

Minneapolis CPED/Minneapolis Public Works

Detailed staff comments on Metropolitan Council draft Transportation Policy Plan as of 9/3/14

GENERAL COMMENTS, by topic

Sustainable System

We support the statement that “freeway-building growth patterns are unsustainable,” and its focus on maintaining existing infrastructure and making focused and deliberate choices regarding additional investments. In an era of limited resources, this is a prudent and sustainable course. In terms of infrastructure, we support a “fix it first” approach; as such, we encourage the prioritization of projects that don’t require highway capacity expansions to be completed.

We also support the concept that the region as a whole needs a fully integrated approach to planning for the future which incorporates all of the regional systems – including transportation, housing, water, and parks. We recognize that this document does call out some connections to the other policy plans, and call for even further recognition of the interrelationships between these systems (and within the body of each policy plan). For instance, project prioritization and funding should provide an advantage to projects that meet multiple goals across the systems.

Finally, we support the development of a regional system that strengthens the urban core. The health, vitality, and growth of the urban core are essential to the overall strength of the region.

Funding

We support the Metropolitan Council leveraging its existing resources, tools, programs and funds to help meet the overall transportation goals of the plan. However, as the draft policy plan notes, the current revenue scenario is inadequate to meet identified needs. The City of Minneapolis further supports identification and allocation of additional resources needed to meet these needs. This includes support for local funding sources where appropriate.

Multimodal System

We support the Metropolitan Council’s plan for a fully multimodal system, but particularly prioritization of investments in bicycle, pedestrian, and transit infrastructure. Building out these systems is critical to development of a sustainable transportation system in the long term. We support the addition of regional bicycle route planning and prioritization, and the further integration of pedestrian facilities into transportation projects. As these systems are developed, we encourage the Metropolitan Council to consider and implement strategies to support the systems functioning together – for instance, though online tools that allow travelers to use multiple modes efficiently when making a trip.

Land Use

The City of Minneapolis supports the plan’s commitment to encouraging higher densities in transit station areas, and reflects this in its plans, policies, and regulations. Supporting land use patterns are key

to developing and sustaining an effective transit system. Likewise, building out a robust transit system is critical to building out higher densities and realizing the Metropolitan Council's population projections for Minneapolis and surrounding communities. We also support continued work to coordinate land use and transportation policy, and refinement of population and employment projections based on both existing trends and policy directions.

Streetcar

We support the Metropolitan Council's recognition within the TPP of the evolving role of Modern Streetcar in the regional transitway system and support the Metropolitan Council's ongoing work to develop regional policy on Modern Streetcar. The City of Minneapolis supports the inclusion of the Nicollet-Central Modern Streetcar as a "Modern Streetcar Acceleration Opportunity" within the "Current Revenue Scenario" and will be working with the Metropolitan Council in the coming months to fully approve the recommended Locally Preferred Alternative, submitted by the City of Minneapolis to the Metropolitan Council in October 2013, as a "Transitway Expansion Assumed to be funded within the Current Revenue Scenario" project within the TPP, similar to the Blue and Green Line LRT extensions, the Orange Line, and the first four arterial BRT projects. The City is committed to advancing other streetcar projects in the Minneapolis and Saint Paul long-term streetcar network plans, including Midtown and West Broadway.

This City of Minneapolis strongly supports including Modern Streetcar as a transitway mode in this TPP Update, similar to LRT, Highway BRT, Arterial BRT, Dedicated Busway, and Commuter Rail; however, we understand and are eager to participate in the ongoing policy discussion that is likely to result in including Modern Streetcar as a transitway mode in a future amendment to the TPP. Modern Streetcar has a significant regional benefit. It will allow the region to develop a broader rail transit network and attract more people, jobs and investment to these connected transit corridors. The current definition of transitways in the TPP significantly limits the opportunities for the region to expand the rail transit network beyond the Blue and Green LRT lines and Northstar Commuter Rail line. There are no other future LRT corridors identified in the region that have both the physical right-of-way for an exclusive runningway and the transit market potential necessary to support an LRT investment. Modern streetcar and light rail transit (collectively defined in Europe as "tramways") are fundamentally very similar technology. Modern streetcar vehicles are small light rail vehicles, the smallest of which is larger than an articulated bus. However, Modern Streetcar and Light Rail Transit differ in how they're designed and operated on the street. Modern streetcars typically have closer stop spacing than LRT over shorter distances, single car vehicles, less substantial passenger facilities, and operate in mixed traffic; however, they can operate similar to light rail with wider stop spacing, trained vehicles, exclusive lanes/tracks, and more extensive passenger facilities. Including Modern Streetcar as a transitway mode - or alternatively expanding the definition of Light Rail Transit to address shorter corridors with closer stop spacing and the ability to operate in mixed traffic lanes - will allow the region to extend the rail transit network to more places with high transit rider demand and strong transit-oriented development opportunities. As noted above, the City of Minneapolis believes that building out a robust transit system – including Modern Streetcar - is critical to building out higher densities and realizing the Metropolitan Council's population projections for Minneapolis and surrounding communities.

Freight

The City of Minneapolis supports a robust freight system for the region, as important for both transportation and economic development. In addition to what is outlined in this plan, this should include strengthened partnerships between the Metropolitan Council, rail and shipping companies, MnDOT, county rail authorities, and local jurisdictions to address concerns and shortcomings in the existing system. This could include support for freight-related improvements to other infrastructure, to address safety, capacity, logistics, or other issues.

