 45 communities within the developing edge of the region. While the Met Council will review its guidelines and administrative practices after the adoption of Imagine 2050, this practice is not recommended to be changed as part of that review.</p>
<p>Regarding the density policy decisions:  Policy #2, Restraining MUSA expansion: While this doesn't affect Maple Grove, a balance of orderly growth, climate change impacts, and affordability impacts must be looked at.</p>	<p>With the intent is to ensure efficient and cost-effective growth management, the Met Council will set standard criteria for MUSA expansion where growth had not previously been planned at a regional or local scale. Regional goals to support climate change mitigation and adaption as well as housing affordability are considerations, amongst others, including preventing premature investment in the regional wastewater system on one hand and on the other hand ensuring the availability of sufficient land supply (20-year rolling supply) to avoid impacting the cost of land.</p>
<p>Regarding the density policy decisions:  Policy #3, Establishing a minimum density for new connections to the regional sewer: Exemptions should be in place for smaller projects such as simple lot splits. Maple Grove has had several lot splits that would fall under the minimum density requirements but are reasonable based on availability of infrastructure for the particular parcel being split.</p>	<p>Thank you for the comment. Many approaches were analyzed during the policy development process, one of which was requiring new connections to the regional system to meet minimum density requirements. However, after discussions with local governments and policymakers, this approach was not recommended and is not included in Imagine 2050 policies. The Met Council will continue to apply density requirements using a community-wide average net residential density calculation. Minimum density requirements apply to all areas that the City is planning to accommodate their forecasted growth. This allows local governments to plan for a diversity of housing types across their community.</p>



Comment	Response
<p>Regarding the density policy decisions:            Policy #4, Evaluate feasibility based on practicality: Who determines what is practical? This seems vague and subject to inconsistent interpretation.</p>	<p>Regarding the practical feasibility of demand and development in land use policy, the City is not required to do that study or analysis. Instead, the Met Council, during the review of local comprehensive plans, will implement a data-based approach using UrbanSim, a real estate market simulation model. This is the same model used to develop the local forecast set.</p>
<p>Regarding the density policy decisions:            Policy #6, ID forecasted growth by decade: One concern is if areas scheduled for growth in a particular decade are not appropriate for higher densities. A look back provision should be included. Example, if in one decade a city has significant higher density development, they should get credit for that the next decade if the only land left to develop is low density. Maple Grove's specific example is that we've experienced significant apartment development in the last decade but next decade most of the land available is guided low density.</p>	<p>Shifting to per-decade density calculations ensures that there is a variety of housing types planned throughout the planning horizon and communities continue to adapt to the changing needs for affordable housing, diversity of housing types, and the availability of housing to support lifelong residency in a community. This approach could assist some communities in meeting their affordable housing planning requirements for the first decade without postponing higher-density development to later periods to achieve overall density targets. This approach does not require new planning tools. Local comprehensive plans already identify stages or phases of growth in 10-year increments, so the foundation for this work already exists as part of planning requirements.</p> <p>We 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 and implement the policies in Imagine 2050. The Met Council looks forward to working with local governments through the update/review of those guidelines.</p>
<p>Regarding the density policy decisions:            Policy #7, Include existing developments: Maple Grove agrees this should not be considered as a requirement but does think it may be a good metric to track.</p>	<p>We believe the commenter is referring to the Density Analysis Report, published in May 2024, which assessed the approach of including all existing developments in density calculations. As the commenter notes, this approach was not recommended to move forward as a requirement but the Report does consider that this approach could be implemented as a tracking measure to assess the overall community progress towards higher density of existing development over time. We agree that this may be a good metric to track.</p>

Comment	Response
<p>Regarding the density policy decisions:  Policy #9, Performance-based approaches: Some of our comments on Policy #1 apply here as well by using plat monitoring data for density requirements.  Another approach worth looking at for communities that at the beginning stages of urbanization is a transfer of development rights program. This could allow certain areas of a city to develop with denser, mixed-use village and town-like development, while leaving more areas to be permanently devoted to agriculture or environmental resources (like water resources that have also been a large focus of the Met Council's work this year.) This could also limit infrastructure costs and allow a better tax base to pay for ongoing upkeep of said infrastructure. Transit options could be better incorporated as well with strings of villages and towns rather than sprawling subdivisions. This could allow development on less expensive land with less environmental impact than an approach discussed under Policy #2.  Without a significant change in the development pattern, increasing density requirements for developing communities just creates a little higher density auto dominated (i.e. high-density sprawl) development with significant environmental impacts.</p>	<p>We appreciate the City's solutions-based comments. Currently, the Met Council does not permit transfer of development rights programs to meet density expectations. Because density expectations are calculated using a community-wide average net residential density, this does allow local governments to plan for or preserve specific areas for no or low development if they wish and where they deem suitable. This approach allows lower densities in one area while higher densities offset that development pattern elsewhere. We recognize that density is just one tool in the planners' toolbox for addressing the goals. As you note, the design and organization of land uses is also important for advancing regional and local goals. The Council will provide technical assistance to support those local urban design and planning conversations.</p>
<p>Regarding Appendix A:  Regarding either approach discussed: What about ROW, ponding, wetlands, floodplains, etc, that impact the actual buildable area of development? Will this impact how we calculate net density vs. gross density in the future?</p>	<p>The Met Council has always required the use of net acres to calculate a community's net residential density calculations in local planning, not gross acres. 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 such as steep slopes. The Met Council publishes its adopted guidelines on how to calculate net residential density on the Local Planning Handbook site here:  <a href="https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx">https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx</a>  The Met Council is committed to working with local government partners on any proposed changes that may be made to administrative guidelines to reflect and implement the policies in 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. The Met Council looks forward to working with local governments through the update/review of those guidelines.</p>

Comment	Response
<p>Regarding Appendix A: Regarding excluding the data from Minneapolis when calculating the average planned density for Urban community designations: Does this impact other decision making that the Met Council is making regarding looking at densities across the region? Since Suburban Edge communities are generally auto-centric (due the lack of transit infrastructure being coordinated with sewer availability among other reasons), each new unit in these communities has a greater greenhouse gas footprint than new units in Minneapolis or other Urban designated communities where transit and bicycle infrastructure is more readily available. Is the Met Council ignoring higher densities in Minneapolis and thus pushing Suburban Edge communities to take on more density, even though this can just take the form of just denser auto-dominated development?</p>	<p>Inclusion of Minneapolis would have presented a much higher average developed density when analyzing past development trends. These trends were considered when contemplating what might be reasonable for future development in urbanized communities. The exclusion of the Minneapolis planned minimum density was only to limit its outsized impact on averages for establishing the minimum density expectation for the Urban Community Designation and was only used for this purpose.</p>
<p>Regarding Appendix B: It is noted that the community designations set land use and density expectations crucial to managing spatial development while preserving agricultural lands and natural amenities. Is this true regarding agricultural land? It seems once you are designated Suburban Edge, the expectation is that your city will develop everything with no agricultural land preserved. Only with some type of clustered approach, possibly using transfer of development rights as discussed earlier, could you get development that accommodated regional growth while preserving agricultural land. Example is Maple Grove and Dayton. Dayton will look like Maple Grove when fully developed based on their current land use plan and community designation. There won't be agricultural land left over.</p>	<p>Over the decades, the developing edge has gradually shifted further outward. Part of this is due to a persistent low density development pattern which takes a large amount of land supply to accommodate. Alongside that are the expanding housing and transportation needs of a growing region. Often communities along the developing edge begin with more than one community designation as you see with communities like Rogers, Corcoran, Medina, and many others throughout the region. Dual designations, one rural and one suburban, allow exactly what you are suggesting, which is long term preservation of agricultural lands while focusing community growth in a more compact area of the community. As communities make decisions about sewer availability and anticipated growth, those rural and agricultural areas do change over time. The agricultural economy is a vital part of the region and regional sewer capacity is not planned to extend to all areas of the region which will help to preserve agricultural areas for the long term. Planning for growth within the designated Suburban Edge (and other MUSA) designations also helps to prevent land speculation in the Agricultural portions of the region.</p>
<p><b>City of Medina</b></p>	

Comment	Response
<p>Flexibility for Minimum Density – The City Council requests that the Metropolitan Council consider flexibility for the minimum average net density required for the Suburban Edge Community Designation. Imagine 2050 proposes to increase the minimum average net density by 33% to 4 units per acre. This change is significant and the City Council is concerned with incongruence between existing neighborhoods and future development if the minimum density is increased. It is important to note that communities are allowed and encouraged to plan for higher densities irrespective of the minimum density requirement. As such, the City Council supports a lower minimum density requirement to limit impacts on local planning and to allow an orderly adaptation from past density practices in suburban communities.</p>	<p>The Met Council's current adopted guidelines for the implementation of minimum net residential density requirements is based on a community-wide average, not individual developments. This allows the City to plan for areas of both high and low density land uses (and everything in between), which the City already does. This hasn't changed. The Met Council will review its guidelines and administrative practices after the adoption of Imagine 2050, but this practice is not recommended to be changed as part of that review.</p> <p>We 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. the Met Council looks forward to working with the City as those guidelines are reviewed as part of the implementation work plan.</p>
<p><b>City of Minneapolis</b></p>	
<p>Page 9: Would be helpful to identify jurisdictions that have been given a new Community Designation since the last planning cycle.</p>	<p>Information in Imagine 2050 identifies current policy and establishes the basis for local comprehensive planning. To avoid confusion around expectations for 2050 plans, the analysis and comparisons for community designations are contained in separate reports that supported policy development. After adoption and at any time during the local planning process, communities may continue to refine those designations. In addition to those reports, our geographic datasets for community designations are another more fine grained analysis to compare/contrast how designations have changed from one planning cycle to the next.</p>
<p>Page 10: Figure 2 – We would recommend adding some county name labels to the map.</p>	<p>Good suggestion. We will make this change.</p>
<p>Page 16: Consider making it clearer that the Met Council is pursuing the “compact growth” scenario to tie the analysis findings into the objectives, policies, and actions. We support this vision and agree with its benefits. We also like that the objectives are all listed in one place here!</p>	<p>Thank you for your supportive comments. Your suggestion will be considered.</p>

Comment	Response
<p>Page 16: “Outcomes for land use policy will be measured with both quantitative and qualitative efforts.” Are there a handful of performance metrics or key areas that local jurisdictions should be focusing on (other than minimum/maximum net residential density) to work toward the land use objectives?</p>	<p>The Met Council is working on establishing metrics and measurements to track and evaluate the implementation of Imagine 2050 which will be adopted as an amendment in 2025. While there will be a broad slate of metrics identified for each policy area beyond one particular data point like residential densities, this statement supports the ongoing commitment to community-centered engagement practices that were identified in the Equity Chapter and implemented throughout the development of Imagine 2050.</p>
<p>Page 18, Objective 1, P2: Consider making it clearer that you are pursuing the “compact growth” scenario. How do the minimum density requirements compare to the existing plan? What other “shifts” are being proposed to execute the compact growth scenario?</p>	<p>The comparison of density requirements between Thrive MSP 2040 (Thrive) and Imagine 2050 (Imagine) is not included in the new policy plan to avoid confusion about what local governments are expected to respond to in local plans. To start, community designations are how density requirements are applied across the region. Thrive and Imagine community designations are not necessarily directly comparable because different variables were used in the analysis to determine the designations for each community in the region. However, generally speaking, changes from Thrive to Imagine include Urban communities changing from 20 units per acre (u/a) to 25 u/a; Urban Edge communities changed from 10 u/a to 14 u/a; Suburban communities changed from 5 u/a to 7 u/a; and Suburban Edge and Emerging Suburban Edge communities changed from 3 u/a to 4 u/a. Rural Centers did not change and were proposed to remain at 3 u/a. The Rural Service Area community designations of Diversified Rural, Rural Residential, and Agricultural, which have density maximums, were also not proposed to change.</p>
<p>Page 18, Objective 1, P2: Applaud the detail given on how MUSA expansion will be evaluated, but additional information on how MUSA expansion investments will be evaluated specifically against opportunities to invest in established urban areas would be useful.</p>	<p>Thank you for your comment. Regional wastewater expansion investments, including new facilities that provide new service to previously undeveloped areas, and new facilities that reflect added capacity to serve existing developed areas for redevelopment, are planned and built to provide for additional regional growth. The timing of these investments coincides with the staged forecasted growth that is reflected in each community's comprehensive plan. Service is provided in time for when it is needed. These investments are not prioritized based on a community's land use designation nor the type of growth that the investment will accommodate.</p>
<p>Page 19, Objective 1, P2, A3, Table 2: The minimum average net density for the Urban category is consistent with existing practice in Minneapolis.</p>	<p>Noted. We agree with the City's assessment.</p>

Comment	Response
<p>Page 21, Objective 1, P2, A4 (Table 3), and A5 (Table 4): It would be useful to see how these standards have changed from the past requirements. It would also be worthwhile to have this conversation in the context of what the state legislature might do with local zoning pre-emption in their next session.</p>	<p>The comparison of standards in Thrive MSP 2040 (Thrive) to Imagine 2050 (Imagine) is not included in the new policy plan to avoid confusion about what local governments are expected to respond to in local plans. First, community designations are how density requirements are applied across the region. Thrive and Imagine community designations are not necessarily directly comparable because different variables were used in the analysis to determine the designations for each community in the region. However, generally speaking, recommended changes from Thrive to Imagine include Urban communities changing from 20 units per acre (u/a) to 25 u/a; Urban Edge communities changing from 10 u/a to 14 u/a; Suburban communities changing from 5 u/a to 7 u/a; and Suburban Edge (generally inclusive of Emerging Suburban Edge) communities changing from 3 u/a to 4 u/a. Rural Centers did not change and were recommended to remain at 3 u/a. The Rural Service Area community designations of Diversified Rural, Rural Residential, and Agricultural, which have density maximums, were also not proposed to change.</p> <p>Table 3, Option 1 in the Land Use Policy Chapter Objective 1, more fully described in the Housing Policy Plan, recommended changes from a minimum density of 8 u/a to 10 u/a. Option 2 recommended changing from a minimum density of 12 u/a at 50% AMI to 12 u/a at 30% AMI and 6 units per acre at 51-80% AMI to 8 u/a at 31-60% AMI.</p> <p>Regarding legislative initiatives, the Met Council is charged 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>
<p>Page 24, Objective 2: Continued focus on growing where regional investments have already been made or are planned makes sense. Regional investment decisions should be made in line with this objective, for instance funding improvements to wastewater facilities in established urban areas instead of at the developing fringe of the metro area.</p>	<p>As part of preparing Imagine 2050, capacity and investment plans on all regional systems are compared and aligned. Met Council agrees that utilizing existing infrastructure capacity is an important part of fulfilling the regions mandate for orderly and economical development.</p>



Comment	Response
<p>Page 27, Objective 3, P1, A7: Clarity on what this is intended to accomplish is requested. While previous planning cycles have included requests for estimates on how much housing vs commercial space is accommodated in mixed-use districts, it is something that is difficult to report on or project. Tracking and monitoring the mix of uses in individual buildings is not part of current practice, and there are no mechanisms in place to do this easily. Which residential and commercial components should be tracked for mixed-use districts? Number of permitted market-rate units, commercial square footage, AMI?</p>	<p>Mixed-use areas look different across the region, depending on the local context and market. From a regional perspective, it remains important to understand the land use mix in each community and its impact on regional systems and policies. With input from communities, the Met Council will prepare guidelines and resources for communities to measure the mix of land uses within their mixed-use areas. These resources and guidelines will accompany the Local Planning Handbook to be released in late 2025.</p>
<p>Page 1: Suggest capitalizing COVID, which is an acronym (“post-COVID”)  Page 5: Add to or revise this sentence for clarity? “One type of growth is not better than others in terms of surface water runoff and quality.”  Page 36: Under Objective 7, P4, “complimentary” should be “complementary”  Page 38: Under Objective 8, Capitalize “fortune” in “Fortune 500”  Pages 21 and 31: Add hyphens to “transit-supportive” instead of “transit supportive” (pg. 21) and “mixed-use” for consistency (pg. 31)  Pages 29 and 32: No hyphen after “locally” (locally driven)</p>	<p>Thank you for your careful review. These changes have been made.</p>
<p>See below for a series of comments developed by staff of Homegrown Minneapolis, the City’s food systems initiative based in the Minneapolis Health Department, for you to consider as you refine the draft land use policy document. Please reach out if you have any questions. We look forward to a final product that supports sustainable agricultural production for growers and equitable healthy food access for residents.</p>	<p>While many of the proposed revisions are too specific for the regional action context, the Met Council may include this language in technical assistance provided to local governments for food security and food access planning. The food-related policies in Imagine 2050 will not be revised because it was important to use accessible language for local partnership and implementation.</p>
<p>General comments:  The inclusion of language recognizing the importance of the food system in land use policies is positive and helpful. While all communities are unique, a strong local food system benefits us all.</p>	<p>Thank you for your comment.</p>
<p>Page 23, Objective 1, P3, A5: We support this action and its components. We recommend adding the following sub-action: “Encourage sustainable models for shared, long-term use for food &amp; fiber production (e.g. incubator farms, community farms)”. Shared long-term models offer sustainable and equitable land access opportunities when finding land to farm is increasingly difficult.</p>	<p>The proposed sub-action aligns with the Met Council's intent to promote the use of underutilized parcels for agriculture and Met Council staff will propose adding it. Renumbering puts this under Objective 1, Policy 3, Action 4 iv.</p>



Comment	Response
<p>Page 28, Objective 3, P2 &amp; P3: We support the inclusion of community gardens and other food growing spaces as green public space in these policies. The draft plan does a good job of encouraging cities to both preserve existing urban agricultural spaces and facilitate the creation of new urban agricultural spaces. Consider further emphasizing the importance of these activities in underserved areas, including those with food access barriers.</p>	<p>The Met Council agrees and appreciates your support. Objective 7, Actions 1-5 more fully address food systems as a means of community resilience including barriers to food access and security.</p>
<p>Page 30, Objective 4, P3, A1: We support the recognition of food-growing spaces as a tool for protecting, restoring, and enhancing natural systems. Food-growing can serve as a beneficial companion to other strategies for building local resilience, such as native plantings, soil restoration, and stormwater management.</p>	<p>The Met Council agrees and appreciates your support.</p>
<p>Page 37, Objective 7, P7: We support the recognition of the role food systems plays in climate resiliency. We appreciate the scope that the actions in this policy contain.</p>	<p>Thank you for your supportive comment.</p>
<p>Page 37, Objective 7, P7, A1: We support this action. The term “food deserts” is often critiqued as inaccurate and misleading by failing to address the underlying systemic causes of inequities in the food system. Consider using the phrase “areas affected by food apartheid” instead.</p>	<p>We considered using this terminology. Given that Imagine 2050 must be used by a wide array of communities and for many purposes, Met Council staff believes that the term 'areas affected by food apartheid' is less generally understood than the term 'food deserts.' No change is proposed.</p>
<p>Page 38, Objective 7, P7, A2: We support this action. It could benefit from more detail. How can the Met Council and local governments support these efforts? Consider adding the following language: “Create dedicated and functional publicly accessible spaces for food aggregation (e.g., food hubs), processing (e.g., commercial kitchens, butchering) and distribution (e.g., farmer markets, meal deliveries). Ensure necessary infrastructure is available in these spaces (e.g., restrooms, electricity, water, cold storage).”</p>	<p>The proposed revisions are too specific for the regional action context. However, the Met Council could include this language in technical assistance provided to local governments.</p>
<p>Page 38, Objective 7, P7, A3: We support this action. Consider adding more specificity by adding the following language: “Change local ordinances and reduce barriers for residents to grow food and native plantings in front yards, along boulevards and other maintained landscapes.”</p>	<p>The proposed revisions are too specific for the regional action context. However, the Met Council could include this language in technical assistance provided to local governments.</p>

Comment	Response
<p>Page 38, Objective 8: We recommend adding language into the objective’s description that acknowledges and supports the role of small/midsize food systems infrastructure in the economic wellbeing of our communities.</p>	<p>We added a reference to local food system access to the narrative for Objective 8.</p>
<p><b>City of Minnetonka</b></p>	
<p>Land Use: Minnetonka understands the minimum densities are overall numbers for new development. In Minnetonka’s case – a suburban location – the overall expected density for new development is seven units per acre. Minnetonka does not have concerns with the density guidance provided in the regional land use plan. However, the city would submit comments supporting tree preservation ordinance requirements and other natural resource considerations as part of the net density consideration.</p>	<p>Thank you for your supportive comments. We 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. However, any changes made to provide local flexibility must be consistent with regional goals. As a note, the City can already remove any areas that are protected from development by ordinance, including tree preservation ordinances or other ordinances with similar intent.</p>
<p><b>City of Minnetrista</b></p>	

Comment	Response
<p><b>Impact on Minnetrista's Housing Market</b>            Minnetrista has historically maintained a consistent growth trajectory, averaging around 100 new housing units per year. These units are predominantly single-family and townhomes, which are in line with market preferences in our community. The current demand for higher-density housing, such as apartments, is limited. Increasing the minimum density requirement to 4 units per acre would force the city to allocate more land for higher-density developments such as apartment buildings, which does not have a sustainable market demand in our area.</p> <p>By mandating a higher density, the 2050 plan could inadvertently lock up land that is better suited for lower density development, thus stalling our current growth rate. This approach would not only disrupt the development pipeline but also potentially reduce the attractiveness of Minnetrista as a place to develop. Flexibility in density requirements is crucial for allowing cities like Minnetrista to continue meeting the needs of our residents without compromising growth, which is essential to meet our current financial obligations regarding water infrastructure.</p>	<p>The City already has areas of both higher and lower density land uses (and everything in between) that contribute to its character. The Met Council still implements a community-wide average for achieving minimum densities. This flexible approach allows the City to plan for a diversity of housing types that ensures that the City's low density neighborhoods can continue to be a part of the local landscape. While we will review guidelines and administrative practices after the adoption of Imagine 2050, this practice is not recommended to be changed as part of that review.</p> <p>We 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. However, any changes made to provide local flexibility must be consistent with regional goals.</p>
<p><b>Flexibility for Exurban and Rural Communities</b>            Minnetrista's geographic location on the exurban fringe requires a more nuanced approach to housing policy. Unlike inner-ring suburbs, our city has larger tracts of land and a low-density character that defines our community's appeal. Imposing a one-size-fits-all density policy across the entire metropolitan region does not account for the unique needs and challenges of exurban and rural communities.</p> <p>Our city has large parcels of undeveloped land that are ideal for future low to medium density developments. Imposing the 4-unit-per-acre requirement would not only hinder this kind of growth but also force us to open additional land for apartment developments, which would likely remain vacant due to the lack of market demand in this area. This would lead to inefficient land use and potentially delay or even halt growth in Minnetrista. It is essential that rural and exurban communities are given the flexibility to tailor their housing policies to local market conditions and development goals.</p>	<p>The Met Council acknowledges that a one-size fits-all approach to regional policy would not account for the various planning needs throughout the region. In Imagine 2050, the Met Council established eight different community types including Urban, Urban Edge, Suburban, and Suburban Edge designations within the MUSA. The minimum density ranges for these communities vary from 24 units per acre (u/a) in Urban areas; 14 u/a in Urban Edge; 7 u/a in Suburban; and 4 u/a in Suburban Edge communities. Further, Rural Centers (small towns outside of the MUSA with local wastewater treatment plants) also have minimum density expectations of 3 units per acre. The rural and agricultural designations outside the MUSA include Diversified Rural, Rural Residential, and Agricultural which support maximum densities to ensure that development pressures don't impede on the agricultural economy in the region. This is a regional approach that acknowledges the diversity of community types, patterns of development, local market trends, and current local plans already in place.</p>

Comment	Response
<p><b>Long-Term Growth and Infrastructure Concerns</b>            Another significant concern is the potential strain on infrastructure that could result from the increased density requirements. Minnetrista's current infrastructure is designed to meet our current density requirements. Increasing density would require substantial investments in roads, utilities, and other public services to accommodate the higher population densities, potentially costing the community tens of millions of additional dollars. These investments would place a financial burden on the city and its residents, diverting resources away from other critical community needs.</p> <p>Furthermore, higher-density developments may lead to traffic congestion and environmental impacts that are inconsistent with Minnetrista's rural character and environmental initiatives. Our residents value the open spaces and natural resources that our city offers. The Imagine 2050 Housing Policy Plan should recognize the importance of preserving these community assets by allowing flexibility in density requirements for cities like ours.</p>	<p>Density policies address the form/design of growth, not the quantity of growth. A modest increase in minimum densities does not require the City to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land. Compact development patterns can also help the City achieve its desired goals of preserving open spaces and natural systems by ensuring these areas are protected from development. Further, density is not the driver of increasing cost for local urban services. Growth is the primary factor that increases the cost for services in a community, through the extension of roads, public infrastructure, and public services.</p> <p>Generally, the cost of additional services per household is lower when the land area per household is smaller. More compact development patterns is one way to manage costs and keep expenditures down.</p> <p>We 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. However, any changes made to provide local flexibility must be consistent with regional goals.</p>

Comment	Response
<p>Market Demand Analysis: Before implementing higher-density requirements, we urge the Metropolitan Council to conduct a detailed market demand analysis specific to exurban and rural areas. This analysis would ensure that any policy changes are based on actual housing needs rather than a blanket regional approach.</p>	<p>The density policy proposal will not change the minimum density expectations in rural centers or other rural areas. In other rural areas (without urban services), the Council does not have a minimum density policy; instead the Council expects maximum densities that are appropriate to rural uses.</p> <p>Regarding market analysis: Metropolitan Council uses UrbanSim, a real estate market simulation model, to develop the local forecast set. This is a kind of market analysis. The logic of UrbanSim is the market sorting of real estate demand and creation of new supply in locations that are available. Distributions are extrapolated from data on actual housing and site choices and behaviors; the local forecast model's results reflect these. We agree there has been and will be some demand for single family detached housing in rural centers and other rural areas.</p> <p>In Council staff's forecasts work, we have not provided the forecasts model with increased densities in the urban and suburban communities; therefore local forecasts are not informed or impacted by the proposed density policy at this time. (It is technically complex to introduce increased densities until cities and townships provide neighborhood-level data through their updated 2050 land use plan maps.)</p> <p>A requirement of higher densities will boost housing potential in urban and suburban places that do not have already-conforming densities, allowing the possibility of more households and population. Again, the policy proposal will not change the minimum density expectations in rural centers or other rural areas. Theoretically, this will yield higher forecasts in that subset of places; that dynamic could offset (reduce) forecasts in other places. We have not yet demonstrated this, because of the technical complexity described above. Still, if there are rural area communities that would want a lowered forecast, Council staff are available to discuss the issue and may be able to accommodate requests for rural area forecast reductions.</p>
<p>Flexibility in Density Requirements: Rather than imposing a blanket 4-unit-per-acre density requirement, we recommend allowing cities on the exurban fringe, like Minnetrista, to maintain lower-density development standards that align with local market conditions. This flexibility would ensure that housing development in these areas is sustainable and reflective of community needs.</p>	<p>We 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. However, any changes made to provide local flexibility must be consistent with regional goals.</p>

Comment	Response
<p>Support for Market Driven Diversity in Housing: Market driven diversity in housing remains the most desirable housing option in Minnetrista. The plan should prioritize policies that support the development of market driven diversity in homes in exurban and rural areas where demand for higher-density housing is limited. By doing so, the plan would promote balanced growth across the metropolitan region.</p>	<p>We understand the local market trends in communities throughout the region, in both the Rural Service Area and the Urban Service Area (within the MUSA). The Met Council's forecasts modeling, community designation analysis, and density analysis, among others, all considered local market trends prior to making the policy recommendations in Imagine 2050. The Met Council also heard support for more density and housing opportunities from the development community. Imagine 2050 makes clear the commitment to fostering sustainable land use practices and expanding housing choices, including more infill, redevelopment, and diverse housing types, to meet the needs of our growing region and to shape policies that support equitable and inclusive communities.</p>
<p>Infrastructure Considerations: Any changes to density requirements should take into account the capacity of local infrastructure to support higher-density developments. In communities like Minnetrista, where infrastructure is designed for lower densities, mandating higher densities without providing adequate resources for infrastructure improvements would create long-term financial challenges.</p>	<p>Density policies address the form/design of growth, not the quantity of growth. A modest increase in minimum densities does not require the City to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land. Compact development patterns can also help the City achieve its desired goals of preserving open spaces and natural systems by ensuring these areas are protected from development. Further, density is not the driver of increasing cost for local urban services. 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. More compact development patterns is one way to manage costs and keep expenditures down.</p>
<p>Public Comment on the Imagine 2050 Housing Policy Plan As a City Council Member of Minnetrista, I wish to express my concerns regarding the Metropolitan Council's proposal to raise minimum density requirements in the Imagine 2050 Housing Policy Plan from 3 to 4 units per acre. In reviewing this proposal, it appears there is insufficient data provided to justify the need for this increase. I request that the Metropolitan Council share any relevant studies or data that support this policy change. With Minneapolis experiencing population decline, it is unclear why increased housing density is required in surrounding cities like Minnetrista. Moreover, the potential conversion of vacant office space to apartments in Minneapolis should be factored into regional housing assessments. I invite the Metropolitan Council to present data addressing why these</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. Further, density policies address the form/design of growth, not the</p>

Comment	Response
<p>solutions are insufficient.</p> <p>If Minnetrista develops land with 4 units per acre and these units remain vacant, who will bear responsibility for this outcome? Given that the Metropolitan Council changes with each new Governor, how can we ensure accountability for this long-term decision?</p> <p>If the Metropolitan Council's data supports this mandate, Minnetrista would still face significant challenges, including increased traffic, higher taxes for expanded infrastructure, reduced availability of land for single-family homes, and a greater need for police services-all of which are detailed in the Mayor's letter.</p> <p>Minnetrista's appeal lies in its open spaces, parks, and lakes. The proposed density increase would compromise these qualities, potentially prompting residents to leave for communities not under the Metropolitan Council's jurisdiction. Residents value their privacy and space, and they oppose the increased traffic, noise, and tax burden that would come with higher-density housing.</p> <p>Allow me to list here the concerns of residents:</p> <ul style="list-style-type: none"> <li>• The residents of Minnetrista value their privacy and space.</li> <li>• The residents of Minnetrista do not want increased traffic and noise which comes with increased housing density.</li> <li>• The residents of Minnetrista already pay high taxes and do not need to pay for extra infrastructure and city services that come with the increase in higher density housing.</li> </ul> <p>I support the Mayor's request for a market demand analysis and urge the Metropolitan Council to share the underlying data and assumptions for this proposed policy. A decision of this magnitude must be based on thorough analysis, not assumptions, and I look forward to a transparent discussion on this matter.</p>	<p>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. The City has already planned for 2040 household forecasts which is 5,000 households as part of the last decennial planning cycle. Imagine 2050 forecasts for 2050 households are 4,200. The City is required to guide enough land at minimum average community-wide densities to accommodate its local forecasts at the minimum density associated with its Community Designation. The community-wide average allows the City to plan for areas of low density by offsetting that with higher density elsewhere. That flexible planning approach is carried forward from Thrive and is not proposed to change.</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. The Density Analysis Report is posted on the Met Council's website at: <a href="https://metro council.org/Planning/Imagine-2050/Density-Report-Imagine-2050-May-2024.aspx">https://metro council.org/Planning/Imagine-2050/Density-Report-Imagine-2050-May-2024.aspx</a>.</p>



Comment	Response
<p><b>Impact on Minnetrista's Housing Market</b>            Minnetrista has historically maintained a consistent growth trajectory, averaging around 100 new housing units per year. These units are predominantly single-family and townhomes, which are in line with market preferences in our community. The current demand for higher-density housing, such as apartments, is limited. Increasing the minimum density requirement to 4 units per acre would force the city to allocate more land for higher-density developments such as apartment buildings, which does not have a sustainable market demand in our area.</p> <p>By mandating a higher density, the 2050 plan could inadvertently lock up land that is better suited for lower density development, thus stalling our current growth rate. This approach would not only disrupt the development pipeline but also potentially reduce the attractiveness of Minnetrista as a place to develop. Flexibility in density requirements is crucial for allowing cities like Minnetrista to continue meeting the needs of our residents without compromising growth, which is essential to meet our current financial obligations regarding water infrastructure.</p>	<p>The City already has areas of both higher and lower density land uses (and everything in between) that contribute to its character. The Met Council still implements a community-wide average for achieving minimum densities. This flexible approach allows the City to plan for a diversity of housing types that ensures that the City's low density neighborhoods can continue to be a part of the local landscape. While we will review guidelines and administrative practices after the adoption of Imagine 2050, this practice is not recommended to be changed as part of that review.</p> <p>We 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. However, any changes made to provide local flexibility must be consistent with regional goals.</p>

Comment	Response
<p>The City of Mound appreciates the opportunity to review and provide feedback on the Draft Imagine 2050 Policy Plan.</p> <p>As a fully developed community with extensive property within the shoreland of Lake Minnetonka, the City is concerned about the potential impact of the proposed policies in the Land Use and Housing Plans. In particular, there is a concern that the increase in the required development density to 7 unit per acre and the required minimum density of 10 units per acre to support affordable housing need will not be achievable for the City due to the existing development patterns and lake and wetland development restrictions.</p> <p>In addition to concerns about increased density requirements, the City notes that the proposed policy plans include new elements to be addressed within upcoming comprehensive plan updates. The City has concerns about its ability to address these with continued staffing and budget constraints. It is hoped that the Metropolitan Council provides cities with as much information and example strategies to help with minimize the impact of additional components to the comprehensive planning process.</p>	<p>Where the City is concerned about accommodating growth, please note that 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>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 also requires new minimum requirements for local governments in the areas of climate mitigation and adaptation. We understand the constraints of local governments during the planning process. Please note that any new requirements would be supported by Met Council technical assistance. In most cases, where a minimum requirement is added for local governments, for instance in the area of climate action, that minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. For instance, the Met Council has a GHG inventory and strategy planning tool that communities can use to make meaningful commitments on GHG reductions and we will provide technical assistance on how to use this tool.</p> <p>As in past rounds of regional planning, the Met Council will also provides technical assistance, tools and resources, and financial assistance to eligible communities via Planning Assistance Grants and direct technical assistance through the Sector Representative Program. 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. In addition, the Local Planning Handbook is being updated for local governments to respond to new goals and policies in Imagine 2050 policies.</p>
<p><b>City of Newport</b></p>	

Comment	Response
<p>Objective 1, Policy 2, Action 3 - this change creates a requirement for the City to plan for redevelopment at densities of 7 versus 5 units per acre. Given the limited amount of land in Newport that is available for new development or redevelopment, this reduces the City's options for how developing areas are guided, and could create conflicts with other regional policies such as those intended to preserve natural resources like Newport's wooded river bluffs.</p>	<p>The Met Council appreciates the City's goals related to natural systems preservation which are consistent with regional goals. Preserving the City's natural systems and accommodating density do not need to be mutually exclusive. More dense development accommodates growth on a smaller footprint than less dense development, thereby allowing more land to be protected for natural ecosystem functions. Compact development patterns help to preserve open spaces and natural systems by ensuring these areas are protected from development.</p>
<p>Objective 1, Policy 2, Action 3 Sub Action v - Newport already evaluates comprehensive plan amendments for feasibility and has invested public dollars into market studies to better understand market realities for land in Newport. How will practical feasibility be evaluated? Are there specific criteria or a specific process?</p>	<p>Metropolitan Council uses UrbanSim, a real estate market simulation model, to develop the local forecast set. This is a kind of market analysis. The logic of UrbanSim is the market sorting of real estate demand and creation of new supply in locations that are available. Distributions are extrapolated from data on actual housing and site choices and behaviors; the local forecast model's results reflect these and can describe the real estate types expected and market absorption. Council staff will work in 2025 to test a market feasibility analysis extension for "off-model", alternative scenarios to answer the questions: would a development case that was not predicted by the main forecast incite new demand if such case is forced into the future scenario; would it be profitable or break-even with local market conditions (predicted absorption), local rents, and construction costs. The market feasibility discussed in Imagine 2050 may be about these questions, or other questions that are still to be determined.</p>
<p>Objective 1, Policy 2, Action 3 Sub Action vi - While a process to introduce flexibility is appreciated, it is unclear what this will mean. What requirements will flexibility be provided for? What are the criteria and process for review? For flexibility to be useful, local communities need to understand how and where it can be applied.</p>	<p>We 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. However, any changes made to provide local flexibility must be consistent with regional goals.</p>

Comment	Response
<p>Objective 1, Policy 4, Action 7 - What is intended by the requirement for local communities to incentivize depaving in redevelopment projects? Is there a requirement that Cities will need to amend their municipal ordinances to implement this policy? A comprehensive set of impervious and stormwater regulations is already enforced by Cities, the Minnesota DNR, and watershed districts around the metro area.</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>
<p>Objective 4, Policy 2, Action 2 - What is intended by the requirement for natural system corridors be identified? How will cities be required to incorporate measures for conservation easements and wild-life friendly development standards?</p>	<p>The policies and actions are not specific requirements. The parentheses after each identify Met Council or local government roles, as opposed to requirements. For natural systems planning, the Met Council is developing a technical assistance package to assist communities with planning for and developing strategies, such as corridor planning, conservation easements, and wildlife friendly development standards.</p>
<p>Objective 7, Policy 1, Action 6 &amp; 7 - The requirement for metro cities to provide a greenhouse gas inventory and action plan to sequester GHG emissions is too broad and requires more clarification. What will the scope of the inventory be? What sectors will be applicable? What resources will the Met Council provide to local communities to complete this work?</p>	<p>When it comes to some of the climate commitments in the policies/actions, some of these are expectations for local governments and some are expectations for the Met Council. In most cases, where a minimum requirement is added for local governments, for instance in the area of climate action, that minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has a GHG inventory and strategy planning tool that communities can use to make meaningful commitments on GHG reductions. The Met Council will provide technical assistance on how to use this tool.</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 also 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>It is difficult to understand what has changed between the Thrive 2040 and Imagine 2050 policy plans. If the Met Council would like more specific feedback from communities, it should be more transparent about which policies are the same and, critically, which have been changed or added.</p>	<p>Thank you for your comment. Because the regional plan is new document each ten years, it is difficult to do a direct comparison. However, Council staff have provided high level reports on what's new for 2050 at public meetings to the governing body of the Council, particularly at the 60% draft stage. The Council will continue to provide guidance on what's new or changed as communities undertake their local comprehensive planning processes.</p>

Comment	Response
<p><b>City of Oak Grove</b></p>	
<p>The Draft 2050 Land Use Policy plan designates Oak Grove as entirely Rural Residential. The City is in support of remaining Rural Residential. The City is concerned about the language 1 unit per 10 acres where possible. As the City is not within the MUSA this language does not feel applicable to the City and our growth and development needs.</p>	<p>Minn. Stat 473.145 requires the Met Council to plan for the orderly and economical development of the 7-county region. Land use policies that manage the region's planned land supply 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. Also, the planning requirements for Community Designations in the Rural Service Area including Rural Residential communities have not changed from those adopted in Thrive MSP 2040.</p>
<p>Objective 1, Policy 2, Action 3 (Residential Density Requirements and Policy Standards)</p> <ul style="list-style-type: none"> <li>• v. Evaluate the practical feasibility of demand and development to ensure that both the intensity (density range) and location of planned developments are practical. Local governments need to plan land uses that are realistically marketable within the planning period, focusing on plausibility and long-term viability. This helps prevent the overestimation of development outcomes, thereby reducing the risk of underutilized infrastructure, inefficient land management, and implausible planned densities. This differentiates between what is merely allowed and what is plausible, providing a realistic framework for land use planning. Many factors affect how the City of Oak Grove will actually grow and develop in the 30 year planning timeframe. Requesting local governments forecast plausible consumer needs in the planning decades is an unreasonable expectation and the City is not in support of this requirement. Plausible demand forecasting could result in a City's inability to quickly adjust to changing market demands and could result in unnecessary and more complex local comprehensive plan amendments.</li> </ul>	<p>Regarding the practical feasibility of demand and development in land use policy, the City is not required to do that study or analysis. Instead, the Met Council, during the review of local comprehensive plans, will implement a data-based approach using UrbanSim, a real estate market simulation model. This is the same model used to develop the local forecast set. Clarification of the roles and responsibilities attributed to that policy will be added.</p>