Aviation

As the Metropolitan Council carries out its role to plan for the orderly development of the physical, social and economic needs of the region as a whole, it is given the responsibility to assess the adequacy and location of airports. It is also expected to provide guidance to airports as they work with their intergovernmental partners to plan for the future. While the TPP reflects consideration of issues such as the physical capacity of airports and their ability to accommodate growth, a full review must also consider how the airport affects the people and environment around it.

In the TPP draft, the Council states that “the planning, development and operation of the region's aviation facilities should be conducted to minimize impacts upon the cultural and natural environment, regional systems and airport communities.” We appreciate this statement and it is clear that the Council shares our interests in this regard, but the TPP currently lacks detail about how this will be carried out in practice.

The City of Minneapolis recognizes that a successful international airport is a valuable asset and important to our local and regional economy. We also know that an airport can cause negative impacts on adjacent communities including noise pollution and air pollution, with health impacts for residents. Noise affects the desirability of Minneapolis as a place to live and work with consequences for our tax base and local economy. In order to maintain balance and the livability of our city, Minneapolis has consistently articulated the following noise-related goals:

- Reduce the overall noise footprint of MSP
- Enforce the regional standard of the 60 DNL for noise mitigation
- Decrease noise in unmitigated areas around MSP
- Adoption of a noise metric other than DNL that better reflects the experience of people on the ground

The Metropolitan Council should acknowledge these issues (in both the TPP and the Housing Policy Plan), and look for tools to prevent or mitigate impacts.

We would like the Metropolitan Council to adopt these and other related goals to provide guidance to airports. The Council already supports the standard of 60 DNL for noise mitigation and that support helped to establish 60 DNL as a regional standard which continues to be recognized by the Metropolitan

Airports Commission (MAC) and was recently incorporated into an ongoing commitment related to noise mitigation.

Another example of what the Council is doing well, is implementing a requirement that the MAC update its Long Term Comprehensive Plans every five years. Regular updates to the MAC comprehensive plan for MSP will ensure that the region has up-to-date information about operation forecasts, facility needs, and environmental impacts. We are pleased to see this commitment and the support of 60 DNL carried forward in the current draft of the TPP.

There is, however, more that can and should be done. We would like to see the Metropolitan Council articulate clearer expectations related to amount of air and noise pollution considered acceptable and to support additional common sense measures that can help prevent or mitigate impacts. An example would be supporting the Runway Use System, a tool that is recognized by the FAA and the MAC as a technique to reduce noise over the most heavily populated areas around the airport. While it will take time to fully develop these practices, we would appreciate the Metropolitan Council committing to the following:

- Adopt specific policies about airports' impacts on livability, human health, and the natural environment, and review airport Long Term Comprehensive Plans against those policies.
- Develop metrics for the same areas - livability, human health, and the natural environment - that aid in understanding the full impacts of airports.
- Within this new set of measures, implement a noise metric that better reflects the experience of people on the ground rather than the method of averages employed by the Integrated Noise Model.
- Develop standards and expectations for airports (not just cities) regarding the prevention, reduction and mitigation of airport impacts.

The TPP does not currently acknowledge the tension that exists with the Council's own systems, and the Council's role as steward of our regional parks. As noted in *Thrive 2040*, a 2012 survey of metropolitan residents found that nearly half of those polled identified parks, trails or the natural environment as the most attractive feature of the region. These features promote healthy activities and make our communities a place where people want to live, work and visit. There is a tension between protecting the enjoyment of these resources and the benefits which come from the Minneapolis St. Paul International Airport (MSP). The Minneapolis Chain of Lakes was the most visited regional park in 2013 and it is also an area that experiences significant impacts from airplanes coming and going from MSP. The Metropolitan Council should acknowledge this issue (in both the TPP and the Regional Parks Policy Plan), and look for tools to prevent or mitigate impacts.

We appreciate the commitment in *Thrive* for the Metropolitan Council to “coordinate with Metropolitan Airports Commission, The Federal Aviation Administration, MnDOT Aeronautics, and local constituencies to ensure that land use and air space use around the regional airports is protected from incompatible uses.” The draft TPP, provides guidance to cities on compatible land uses, but does not provide corresponding expectations for airports to conduct operations in a manner that is compatible with

existing land use. We would like to see the Council provide some accountability, by making this part of the lens used to review capital, or long-range plans.

The Metropolitan Council is uniquely charged with a long term outlook on whether the system of airports is adequate and in the right place to serve the region. Consistent with those responsibilities, we would like to see more information about the long-term sustainability of the system. Specifically, what is the growth potential and capacity at MSP? What are the next steps if MSP approaches or exceed that capacity? Is there a point where the environmental and health impacts become unsustainable?

The Council is also unique in its role to look at the functioning of the entire system of regional airports. We urge the Metropolitan Council to use your role to better evaluate opportunities to share benefits and burdens. An example would be to recognize opportunities to provide commercial service at locations other than MSP, or exploring ground transportation issues that may help the efficiency of the system overall.

We would appreciate a show of support in the TPP that the Metropolitan Council intends to:

- Provide clear guidance on the long-term future of the regional aviation system, with a focus on the capacity of MSP, and what happens when MSP reaches that capacity.
- Develop measures of airport capacity that assess not just passenger delay, but the degree to which the airport may exceed tolerable impacts on livability, human health, and the natural environment.
- Commit to facilitating conversations with the airports across the metro area and state to maximize the efficient use of our regional and state airports and to share burdens and economic benefits.

Park-and-Rides

The references to park-and-ride lots are minimal and lack substance. Sections of the Land Use and Local Planning section reference the benefits of transit-oriented development and urban design over surface parking at rail stations in particular, but the only full section on Park-and-Ride Facilities is late in the plan on page 227. In this section, there is no policy guidance but instead a reference to a plan from 2010. This is too important of a policy document not to have more specific guidance for park-and-rides, particularly along transit lines. One option is to adjust the policy from four years ago to match the Transit Market Areas. For example, a policy could be that Park-and-Ride Facilities are not appropriate in Transit Market Areas I and II.

- The City of Minneapolis' position is that we do not support park and ride lots within the city boundaries because they hinder transit-oriented development at key locations adjacent to transit stations. Park and ride facilities also encourage driving, when a primary purpose of transit is to promote alternatives to driving. The ridership generated by urban park-and-rides can be replaced or surpassed by a combination of new development, high-quality bicycle and pedestrian connections to the station, and enhanced feeder bus service.

Feeder Bus System

There are no concrete policy statements about how to design a bus system to integrate with a new LRT or BRT line. The region should have a policy stating that all LRT and BRT stations should be connected to the larger transit system through a comprehensive bus feeder network.

Environmental Justice

We support Metropolitan Council's position to not only adhere to federal regulations, but to set higher aspirations. (See p. 61.) The demographic changes facing our region mean that this is not just about fairness, but about the future of the population and governance of this area. Deliberate steps need to be taken to advance this concept across the board, for the benefit of everyone.

Complete Streets

We support the inclusion of complete streets concepts throughout the document and support the definition on p. 100 that Complete Streets "does not mean 'all modes on all roads' . . .". We realize that implementation of this concept will vary based on existing conditions and local modal priorities, and it is important to consider it within the context of the entire network. We think further clarification of what is meant by local communities approving "complete streets policies" and the relationship of those policies to MnDOT's Complete Streets Policy is important. We also support funding and prioritization for more challenging and expensive projects that will result in significant gains to the system of complete streets, due to their proximity to job, population, and transit centers.

SPECIFIC COMMENTS, by page

Introductory Summary

p. 2, Paragraph 5 – While the document calls for it, the synergy between land use and transportation needs to be more clearly linked when overlaying the projected population and job growth with the anticipated investments in infrastructure, particularly transit.

p. 2, Paragraph 5 – Need to add a more deliberate statement about encouraging growth in jobs and population along our major transportation investments.

p. 4, Paragraph 1 – Supportive of highlighting the regional bicycle and pedestrian systems

p. 4, Paragraph 8 - This section should include a summary of the potential acceleration of modern streetcar projects within the current revenue scenario, as described on page 251 of the Transit Investment Chapter and page 53 of Part I, similar to the summaries of other transit priorities within the current revenue scenario.

p. 5, Paragraph 1 –The term “regional mobility improvements” should be defined somewhere in the document.

p. 5, Paragraph 3 – Supportive of the statement that this TPP elevates the importance of land use and development planning in support of the regional transit system

p. 5, Paragraph 5 – Regarding climate change, there are adopted goals for state agencies to operate under. Will those goals apply to the Metropolitan Council or will there be new evaluative measures adopted as part of this document?

Part 1: Transportation for a Thriving Region

p. 9, Paragraph 1 – The plan should acknowledge that people’s existing transportation choices are constrained by our current transportation infrastructure. As the infrastructure changes, so do people’s transportation options and choices. (For example, the investments in bicycling and walking infrastructure through the NTP program led to substantial increases in cycling and walking in Minneapolis.) Thus, current transportation patterns, which are heavily dependent on autos, should not necessarily dictate future transportation investments.

p. 9, Paragraph 4 – Many people may not find it surprising that a larger percentage of trips are for social and recreational purposes than for work. There is a significant percentage of the adult population that is not actively in the workforce. Based on type of trip, are there different strategies to encourage use of alternative modes of transportation? It is worth noting that we are still planning with the assumption that most trips will be by automobile.

p. 10, Paragraph 2 – The data link income and transit ridership, but describes this as related to auto ownership. It might be better to say access to a car rather than income, as this is a better indicator. (Lack of car does not equal low income.)

p. 10, Paragraph 4 – Thank you for addressing driver assistance technology. This section should note that driverless technologies could have an enormous positive impact on pedestrian and cyclist safety.

p. 11, Paragraph 1 – While social networking for transit trip planning has value, the aforementioned frequency of service is much more important. Frequent service and appropriate land use negates the need for knowing when trips are occurring.

p. 12, Maps – The maps would be much more instructive if they showed major infrastructure at the time of development, rather than just the current freeway network. Adding a density element to the maps would also be instructive.

p. 12, Paragraph 4 – Should say “by 1890” not “by 1990”

p. 15, Paragraph 4 – The link between the Great Recession and a decline in driving has not been fully established. It is possible that other factors contributed to this change as well. This should be

acknowledged. If it is only linked to the economy, there should be an upward trend in driving since the recession has ended – has this been the case?