Comment	Response
<p>Objective 7 Policy, 1, Action 6: Local governments must include in their comprehensive plans a greenhouse gas emissions inventory and projections generated from activity within the local government's jurisdiction and covers the range of applicable emissions sectors.</p> <ul style="list-style-type: none"> <li>• While the City understands the need to better understand greenhouse gas emission, inventory and projection analysis of this nature can pose a burden on local governments such as Oak Grove who do not have the resources available to conduct this analysis. Should the Council implement this action item, the Council should provide direct financial assistance to local governments and provide technical data to achieve this component of their individual comprehensive plans.</li> </ul>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. For example, the Met Council has a GHG inventory and strategy planning tool that communities can use to make meaningful commitments on GHG reductions. The Met Council will provide technical assistance on how to use this tool.</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 also 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>Regional policy plans do not show a plan to expand transit services into the City. The City does not have the current infrastructure capabilities to provide any expansion opportunities, and we would not support expansion into the City or policies that would enable that approach in the next ten years. Objective 2 “Maximize opportunities for growth in places well served-by transit, bicycle and pedestrian infrastructure” is exclusive to communities that are prepared for that transportation infrastructure and want rapid expansion of such. All communities should be supported by the Metropolitan Council with guided growth decisions tailored to their individual needs rather than a tunnel vision focus of transit-oriented development.</p>	<p>Local governments at every level of development can work on their development patterns. For smaller jurisdictions without transit, a focus on walkability, bike-ability, and development that supports local trips may be the most achievable outcome, and can make the community a great place to live. This policy is not restricted to those with access to transit services.</p>

Comment	Response
<p><b>One Size Fits All Approach</b>  The City understands the need for comprehensive planning, but it can be resource intensive and costly. While a collaborative region is important for thoughtful planning and infrastructure, a one size approach for Plan content is not beneficial when it comes to the content within a city’s comprehensive plan. We ask the Metropolitan Council to consider aligning the needs with smaller communities and how we can affordably develop and submit a reasonable Plan.</p>	<p>The Met Council acknowledges that a one-size fits-all approach to regional policy would not account for the various planning needs throughout the region. In Imagine 2050, the Met Council established eight different community types including Urban, Urban Edge, Suburban, and Suburban Edge designations within the MUSA. The minimum density ranges for these communities vary from 24 units per acre (u/a) in Urban areas; 14 u/a in Urban Edge; 7 u/a in Suburban; and 4 u/a in Suburban Edge communities. Further, Rural Centers (small towns outside of the MUSA with local wastewater treatment plants) also have minimum density expectations of 3 units per acre. The rural and agricultural designations outside the MUSA include Diversified Rural, Rural Residential, and Agricultural which support maximum densities to ensure that development pressures don't impede on the agricultural economy in the region. This is a regional approach that acknowledges the diversity of community types, patterns of development, local market trends, and current local plans already in place.</p> <p>As part of the planning process, the Met Council provides technical assistance, tools and resources, and financial assistance to eligible communities via Planning Assistance Grants and direct technical assistance through the Sector Representative Program. 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>
<p><b>City of Orono</b></p>	



Comment	Response
<p>Our City staff reviewed this draft document and identified several areas of concern regarding how this policy impacts the City of Orono. Orono is divided, with an urban area surrounding the lakeshore served by sewer as well as a rural area located outside the MUSA. A major issue we've identified within the draft plan surrounds the Met Council's desire for increased development without considering the pressure placed on the natural environment. The draft policy guides Orono to become more dense in the areas where the natural environment is most sensitive, i.e. around our lakeshores and wetlands. It is our opinion that the proposed plan will negatively impact Orono's capacity for growth and directly contradicts Orono's long-standing goals to protect the natural environment.</p>	<p>The Met Council appreciates the City's goals related to natural systems preservation which are consistent with regional goals. Preserving the City's natural systems and accommodating density do not need to be mutually exclusive. The Met Council's Scenario Planning analysis that was completed for Imagine 2050 identified that dispersed development patterns pose a higher threat of natural systems loss, fragmentation, and species loss than compact development patterns. More dense development accommodates growth on a smaller footprint than less dense development, thereby allowing the opportunity for more land to be protected for natural ecosystem functions. Compact development patterns help to preserve open spaces and natural systems by ensuring these areas are protected from development.</p> <p>We understand that policy changes have impacts on communities as they turn to their local planning process. The Met Council is committed to supporting local governments through technical assistance, tools, and funding resources to aid in that process.</p>
<p>Orono is designated as Suburban Edge and Diversified Rural. We believe this is an error and the diversified rural areas classified as Rural Residential are the areas not served by sewer and water.</p>	<p>The Rural Service Area designations did not change in Imagine 2050 from what was adopted in Thrive MSP 2040. The City's correct Community Designations in Imagine 2050 are Diversified Rural and Suburban Edge.</p>
<p>Orono has long-prioritized protection of sensitive lakeshore environments by removing private septic systems close to lakes and streams. There are existing single-family lots within the MUSA that may need to connect to the current system in the future to continue this policy of protection. The policy Objective 1, Policy 2, Action 2, prevents the connection of existing lots unless additional density is proposed, which contradicts the ability to protect the natural environment. Additionally, this action has unclear language and is challenging to understand.</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. Language will be revised to make the intent clear. However, accommodating density and protecting natural systems are not mutually exclusive. In fact, more dense development can support protection of natural areas. 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.</p>

Comment	Response
<p>The draft plan outlined in Objective 1, Policy 2, Action 3 requiring an increase in density standards from 3 units per acre ( current) to 4 units per acre (proposed) is excessive and out of reach for the City of Orono. This standard which calls for guidance to this level of density within the MUSA is extreme as it pertains to Orono. The MUSA is located within the most environmentally sensitive areas in the city where additional density would adversely impact and degrade the natural environment. Flexibility must be offered to communities identifying different sets of needs and goals.</p>	<p>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. Any changes to net density calculation guidelines or programs which rely on density calculations must be approved by the Met Council after Imagine 2050 is adopted. This is planned to be a part of the implementation work plan.</p>
<p>Net residential density calculations are unclear and challenging to apply to parcels encumbered by wetland and floodplain areas which are continually evolving. Much of the land within Orono is encumbered by natural areas intended to be preserved, including land within the shoreland overlay district, wetlands, and floodplain areas which, by definition, are extremely limited from a development standpoint. The city cannot confirm the net land area within a parcel until a thorough evaluation of the land is conducted, including wetland delineations and studies to examine both the hydrology and hydraulics of the watershed. Without a reliable net land area determination, any attempt to project density and development numbers will be wildly inaccurate. For example, a proposal on a 30-acre parcel in Orono with high density (20-25 units/acre). Once the outside studies were complete, only approximately 7 of the 30 acres was developable due to the presence of wetlands and other constraints. This land reduction drastically impacts Orono's housing numbers and density calculations. The majority of Orono is rural with only a few areas suitable to support housing densities while maintaining our priority to preserve and protect the natural environment. Net residential density calculations are cumbersome and the process is challenging to apply. More focus and support should be afforded to cities like Orono that implement environmental preservation and protection philosophies.</p>	<p>The Met Council has always required the use of net acres to calculate a community's net residential density calculations in local planning. In fact, the City can net these areas out now, if they are protected or removed from development by local ordinance. The Met Council will 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 Imagine 2050 is adopted. This is planned to be a part of the implementation work plan. However, any changes made to provide local flexibility must be consistent with regional goals. The Met Council publishes its adopted guidelines on how to calculate net residential density on the Local Planning Handbook site here: <a href="https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx">https://metro council.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx</a>.</p>

Comment	Response
<p>We request the Metropolitan Council consider making changes to the Imagine 2050 Land Use Policy draft plan such as building flexibility into the action plans for density requirements. As a suburban edge/rural community, we find that many of the objections, policies, and actions outlined within the draft plan do not meet the needs of our community. High standards for preservation of the natural environment should be emphasized within the plan as well as support for the need to lower densities within the community.</p>	<p>The Met Council supports and encourages natural systems preservation, enhancement and protection. It is a regional goal. While the Met Council established minimum density expectations, how and where the City decides to plan to accommodate its forecasted growth remains a local decision. 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. 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 reflect policies in Imagine 2050. The Met Council will 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 Imagine 2050 is adopted. This is planned to be a part of the implementation work plan. However, any changes made to provide local flexibility must be consistent with regional goals.</p>
<p>The draft land use plan is focused on areas with a higher demand for density and infrastructure. One of Orono's main goals is to protect the existing natural environment. The draft plan is written to address the needs of communities that are much more developed and denser than ours. Orono is unique with our limited infrastructure and large areas of undeveloped rural space. We urge the Met Council to pursue additional research and study of rural and suburban-edge communities to address to demand and unique challenges on these areas.</p>	<p>We understand the local market trends in communities throughout the region. The Met Council's forecasts modeling, community designation analysis, and density analysis, among others, all considered local market trends prior to making the policy recommendations in Imagine 2050. The Met Council also heard support for more density and housing opportunities from the development community. Imagine 2050 makes clear the commitment to fostering sustainable land use practices, protecting natural systems, and expanding housing choices, including more infill, redevelopment, and diverse housing types, to meet the needs of our growing region and to shape policies that support equitable and inclusive communities.</p>
<p><b>City of Prior Lake</b></p>	

Comment	Response
<p>The City of Prior Lake does not support the policy related to the Metropolitan Council evaluating requests to connect areas within the municipality to the regional wastewater system based on the regional need for additional land to accommodate growth and local development trends. The Metropolitan Council is proposing to review requests to ensure a 20-year rolling land supply considering both regional and local market demand. A significant portion of developable property in the City of Prior Lake is owned by one family who appears to have little interest in selling their property for development. The City does not want future development decisions to be made by Met Council staff based on having available land elsewhere in the community, or region, that may not actually be available for development due to that property owner's decisions or other market conditions.</p>	<p>The Met Council sets policies for system expansion to ensure infrastructure is utilized economically to both prevent premature investment as well as to prevent under-utilization of regional infrastructure investments. The intent of the policy is to consider requests for MUSA expansion beyond what is already planned for in local comprehensive plans to include both regional and local demand and constraints. We understand the uncertainty of knowing when a certain property owner might want to sell or when there might be the next economic recession or global health crisis. All of these factors are considered both in our forecasts and in how we support local governments in developing their local comprehensive plans. The Met Council has a comprehensive plan amendment process to consider new development that relates to the local context. The Sector Representative program is staffed to provide technical assistance and information regarding this issue.</p>
<p>The Land Use Policy Plan recommends planning for forecasted growth and land supply by decade in local comprehensive plans to ensure each planning decade meets the community designation minimum density requirements. The intent of this language appears to address an alleged abuse that some communities may be allocating the majority of their medium- and high-density developments in areas that will most likely not be developed within the planning horizon, thus not achieving their minimum density target. The City of Prior Lake understands the intent of this language but urges flexibility in its implementation. It is difficult to predict when specific medium- and high-density parcels will develop, and it is largely dependent on market conditions. Implementation of this policy should not result in the need for cities to predict when parcels will develop or require a comprehensive plan amendment if a parcel is proposed to develop sooner or later than anticipated. Prior Lake would recommend utilizing the existing plat monitoring system or some other measure to ensure communities are developing at their targeted densities.</p>	<p>We appreciate the solutions-based approach the City provides in its comments. We 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 and implement the 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. The Met Council looks forward to working with local governments through the update/review of those guidelines.</p>

Comment	Response
<p>The City of Prior Lake does not support the proposed language which would require cities to allow for more than one type of housing in residential land use districts. Prior Lake is a Suburban Edge community, which is proposed to increase from three to four units per acre based on this community designation. This change will require the City of Prior Lake to develop at greater density than in previous decades. It is deeply concerning that language related to multiple housing types in low density residential districts appears in the policy plans. This language is similar to legislation proposed in recent years which is intended to limit local control of zoning regulations and intentionally subverts the legislative process where this discussion belongs.</p>	<p>Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p> <p>As part of 2040 Plans, in the checklist of minimum requirements all land use categories were required to "include types of allowed uses and the minimum and maximum densities ('the allowable density range') for all categories that allow residential uses. Allowed uses should include a description of allowable housing types such as single family, detached, duplexes, townhomes, etc." This is not proposed to change and if missing in the 2040 Plan, can be reconciled as part of the City's 2050 planning process. Broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process.</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>

Comment	Response
<p>Prior Lake's position is that the Metropolitan Council should have a say in the overall density of the region to meet housing needs; however, the Metropolitan Council should not have the authority to impose zoning regulations on communities. It is our expectation that individual communities will be allowed to decide how to best achieve their minimum density requirement and the Metropolitan Council will not impose a top-down approach to local zoning ordinances. Additional housing units are needed in the region, and we share the Metropolitan Council's belief that an increase in the minimum density requirement will help achieve that goal. We do not support achieving increased density through state- or region-wide zoning mandates.</p>	<p>Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. The Met Council does not regulate local zoning so a regional zoning approach is not possible. However, Minn. Stat. §473.858, subd 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p>
<p>The policy plans address a desire to direct growth away from sensitive ecosystems and water sources to prioritize protection of natural systems. Areas with high biodiversity or ecological significance require sensible land use approaches to development. The Met Council promotes development and land use stewardship that integrates natural systems in design and implementation. The City of Prior Lake agrees sensitive areas require flexibility and would encourage the Council to provide its staff with discretion/authority to approve sewer extension permits for subdivisions that do not meet minimum density requirements in areas with sensitive ecosystems, such as areas adjacent to Natural Environment Lakes. We've run into issues in the past where Metropolitan Council and DNR regulations conflict related to lot area requirements; Met Council requires a minimum density to be met and the DNR requires a large lot development. In these cases, it may make sense for a less dense development, but Council staff does not currently have the ability to approve the development. Perhaps if density goals are exceeded over a specific rolling time period, flexibility could be provided in these unique situations.</p>	<p>The Met Council is exploring flexibility alternatives, especially as relates to natural systems and density calculations. However, it should be noted that the density requirement is a community-wide average minimum, and not a per subdivision requirement. Consistent with Thrive MSP 2040 policy and carried forward to Imagine 2050, cities already have flexibility to plan for some areas to be below the minimum community-wide density requirements provided that the community's overall density (on average) meets or exceeds the required minimum. This allows the City to accommodate lower density development in sensitive natural areas while guiding higher density development elsewhere to meet overall minimum requirements. The Met Council encourages density, in part, to accommodate growth in a manner that reduces habitat fragmentation and is directed further away from sensitive ecosystems than lower density development would allow. Approval of any sewer extension permits, however, can only be granted when a proposed development is consistent with the land use guiding in the city's local comprehensive plan. We encourage communities to plan for the varying density ranges needed to meet state requirements, regional goals, and local goals, and amend their plans if needed to support those goals.</p>

Comment	Response
<p>Several of the “Actions” within each policy statement are identified for both the Met Council and the Local Governments to implement; it is not clear if these actions are a recommendation or a requirement so that should be confirmed. It is also noted that a number of the action items appear to require local financial support. It should be clarified and highlighted in the draft policy statements if local financial support for the action items is required from cities. The Imagine 2050 plan and policy statements are well intentioned and the City of Prior Lake recognizes and appreciates the value of regional planning documents. That said, these documents are overly complex and will be extremely difficult to administer. In addition, the City of Prior Lake feels many of the proposed policies exceed the scope of the Metropolitan Council as a regional planning agency and place additional burdens on local communities. We encourage the Council to simplify the policy plans, establish clear guidelines and requirements that are within the purview of the Met Council, remove language that limits local zoning control and allow individual communities to decide how to best develop their local plans to meet the regional guidelines.</p>	<p>We have added a new section on Roles and Responsibilities at the end of the land use policy chapter and clarified throughout with the tags for "Local Government" or "Met Council" or both where appropriate. Where requirements are identified, the Met Council provides technical assistance, tools and resources, and financial assistance to eligible communities via Planning Assistance Grants and direct technical assistance through the Sector Representative Program. 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> <p>The Met Council will identify required actions in the Checklist of Minimum Requirements to be provided to each community in late 2025 as part of the update to the Local Planning Handbook. The Local Planning Handbook will provide specific directions on each minimum requirement and how to meet it, including tools, maps, templates, and resources appropriate to each item.</p>
<p><b>City of Richfield</b></p>	
<p>Land Use Objective 1 Policy 2: Action 4: regarding option two, it is unclear how land is guided for certain levels of affordability; land isn't guided 30% AMI.</p>	<p>The Land Guided for Affordable Housing (LGAH) requirement has qualifying cities and townships guide sufficient acres of land uses at the identified minimum densities to potentially meet the number of units in their allocation of Future Need. Option 1 requires guiding acres of land with residential land uses with a minimum density of 10 units per acre to potentially meet all allocated Future Need units regardless of income band. Option 2 allows land uses below 10 units per acre to be used to meet the LGAH requirement but only for the total number of units allocated in the 51-60% AMI band for that city, to balance this lower density land use choosing Option 2 requires cities to guide enough acres of land with minimum densities of 12 units per acre to meet the remaining units of Future Need, which are those that are allocated for 50% AMI and below.</p>



Comment	Response
<p>Land Use Objective 1 Policy 2: Action 5: Our understanding is that if an area near a BRT stop is not guided to accommodate required growth, then it doesn't need to meet these requirements. Please confirm, as it is not clear whether the intention is an average density of the entire transit area, or a minimum density only for redevelopment parcels within that area. If our understanding is correct, it would be helpful to clearly state in the table heading that the minimum average net density applies to areas guided to support growth, not to a community's overall net density. The aggregate amount of land these areas encompass is approximately one-third of our city. If our understanding is not correct - that is a VERY significant amount of area to be dictating, that if redevelopment occurs, what the minimum density must be. It is a usurp of local control without sufficient flexibility. Nicollet Ave/Route 18 is one of seven metro corridors to be converted to Bus Rapid Transit. We understand it has a rough timeline of 2031-2035. We assume we apply the future transit type? With Metro Transit's proposed changes in the Network Now Plan, it appears that 66th Street (515) and potentially Bloomington Ave N of 66th Street (14) would become High Frequency lines? The timeline for implementation is unknown; do we leave them out until a conversion date is determined? We have intentions of up-guiding land around transit areas to a density that is appropriate for our community, which in some areas may be less than 30du/ac. Our concern is that an outside imposed minimum requirement of 30 du/ac would create such a kick-back by the community, that up-guiding does not occur at all.</p>	<p>It is correct that transit station area minimum average net density applies only to areas guided to support growth within the station area. Table 4 provides clarification on this point by stating the following in a table subscript, "Average minimum and maximum densities apply to all areas guided to support forecasted growth within the planning period."</p> <p>Transit corridor planning takes many years, and local planning and support moves from general planning to specific implementation. The Local Planning Handbook will provide specific guidance on the transit planning stage that initiates application of average minimum densities for areas of change in the planned station areas.</p> <p>Permit data from around the region shows that the scale of new development around station areas has been performing at and above the average minimum densities for new development identified in Imagine 2050. In each case, local planners and community members have determined how to accommodate change and new forms of development suited to their local context and in support of tax base and community vitality.</p>
<p>Land Use Objective 1 Policy 4: Action 6, re: streamlining local development review processes: While we are supportive of this goal, this too appears to be outside of the Met Council's authority.</p>	<p>Communities are encouraged to consider opportunities to streamline the local development review process but this is not a requirement. Language will be clarified to make the intent clear.</p>