p. 16, Paragraph 3 – Agree that “freeway-building growth patterns are unsustainable.” Investments in transit and other multimodal transportation help to support a more sustainable transportation and land use system for the region.

p. 16, Paragraph 4 – Growth projections indicate that growth will continue to spread outwards. However, strong policy can support focusing and concentrating growth in transit oriented areas, to help shape this future.

p. 17, Paragraph 4 – The plan assumes that congestion is an inevitable result of growth. However, focus on long term policy and travel mode shifts may result in a different future.

p. 18, Paragraph 2 – While providing affordable options is an important goal, it is also important that the accounting of the costs of transportation investments takes into account indirect costs and benefits on the region in terms of economic, environmental, and social impacts. Maintenance and other life-cycle costs should also be taken into account.

p. 20, Paragraph 1 – This plan should document the reasons that overall travel is expected to increase, particularly since there are many trends working to counteract this (e.g. e-commerce, cost of transportation, aging, cost of housing, etc.)

p. 21, Paragraph 8 – We support the inclusion of the health impacts of improving air quality; however, the following sentence is slightly inaccurate about the specific health impacts. Here is a suggested revision: “These strategies will have positive effects on air quality and ~~their~~ its related health impacts including ~~asthma and heart disease~~ increased risk of hospitalizations and deaths from asthma and cardiovascular conditions.”

p. 22, Paragraph 1 – The phrase “Minneapolis and Saint Paul are studying the possibility of bringing streetcars back” suggests a return to a heritage streetcar technology, whereas Minneapolis has consistently supported a modern streetcar technology. Modern streetcar is closely related to light rail transit, but more appropriate for dense urban corridors with limited right-of-way and a transit market oriented to short trips. The vehicles are larger than modern articulated buses and significantly larger than the historic streetcars in the Twin Cities. The phrase “Minneapolis and Saint Paul are working with the Metropolitan Council to develop a network of modern streetcar lines” would be more consistent with Minneapolis’ streetcar initiative. The current statement understates our work on this effort, as our status is far beyond studying the possibility when the Minneapolis City Council has approved a long-range network and the LPA for an initial line along with the creation of the Value Capture district for funding.

p. 22, Paragraph 4 – This plan rightly identifies that the current development pattern, and its consequence of auto dependency for many residents, is an equity issue – just as much as transit

dependency. This has implications for both land use and transportation planning. A dispersed growth pattern will further exacerbate these issues.

p. 22, Paragraph 5 – Infrastructure investment has created a favorable environment for economic development throughout the region

p. 22, Paragraph 6 – We support the statement “To the extent the region can seize these opportunities and plan for land use and development patterns that support transit, bicycling, and walking, and allow for multiple modes will determine its long-term success within reasonably available financial resources.” The Metropolitan Council should provide strong policy guidance in support of this direction and provide financial incentives through funding priority where possible.

p. 23, Paragraph 1 – The sentence “.....has an extensive bus transit system that serves the region’s urban center relatively well, but has room for improvement....” seems to go against what both Minneapolis and Metropolitan Council have been hearing recently from North Minneapolis both as part of the discussions related to SWLRT and those when the Bottineau LPA was selected.

p. 25, Paragraph 2 – Objective A should include the possibility of decommissioning facilities that are expensive to maintain and are underperforming.

p. 26, Paragraph 3 – In Transportation System Stewardship, some additional examples could be added under the measuring performance section to include condition of non-motorized facilities, freight rail track condition, and adequately maintained bus stops.

p. 27, Paragraph 1 – In Safety and Security, there should be a section on bicycling and walking and how vulnerable those users are to more serious injuries. There should be a mechanism built into the system, including funding requirements that require that bicycle and pedestrian safety be addressed.

p. 30, Paragraph 3 – The City of Minneapolis is closing its Upper Harbor Terminal barging facility. This facility has been underperforming for many years, and is now no longer a feasible option because of the permanent closure of the lock and dam system near Downtown Minneapolis.

p. 30, Paragraph 4 – Miles of bikeways or miles of sidewalks could be added in the measuring performance section for Access to Destinations. These standards also should recognize the function and performance of trails that serve a transportation function as well.

p. 30, Paragraph 4 – There is no performance standard to measure the change in transit/walk/bike mode share in objective D. This is a question that frequently comes up from policy makers and the media, and it is important to measure it, even if the data is not available on an annual basis. The number of transit riders does not measure mode share.

p. 31, Paragraph 5 – It would be helpful to have a map of the 42 job concentrations included. How was the 7,000 jobs at 10 jobs/acre threshold determined? Is this related to the minimum density for transit service?

p. 32, Paragraph 3 – In Competitive Economy, tons of freight (both barge and freight rail) moved could be added as a performance measure.

p. 34, Paragraph 5 – What are the possibilities for bicycle and pedestrian facilities that promote healthy living? Where are the opportunities to make these projects happen?