Comment	Response
<p>Land Use Objective 1 Policy 5: Action 3: “Adopt regional guidelines to protect vulnerable, regional priority waters and aquifers from development and restore water quality as part of development practices. (Met Council) Perhaps clarify the protection is from the IMPACTS of development?”</p>	<p>While it's also important to mitigate the impacts of development, the intention here is to protect vulnerable systems from development impeding on or changing these areas. Regional guidelines would be a resource for local governments to use when considering development proposals. We will consider if language adjustment is necessary for clarification.</p>
<p>Land Use Objective 1 Policy 5: Action 4: “Amendments to local water supply plans are needed when changes exceed the Met Council-adopted threshold for change, which will be established through updated guidelines for comprehensive plan amendments.” While we agree adjustments of a certain size in one begets adjustments in the other, the threshold should be articulated now, not at a future date.</p>	<p>Development or revision of administrative guidelines to implement regional policy must occur after adoption of Imagine 2050 to ensure they are reflective of adopted policy language. The Met Council commits to continue working with its partners and stakeholders as changes are considered. Further, this action applies to amendments to 2050 Plans which would not likely occur until after 2028 when the updated local comprehensive plans are due.</p>
<p>Land Use Objective 3 Policy 1: General: Some of these Action Items use words like "consider incorporating," others say "Adopt" or "Implement." These seem to be establishing minimum requirements of the Comp Plan (e.g. Integrate creative street design...) Is this required? "Adopt a Living Streets Policy..." is this required? What does “Action Item” mean?</p>	<p>Language will be adjusted to clarify intent, to differentiate between elements that are required and those that are encouraged, as well as to clarify the respective roles of the Met Council and local governments. Where requirements are identified, the Met Council will provide technical assistance, tools and resources, as well as planning assistance grants to eligible communities.</p>
<p>Land Use Objective 3 Policy 1: Action 7, re: monitoring mixed use districts: We oppose unfunded mandates such as mandatory tracking and reporting. What is “large”? If the municipalities establish the methodology, wouldn't they all differ, creating a compilation nightmare?</p>	<p>Mixed-use areas look different across the region, depending on the local context and market. From a regional perspective, it remains important to understand the land use mix in each community and its impact on regional systems and policies. With input from communities, the Met Council will prepare guidelines and resources for communities to measure the mix of land uses within their mixed-use areas. These resources and guidelines will accompany the Local Planning Handbook to be released in late 2025.</p>

Comment	Response
<p>Land Use Objective 7  Policy 7:  Action 2: "Support farm-to-table initiatives and local food markets, facilitating direct connections between producers and consumers and promoting regional food systems." What does it mean for this to be an Action item? Do we need to restate this in our plan?</p>	<p>There are many adaptation measures which can address climate requirements, including identifying vulnerabilities like food systems disruption. The Met Council has not developed minimum requirements yet although they will be provided as part of the Local Planning Handbook update to be released in late 2025. Local governments will have to identify and address both mitigation and adaptation measures for climate requirements in response to new statutory requirements. The Met Council will also provide technical assistance, tools, and resources to meet minimum requirements.</p> <p>For food systems planning, a local government could commit 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. The Met Council looks forward to working with local governments as minimum planning requirements are established.</p>
<p>Land Use Objective 7  Policy 2:  Action 3: Now that the state legislature has passed energy benchmarking, it is unclear what is expected at the local level.</p>	<p>The comment refers to Policy 3, Action 2: Promote green building certification and energy benchmarking to encourage sustainable construction practices. (Met Council/Local Government). This would not be a requirement for local comprehensive plans, but the Met Council may provide technical assistance or grant funding in this area. This may be a strategy that local governments can employ to help meet climate requirements, as a suite of options to meet minimum requirements.</p>
<p>Land Use Objective 7  Policy 5:  Action 5: Even with explanation "planning practices that support nature as a climate adaptation solution" is still unclear as to the meaning.</p>	<p>Nature based solutions are sustainable approaches that utilize natural ecosystems and biodiversity to address various environmental, social, and economic challenges. Examples of this could be using Cottonwood trees to clean contaminated soil. It could include planning for dual purpose uses to deal with localized flooding - for instance, designing a frisbee golf course with native planting and low-lying areas that can be designed to flood when local road networks are overwhelmed with water. It means using landscaping practices to remove chloride from the soil or clean the air. These are just some examples, but there are many more. The Met Council will provide technical assistance, tools, and resources to assist with examples, best practices, and guidelines for new policy areas like this.</p>

Comment	Response
<p>Land Use Objective 7 Policy 5: Action 7 &amp; 8: Similar language and related confusion as with Action 5.</p>	<p>These are somewhat similar actions under Policy 5, adaptation planning. However, we can break them down like this - action 5 focuses on prioritizing planning practices that encourage nature-based adaptation solutions; action 7 focuses on the same theme but for construction and operations; and action 8 focuses on funding and incentives to implement nature-based solutions. Action 8 should be revised to Met Council and local government responsibility. We are proposing to remove O7, P5, A7 because of its operational nature more closely related to implementation.</p>
<p>Page 6. Parks and Trails: The first sentence of this section states “the amount of growth rather than its location plays a more important role in determining park and trail acquisition, protection, and use outcomes.” The last sentence states “the specific challenges and opportunities associated with acquisition, protection, and use of parks and trails depend on where growth happens...” These sentences appear to be contradictory. This section also states: “higher growth could imply higher visitation, which might lead to increases in funding appropriations.” Higher visitation may lead to the need for increases in funding appropriations but does not necessarily lead to actual increases in appropriations. Visitation is a factor in the distribution of appropriations but is not necessarily tied to the actual appropriation amount. Parks and Trails Legacy Funds are tied to sales tax revenues; State bonding is tied to the political will of the Legislature with Council bonds issued as a match; Environment and Natural Resources Trust Fund appropriations are subject to the will of the Legislative Citizen Commission on Minnesota Resources and the Legislature; and unfortunately, the Legislature has never met its statutory obligation for operations and maintenance appropriations (of which visitation is a factor). Consider stating that “higher growth could imply higher visitation, which might lead to the need for increases in funding appropriations for capital projects and operations and maintenance.”</p>	<p>Thank you for your comment. Met Council staff have made the revision as suggested.</p>
<p>Page 6. The “Climate” section uses the acronym “GHG”. It would be helpful to define the acronym (it isn’t defined until Page 19).</p>	<p>Thank you for your comment. Met Council staff have made the revision as suggested.</p>
<p>Page 7. The “Climate and Natural Resources” section indicates that Regionally Significant Ecological Areas are features that are an important variable in long range planning. The Minnesota Department of Natural Resources (DNR) created this data for the metro area in 2008. Does the Council or the DNR plan on updating this dataset?</p>	<p>The Met Council is coordinating with the DNR and anticipates a minor update to the Regionally Significant Ecological Areas data that reflects more recent development.</p>

Comment	Response
<p>Page 19. Table 2— It would be helpful to clearly state in the table heading that the minimum average net density applies to areas that are guided to support growth, not to a community’s overall net density.</p>	<p>Table 2 provides clarification on this point by stating the following in a table subscript, “Average minimum and maximum densities apply to all areas guided to support forecasted growth within the planning period.”</p>
<p>Page 21. Table 4-- It would be helpful to include the Council’s definition of a “High Frequency Bus”.</p>	
<p>Page 22. A6 “Allow for more than one housing type in land use categories with residential uses...” This is zoning. Met Council does not have zoning authority. It appears that this is trying to increase housing choice in single-family residential districts. However, in areas guided for high density housing, it would require us to lower the minimum density to allow for other housing types. For a city whose community designation is Urban, this may limit our ability to meet the minimum average density requirements not only in our transit station areas, but in our city overall, which is counter to the intent of the Land Use</p>	<p>Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which oftentimes have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p>
<p>Objective 2: Maximize opportunities for growth in places well served by transit, bicycle, and pedestrian infrastructure.  Page 23. A7 "Update land use guidance and regulations to incentivize de-paving in infill and redevelopment opportunities." This is a very specific and seemingly random item; what are you asking of us in a Comprehensive Plan document? We do many things to limit impervious surface, do we need to list them all in what is supposed to be a high-level planning document? The ability to create this type of regulation is afforded to cities as an official control through their zoning ordinance, which is statutorily part of a local government’s police powers. The only power that the Council has over local controls is if an official control permits activity that conflicts with metropolitan system plans.</p>	<p>This action has been revised with the addition of the word 'consider'. This action is not a requirement of local governments to implement. The action is recommended for local governments to consider in their official controls.</p>

Comment	Response
<p>Objective 2: Page 25. P3-A2 says that local government should identify appropriate mitigation measures for different scales of development. A comp plan is a high-level, long-range planning document and is not the appropriate place to identify specific measures to mitigate displacement. The appropriate measure to be used may be dependent on the context of the specific situation. Or, we may have identified a measure in our comp plan that we find at a later date is not practical or feasible, which would require us to amend our comprehensive plan.</p>	<p>The intent of this action is for communities to identify in general terms what opportunities and strategies it might consider using to mitigate residential or commercial displacement resulting from development impacts.</p>
<p>Page 26. P4-A3 states “include market studies in local implementation strategies and priorities.” This lacks clarity. How does this relate to the priority? What type of market study does this refer to? Is this intended to be required as part of the implementation section of our comp plan? How does this action relate to the Council’s statutory authority?</p>	<p>Market studies can help evaluate how different types and levels of transportation infrastructure might leverage the market potential of an area for compact and connected development that can reduce trip lengths and VMT. The language has been revised to clarify that exploring the inclusion of market studies is encouraged and not required.</p>
<p>Page 27. P1-A2. How does the Council define “creative street design?”</p>	<p>This language has been changed to reduce ambiguity and now refers to integration of "new ideas and variety in design of public rights-of-ways" in collaboration with other transportation partners. It would be a local decision as to what that might look like in your community.</p>
<p>Page 27. A5. The hyperlink to Maplewood’s Living Streets Policy is broken.</p>	<p>We appreciate you bringing that to our attention. Revisions to the language removed the link in this action.</p>
<p>Page 28. P2. Why is a regional planning agency adopting policies regarding neighborhood level planning related to public spaces for community gatherings? This is not within the Council’s scope of statutory authority.</p>	<p>Regional policies serve a variety of purposes. Policy not only directs the work the Met Council does when we have projects within communities, it also supports local governments as they submit applications for various grant programs when they can demonstrate consistency with regional policies. In this case, while the local government is responsible for implementing these policies, they are all supportive functions to consider or encourage during the development process in a manner that would support regional goals. These are not minimum requirements and remain local level decisions.</p>

Comment	Response
<p>Page 29. A2 requires a community to identify historic and cultural assets within their community and A3 requires adoption of culturally expansive ordinances. The Council does not have statutory authority to require local communities to adopt such an ordinance.</p>	<p>Minn. Stat. §473.859 Subd. 2b requires the historic element as part of the land use plan and this is reviewed as part of the local comprehensive planning process. Objective 3, Policy 4, Action 3 requires local governments to adopt policies to protect and preserve historic and cultural assets to meet the statutory requirements. The second part of that sentence states that local governments "should" adopt ordinances, which is not a requirement. The language has been revised for clarity to state in part, "Develop policies to protect and preserve historic and cultural assets and consider adopting culturally expansive ordinances..."</p>
<p>Page 31-32. None of the action items for Policies 1-3 identify whether they are the responsibility of the Council or local government.</p>	<p>The notation of "(Local Government)" is at the policy level for all of these items which applies to each of the actions, as well. But, to clarify and reduce confusion, we have indicated Local Government or Met Council behind each item for clarity throughout the entire land use chapter. We are also working on other ways to better communicate roles and responsibilities.</p>
<p>Page 39-40. None of the action items for Policies 1-4 identify whether they are the responsibility of the Council or local government, which makes it difficult to ascertain what is required in our comp plan, or whether the actions are recommendations for communities to consider.</p>	<p>The notation of "(Local Government)" is at the policy level for all of these items which applies to each of the subsequent actions under each policy. But, to clarify and reduce confusion, we have indicated "Local Government" or "Met Council," or both as appropriate, behind each policy and action for clarity throughout the entire land use chapter. We also added a new section at the end of the policy chapter on "Roles and Responsibilities" for clarification.</p>
<p><b>City of Rogers</b></p>	
<p>Page 1, Paragraph 5: It states the Council guides land uses and development patterns. I would recommend amending it to say the Council works collaboratively with local units of government to guide land uses</p>	<p>Thank you for the suggestion. This change has been made.</p>
<p>Page 6, Natural Systems: It should be highlighted that as development does occur, there is a unique opportunity to permanently protect and preserve natural areas of significance. This could also be used under parks and trails as new parks and trail extensions occur with development.</p>	<p>This section refers only to the findings of the scenarios analysis, so may not be the right location. We did consider this in other areas of the land use policy language to support this suggestion. We made a change to Objective 1, Policy 5 to include language that supports "including natural areas protection and use of green stormwater infrastructure." This has also been shared with the Parks and Trails policy team for their consideration.</p>



Comment	Response
<p>Page 18, paragraph 2: I believe there should be an action item related to replacing aging infrastructure and supporting the usual high price to do so.</p> <p>An action item should be added to ensure orderly expansions of infrastructure take place – i.e., reducing the chance of properties being leapfrogged with utility expansions.</p>	<p>We agree that it is important to consider reinvestment in existing infrastructure to support existing and new development in areas that are already served by urban services. The Regional Wastewater System Plan identifies the Metropolitan Urban Sewer service Area (MUSA) where regional wastewater service is currently provided, planned to be provided within the 20-year planning period (2050), and anticipates areas to be served beyond the 20-year planning period. For the most part, it represents a contiguous outward expansion for regional service and thus the efficient and orderly expansion of “regional” wastewater services. Communities control the location and timing of local infrastructure investments within those staged 20-year planning periods and thus control where and when local infrastructure investments are made.</p>
<p>Page 20, item iii: For minimum net density, it would be beneficial to add shoreland impact zones and floodplain as areas which are not included in the net acreage determination. Specifically, shoreland impact zones and setback areas as defined in local shoreland ordinances. When these areas are included, it becomes more challenging to meet densities and these areas are directly important to the goals of protecting the environment.</p>	<p>Net density calculations already allow areas protected or removed from development by local ordinance can be netted out, which can include buffers. The Met Council publishes its adopted guidelines on how to calculate net residential density on the Local Planning Handbook site here: <a href="https://metrocouncil.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx">https://metrocouncil.org/Handbook/Files/Resources/Fact-Sheet/LAND-USE/Net-Residential-Density.aspx</a></p> <p>We 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 reflect policies in Imagine 2050. Any changes to net density calculation guidelines or programs which rely on density calculations must be approved by the Met Council after Imagine 2050 is adopted. This is planned to be a part of the implementation work plan. Changes under consideration (albeit not all-inclusive) include allowing permanent public easements to be netted out and reducing the look-back period for those enrolled in the Plat Monitoring Program. Stormwater management areas need to be evaluated and clarified as part of the update process. Any changes made to provide local flexibility must be consistent with regional goals.</p>
<p>Page 23 - A3/A4: Included clean-up efforts/environmental remediation of pre-existing issues which may be present on a property.</p>	<p>Thank you for this suggestion. Language has been added to Objective 1, P4, A3 to support funding and incentives for redevelopment project where environmental remediation or clean-up efforts may be required.</p>

Comment	Response
<p>Page 23 - A6: Local government review process is dictated by state statute related to 60-day rule. A more applicable item would be to encourage local governments to identify and do initial due diligence work on properties that could be suitable for the adaptive re-use ahead of developers/developments being proposed.</p>	<p>Thank you for the suggestion. The policy language was changed for Objective 1, Policy 4, Action 6 to reflect considerations for streamlining the development review process including "identifying and proactively completing initial due diligence work on properties that could be suitable for adaptive re-use."</p>
<p>Page 24/A6: An action item for local government could be added to encourage cross-jurisdictional conversations related to water to continue on a regular basis. And in a manner which includes both community development/planning staff as well as engineers.</p>	<p>Thank you for the suggestion. The following action was added to Objective 1, Policy 5: "A6. Encourage cross-jurisdictional conversations related to water to continue on a regular basis in a manner which includes all relevant partners including community development and planning staff as well as engineers and public works staff."</p>
<p>Page 26 - P5/A1: Under the policy it includes land acquisition for public investment and the action item references LCA programs. However, the TBRA program does not include public uses as an eligible grant type (i.e., a city facility). Unless the intent is to amend the TBRA parameters to allow for public facilities to be included, public investment may not fit here unless specifically referencing public investment into private development.</p>	<p>The language in this action is simply intended to suggest that a broad range of Met Council funding sources exists to aid in supporting the policy; over the next decade, other programs may appear and requirements may shift.</p>
<p>Page 38, Objective 8: General Comments  There should be a larger reference to under employment, specifically related to current job qualifications not seeing needed updates. For example, numerous immigrant persons hold post-secondary degrees which employers have not recognized in the US which has led to educated populations taking lower wage positions beneath what their skill set may allow for.  Another comment is it should be recognized how immigrant populations are more likely to start a business and how local entrepreneurs and businesses are more likely to hire from within the surrounding neighborhood.</p>	<p>For Objective 8, the narrative section is intended to provide a brief, high-level context for the subsequent policy and action section. A detailed analysis of the region's economic outlook can be found in the Dynamic and Resilient goal chapter, which contains data and information related to immigrants, and black, indigenous, and peoples of color, and their extensive economic contributions.</p>
<p><b>City of Saint Paul</b></p>	

Comment	Response
<p>General comments:  The Actions starting with “Consider...” seem like a different category overall. Suggest creating a new subcategory called “Considerations.” This would help to prioritize actions within the chapter.  For actions that don’t start with “consider” or “explore” is there a mandate to do every part of the action at the local level. For example, does the following policy mandate local governments to create a funding source for this action step? A8. Develop policy incentives and allocate dedicated funding to support the adoption of nature-based climate adaptation solutions at the local level. (Local Government)  There are no policies about non-governmental institutional uses, like colleges/universities and hospitals. These are important land uses and could be acknowledged with policies/actions under Objective 8 as key contributors to the economy or elsewhere in the document for the other many roles they play.</p>	<p>We appreciate your suggestion. 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. Adjustments were made to each policy and action to add clarity of roles for the Met Council or the local government. A new section was added to the policy chapter about roles and responsibilities. Language will be revised for clarity.  The Dynamic and Resilient Regional Goal chapter highlights the critical role of public-private partnerships in driving economic development, with a particular emphasis on collaboration with educational and medical institutions as key anchors for innovation, workforce development, and community investment. Clarifying language was added to Land Use Objective 8, Policy 3, Action 4 to emphasize the role of institutional uses.</p>
<p>Objective 1. P1. A2. Would the proposed American Indian Advisory Council be available as a resource for local governments to consult and collaborate with when drafting local comprehensive plans? This could be valuable resource as cities draft plans.</p>	<p>The American Indian Advisory Council provides advice and guidance to the Met Council and will be working to provide resources for the local planning process as their priorities align with that effort. As a co-created effort, the Advisory Council will help set priorities. Some of the most pressing priorities for the community include harvesting policies which may align with work of the region's park implementing agencies, affordable housing, and water policy. The Met Council will share resources like land management guidelines and others identified in Imagine 2050 as the American Indian Advisory Council work continues.</p>
<p>Objective 1. P4. Does the sewer chapter have an action step related to upgrading the capacity of the sewer systems in the urban core to facilitate dense infill development? And would another policy be appropriate here?</p>	<p>The Water Policy Plan commits to providing regional investments in the regional wastewater system to accommodate regional growth. This would include capacity related improvements regardless of whether that need for additional capacity is for urban redevelopment (urban core included), or for new development around the urban area edge.</p>
<p>Objective 2. P3. A1. Often federal and state projects can have the greatest spatial impact to land. This warrants a broader partnership rather than just a local government issue as the Action indicates.</p>	<p>While this section has been revised, for simplification and clarity, the Met Council agrees with this comment. In most areas of planning where Local Government is listed as the main actor, partnership is assumed.</p>

Comment	Response
<p>Objective 2. P4. A3. What is the “market study” referenced here? To identify the market for the infrastructure? A fiscal impact of proposed infrastructure? How does this support the policy? Please clarify.</p>	<p>Including market studies is a suggestion; not all projects would warrant a market study. Language has been clarified to reflect that this is not a requirement. However, examining the potential demand for various kinds of transportation investments could be done as comprehensive planning and infrastructure planning proceed. Here municipalities are encouraged to evaluate options for local pedestrian, bike, and rolling infrastructure that could increase local use and reduce overall VMT, while enhancing local quality of life. This encourages municipalities to think a little beyond current assumptions.</p>
<p>Objective 3. P1. A5. Is this policy intended to be directive, requiring local governments to adopt a living streets ordinance? If not, suggest revising to “Consider adopting...” If so, why is this approach prioritized over other policy solutions?</p>	<p>Communities are encouraged to consider Living Streets policies and principles but will not be required to adopt them. Language will be clarified to make the intent clear.</p>
<p>Objective 3. P2. A2. This policy is written in a way that seems like it is better suited under P5.</p>	<p>Thank your for your suggestion. We have made this change.</p>
<p>Objective 3. P5. How are A3 and A4 different actions? Suggest combining them.</p>	<p>Thank you for your suggestion. We removed A3 in response to your feedback, as we agree it seemed duplicative.</p>
<p>Objective 7. P1. A6 – A7. Will the Met Council provide the inventory and projections, or is that something that the local governments need to do?</p>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has a GHG inventory and strategy planning tool that communities can use to make meaningful commitments on GHG reductions. The Council will provide technical assistance on how to use this tool.</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 also 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>

Comment	Response
<p>Objective 8. In addition to the policies listed, it would be good to have another policy with associated actions supporting local businesses in general and acknowledge the role they plan in creating jobs and contributing to economic development of the region.</p>	<p>The Met Council is committed to supporting local and small businesses in partnership with our economic development stakeholders. Small and local businesses play a vital role in strengthening local and regional economies. A more complete assessment of the ways that local businesses and entrepreneurs play in the regional economy can be found in the "Our Region is Dynamic and Resilient" chapter of Imagine 2050. The Met Council is currently in the process of updating the Regional Economic Framework (to be completed in 2025) which will provide a pathway for the region to access grant opportunities from the Economic Development Administration.</p>
<p><b>City of Shorewood</b></p>	
<p>Objective 1, narrative: The plan says that “the development pattern that reduces the amount of land used to accommodate growth supports” the desired outcome of respecting land and water as a foundation for regional growth, because it would “leverage... the region’s existing resources and limit... impacts to existing habitats”. However, the requirement to develop every remaining inch of less developed properties to provide room for 1,000 additional people and 400 additional employees will be land intensive and require loss of trees, habitat and pervious surfaces.</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. 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>Compact, dense development accommodates growth on a smaller footprint than less dense development, thereby allowing more land to be protected for natural ecosystem functions. The policies are intended to be interpreted more broadly than for specific properties. Preserving tree canopy, protecting habitat, and accommodating density do not need to be mutually exclusive.</p>

Comment	Response
<p>Objective 1, Policy 1 – “encourage more broad application of American Indian land and water management practices at the individual, neighborhood, community and regional level”.</p> <p>What does this mean in a suburban edge city like Shorewood?            What are American Indian land and water management practices?            The Plan says that this is encouraged, what, if any, measure will be used to evaluate the local comprehensive plans for conformance with regional systems?</p>	<p>The inclusion of indigenous perspectives in land management not only acknowledges the ancestral Dakota lands over which the seven-county region sits, but the inclusion of this work as a land use policy establishes a role for American Indian communities in land management decision-making with the Met Council. This is not a requirement for local governments, thus not a conformance issue, but instead relates to areas of Met Council influence or ownership like the regional parks system and where local governments are interested in incorporating this perspective. The Met Council has established an American Indian Advisory Council to advise on this work and will be collaborating with the American Indian communities in the region. Also, the Met Council does not plan on re-creating resources which already exist. However, if there are region-specific issues and opportunities, the Met Council commits to ensuring that educational resources are available.</p>
<p>Objective 1, Policy 2, Action 1 – promote more compact development. Shorewood doesn’t have a downtown or other dense commercial nodes. The areas that the City Council felt could be developed with higher density land uses near commercial areas have all been reguided to higher density land use classifications based on the Thrive 2040 plan. There are few other properties left that could be developed for greater density that would meet the criteria.</p>	<p>The City will only be required to identify where they plan to accommodate the City's forecasted growth which may include infill, redevelopment, new development, and/or already planned but as of yet undeveloped areas. The Met Council provides support for the comprehensive planning process through tools, resources, direct assistance through Sector Reps, and financial assistance for eligible communities through Planning Assistance Grants. 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>Objective 1, Policy 2, Action 2 vi. There doesn’t appear to be a definition of “publicly protected areas.” Are these reductions in addition to those listed in Action 3 iii?</p>	<p>Measuring land supply (O1,P2, A2vi) is different than calculating net residential density (O1,P2,A3iii). "Publicly protected areas" is meant to be broad to capture the variety of different types of public protection that may be in place including conservation easements, public ownership for park or conservation or similar purpose, and other similar types of protection. The details will be included in guidance for requesting changes to the MUSA (O1, P2, A2).</p>

Comment	Response
<p>Objective 1, Policy 2, Action 3 i. The paragraph indicates that all plans for the overall minimum average net density expectations across all land within the city, however the footnote above says that the minimum and maximum densities apply to all areas planned to accommodate growth. These two statements conflict. During the pre-public comment meetings, Shorewood staff specifically asked how small infill development would be considered and Metropolitan Council staff told all the listening audience generally that infill could occur without penalizing the community. Shorewood would like to preserve the ability of allow small infill lot splits or small subdivisions that are consistent with the zoning district and the neighborhood without penalty of having to average the density across the entire city.</p>	<p>For clarification, the policy language states, "Plan for the overall minimum average net density expectations across all land within the city or township guided to support growth within the planning period." This is consistent with the direction below Table 2 which states, "Average minimum and maximum densities apply to all areas planned to accommodate forecasted growth in the planning period." It is important to note the "areas guided to support forecasted growth within the planning period" as part of the policy language.</p> <p>The Met Council will review its guidelines and administrative practices after the adoption of Imagine 2050. As part of that review, the Met Council is evaluating how infill developments which achieve regional goals, but may not meet some planning requirements, might be afforded additional flexibility. However, any changes made to provide local flexibility must be consistent with regional goals.</p> <p>It is also important to note that Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p>
<p>Objective 1, Policy 2, Action 4 – Increase Affordable Housing Minimum Density</p> <p>The 2040 land use plan allowed areas at 8 unit per acre minimum to meet the affordable housing goal, while Imagine 2050 increases this minimum to 10-12 units per acre. Density alone does not lead to affordable housing and the document provides no empirical evidence to show that this increased density will result in more affordable housing in Shorewood. It could be argued that this will not create more affordable housing, as remaining developable land in Shorewood is not and is expected to remain limited.</p> <p>Additionally, the 2040 plans were only recently adopted, mostly likely within the last three years. The Metropolitan Council hasn't given the cities time to absorb the previously required 8 units per acre minimum before ratcheting up the numbers. This allows very little time for the residents and property owners to absorb the change before the new plan has to be adopted. It seems like the Metropolitan Council has created a moving target that cities will never be able to achieve before the next plan is required to be completed.</p>	<p>The draft 2050 Housing Policy Plan recognizes that density is not the only tool for the creation of affordable housing and has made modifications to increase the flexibility of the Land Guided for Affordable Housing (LGAH) requirement in Section 4 of the 2050 Housing Policy Plan in order to reflect this reality, however Section 4 of the Housing Policy Plan does provide evidence that affordable housing is much more likely to be built at higher densities. According to Minn Stat 473.859 comprehensive plans must use land use planning to promote the availability of land to meet low and moderate income housing. This land must be available at densities high enough to accomate low and moderate income housing not necessarily developed as affordable housing.</p> <p>Communities will adopt their 2050 plans approximately 10 years after their 2040 plans; this 10-year planning cycle is outlined in state statute.</p>



Comment	Response
<p>Objective 2: Maximize opportunities for growth in places well-served by transit, bicycle, and pedestrian infrastructure.</p> <p>The Metropolitan Council has cut all transit routes that used to travel through Shorewood and closed the small surface park and ride in our community. The majority of the city developed before bicycle commuting was a societal norm. Adding sidewalks and trails after the fact is costly and controversial, both for the cost and the upset to adjacent property owners. Obtaining grants is harder as competition among communities grows. Writing grants and asking for bonding for projects is so time-consuming that small communities are left out of the mix simply because its too expensive to apply. Consider creating grant opportunities to add trails in communities that have few trail resources.</p>	<p>The Met Council recognizes the variety of local communities in the region. Local governments at every level of development can work on their development patterns. Shorewood may not see transit investment, but it could focus on the walkability, bike-ability, and local accessibility. Development that supports local trips may be the most achievable outcome as it plans for its future. The challenges inherent in this are also appreciated. The Met Council commits to working with the City as it moves forward. Funding for trails is currently available through competitive processes in the Regional Solicitation and the Regional Parks and Trails at the Met Council. The Met Council continues to work on streamlining application processes.</p>
<p>Objective 2, Policy 4 Action 7 – Adjust parking requirements.</p> <p>The City of Shorewood developed initially with cabin lots around the lakes at the turn of the century. As stated previously, the community is a bedroom community with multiple vehicles for each household. The older the subdivisions, the narrower the streets. Some streets are only 8 to 15 feet wide in rights-of-way that are about the same width. Allowing private development to intensify without acknowledging the need for parking would be irresponsible in an area where on-street parking would block emergency vehicle access. The City of Shorewood supports reasonable parking standards.</p>	<p>While the Met Council supports communities efforts to mitigate impacts of parking, these are not requirements rather are areas where the Met Council supports local actions which help to achieve regional goals. The policies throughout the Chapter have been updated for clarity in roles and responsibilities as well as language to reflects requirements verses areas where actions are encouraged.</p>
<p>Objective 3, Policy 1, Action 5 – Adopt a Living Streets Policy</p> <p>Is this mandatory? If yes, will funding be provided by the Metropolitan Council to local governments for this effort.</p>	<p>Communities are encouraged to consider Living Streets policies and principles but will not be required to adopt them. Language will be clarified to make the intent clear.</p>
<p>Objective 3, Policy 1, Action 7 – Residential Density in Mixed Use Districts</p> <p>How is a “large mixed-use district” defined?</p> <p>What are “system impacts and regional trends” as they relate to this action and how would they be measured?</p>	<p>Mixed-use areas look different across the region, depending on the local context and market. From a regional perspective, it remains important to understand the land use mix in each community and its impact on regional systems and policies. With input from communities, the Met Council will prepare guidelines and resources for communities to measure the mix of land uses within their mixed-use areas. These resources and guidelines will accompany the Local Planning Handbook to be released in late 2025.</p>

Comment	Response
<p>Objective 3, Policy 4, Action 3 – “Local governments must develop policies to protect and preserve historic and cultural assets and should additionally adopt culturally expansive ordinances to further enhance restoration and preservation efforts”.</p> <p>What is a culturally expansive ordinance? Are there examples of what this ordinance would look like?</p>	<p>The Action statement describes culturally expansive ordinances as those that may “... include provisions related to language access, cultural celebrations, religious practices, heritage preservation, and other aspects of cultural expression and identity.” Communities are encouraged to consider adopting this type of ordinance but will not be required to adopt them. Language will be clarified to make the intent clear and the Met Council will provide technical assistance on topics like these as part of the Local Planning Handbook update set to launch in late 2025.</p>
<p>Objective 4: Narrative This section conflicts with Objective 1, Policy 2 Action 3 i. – Density Policy. It is not possible to protect all the nature areas of a community and require compact dense development on the few remaining properties. In a suburban edge community like Shorewood, those requirements conflict. Shorewood has always prided itself on being a heavily forested area and encouraged tree planting. The results are apparent on the excellent heat maps produced by Metropolitan Council staff. Removing the tree canopy to build more and more dense housing will reduce the opportunities for such plantings.</p>	<p>Compact, dense development accommodates growth on a smaller footprint than less dense development, thereby allowing more land to be protected for natural ecosystem functions. The policies are intended to be interpreted more broadly than for specific properties. The Council appreciates the work the City has done to increase and maintain its tree canopy. However, preserving tree canopy and accommodating density do not need to be mutually exclusive.</p>
<p>Objective 6, Policy 1, Action 4 – Acknowledge Inequities &amp; Disparities What does this look like? How will this requirement be evaluated?</p>	<p>The Metropolitan Council is committed to creating an inclusive and equitable region. The language was clarified to "Prioritize opportunities to acknowledge inequities and disparities..." As part of the comprehensive planning process, the Metropolitan Council will provide local government units with technical assistance and best practices to help meet these goals. Additionally, the Met Council will provide individual checklists of minimum requirements for each community updating their local comprehensive plan as part of the Local Planning Handbook update set to launch in late 2025.</p>

Comment	Response
<p>Objective 7, Policy 1 – Reduce Greenhouse Gas Emissions</p> <p>It appears that local governments now expected to include a climate action plan in the 2050 Comprehensive Plan. What are the minimum standards/expectations?</p> <p>Shorewood is a city of less than 8,000 people and located within a larger Metropolitan context. Requiring each city in the Metro area to submit climate action plans does not equate to reducing climate impacts as there is little local control.</p> <p>Will additional criteria for climate action plans be provided to cities for review prior to their adoption?</p>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would be supported by Met Council technical assistance and resources. 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 also 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>The Council will not require the City of Shorewood to complete a Climate Action Plan, but the Council encourages local governments to consider such frameworks to support climate action.</p>
<p>Objective 7, Policy 5, Action 5, 7 and 8 – Nature Based Solutions</p> <p>What are nature-based solutions as they relate to this action?</p> <p>How will cities establish standards to ensure compliance?</p> <p>How are cities expected to implement nature-based solutions with the objectives to add compact, dense housing?</p> <p>How much funding will cities be required to allocate? Can the funding be used for public properties or are cities required to subsidize private development for this purpose?</p>	<p>Nature based solutions are sustainable approaches that utilize natural ecosystems and biodiversity to address various environmental, social, and economic challenges. Examples of this could be using Cottonwood trees to clean contaminated soil. It could include planning for dual purpose uses to deal with localized flooding - for instance, designing a frisbee golf course with native planting and low-lying areas that can be designed to flood when local road networks are overwhelmed with water. It means using landscaping practices to remove chloride from the soil or clean the air. These examples can be implemented on large or small scales. Nature-based solutions are one possible climate adaptation solution. New climate requirements have not yet been established but we look forward to working with local government partners as they are developed. They will be included in the Local Planning Handbook update planned for release in late 2025.</p> <p>Compact, dense development accommodates growth on a smaller footprint than less dense development, thereby allowing more land to be protected for natural ecosystem functions. Implementation of nature-based solutions and accommodating density do not need to be mutually exclusive. Raingardens are one example of scalable nature-based solutions that can address multiple adaptation issues within a location. Cities will not be required to allocate funding to these efforts. The Met Council provides technical assistance, tools and resources, and financial assistance to eligible communities via Planning Assistance Grants and direct technical assistance through the Sector Representative Program.</p>

Comment	Response
<p>Objective 8, Policy 3 – “Value and promote a just economy through the economic growth and wellbeing of Black communities, American Indians, people of color, immigrants, and people of all ages and abilities in the region through equitable access to economic resources (Metropolitan Council/Local Government)”.</p> <p>What is required of cities as part of the comprehensive planning process? Do cities individually meet with tribal nations and American Indian communities and other underrepresented communities outside our jurisdiction to satisfy the requirement or those living within the community?</p>	<p>Thank you for your feedback on land use, economic development policies. As part of the comprehensive planning process, the Met Council provides cities with technical assistance and best practices to help meet these goals. The Met Council is committed to an inclusive, and sustainable economy that values businesses owned by people of color and immigrants and is resilient to the effects of climate change. Cities are encouraged to engage with Tribal nations and underrepresented communities in the planning process to ensure diverse voices are heard. We are here to support local governments in developing plans that promote sustainable industries and equitable economic growth, ensuring that all communities have access to economic resources. This is not a requirement, but an area where the Met Council encourages and assists with local implementation of actions that will support regional goals.</p>
<p>Shoreland Regulations</p> <p>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><b>City of Spring Lake Park</b></p>	
<p>Suburban Community Designation: We support the Council's decision to retain the City's suburban designation, as it aligns with our fully developed status and infrastructure capacity. However, we strongly advocate for maintaining the Thrive 2040 density requirement of 5 units per acre for the suburban designation. This density is appropriate for preserving the character of our community, ensuring sustainable infrastructure use, avoiding potential overburdening of our aging systems and allowing the City's current density to remain in compliance with the regional plan.</p>	<p>The Met Council agrees that Suburban is an appropriate designation for the City. However, density policies address the form/design of growth, not the quantity of growth. A modest increase in minimum densities does not require the City to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land. Further, density is not the driver of increasing cost for local urban services. 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. More compact development patterns is one way to manage costs and keep expenditures down.</p>

Comment	Response
<p>Decennial Comprehensive Planning Process: The process places a significant resource burden on our small, 2.2 square mile, fully developed community. During the last comprehensive plan update, significant comments from Metropolitan Council staff required substantial updates, even though these issues were not clearly outlined in the community system statements. We ask that the Metropolitan Council consider providing technical resources or grants to assist smaller communities like ours, helping to minimize the financial and staffing impact of these required updates.</p>	<p>Based on feedback from the last round of Comprehensive Plan updates, the Met Council understands the importance of clearly identifying minimum requirements and items to be addressed in local comprehensive plans, before and throughout the update process. As in past rounds, the Met Council will provide Planning Assistance grants to eligible communities and technical resources, tools, and guidance to all. If there are specific items that you have questions about, please reach out to your Sector Representative at any time.</p>
<p>Affordable Housing and Income Distribution: Spring Lake Park benefits from a substantial amount of naturally occurring affordable housing, which helps meet the needs of residents without the need for additional concentrated low-income developments. The City currently has nearly 500 units of concentrated affordable housing within the community. While we support the provision of affordable housing, we are concerned about the potential negative effects of concentrating too much low-income housing in one area, which can impact community diversity and access to resources. According to the 2020 Census, the City's median household income is significantly lower than both the broader Twin Cities metropolitan area and the state of Minnesota. We believe it is important to maintain a balanced mix of housing options to avoid over-concentration and ensure that all residents benefit from a diverse and inclusive community.</p>	<p>The allocation of Future Affordable Housing Need (Future Need) considers the existing affordable housing in a city or township, including subsidized and unsubsidized units.</p>
<p><b>City of Tonka Bay</b></p>	