p. 35, Paragraph 2 – The number of bicycle and pedestrian crashes seems to be more related to the safety goal rather than to the healthy environment goal, especially because the safety goal refers to all modes of transportation. In this and other sections in Part D, there are several instances where increasing both rates of use of non-motorized transportation and bike/pedestrian infrastructure are mentioned; however, these modes are mostly excluded in the examples of performance measures. We recommend adding example performance measures related to 1) rates of non-motorized transportation (trips to work AND other trips as well), and 2) measurements of new or improved bike/pedestrian infrastructure (such as miles of bikeways and sidewalks, new pedestrian crossings, etc.) The only example performance measure related to bicyclists and pedestrians is the number of bike/pedestrian crashes in the region. While measuring bike/pedestrian safety is vital to improving safety for these modes, simple counts of bike and pedestrian crashes won't indicate whether roads are getting safer for bicyclists and pedestrians. Total numbers of bike and pedestrian crashes might increase while rates of crashes simultaneously decrease. In this scenario, the trend in number of crashes might indicate that biking and walking are getting less safe, while the rates would indicate that using these modes is actually getting safer. We recommend changing these example performance measures to rates of bicycle and pedestrian crashes.

p. 36, Paragraph 2 – In Objective D, instead of limiting incompatible land uses near airports, the objective should be more collaborative (as stated in the key takeaways). A suggested change would be for communities, businesses, and aviation interests to work together to encourage appropriate land uses next to airports and to balance the needs of residents and business owners without giving airports unlimited growth.

p. 37, Paragraph 1 – The City of Minneapolis strongly supports the goals of increased growth and density along transit corridors, and is committed to supporting this through its own land use policies and regulations.

p. 37, Paragraph 2 – Transit oriented development is defined here as just housing and retail. However other uses, including office, institutional, and industrial, should be part of this as well. Jobs are needed in transit-oriented areas – particularly as one of the plan's major goals is access to job centers. This could also reference the land use chapter section on transit supportive densities.

p. 37, Paragraph 2 – Supportive of preservation vs. expansion of highways with expansion of transitways supported by strong bicycle and pedestrian connections

p. 37, Paragraph 5 – Under Measuring Performance, the second bullet is vague as to how the data would be used. Is it a positive or negative indicator to have a large number of intersections within a square mile?

p. 42, Paragraph 3 – While the highway system has resulted in a number of benefits to the region, it might also be worthwhile to highlight some of the drawbacks and challenges – including unsustainable travel and land use patterns.

p. 44, Paragraph 1 – Add “and health” to the end of this sentence: “Walking and bicycling allow people to make trips without adding to roadway congestion and vehicle-related air pollution that is affecting climate change.”

p. 44, Paragraph 2 – Should note that facility design is very important for pedestrian and bicycle facilities, not just their location and connectivity. This is especially true because not all types of users will feel comfortable on all types of facilities.

p. 44, Paragraph 7 – The phrase “provide Complete Streets, designed to accommodate all users” may be misinterpreted to mean “all modes on all roads.” We suggest a revision such as “implement Complete Streets practices” or other similar language on page 99, such as “ensures that the accessibility and safety of all travelers be appropriately considered and incorporated throughout any road project’s planning, design, and construction.”

p. 45, Paragraph 3 – Note that the Minneapolis port is closing due to permanent closure of the lock and dam

p. 46, Paragraph 2 – Though it states Metropolitan Council has a minimal role in intercity bus and rail, it should be noted that they are co-located with other transit stations in both downtown Minneapolis and St Paul, with the cooperation of the Metropolitan Council (e.g. Union Depot).

p. 51, Figure 1-3 – Need to define the terms in the legend on the map in Figure 1-3, or link to a location in the plan that does.

p. 52, Table 1.1 – Table 1.1 should indicate that numbers in “increased revenue scenario” column are in addition to the amounts in the previous column. Otherwise, the column should have the total (sum) of the two amounts. Also, does highway total include bike/pedestrian?

p. 52, Table 1.1 – It is unclear how these allocations/ratios for spending are related to the goals outlined in throughout Part 1. These numbers should reflect the desire to achieve the outlined goals, and they may, but there is no narrative clarifying why the amounts are what they are.

p. 54, Figure 1.4 – As stated in the plan, we affirm that the current revenue scenario is insufficient to build out a fully functioning fixed route transit network needed to support existing and planned growth.

p. 53, Paragraph 6 – Please modify this sentence to more accurately summarize the modern streetcar acceleration opportunities described on page 251: “ Additional acceleration options may also be possible for arterial BRT projects and modern streetcar projects within the current revenue scenario. While this plan acknowledges that a broader discussion on modern streetcars needs to occur at the regional level, there are opportunities for projects to move forward on a case-by-case basis.”

p. 57, Table 1.2 – The same comments apply as for Table 1.1 regarding the final column.

p. 59, Table 1.4 – The same comments apply as for Table 1.1 regarding the final column.

p. 59, Paragraph 1 – We strongly support the new regional bicycle transportation network. This helps to elevate bicycling as a travel mode by focusing on regional connectivity and linkages to key destinations. It would be helpful to include language regarding how this relates to the Metropolitan Council’s role regarding the regional recreational trail network related to the regional parks plan.

p. 59, Paragraph 3 – There should be more clarity as to how prioritization addresses not just general connectivity, but producing high quality facilities that really can make a difference in mode share. It is not enough just to have a facility – it has to be a safe and attractive choice. Additionally, the reference to “limited funding” could be expanded further – to explain the implications of an underfunded system in terms of the ability to achieve goals.

p. 61, Paragraph 2 – There is support for this expanded approach to equity and environmental justice. However, more detail is needed regarding how equity considerations will be used to evaluate and prioritize projects.

p. 61, Paragraph 3 – While most of the topics regarding equity describe how concerns are addressed, the safety one doesn’t. How will this be addressed?

p. 62, Paragraph 1 – The language under “Transit Service Planning” is a duplicate of the paragraph on “Focus on Preservation.”

p. 63, Paragraph 2 – The outcomes of the current revenue scenario are very helpful to see. If possible, it would be good to see this broken down by mode.