Comment	Response
<p>Minimum Average Net Density for Suburban Communities (Land Use Policy, Objective 1, P2, A3) The City objects to the proposed change in the minimum average net density for communities designated as Suburban from 5 to 7 dwelling units per acre. Imagine 2050 proposes an expected increase in the minimum residential density requirement. Tonka Bay is designated as a Suburban community. According to Imagine 2050, the minimum average net residential density for communities designated as Suburban is proposed to increase from 5 units per acre to 7 units per acre. This increased density is a dramatic shift from the previous density requirement in Th rive MSP 2040. Tonka Bay is a fully developed lake community with very limited greenfield development opportunities. Most residential development opportunities are associated with tear downs and rebuilds, and the number of these occurring each year is miniscule. In summary, the new density requirement fails to take into consideration local development and public improvement patterns, lot size and their location adjacent to a DNR protected body of water. Furthermore, the city's infrastructure does not have the capacity to handle the increased density, traffic and parking congestion that would come with it due to geographical constraints. It will be difficult for this community to meet the density requirement in Imagine 2050. Please reconsider this density requirement and/or community designation for Tonka Bay.</p>	<p>There were several communities with comparable landscapes as the city whom indicated similar concerns. Typically, the Met Council does not change a community designation to reduce density expectations. However, in Imagine 2050, we did agree to changes for small cities with constrained land supply similar to Tonka Bay. Therefore, the Met Council concurs that the Suburban Edge community designation is more consistent with the city's current development patterns and we have made this change.</p> <p>It is important to note that the city's forecasted household growth for 2050 remains the same as its 2040 forecast. The 2050 Plan only needs to identify where the City plans to accommodate forecasted growth which may include infill, redevelopment, new development, and/or already planned but as of yet undeveloped areas. 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.</p>
<p>Housing Type Directive (Objective 5, P1, A 1) The City objects to the requirement placed on cities to allow for more than one housing type within residential land use categories. Imagine 2050 includes a requirement that will force cities to allow more than one type of housing within residential land use categories to encourage mixed-income developments, diversity of housing types within neighborhoods and broader access to housing for more people. While the issues that this policy is trying to address are important, this requirement does not consider the nature of the community and the ability for cities to decide which types of development are appropriate in the community. Additionally, this policy would likely result in zoning changes, which are a hyper-local decision, and the City opposes any such regulation that would infringe upon its right to make such decisions.</p>	<p>The Metropolitan Council is committed to fostering sustainable land use practices and expanding housing choices, including more infill, redevelopment and diverse housing types, to meet the needs of our growing region. Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p>

Comment	Response
<b>City of Victoria</b>	



Comment	Response
<p>Objective 1, Policy 2, Action 3</p> <p>While we recognize the importance of accommodating growth, we have significant concerns about the increased density requirements and their intersection with other regulations. Specifically, increasing the density requirements from 3 units per acre to 4 units per acre could present several challenges for the City of Victoria. Higher density may place additional strain on our existing infrastructure, including roads, utilities, and public services, which may not be equipped to handle the demands of more residents without significant and costly upgrades.</p> <p>Balancing density with the need for open spaces and preserving neighborhood character is vital to our community. The City's topography contributes to its distinct charm but also adds great challenge and costs to the development of new housing, regardless of density. Though compact growth may align with regional goals, it overlooks the unique preferences of communities like Victoria, which have historically favored lower-density, suburban development. The pressure to accommodate more people per acre can lead to drastic changes in the local environment, impacting the small-town atmosphere that residents cherish. Furthermore, it is critical to understand how flexibility in density will be considered and how density will be measured. This will play a key role in determining whether growth can occur without compromising the distinctive qualities that make our community special.</p> <p>We request clarification on whether areas such as stormwater ponds and HOA/private greenspace will be excluded from density calculations. Since stormwater management is a mandated requirement and HOA greenspace provides effective communal areas without imposing city maintenance burdens, excluding these from density measures seems a practical and equitable approach. Additionally, we would appreciate clarification on whether similar areas, such as wetlands or conservation easements, will also be considered for exclusion, as they serve environmental or communal purposes but do not contribute to the developable land base.</p>	<p>Density policies address the form/design of growth, not the quantity of growth. A modest increase in minimum densities does not require the City to accommodate additional population or households, but to plan for the already forecasted growth to be accommodated more efficiently, using less land. Compact development patterns can also help the City achieve its desired goals of preserving open spaces and natural systems by ensuring these areas are protected from development. Further, density is not the driver of increasing cost for local urban services. Growth is the primary factor that increases the cost for services in a community, through the extension of roads, public infrastructure, and public services.</p> <p>Generally, the cost of additional services per household is lower when the land area per household is smaller. More compact development patterns is one way to manage costs and keep expenditures down.</p> <p>The City already has areas of both higher and lower density land uses (and everything in between) that contribute to Victoria's character. The Met Council still implements a community-wide average for achieving minimum densities. This approach allows the City to plan for a diversity of housing types that ensures that the City's low density neighborhoods can continue to be a part of the local landscape. While we will review guidelines and administrative practices after the adoption of Imagine 2050, this practice is not recommended to be changed as part of that review.</p> <p>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 reflect policies in Imagine 2050. Any changes to net density calculation guidelines or programs which rely on density calculations must be approved by the Met Council after Imagine 2050 is adopted. This is planned to be a part of the implementation work plan. Changes under consideration (albeit not all-inclusive) include allowing permanent public easements to be netted out and reducing the look-back period for those enrolled in the Plat Monitoring Program like Victoria. Met Council staff agree that stormwater management areas need to be evaluated and clarified as part of the update process, too. However, privately owned greenspace does not provide the protection from development which public open space areas provide nor the level of responsibility for its maintenance that local governments ensure. Any changes made to provide local flexibility must be consistent with regional goals.</p>

Comment	Response
<p>Objective 1, Policy 2, Action 2  Victoria has strong concerns regarding the look-back period, specifically holding the city accountable for past project approvals and market conditions that were beyond our control.  Cities often approve projects based on developers' input, which is inherently tied to market needs and conditions at the time of approval. We believe it is unfair to apply retrospective regulations or metrics when these conditions evolve outside the city's jurisdiction or ability to predict. We seek further discussion on this issue to ensure cities are not disproportionately penalized for past decisions driven by previous governing bodies, and the economic realities of those times.  The requirement to conform to density policies and meet past density expectations introduces significant challenges. Victoria's development patterns, which prioritize open spaces and preserving the small-town character of our community, may not always align seamlessly with regional density targets. It is essential that any evaluation of past performance, especially regarding density, be assessed according to the standards and expectations that were in place at the time of approval, rather than applying new metrics retroactively.</p>	<p>We agree and are currently reviewing changes to the Plat Monitoring Program. Reducing the look-back period for those enrolled in the Plat Monitoring Program, like Victoria, can better reflect current market conditions and development preferences. We are currently exploring the impacts of different look-back periods on communities and is committed to making sure that any changes to the program do not cause communities to become inconsistent with regional policy. We also agree that any assessment of performance should be linked to the comprehensive planning requirements that were in place at the time. The Met Council looks forward to working with local governments as changes to programs and guidelines are considered as part of the implementation work plan.</p>
<p>Objective 7, Policy 1, Action 1  While Victoria supports efforts to reduce greenhouse gas emissions, we have questions about what these requirements entail, how they will be measured, and how enforcement will be managed. Additionally, there is concern within the community that adding more density may seem counterintuitive to reducing emissions. For example, increased density could lead to concerns about traffic congestion, energy use, and the strain on existing infrastructure. It is essential to understand how these factors will be mitigated to ensure that higher-density development does, in fact, lead to a reduction in emissions rather than the reverse. Additionally, Victoria seeks guidance on how to balance these climate goals with maintaining the character of our community, which values open spaces, natural areas, and a smaller-town feel. We request that any policies or guidelines take into account the specific context of smaller cities like ours, where growth must be thoughtfully managed to preserve quality of life for current and future residents.</p>	<p>When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources.  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 also 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.  Higher density has been proven, through various studies, to reduce greenhouse gases by virtue of more efficient heating/cooling and reduced vehicle miles traveled given increased proximity to local amenities. Cities can also protect natural systems by promoting more compact development in order to preserve open space from development.</p>

Comment	Response
<p>Objective 1, Policy 2, Action 4  Victoria is committed to increasing affordable housing options, and we fully support initiatives aimed at achieving this goal. However, we face significant challenges due to a lack of adequate tools to make meaningful progress in this area. While the city strives to meet affordable housing targets, the current policy framework does not provide sufficient mechanisms for smaller suburban fringe cities like Victoria to succeed in the long term. Victoria also faces unique challenges as a community with a relatively high economic status, which can drive up property values and limit affordable housing development. Additionally, the absence of nearby transit options further complicates efforts to create affordable housing, as it reduces access to job opportunities and essential services for potential residents.</p> <p>To address these challenges, we believe the Metropolitan Council should play a crucial role in providing direct financial support through dedicated affordable housing grants or loans that specifically target smaller cities. Increasing the pool of available funding through the Livable Communities Act Pre-Development grant, Local Housing Incentives Account grant, or creating new grant programs is one strategy to accomplish this. Funding for land acquisition, infrastructure improvements, or subsidizing development costs would make it more feasible to build affordable housing in higher-cost areas like Victoria. We are eager to collaborate with the Metropolitan Council to explore additional tools or incentives that can better support our efforts.</p>	<p>Thank you for your comment and identifying tools that would be helpful for Victoria to increase development of affordable housing. The Met Council supports making funding easier to access by having clear priorities for the LCA program. The Met Council wants to work to make funding easier to access for communities with limited capacity to apply for projects that meet goals of creating affordable housing. We also have an action to "encourage the development of affordable housing in all areas of the region by exploring options to provide funding for the development of local housing programs that will increase affordable housing opportunities, with priority for cities and townships that do not have a demonstrated history of developing affordable housing."</p> <p>We will share these suggestions about LCA programs with the LCA program team at the Met Council.</p>
<p><b>City of Woodbury</b></p>	

Comment	Response
<p>The City of Woodbury understands the policy reasons to increase minimum density throughout the metropolitan area. We ask that the Council take a vocal position in Woodbury Comments on Draft Imagine 2050 Plan championing that planning for and delivering regional growth should be a Comprehensive Plan process and not achieved through preemption of local zoning control via state law changes. We further ask the Council to provide, prior to the start of the 2025 Legislative cycle, an analysis of the additional number of residential units delivered through the proposed increased density requirements. If an increased number of housing units is not delivered through the proposed density increases, then the Council should reevaluate to ensure the powerful tool of Comprehensive Planning is utilized to deliver the shared want of increased housing opportunities.</p>	<p>Regarding legislative initiatives, the Met Council is charged 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> <p>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. Density policy does not aim to achieve a specific number of increased residential units, but instead increased land use efficiency. More efficient use of land may provide opportunities to preserve natural systems, to provide public open space, as well as accommodate housing, or any other public purpose. These are local decisions.</p>
<p>The City of Woodbury has successfully used density transfers and Planned Unit Developments to deliver density. The Council should allow cities flexibility to continue to use these tools and should ensure density requirements have the opportunity to be evaluated community-wide and not at the parcel level alone.</p>	<p>The Met Council's current adopted guidelines for the implementation of minimum net residential density requirements is based on a community-wide average, not individual developments. This allows the City to plan for areas of both high and low density land uses (and everything in between). The Met Council will review its guidelines and administrative practices after the adoption of Imagine 2050, but this practice is not recommended to be changed as part of that review. It is unclear what the City is referring to in regards to density transfers. The Met Council understands the use of PUDs as a local implementation tool, and they are allowable as long as the local ordinances are consistent with the guiding land use plan. Minn. Stat. §473.858 requires zoning to conform with the adopted local comprehensive plan.</p>

Comment	Response
<p>The City of Woodbury has used phasing and sub-phasing for decades to deliver planned growth. The Imagine 2050 Plan references modifications to the 2040 MUSA but does not provide specifics. It is critical that no modifications are provided to the 2040 MUSA area and that evaluation of the 2050 MUSA includes growth areas consistent with past plans.</p>	<p>The Met Council does not intend to modify the 2040 MUSA, except as requested to be modified by local governments during their 2050 planning process. The 2050 MUSA will be determined for areas where growth had not previously been planned at a regional or local scale, through the local planning process. The Met Council will use a rolling land supply analysis based on established criteria currently identified on page 19 under Objective 1, Policy 2, Action 2 in the Land Use Chapter as part of its review of proposed 2050 MUSA areas.</p>
<p>The Imagine 2050 Plan identifies restricting MUSA expansion in the future. This could have negative impacts on Woodbury as we have established policies that guide churches, schools and affordable housing to lands that are immediately adjacent, but not in, the MUSA. The City of Woodbury would request a "carve out" for these types of uses.</p>	<p>It is unusual to see affordable housing, which typically requires a higher density to ensure financial viability, would be planned for areas that are not provided regional sewer service like those outside of the MUSA. Also, MUSA expansion is not prohibited, but merely proposed to be analyzed based on needed land supply prior to inclusion within the MUSA. 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 the 2050 forecasted growth. The Met Council is committed to continually assessing the availability of land within the MUSA to ensure a 20-year rolling land supply.</p>
<p>Required preservation of agricultural land within a Suburban Edge should not be a Council priority and those decisions should be left to the local jurisdiction. Preservation of agricultural lands in close proximity to transit, jobs, transportation networks and services will lead to unnecessary sprawl.</p>	<p>The Met Council prioritizes the preservation of agricultural lands within the region's Rural Service Area and recognizes that communities within the Urban Service Area, including Suburban Edge communities, will necessarily prioritize orderly and compact development. We support and encourage Suburban Edge communities using land use controls, including agricultural preservation, to guide and manage growth in a manner that facilitates the efficient use of local and regional infrastructure.</p>
<p><b>Great Plains Institute</b></p>	
<p><b>Solar Energy Land Uses</b>  The Draft Land Use Policy chapter of the Imagine 2050 plan has many excellent recommendations and guidance and covers a remarkable depth of topics consistent with sustainable development principles, resilience and equity goals, and the State's adopted climate goals. We are offering some brief comments on a specific element of the Plan; the treatment of solar energy land uses, a growing development form that is widely recognized as necessary for meeting the State's adopted climate goals, but which is frequently perceived as being in conflict with other important</p>	<p>Specific responses are provided under the subsequent specific policy recommendations. Met Council staff agrees that solar is one of many tools that can be used to advance many of the region's goals, especially those related to restoring and preserving natural systems. Regarding the noted recommendations for regional plans, many of these specific requirements will be developed as part of the minimum requirements for comprehensive plans after the adoption of Imagine 2050.</p>

Comment	Response
<p>land use priorities.</p> <p>The land use chapter directly addresses solar land uses in two places: 1) Objective 1: Respect the relationship with land and water as a foundation for regional growth; and 2) Objective 7: Implement land use and development practices that reduce greenhouse gas emissions, embed climate adaptation, and create resilient communities. In Objective 1, solar land uses (focusing on principle use solar generally in the form of community solar installations) are characterized by the risks that solar development presents to agricultural resources and community character. In Objective 7, solar land uses are recognized as a required component in comprehensive plans and a necessary component of the climate solutions adopted by the State. Objective 7 also, however, characterizes principal (non-accessory use) solar development as a risk to, and largely incompatible with, agricultural land uses.</p> <p>The characterization of principal use solar as something in conflict with agricultural protection and community character goals is significantly overstated, and does not acknowledge validated benefits of appropriately designed solar. The current language can unfortunately enable unjustified bans or virtual bans on solar development by local jurisdictions. The Great Plains Institute has been helping communities navigate the path to the clean energy future for the past decade. We are aware of the concerns expressed quite frequently by communities and residents regarding proposals for community or utility scale solar. We are also familiar with the established and growing body of research on this topic as it relates to both social perceptions and scientific evidence regarding impacts to the host community. The language used in the current draft of the plan reflects the perceived risks of solar development, but recognizes little of the scientific research on the real risks, nor the opportunities for solar development to provide valuable benefits to host communities that the Plan otherwise promotes.</p> <p>Principal use solar is not an industrial land use. Industrial land uses are considered “industrial” largely due to the health and safety risks and nuisances common to industry. These include noise, smells, truck or rail traffic, air emissions, waste generation, storage or warehousing of production inputs or manufacturing outputs, etc. Industrial land uses require urban infrastructure (roads, water, wastewater, etc). Principal use solar has virtually none of these characteristics or needs. A commodity is being produced, but that does not make solar an industrial land use any more than agriculture is an industrial land use. Ironically, agriculture (unlike solar) actually has many of the characteristics of and industrial land uses, but is instead recognized as something distinct from industry.</p>	



Comment	Response
<p>Solar development is compatible with and can be co-located with a number of land uses recognized in the draft Plan as desired and beneficial to the host community and the region. For instance, plan policies call for development that incorporates pollinator and other habitat, nature-based stormwater management and watershed protection, creation of opportunities for local food production, development that restores ecosystem function, and separation of urban land uses from rural areas. As has been demonstrated in dozens of solar developments in Minnesota (and hundreds across the nation), solar development can successfully be designed to provide any of these co-benefits to the host community and the region. Frequently, solar development can provide multiple co-benefits on a single site. Finally, community-scale principal use solar benefits the host community, as it is connected to the distribution grid and can be a direct economic benefit to local businesses and households.</p> <p>Solar development can and should be designed to restore soil health and sequester carbon. Solar land uses, unlike, other forms of development, can (and should) be designed to restore prime soils that have been depleted by conventional agricultural practices. Communities can provide interim or time-limited conditional use permits that allow the community to choose to return the site to agriculture (or other land uses) at the end of the installation's life.</p> <p>Community-scale solar poses a lower risk to loss of farmland and rural character than other forms of development. The primary development risk to agricultural areas has been and continues to be development of housing and commercial expansion. Moreover, even considering just the impact of solar on agricultural practices (rather than comparing it to other land uses), the total acreage being affected in any county is rarely more than the amount of farmland annually coming in or out of conservation reserve or other farmland idling programs. Effects at the township level can, in theory, be more significant but in practice is rarely more than a minimal impact as measured by the acres being taken out of production (and assuming that the solar development does not co-locate agriculture). The land use chapter should be consistent with solar-ready planning practices. As is recommended by the SolSmart program (in which the Met Council is a Gold-certified regional government), jurisdictional plans should: 1) Identify and quantify local solar resources; 2) proactively guide potential conflicts between solar resources and other priority resources; 3) identify and capture co-benefits of solar development, and; 4) set solar development goals, similar to housing, job creation, trail development, or other forms of development. The draft plan should be modified to set</p>	



Comment	Response
<p>reasonable guidance for principal use community-scale solar that balances solar and other rural/agricultural uses, supports solar site design that provides co-benefits, and enables reasonable development sufficient to meet the Minnesota’s clean energy and climate goals.</p>	
<p>Recommendations  Objective 1 P3: The point of P3 is to encourage protection of prime soils and agricultural practices in rural areas. Each of the objectives is framed as encouraging positive and productive actions, except A3. Modify P3 by eliminating A3. A3 calls out solar development but not any other kind of development, despite the greater risk to farmland from housing development. Moreover, a careful comparison of other objectives throughout the chapter finds that “discourage” is almost never used in any other objective or policy. The point of A3 appears to be anti-solar rather than pro-farmland. An alternative is to modify A3 to encourage co-location of appropriate dual uses. “Encourage or require solar development on prime farmland or farmland of statewide importance to co-locate agricultural uses (local food production, grazing) or certified conservation ground covers such as Minnesota’s habitat-friendly solar certification.” A3 would thus be consistent with the other objectives in recommending positive action that benefits the community and the region.  Objective 4: Solar development is not currently mentioned in this objective, but should be in conjunction with the opportunities to achieve Objective 4 in the solar development process. For instance, in P5, solar development could appropriately be called out as opportunities for achieving A1 or A2. Similarly, the solar+conservation opportunity or conservation design opportunity could be mentioned in the Objective’s description. “. . .preservation and restoration of natural systems must also take place at a more local and site-specific scale. Smaller scale efforts may include . . . using solar development as green infrastructure or restoration of habitat lost to development or agriculture.”</p>	<p>Having received comments from various stakeholders and community partners on this item, Met Council staff is proposing to remove this action. We agree that the intention of keeping prime farmland in productive use is adequately covered by other actions within this policy, and that techniques like agrivoltaics allow for the co-existence of solar and agriculture.</p>