Part 2: Implementing the Transportation Vision

A. Existing Regional Transportation System

p. 67, Paragraph 6 – The first paragraph of The Highway System section describes the region’s highway system as the network of principal arterials and A-Minor arterials then calls out MnDOT, the counties and the city of St. Paul as owners and operators. This is confusing, there are many other cities that own and operate A-Minor arterials, was this statement intended to speak only to principal arterials?

p. 67, Paragraph 6 – We have a number of arterials which serve multiple needs, including both moving regional traffic and accommodating neighborhood activity. How are these being balanced and accommodated? How can this document (for instance, through an equity lens) support the needs of local road uses as well as commuters?

p. 70, Figure A-2 – It would be good if there was also a similar map showing functional class for bicycle facilities.

p. 71, Paragraph 2 – Has the recent recession been formally named “The Great Recession”? If not, then this should be revised.

p. 72, Paragraph 3 – The I-35W/4th Street northbound access ramp and the I-94W/7th Street ramp reconfiguration should be added to the list of “Interchanges opened or advancing since 2010”

p. 73, Paragraph 2 – Spot mobility bullet for MN 13 should say timing, not tuning.

p. 76, Figure A-3 – Figure A-3 Transit System by Service Type and the associated text does not distinguish between local bus and the very frequent urban local bus routes or “hi-frequency routes” that are the majority of transit ridership in the region. This should be reflected somehow in the existing conditions. The City of Minneapolis made a similar comment on the draft 2010 Update to the TPP, and a map and discussion of the Hi Frequency Network was added to the final 2010 Update to the TPP, but was not carried through to this version. Please provide this information.

p. 76, Paragraph 1 – The plan should mention the Cedar Lake Trail as a component of Target Field Station. Should the Minneapolis multi-modal hub be referred to as “The Interchange”?

p. 78, Paragraph 2 – Has there been any evaluation to show the relative value (in terms of increased ridership) of investing in park and rides, versus other system expansion?

p. 79, Paragraph 4 – While sidewalks and trails are the primary elements in pedestrian infrastructure, supporting elements – just as pedestrian-scale lighting, benches, etc. – are also part of it.

p. 80, Paragraph 3 – The Metropolitan Council’s interest in pedestrian facilities should extend far beyond just access to transit stops. People are pedestrians during a portion of virtually every trip, even if they are traveling by bus, train, car, or bicycle. Pedestrian connectivity and safety is therefore a vital component of the entire multimodal transportation network. This is actually stated later on p. 259.

p. 80, Paragraph 6 – While useful, Cyclopath and Cycloplan rely on a fairly limited pool of participants. We need to rely on a much wider effort to engage our communities in these questions than what is currently happening on either of these. Or there should also be a concerted effort to bring more attention and users to those technologies.

p. 81, Paragraph 2 – The reference to cycletracks in Minneapolis incorrectly suggests that there is not always a vertical separation from auto traffic lanes. A painted buffer without a vertical separation such as a delineator, parked car lane, or curb is not considered a cycletrack in Minneapolis. We suggest the following revision: “In addition, the City of Minneapolis has installed several cycletracks, which consist of a system of two-way bicycle thoroughfares, sometimes barrier separated from busy street traffic. Several new cycletracks are planned within the city. In addition, several “cycletracks” or “protected bike lanes” have been installed or are planned within Minneapolis. These are bicycle facilities within street corridors that have a vertical separation from traffic lanes and are intended to provide a more comfortable user experience, similar to a trail.” Where cycle tracks are discussed, Minneapolis uses the more encompassing term “protected bikeway” to describe this type of facility. Protected bikeways can

be on-street or off-street facilities and have a vertical element such as a bollard or curb separating moving traffic from the bicycle facility.

p. 81, Paragraph 4 – Page number needs to be added

p. 81, Paragraph 6 – It is our understanding that the counting effort described here may be ending due to lack of funding. We support the continuation of this effort or another mechanism to continue the counting, as it is important for transportation plans and projects. There is also a direct correlation to the funding applications for the regional solicitation where non-motorized counts are not currently required but there is a desire to work toward incorporating them in the future.

p. 82, Paragraph 2 – The Cycletracks tool is very useful. However, it is restricted to those who are able to afford and use smartphone technology. Generalizing the information too much may result in an equity issue, where those communities that are less plugged into this technology are not addressed.

p. 82, Paragraph 4 – Is there a need for dedicated freight lanes on the horizon? I-94 is identified as the main freight thoroughfare for trucks, should we be considering managed lanes for these movements?

p. 85, Paragraph 1 – It should be mentioned that the St. Anthony lock and dam will be closed in addition to the Upper Harbor Terminal. The Minneapolis port is closing due to permanent closure of the lock and dam.

p. 87, Paragraph 1 – Where are the two major intermodal container facilities? They should be mentioned.

p. 87, Paragraph 3 – The plan acknowledges bottlenecks in the freight rail system. Is there any attempt to develop strategies and projects to address this issue?

p. 90, Paragraph 2 – The City of Minneapolis has attempted to address the challenges of Megabus curbside stops by relocating them to locations in proximity to public facilities – to lessen impacts on adjacent uses.