Comment	Response
<p>Recommendations Objective 4: Solar development is not currently mentioned in this objective, but should be in conjunction with the opportunities to achieve Objective 4 in the solar development process. For instance, in P5, solar development could appropriately be called out as opportunities for achieving A1 or A2. Similarly, the solar+conservation opportunity or conservation design opportunity could be mentioned in the Objective’s description. “...preservation and restoration of natural systems must also take place at a more local and site-specific scale. Smaller scale efforts may include . . . using solar development as green infrastructure or restoration of habitat lost to development or agriculture.”</p>	<p>The primary intention of Objective 4 and Policy 5 is about enhancing natural systems such as wildlife and pollinator habitat as opposed to promoting renewable energy. While there are good examples of how solar development presents opportunities for pollinator habitat, solar development is more a strategy to achieve some of the actions rather than an a standalone action or objective in this instance.</p>
<p>Recommendations Objective 7: Accelerated solar deployment is a key component, as reflected in all the state’s modeling and in utility resource plans, for achieving Objective 7 mitigation (GHG reduction) goals. P3 appropriately encourages renewable readiness and energy efficiency at the building scale. although the term “sustainable energy” is overly broad and not defined, the term of art in current policy is “clean energy,” which refers to carbon-free energy in both federal and state policy. However, P4 policy language focuses as much on where not to install solar as to encouraging expansion of solar to meet this objective’s climate goals. The policy appears to encourage principal use solar on industrial land, which is usually an inappropriate land use for sites that have infrastructure (streets, water, wastewater) that can support industrial development. Alternative policy language could be: “Encourage principal use solar installations on underutilized or contaminated land, in buffer areas around industrial land uses, and with infrastructure (such as airports) where other forms of development should be discouraged. Expand use of solar on rooftops for both existing buildings and in new development (residential through industrial). Enable appropriate levels of community-scale solar where it can provide community co-benefits such as surface or drinking water protection, habitat creation, and local food production.” The objectives (A1-A3) are fine. The final sentence of A4 should say “... plans must include strategies to implement local solar protection and development policies.”</p>	<p>These are good suggestions for changes, and we will review these accordingly, with potential revisions in mind.</p>
<p><b>Housing Justice Center</b></p>	

Comment	Response
<p>Realistic Guiding of Land: The University’s Center for Urban and Regional Affairs demonstrated in a 2002 study that over a 20-year study period “only 6% of the acres set aside for high-density residential use produced new high density low- and moderate-income housing.” This finding has had no effect on the Council’s inadequate land use requirements imposed on comprehensive plan development. The Council’s Plan concedes this failure, noting that the average affordable housing is built at more than 56 units per acre, but the Council requires only density minimums of 10-12 units per acre. Limiting “planning to promote availability of land” to a requirement that cities simply compile a list of higher density residential uses ignores, among other things: the need for an analyses of land, especially including public land, which is actually likely to be potentially available for affordable housing; the need for programs that use land-use controls to promote affordability in new developments; and the need to alert affordable housing developers to a city’s readiness to be flexible in its land use policies in order to promote affordable development. The Council’s draft Land Policy Plan acknowledges this problem, regarding land planning generally, not just for affordable housing, Objective 1, Policy 2, A3. V.: “Evaluate the practical feasibility of demand and development to ensure that both the intensity (density range) and location of planned developments are practical. Local governments need to plan land uses that are realistically marketable within the planning period, focusing on plausibility and long-term viability. This differentiates between what is merely allowed and what is plausible, providing a realistic framework for land use planning.”</p> <p>Developing guidelines for land guiding that addresses this issue and ensures the land that is guided is realistically available for affordable development is one of the most useful new steps the Council can undertake. As the Council fleshes out its guidance in this area, it should incorporate California’s experience with this same issue. In that state, a detailed definition of when land will be considered “realistically available ” is now in use and appears to be having a positive effect.</p> <p>The Plan notes the density requirements for land guiding of 10-12 units/acre, while also noting that the average affordable housing development is built at 56 units/acre. This is a stark contrast, raising the question of how the first set of numbers can hope to achieve the second. The draft Plan does not adequately address this discrepancy which essentially guarantees failure. It is inconsistent with the Council’s Guidance obligation under 473.854.</p> <p>For that reason, and because of the likelihood that the land set aside will not necessarily turn out to be the best places to develop affordable</p>	<p>The Council encourages cities to think more broadly about their planned density ranges in order to facilitate development without need for an amendment.</p> <p>While higher densities are common for affordable housing development across the metro area, as this comment notes, the density minimum of 10-12 units per acre that is defined in Land Guidance for Affordable Housing is appropriate in some community typologies and for some forms of affordable development.</p> <p>It should be noted that the study that was referenced is more than 20 years old, relating to plans developed under a vastly different planning environment in the 1990s. Since then, as reported in the Council’s own Comprehensive Plan Composite and annual reports on amendments, cities have been planning for far greater densities than those analyzed in the 2002 study, as well as supporting increased densities through amendments. In the event that an amendment is needed, the Council has worked to streamline the amendment review timeframe, increasing the unit threshold for administrative review in order to shorten timeframes. However, all plans and amendments thereto must always be reviewed for impacts to regional systems.</p> <p>Thanks for the supportive comments on Objective 1, Policy 2, A3. V. regarding the “practical feasibility of demand and development...” The Met Council, during the review of local comprehensive plans, will implement a data-based approach using UrbanSim, a real estate market simulation model. This is the same model used to develop the local forecast set. This analysis, paired with the criteria established for MUSA expansion, is intended to support a realistic land use planning framework. The comment about Comprehensive Plan amendments is noted. The 2050 draft Land Use Policy chapter includes several actions relevant to streamlining development approvals for affordable housing, including (as of the draft posted in December 2024):</p> <ul style="list-style-type: none"> <li>o O1.P4.A6: “Consider opportunities to streamline local development review processes, programs, and incentives that may help realize adaptive reuse for affordable or senior housing developments. This can include identifying and proactively completing initial due diligence work on properties that could be suitable for adaptive re-use. (Local Government)”</li> <li>o O5.P1.A1: “Support local controls and fiscal devices which allow mixed-use developments and diverse housing types by right, and incentivize the creation of affordable housing opportunities, including modular homes in single-family districts, cooperative housing, and multi-generational housing options. (Local Government)”</li> </ul> <p>The credit proposed in the draft Housing Policy Plan for policies that are</p>

Comment	Response
<p>housing, the Policy should include a provision guaranteeing quick, or automatic, Council approval of Comprehensive Plan amendments necessary to permit affordable developments.</p> <p>Finally, the Plan's proposal to reward cities for certain affordable housing policies or actions by reducing their land guiding obligations is counter to the stated objectives and obligations of the Council. Strengthening rather than weakening city obligations to guide land for affordable housing would not only bring current practice closer to what the statute requires but it would also go far to address one of the reasons it is so difficult to build new housing</p>	<p>likely to support development is in recognition of the fact that, in many cases, having viable tools available to support affordable housing development can be even more impactful than land guidance alone. Any reduction of land guidance for affordable housing requirements would be carefully assessed to ensure that the local government plan will still allow for meeting its allocation of Future Need.</p>
<p>Land Guiding and Zoning Conformance: The land guiding requirements of MLUPA have little impact unless local governments conform their zoning to how they have guided their land, as required by Minn. Stat. 473.858 Subd.1. Despite being legally obligated to bring zoning into conformance with Comprehensive plans, generally within nine months of adoption of comprehensive plan updates, many cities fail to do so. The consequence is that a developer seeking to build housing may look to the comprehensive plan for the city's intentions but then find that if they acquire and seek to develop that land, they will be compelled to seek a rezoning because the city failed to conform their zoning to the comprehensive plan as required by law.</p> <p>A recent experience in Edina illustrates the problem. After financing fell through on a market rate development, a developer sought to replace it with a much smaller but affordable apartment building. The city had guided the land to meet its affordable housing obligations, and the developer obtained 9% LIHTC for the project based. However, despite the comprehensive plan, Edina never rezoned the property. The developer was forced to seek a rezoning, and the city took the position it had full discretion in considering rezoning despite the fact it had been obligated to rezone itself and had never done so. The developer's rezoning application triggered a public hearing process in which a strong and well-organized NIMBY movement convinced the City Council to discourage the application. Most telling was that the primary argument of the Council and the NIMBY opposition was that the city needed to adopt a small area plan for this location before permitting any redevelopment, even though no one said a word about a small area plan when the earlier market rate development was under consideration.</p> <p>Further, illustrating the need for affordable housing densities to be located where housing can be built, the city had designated this site to meet its affordable housing obligations even though it had purportedly not</p>	<p>The Met Council agrees that zoning is a local regulatory tool used to implement comprehensive plans and that Minn. Stat. § 473.858 does require zoning to conform with the adopted local comprehensive plan. In addition to this, sewer permits are regulated, in part, through Minn. Stat. § 473.513 which requires consistency with the local comprehensive plan. Submission of a sewer permit is another review where adopted land use consistency with the development is confirmed. Granted, this is further along in the process than in the Edina example provided by the commenter which is outside of the control of the Met Council.</p> <p>The comment about tying zoning conformance to LCA is noted. As noted, LCA eligibility is tied to requirements that are specific to affordable housing and land use guidance.</p>

Comment	Response
<p>developed sufficient sewer capacity to serve multifamily housing at that location. The lack of sewer capacity also helped kill the affordable project, raising the question of how serious the city really was in designating this location to meet its affordable housing obligations and demonstrating the need to require cities to designate only land actually available for redevelopment.</p> <p>As the Council is aware, zoning barriers are a major impediment to building more housing of all kinds, but particularly affordable housing. We are pleased to see that the Council was able to obtain a PRO grant from HUD to offer technical expertise to cities and to encourage them to undertake zoning reform. We support the use of incentives to achieve policy goals where they really work and where there are not adverse consequences. But, as the Council is aware, its relationship with local governments requires a combination of incentives and requirements. Incentives only go so far.</p> <p>Cities' failure to conform their zoning to their comprehensive plans is a long-standing problem, due largely to the fact there are no practical consequences for failing to rezone. There are relatively simple steps the Council can take, however, which could go a long way to fixing this problem.</p> <p>The Livable Communities Act program was designed to offer grants to cities in exchange for city commitments to certain public policy goals. For example, the Council requires as a condition of LCA eligibility, negotiation of affordable housing goals and a city adoption of a Fair Housing Plan. We would note that exclusionary zoning practices such as described above, should be just the kind of issue addressed by a local Fair Housing plan. The Council has stated in the draft plan the desire to strengthen local Fair Housing plans. Addressing exclusionary and unnecessary zoning barriers would be the most useful improvement. Minnesota statutes set general requirements for Met Council administration of the LCA program but leaves to the Council the adoption of the details of eligibility conditions for cities.</p> <p>In the Housing Policy Plan, the Council should amend LCA procedures to require that to receive a LCA grant, a city must demonstrate its zoning is in conformance with its comprehensive plan. There will be timing issues to work out since LCA grants could be awarded before, during or after comp plan updates. Adopting this eligibility requirement would provide a powerful incentive for cities to follow the law and would also be fully consistent with the statute creating the LCA program.</p> <p>The draft Plan does link LCA to cities' land guiding obligations, but only by making cities ineligible for LCA if they fail to guide sufficient acres at</p>	

Comment	Response
<p>appropriate densities in their comprehensive plans. But as noted above, guiding land is all too easy to do, and too often not in the spirit of the statute. LCA eligibility should be linked both to realistic land guiding and to subsequent zoning conformance.</p> <p>Finally, consistent with the Plan's emphasis on equity and inclusion, the Plan should expressly make it clear that a city's failure to comply with the statutory requirement to rezone consistent with the comprehensive plan, could result in affordable housing barriers that violate federal or state fair housing laws and be subject to legal remedies.</p>	
<p><b>May Township</b></p>	
<p>Housing Type Directive. The draft of the land use policies state that there cannot be a land use designation without more than one "housing type." The Town of May is a predominantly 1 unit per 10 acres community and all on septic systems. Allowing accessory dwelling units or twinhomes is not appropriate without public sewer.</p>	<p>We agree and will clarify the policy language. This requirement only applies to communities within the MUSA.</p>
<p>Supporting Urban Agriculture. Under Objective 1, Policy 3, Action 5, there are statements regarding "supporting urban agriculture" and establishing standards for the definition of farm and allowing structures like "hoophouses." Communities like the Town of May, which are rural by nature, many times have to consider the needs of productive agriculture against metro area influenced development pressures. The Town is a mix of farms, rural residences, and natural areas. Conflicts often arise between the different uses. The Town balances these interests in the best possible manner for its community and residents and would like to ensure that the Met Council continues to respect this local level of decision making.</p>	<p>The Met Council agrees that individual communities are the best equipped to balance the tensions that can arise between agriculture, preservation, and residential land uses. These actions are not envisioned as usurping the role that zoning codes play in balancing those needs, but rather as opening up options for more urbanized communities to permit additional agricultural activity in desired locations.</p>
<p>Agricultural Preserves Program. The Town of May often reguides properties from the 1 per 10 density to the 1 per 40 designation to allow for property owners to enroll in the Agricultural Preserves Program. The Town would appreciate the Metropolitan Council coming up with an expedited procedure for allowing these designation shifts without the Town having to spend time processing these minor amendments.</p>	<p>The Met Council appreciates the Town of May's support for the Agricultural Preserves Program and currently has policy in place that allows for the administrative review of comprehensive plan amendments that facilitate the enrollment of parcels into the program. The Met Council will continue to work towards streamlining the process for eligible parcels to enter into the Agricultural Preserves Program, though some requirements, particularly those relating to density, will by their very nature continue to necessitate comprehensive plan amendments.</p>

Comment	Response
<p><b>Metro Cities</b></p>	
<p>Generally, Metro Cities’ review of the provisions related to the land use policy plan finds the need for greater clarity and specificity in terms of what will be required for cities, and in some cases, which regional or local entities are responsible for specific actions and requirements.</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. Additionally, adjustments will be made to add clarity of roles for the Met Council or the local government. The final document will also provide a summary of policies and actions by Urban or Rural Service area (and by community designation, where applicable).</p>
<p>Metro Cities recognizes the need for a regional density policy, including minimum density requirements, that allows the Metropolitan Council to effectively plan for and deliver cost-efficient regional infrastructure and services. Regional density requirements must be sufficiently flexible to accommodate local circumstances, needs and constraints, as well as the effect of market trends on local development and redevelopment activity. The Metropolitan Council must work closely with local governments in establishing or revising density requirements and should ensure they comprehensively reflect local densities and land uses.</p>	<p>We 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. However, any changes made to provide local flexibility must be consistent with regional goals. Market conditions, current local plans, development trends, and more were considerations as the density policy was developed for Imagine 2050. We look forward to continuing to collaborate with you and local governments on these requirements.</p>



Comment	Response
<p>The policy requires allowance of more than one housing type in a residential land use category. Metro Cities recognizes the Metropolitan Council's role in managing land use to provide for regional systems and supports tools to increase housing opportunities. However, Metro Cities opposes requirements that impede or eliminate local decision making over land uses and zoning, and that would constrain cities from addressing local circumstances and needs. Metro Cities is concerned about the language of this policy along these lines, and requests that the Council provide additional information on the intent and purpose of this requirement. Metro Cities will provide further feedback on the policy once the association has further information from the Metropolitan Council.</p>	<p>Land use categories which allow more than one housing type within residential land use categories encourage mixed-income developments, diversity of housing types within neighborhoods, and broader access to housing for more people. Local governments still retain local control through zoning ordinances which have a many-to-one relationship with land use categories. This means that the local regulatory mechanism implementing land use policies in the comprehensive plan (zoning) can have more than one district associated with a single land use category, which is common and enables the local government to differentiate densities between neighborhoods. Additionally, broader land use categories that allow for more housing types often require fewer comprehensive plan amendments which saves time during the development process. Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed.</p> <p>As part of 2040 Plans, in the checklist of minimum requirements all land use categories were required to "include types of allowed uses and the minimum and maximum densities ('the allowable density range') for all categories that allow residential uses. Allowed uses should include a description of allowable housing types such as single family, detached, duplexes, townhomes, etc." This is not proposed to change and if missing in the 2040 Plan, can be reconciled as part of the local government's 2050 planning process.</p>

Comment	Response
<p>The land use policy proposes that density requirements should be met each planning decade. This policy requirement requires further information, and a stated purpose.</p>	<p>For Thrive MSP 2040, local plans calculated the minimum density requirement based on the acreage identified for new development or redevelopment between the date of the plan (for example, 2018) and the planning horizon (for example, 2040). For land use and density purposes, communities were not required to divide the planning period into smaller timelines and only needed to meet the minimum density requirement over the entire period.</p> <p>However, that approach led to more lower density developments being planned for the near future and in some cases, higher density development was postponed to a later time in the planning horizon (i.e. 2040). This cycle delays higher density development with each consecutive planning cycle as comprehensive plan updates occur every 10 years. Calculating minimum density by decade will ensure that local governments meet density requirements in each decade, and higher density developments are also planned for the more immediate future. Shifting to per-decade density calculations may result in fewer lower-density developments being planned for the initial decade of the period, aligning with regional objectives for increased density. This approach could assist some local governments in meeting their affordable housing planning requirements for the first decade without postponing higher-density development to later periods to achieve overall density targets. Additionally, this approach does not require new planning tools. Local comprehensive plans already identify stages or phases of growth in 10-year increments, so the foundation for this work already exists as part of planning requirements.</p>
<p><b>Minnesota Department of Health</b></p>	
<p>Within the Land Use Policy, consider using the industry standard language of “vulnerable areas of water supply” rather than “very highly vulnerable area of water supply”. Suggest explicitly including both groundwater and surface water drinking water sources in “natural systems.”</p>	<p>These changes are under consideration through coordination between the water policy and land use policy teams.</p>

Comment	Response
<p>The list of water considerations that influence planning choices doesn't explicitly mention legislation, court decisions, or groundwater and surface water drinking water supply management areas (DWSMAs) as distinctly separate types of management areas. These are important factors when considering land use planning.</p>	<p>As stated in that section, "Local governments may also find these data sources important as they commence their future land use planning and in determining the most optimal location for various uses within their communities." The list of Water Considerations included on pages 6 and 7 of the Land Use Chapter is not meant to be all inclusive of extraneous circumstances that impact local planning, but only refer to available data sources. The Met Council will provide and link to these data sets as technical assistance and resources to local governments.</p>
<p>Within the community designations, consider "legacy contamination" as a "significant environmental challenge" within the Urban and Urban Edge designations. Many of these communities have significant environmental clean-up efforts which influence land use planning. Also, it is important to note that there are higher proportions of residents relying on private wells for their primary supply of drinking water in the Diversified Rural, Rural Residential, and Agricultural community designations compared to the others. Private well users have limited protections. Protecting these private well users from the negative consequences of land use decisions should be included in the Land Use Objectives, Policies, and Actions section.</p>	<p>O1, P5, A1-A4 commit the Council to working to protect groundwater/water supplies for ALL users, including private wells. We look forward to parting with MDH on the development of guidance and implementation support tools.</p>
<p>The Agricultural community designation mentions "higher vulnerability drinking water areas, as well as high potential for groundwater surface water interactions." The vulnerability of DWSMAs does not depend on the presence of agriculture as this section implies. It is also unclear how "the high potential for groundwater and surface water interactions" was determined. While there are interactions between groundwater and surface water in these communities, the interactions are not limited to these communities, and many of the communities with the most significant groundwater and surface water interactions would fall under a designation other than Agricultural.</p>	<p>The Community Designation descriptions are meant to describe the current state of the landscape within communities with those designations. As is noted in other descriptions, like Diversified Rural, agricultural uses exist across designations in addition to within the Agricultural designation. The presence of certain key features are noted across all descriptions. In the case of Agricultural, DWSMAs were noted based on the analysis that Council staff had performed as part of its work on the regional water supply plan.</p>