B. Transportation Policy Plan Strategies

p. 93, Paragraph 2 – Why does the supportive local action call out snow, ice and debris removal for coordination – out of all the potential elements where coordination is needed?

p. 93, Paragraph 7 – We support planning and implementing bicycle and pedestrian improvements as part of roadway projects. Accommodating the bicycle/pedestrian tunnel under the new I-35W bridge is a great example of this. We couldn't have incorporated it into the new bridge design had it not been mentioned in our local plans.

p. 94, Paragraph 2 – How will Metropolitan Council balance the guidance to (1) remove funding from underperforming routes with (2) managing routes to improve performance? How will routes in growing areas that haven't reached their full capacity be allowed to mature and improve?

p. 94, Paragraph 2 – Under A3, when making decisions on how to adjust underperforming bus routes, the phrase “also consider the impacts and benefits to low-income groups and people of color” is too low of a bar for this analysis. Instead, the standard should be that “no changes are made to a route that negatively impact low-income groups and people of color”.

p. 95, Paragraph 1 – How can the Metropolitan Council support local jurisdictions in their efforts to make streets safer for pedestrians and bicyclists, especially on local roads that connect to transit stations?

p. 95, Paragraph 2 – Safety should also be addressed specifically in the context of freight planning, including rail. Passenger rail is covered in the narrative, but freight rail isn't.

p. 95, Paragraph 4 – Under B1's Supportive Local Actions, the second bullet should be clarified to indicate the 250-foot height limit is within a designated perimeter of airports, not generally throughout the region.

p. 95, Paragraph 5 – Does the emergency response framework include designating emergency evacuation routes in the region, should mass evacuation be required?

p. 96, Paragraph 3 – Under policy B3, could indicate that safety data should consider safety implications for all modes, including bicycle and pedestrian.

p. 97, Paragraph 5 – It's worth acknowledging here that Metro Transit has one of the best safety records in the country when considering bus interaction with pedestrians and bicyclists.

p. 98, Paragraph 2 – The plan should reflect a priority and requirement for bicycle and pedestrian supportive infrastructure near transit station areas, and be linked to funding.

p. 99, Paragraph 6 – Complete streets policy implementation is very incomplete statewide. As a state agency, will the Metropolitan Council hold its funded projects to the MnDOT complete street policy standards?

p. 100, Paragraph 1 – The City of Minneapolis supports the stated complete streets policy and commitment to build a system of high-quality bicycle and pedestrian facilities.

p. 100, Paragraph 1 – There are a lot of references here and elsewhere to local governments approving a complete streets policy. What does that mean? Is it a standalone policy vs. part of the comprehensive plan or other plans? Please clarify.

p. 102, Paragraph 6 – Need to define the term “queue jumps.”

p. 102, Paragraph 7 – Has there been any analysis of the need for a feasibility study of dedicated freight lanes, in addition to the option to buy in to MnPass?

p. 103, Paragraph 4 – Under C6, it states that the Council’s RALF fund “will be used to preserve right-of-way for state highway projects”. This fund should also be available for acquisition of land for rail projects.

p. 103, Paragraph 7 – Under C7, will the analysis of optimizing “person throughput” consider the relative impacts of improvements to different modes (e.g. expanding highway capacity vs. transit service)? Additionally, will it look at the relative roles of local versus regional routes?

p. 104, Paragraph 4 – Shouldn’t this list of goals be inclusive of equity as well?

p. 109, Paragraph 4 – We support policy C16, providing bicycle and pedestrian access across or around physical barriers.

p. 110, Paragraph 3 – C17 policy on access to jobs is an important one. It shouldn’t just focus on the pedestrian mode.

p. 110, Paragraph 6 – C18 policy: rail studies are not enough. Need support for upgrades and investments to preserve and expand connections, as well as investments in highway truck routes that connect to these facilities. This also falls under their goals of investing in the future and equity – as in Minneapolis the rail lines go through some of the areas with lower incomes.

p. 112, Paragraph 2 - Transportation for economic development is much more than moving people (although it's that too). It needs to consider the experience as well. Transit and bicycle facilities are not all created equal – their design impacts their use and potential for economic impact.

p. 114, Paragraph 5 – Driverless cars could be a future solution to working to reduce air emissions.

p. 116, Paragraph 2 – Need to include web link to DNR’s natural resources inventory here.

p. 117, Paragraph 6 – The City of Minneapolis supports the Metropolitan Council encouraging cities to “allow the market to determine necessary parking ratios (remove requirements) and support shared parking”. The City approved significant changes to our parking standards in 2009 that included elimination of parking minimums in our Downtown, lowering parking minimums in transit station areas, and requiring parking maximums citywide. These changes to our regulatory requirements have allowed the market to better dictate their demands rather than the City potentially requiring an oversupply of parking.

p. 118, Paragraphs 3 and 4 – E6 and E7 need “supportive local actions” sections, as the other topics have; this is a complicated issue and needs more clarity

p. 118, Paragraph 7 – Section F starts by saying the actions apply only to local governments, but this is not true, as there are references further down to Metropolitan Council and MnDOT actions.

p. 123, Paragraph 7 – The plan should acknowledge that not all industrial uses require rail or barge access. It should also recognize that there may be higher and better reuses for some older industrial sites in core areas than reuse as traditional industrial development. Regardless of development type, it is important to retain job intensive uses in concentrated, central locations well served by transit.