Comment	Response
<p>It is strongly suggested that the Land Use Policy be reviewed to ensure that it aligns with the Water Policy Plan. In particular, residential density requirements do not include available drinking water as a consideration, as suggested by the Water Policy Plan. This is especially important in areas where access to high quality drinking water is limited, such as the northwest metro, communities within five miles of White Bear Lake, and southern Washington County. These areas are dealing with limited water supplies due to limited access, whether due to geography, legislation, court orders, or contamination.</p>	<p>Local governments are responsible for developing local water supply plans to accommodate forecasted growth and development to meet the needs of all people they serve, for both now and in the future. We acknowledge that some communities face water supply challenges across the region and the Met Council supports local governments address all planning challenges through technical assistance, tools, and resources. Land Use Objective 1, Policy 5, in fact, speaks to this in an Action which states, "Local water supply plans, as part of the local comprehensive plan, shall adequately demonstrate availability of clean, safe drinking water in areas where forecasted growth will be accommodated."</p>
<p>In objective 1, priority 5, action 4, regarding local water supply plans, consider adding language to ensure that the local water supply and land use plans align.</p>	<p>Thank you for the comment. This will be considered in coordination with the water policy team.</p>
<p>In objective 1, priority 5, action 5, best management practices should protect drinking water sources in addition to surface water.</p>	<p>This change has been made.</p>
<p><b>National Park Service</b></p>	
<p><b>Transportation River Crossings</b>  As the metropolitan area continues to grow and expand into less developed areas the need for new river crossings will continue to be proposed. New river crossings can pose significant impacts to the natural and cultural resources of the Mississippi River. The NRRRA Comprehensive Management Plan possesses a specific policy for determining the compatibility of new crossings. NRRRA recommends identifying this policy in any framework around new vehicular, transit, pedestrian, or bike crossings within the NRRRA. This policy ensures that new bridges are evaluated based on their potential impacts on river resources, and we recommend incorporating this evaluation process into the Imagine 2050 Plan to protect the integrity of the river corridor while facilitating regional growth.</p>	<p>The Met Council agrees the Mississippi River is an important natural and cultural resource to our region. The Transportation Policy Plan does not include any new bridges over the Mississippi River. The Riverview corridor transitway project which did include a crossing over the river and would have potentially required significant modification of the existing TH5 bridge has been removed from the plan.</p>
<p><b>Neighbors for More Neighbors</b></p>	

Comment	Response
<p>We strongly support the policies to:</p> <ol style="list-style-type: none"> <li>1. Require municipalities to allow at least 4 units/acre within the MUSA,</li> <li>2. Require municipalities to allow diverse housing types on all residential land, and</li> <li>3. Carefully plan expanded areas where higher density housing near transit stops and existing or planned businesses are permitted.</li> </ol>	<p>Thank you for your supportive comments.</p>
<p>#1 and #2: Require municipalities to allow at least 4 units/acre within the MUSA, with higher density in existing suburban, urban-edge and urban communities (Landuse P2, A3) and allow for more than one housing type in residential zones (Landuse P2, A6) We comment on these aims and policies together because of their close relationship. As Imagine 2050 notes the production of duplexes, triplexes, fourplexes and accessory dwelling units (ADU) has been minimal since 2002. These types of homes are not produced because they are not allowed on the vast majority of residential land in the Metropolitan Council area. Taken as a whole, zoning regulations throughout the Twin Cities offer people two predominant types of homes: detached houses on large lots on streets with low traffic volumes; or smaller homes in large apartment buildings on streets with higher traffic volumes. There are only limited exceptions to this rule. Both of these housing forms increase private and public costs: detached single family dwellings require more land than most families desire. As Imagine 2050 notes, the public cost of requiring large lots for a single home is the inevitable pressure to expand housing into farmland or wetland at the edges of the metro. And the costs for multi-story apartment buildings are significantly higher per square foot than for 2-4 story buildings.</p>	<p>Thank you for your comments.</p>

Comment	Response
<p>There is significant room for infill housing throughout the Twin Cities. Given the age of the housing stock in the region, opportunities for infill will be scattered, and will differ between different community types. In urban and urban edge communities, with older housing stock and smaller lots, infill housing will more often replace existing structures that have deteriorated. In suburban and suburban edge communities with larger parcel sizes and newer construction, the housing stock is unlikely to need replacement. However, parcel sizes in suburban (edge) communities are sufficiently large that municipalities should be required to allow lot splitting to enable the construction of townhouses, 2-6 “plex” homes, and cluster developments or ‘cottage homes’ sharing common yard space. The rules that enable infill housing should be similar across the region so that residents of the Twin Cities and the construction industry can plan predictably. Similar rules about building bulk and design will allow the construction industry to develop a range of standard infill housing types that can be easily adapted to different land parcels throughout the region.</p>	<p>The Met Council's policies support infill and redevelopment by promoting flexibility to address unique infrastructure needs and achieve regional goals, such as economic growth, environmental sustainability, and equitable development. By encouraging redevelopment, infill, and adaptive reuse, the Council prioritizes efficient land use and revitalization of underutilized areas while mitigating impacts on natural systems through strategies like de-paving and environmental remediation. Established grant programs provide technical assistance and funding to address financial gaps often associated with redevelopment, such as clean-up efforts and adaptive reuse. Additionally, the Council will support data-driven decision-making through a redevelopment monitoring program.</p>
<p>#3: Plan for higher densities near high frequency transit (Landuse P2, A5) The regional transit system is a strong point of the Metropolitan Council's responsibilities. Building on the strengths of the transit system is important. In urban and urban-edge communities that already have the population density needed to support all-day bus service, small-scale infill housing will strengthen the performance of regular route transit service. The performance of the arterial BRT network has been strong since its introduction. Municipalities with arterial BRT service should be required to allow significantly higher housing density within a 400 yard radius of half-mile stop spacing. Because arterial BRT is running through already-developed areas, infill construction needs to make more efficient and intensive use of land than the existing housing does. Within a 400-yard radius of arterial BRT, a minimum expectation should be that 4-story residential buildings with no limitation on floor area ratio are allowed by right. It is important that cities allow additional homes per acre off of transit corridors, so that people choosing to live in multi-family buildings can choose between living on busier or quieter streets.</p>	<p>The Met Council agrees with the comment with minor clarifications. Imagine 2050 requires planning for higher density housing within a slightly greater distance than suggested – 440 yards (¼ mile) instead of 400 yards - of arterial BRT stations. Also, the comment suggests 4-story residential buildings be allowed by right. The Met Council does not prescribe building forms since development controls are a municipal authority, to be worked out in the local comprehensive plan and implemented through local official controls. However, development at the required densities (between 15 to 30 units per acre on arterial BRT routes) is likely to result in an urban form similar to what is suggested. Refer Table 4 of the Land Use Policy chapter.</p>

Comment	Response
<p>As Imagine 2050 notes, higher densities are appropriate around light rail stations. However, in its current form, Imagine 2050 allows for fewer homes near LRT in suburban communities vs. urban communities – and there is no clear rationale for why this should be. Given the region’s significant and ongoing investment in light rail and the ability of rail to scale with demand and density, it is appropriate for station areas to be given uniform guidance throughout the region.</p>	<p>The requirements noted in the comment are a result of several influences. Density requirements overall are lower for suburban areas; this aligns with lower infrastructure capacity in these areas. Each area of the region is on its own development and redevelopment trajectory. The densities required in Imagine 2050 press each local government to do its part in utilizing transit investments. The requirements for jurisdictions within the Metropolitan Service Area (MUSA) in Imagine 2050 are minimum expectations; local governments are free to exceed these if the market bears it.</p>
<p>We ask that Met Council sets clearer guidance for cities on the building forms required to meet these targets:</p> <ul style="list-style-type: none"> <li>● Mixed use: Imagine 2050 should give clearer guidance on the requirements for municipalities to allow mixed commercial and residential uses around high frequency transit. Within a half-mile radius of light rail, low-impact commercial uses should be broadly allowed.</li> <li>● Performance metrics and progress: Imagine 2050 sets reasonably ambitious goals for cities throughout the region. In past cycles, some municipalities have not updated zoning to match the density goals of their comprehensive plan. In order to meet the goals of these policies, it is important to monitor cities for their performance in implementing guidance on land-use and housing. At a minimum, there should be transparent public reporting on whether cities have allocated sufficient land to meet zoning density requirements. The Council could facilitate municipal compliance by supporting cities in adopting a baseline of zoning regulations that would meet density goals, particularly around transit stations. Examples of possible ways to reach the desired density goals would allow municipal control, while balancing the broader regional goals.</li> </ul>	<p>The Met Council provides technical assistance and support for the local comprehensive planning process in many ways whether that is guidelines, tools and resources, grants for eligible communities, or direct planning support through the Sector Rep program. This is inclusive of establishing requirements for planning around transit station areas. The local comprehensive plans include land use plans that demonstrate how they will meet average minimum residential densities for their forecasted growth based on their community designation and around high frequency transit stations, if they have any. Municipalities are legally required to update their local zoning ordinances to comply with the Comprehensive Plan within 9 months of Comprehensive Plan adoption. Implementation of zoning ordinance updates is a municipal responsibility, and local Comprehensive Plans are the definitive legal base for land use decisions, whether or not zoning is consistent.</p>
<p>Walkability is a key factor for thriving communities. And we need the population density to support local businesses, so that people can choose to walk, bike, or take transit to their destinations. The EPA showed that about 20 du/acre is needed to support corner stores and local businesses. Allowing more homes in commercial areas and near business nodes is a vital step towards lowering Vehicle Miles Traveled (VMT) and creating livable vibrant neighborhoods.</p>	<p>The Met Council agrees with the need for walkability, and the mix of activities in an urban form that supports walking and other non-car travel. Mixed-use development in walkable areas is encouraged in Imagine 2050 in land use and transportation policies and actions. In particular, land use policy objectives 2 and 3 support walkability, although it is supported throughout.</p>



Comment	Response
<p>Neighbors for More Neighbors supports the goals of Imagine 2050. We believe all communities within MUSA have the ability to grow. And they should grow up, not out. We encourage the Met Council to rise to the moment and provide accountability to cities to meet their commitments to build more homes and plan for growth in a climate conscious way.</p>	<p>You suggestions are consistent with the Council's policies to support increased densities in Imagine 2050, including community-wide, within station areas, and to support the allocation of affordable housing need. In addition, policies in the Land Use and Housing chapters both support reducing building-related emissions, particularly in residential buildings.</p>
<p><b>Scott County</b></p>	
<p>It is notable that this draft policy plan states that, based on capacity within the existing MUSA boundary, the region has more than 100 years' worth of land supply to serve the rate of projected population and employment growth. This statement and data point will likely be referenced in any discussions or negotiations between our cities and townships in Scott County on the topic of urban growth and annexation that involves land beyond the existing MUSA boundary.</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>
<p>It appears Jackson Township moved from "Diversified Rural" in the 2040 community designations to "Suburban Edge" in the 2050 community designations. We assume this reflects the fact that Jackson Township has an Orderly Annexation Agreement (OAA) with the adjacent City of Shakopee. If the 2050 community designations for township areas are intended to reflect current OAA boundaries, please note the following: The Spring Lake Township-City of Prior Lake OAA boundary has been modified in an updated agreement and map adopted by both jurisdictions in August and September of 2024. Portions of this new OAA boundary area shown as "Suburban Edge" on the 2050 map will need to be modified.</p>	<p>Your assumption about the community designation is correct and the change for Prior Lake and Spring Lake Township is noted. We update these datasets on a quarterly basis. The next scheduled update is in January 2025, which will be before Imagine 2050 is adopted. We will make the adjustment to show the corrected boundary.</p>
<p>This Board supports the 2050 Land Use Plan's continuation of overall density expectations for communities designated as "Rural Residential" (1 per 2.5 acres existing/1 per 10 acres where possible), "Diversified Rural" (4 per 40 acres) and "Agricultural" (1 per 40 acres). This remains consistent with Scott County's land use guidance and zoning.</p>	<p>Thank you for your comment.</p>

Comment	Response
<p>This policy plan should clarify the definition of Urban and Rural Service Areas. We recommend that all plan objectives, policies, and actions clarify expectations for "rural centers" as it relates to "urban service areas." The cities of Belle Plaine, Jordan and Elko New Market are designated as a "Rural Center." Belle Plaine and Jordan provide their own municipal drinking water and wastewater treatment services; Elko New Market is connected to the regional wastewater treatment system. The policy 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 these cities place in the regional policy framework. Therefore, we request the language be appropriately restated to plainly state "rural 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. 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>Policies and actions contained under Objective #1 , in aggregate, order the form (density, staging, type of housing allowed, etc.) and pace (rigid decision-making at local level regarding sequence of parcel take down) in a top-down directive manner. This is without regard to ever-changing variables including: economic conditions, what can get approved, what the market wants/will bear, or current property owner mindset. The fact is circumstances can and do change and the burden of regional policy restrictions should ideally be responsive, resilient, and accommodate change without adding process and cost.</p>	<p>The Council is directed to plan for the orderly and economical development of the region, including effective stewardship of regional infrastructure investments to support regional growth and administering the requirements of the Metropolitan Land Planning Act. Objective 1 continues many of the policies and practices of past regional plans regarding setting density standards and staging of development in 10-year increments, in addition to refining and responding to changing market conditions, which help the Council to carry out its legislative directive. We understand the uncertainty of knowing when a certain property owner might want to sell or when there might be the next economic recession. All of these factors are considered both in our forecasts and in how we support local governments in developing their local comprehensive plans.</p>

Comment	Response
<p>Adding higher density standards, requiring local jurisdictions to make increasingly constrictive assumptions about what land is going to develop when, forcing local zoning district change which has been the subject of discussion at the legislature, controlling sewer expansion permits, and making comprehensive plan amendments the only route to accommodate change are headwinds for housing development. Wouldn't a flexible, inexpensive planning process promoting development flexibility, collaboration and information exchange between local governments and Metropolitan Council better respond to the unique nature of individual developments while maintaining the Metropolitan Council's policy interests?</p>	<p>Scott County is delegated responsibility for land use planning by the Townships within its boundary. These are largely the rural and agricultural areas within the County which do not have density minimums. Instead, density maximums are applied to these land uses so that they are protected from development pressures and preserve the region's agricultural economy. This has not changed from previous regional plans. Sewer permits are regulated, in part, through Minn. Stat. §473.513 which requires consistency with the local comprehensive plan. This has not changed.</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. Regional planning must be completed on a defined timeline 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> <p>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>

Comment	Response
<p>Several actions proposed in this policy plan appear to place additional reporting and regulatory directives on local governments. For example, establishing another monitoring program (redevelopment), further reporting on building permits, requiring local jurisdictions to update parking regulations, requiring greenhouse gas emissions inventories and projections, requiring development and funding of policy incentives supporting nature based climate adaptation solutions, requiring streamlining of local processes, requiring adoption living streets policies, required tracking/monitoring of residential and commercial components in mixed use districts, and incorporation of placemaking initiatives. Some actions have been softened by incorporating modifiers such as 'consider' or 'examine.' We recommend the Metropolitan 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>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. For additional clarity, the final document will provide a summary of policies and actions by community designation. Adjustments will also 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 and direct technical assistance through the Sector Representative Program. These resources alleviate some, but not all of the impact to local governments from the decennial planning process, and they are intended to assist meeting minimum planning requirements to the extent possible. We also use existing processes like the Plat Monitoring Program and the annual building permit survey to collect information to the extent possible, understanding that reporting requirements take time from local staff and the intention is to alleviate that as much as possible, while still being able to receive necessary information for regional policy implementation. However, 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, also requires new minimum requirements for local governments in the areas of climate mitigation and adaptation. When it comes to some of the climate commitments in the policies/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 minimum requirement for local governments would tend to be supported by Met Council technical assistance and resources. The Met Council has a GHG inventory and strategy planning tool that communities can use to make meaningful commitments on GHG reductions. The Met Council will provide technical assistance on how to use this tool.</p>
<p>It is noted that the 2050 Land Use Plan's policy states that any expansion of the "Rural Residential" community designation is inconsistent with regional goals and objectives and considered a departure from regional system plans.</p>	<p>This is correct.</p>

Comment	Response
<p>This Board supports the 2050 Land Use Plan's policy encouraging orderly annexation agreements between growing Rural Centers (as well as Suburban Edge communities) and adjacent townships to encourage planned and orderly development in rural areas.</p>	<p>We acknowledge that some Suburban Edge communities also have orderly annexation agreements and will add that reference to the policy language. Thank you for ensuring that these references are accurate.</p>
<p><b>Twin Cities Housing Alliance</b></p>	
<p>We are deeply involved in finding practical solutions to address the alarmingly short supply of housing and work to advocate for policies and programs that support more housing supply, ensure that there is quality well maintained existing housing and that there are protections for those most vulnerable to housing instability. This requires partnership across the entire housing ecosystem and with the public sector. We are attaching our policy framework which recognizes the role of the Metropolitan Council in supporting policies and programs to increase housing supply, opportunities and affordability.</p>	<p>Comment noted.</p>

Comment	Response
<p>TCHA Supports/Encourages:  Proposed increases in minimum densities across all communities and in areas near key regional transportation investments. As noted in the density report, many developments far exceed the minimum densities. We would encourage increasing these minimum densities, particularly in areas near key job centers and areas with access to infrastructure and amenities.  Holding cities accountable to higher densities in all areas of the region by proactively aligning zoning with comprehensive plans.  Provide enhanced technical assistance to support those cities with limited capacity to ensure the alignment of zoning with comprehensive plans occurs within the timeframe set by State Statute.  Providing flexibility in guiding land at higher densities to create more affordability in housing across all areas of the region. In a time when the region has a severe housing shortage of over 80,000 units, ensuring that more housing development of all types and at all incomes levels is supported and encouraged is critically important including:</p> <ul style="list-style-type: none"> <li>o Streamlined and standardized approval processes</li> <li>o Relax parking requirements and partnering with the development community to ensure that parking meets the needs of the project</li> <li>o Reduce local fees, particularly for affordable housing projects</li> <li>o Expand use of local finance tools and resources</li> <li>o Allow multifamily housing in exiting commercially zoned area</li> <li>o Support conversion of economic obsolete buildings to housing</li> </ul>	<p>Minn. Stat. §473.858, subd. 1 requires local governments to ensure that local zoning ordinances conform to all aspects of the adopted local comprehensive plan, including the land use plan. This requirement has not changed. Additionally, local governments are required to meet the requirements of Minn. Stat. §473.865 which requires local official controls to be amended within 9 months following amendments to comprehensive plans. The Livable Communities Act (LCA) Policy Development grant program to advance equitable development patterns, may be able to provide funding assistance to update local ordinances to meet these statutory requirements and assist local governments meet these requirements.  We 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 and implement the 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. The Met Council looks forward to working with local governments through the update/review of those guidelines.  Many of the bullets listed in the comment refer to parts of the development process controlled by local governments. The local approval process, parking requirements, local process fees, local finance tools, zoning, and redevelopment/adaptive reuse are not within the Met Council's authority to regulate at a local or regional scale. Imagine 2050 provides supportive policy language, technical assistance, tools, and resources which encourage local adaptation of these efforts and more. Through local and regional partnership, public and private, the goals of Imagine 2050 can be realized.</p>

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<p><b>Washington County</b></p>	



Comment	Response
<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. Specifically land use and transportation.</p> <p>The County's role in land use is limited to shore land areas in the unincorporated areas of the County. We retained this role to protect our valuable water resources and related ecosystems. We also protect high value habitat through our Land and Water Legacy Program. The County supports the Council's policy to direct growth away from sensitive ecosystems and water sources and the policy to identify natural systems to protect and restore.</p> <p>The County has permit authority over the aggregate mines in the unincorporated areas of the County. While this land use can cause tension between neighboring uses, the County supports the policy to stage development to protect the viable remaining aggregate resources.</p>	<p>Thank you for your supportive comments.</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><b>Waterford Township</b></p>	
<p>Regional Development Guide</p> <p>I wanted to add my opinion on the Rural Density Policy. I have considered that maybe we should consider 2 per 40 if they were say 2-2.5 acre buildable lots. Maybe larger lots I guess but the idea is to preserve ag but also capitalize on additional tax base with more housing.</p>	<p>The Township has an Agricultural community designation which continues the long-held practice to protect the region's agricultural economy from premature development pressures. This does permit only 1 unit per 40 acres for residential use and is carried forward from Thrive. Farming activities support the economic competitiveness of the region and promote local food production. Most of these areas are enrolled in the Metropolitan Agricultural Preserves Program and are discouraged from higher density development.</p>

Comment	Response
Objective 4, Policy P2, A2: Will the natural system corridors be identified? What requirements are expected for cities to incorporate measures for conservation easements and wildlife friendly development standards?	The Met Council is developing a technical assistance package to assist communities with planning for natural systems and developing strategies, such as corridor planning, conservation easements, and wildlife friendly development standards. However, any requirements will be broader than these specific strategies.



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