C. Land Use and Local Planning

p. 126, Paragraph 2 – Market forces are not the only thing shaping development patterns. Public sector policies and programs have an impact.

p. 127, Paragraph 2 – In addition to the constraint of the current land use system, fiscal constraints prevent the ability to fully build out the regional highway system.

p. 128, Paragraph 6 – Population and employment forecasts need to be updated to reflect land use/investment scenarios discussed in Thrive 2040. Having just one set updated every 10 years (as stated here) is not sufficient or reflective of the impact of the policies in this plan. There needs to be a relationship between forecasting and planning for the growth forecasted, rather than planning with the assumption that forecasts will be the same (in level and distribution) no matter what else is done.

p. 135, Paragraph 1 – Eliminating parking requirements and allowing the market to take care of it requires proactive and ongoing management of on-street parking and other “free” parking sources if it is to be effective.

p. 136, Paragraph 2 – The City of Minneapolis supports transit and transit oriented development through the strategies outlined here.

p. 137, Table C-2 – This table could be referenced earlier in the document, to give a sense of the parameters for transit supportive development. It may be more effective to have densities based on transit facility type rather than community type, and to emphasize what densities are needed to support these transit types. Densities may be too low for the fixed transitways. It would be helpful to know more about how these numbers are directly related to the ability to get funding for transitways – also, how is this tied to our growth projections, does this actually get us there? Finally, streetcar should be added to the list of modes included in this table, with appropriate density levels identified.

p. 138, Table C-2 – Change language from “people, jobs, and students” to “*residents*, jobs, and students” for clarity

p. 139, Paragraph 4 – It is critical that station area plans take into account reverse-commuting opportunities. The residents surrounding a transit station need direct access to the platform, but it is also critical for reverse-commuters to be able to get to their place of business without a car. Station platforms surrounded by a park-and-ride lot have particular challenges for pedestrians getting to their places of business.

p. 141, Table C-3 – Need clarity on prohibition of parking lots: (1) the “must” language here is unusually strong for the plan, and (2) how does this impact park and ride surface lots? What about reduction in curb cuts, and building frontage design?

p. 142, Paragraph 3 – Managing parking supply and supporting travel options is an equity issue as well, as it can help control transportation costs for households

p. 146, Paragraph 5 – While wayfinding is an important tool, creating a well-connected and intuitive system is even more important.

p. 147, Paragraph 4 – The Metropolitan Council should also play a role in wayfinding in areas of high-pedestrian activity, not just local governments. The Metropolitan Council should especially play a leadership role in wayfinding at and to transit stations.

p. 147, Paragraph 5 – Will Metropolitan Council hold projects to the standards in the Elements of a Good Pedestrian Experience section?

D. Transportation Finance

p. 150, Paragraph 2 – This section needs to make a stronger case for why current revenue sources are insufficient and why demand is growing disproportionately. There is always more to be done than there is funding for. Is this particular situation due to deferred maintenance, structural issues with taxing, or other factors? How does this plan make the case that the planned investments are sustainable, and will not just result in larger deficits down the road?

p. 161, Paragraph 3 – In the Bus and Support System Spending section, one bullet says no funds are available for expansion, but another one says limited funds are available. This needs to be clarified.

p. 162, Paragraph 2 – As mentioned above, should explain why need is increasing so greatly in contrast to resources.

p. 164, Paragraph 4 – Some projects such as modern streetcar will likely involve some local funding. Identifying and pursuing appropriate local funding sources for this and other priority projects should be identified here as a possibility.

p. 165, Table D-2 – Clarify that last column in Table D2 is funding “over and above” the current revenue scenario, not the total amount in the increased revenue scenario.

p. 167, Figure E-1 – Will Metropolitan Council support funding for technologies to advance the implementation of driverless cars as a potential future solution for congestion? Research estimates vary, but potential for an increased capacity of 2-3 times on our freeways with driverless technology could completely change the funding picture.

E. Highway Investment

p. 169, Paragraph 1 – Traffic management technologies should include a focus on strategies for freight.

p. 173, Paragraph 5 – Strategies considered should include the decommissioning of any unneeded freeway segments.

p. 176, Paragraph 4 – Particularly if Metropolitan Council funding is involved, should require space for bicycle and pedestrian facilities on freeway crossings.

p. 177, Paragraph 3 – ATM improvements should consider signal upgrades for compatibility with LRT and other on-street transit systems.

p. 182, Figure E-5 – It's unclear why each item was described as tier 1, 2, etc. Is congestion more of an immediate issue in these locations? How is this paired with transit investment? Where is our job and population growth projected to occur?

p. 191, Paragraph 2 – Increased revenue scenario assumes general purpose funds are available. The plan should also note that more constrained sources might be available for specific project types and modes. Priorities developed for this plan would also be useful in that scenario.

p. 194, Table E-6 – The City of Minneapolis supports MnPass funding for the entire 35W corridor as a congestion management strategy for commuting into the City.

p. 202, Paragraph 1 – Forecasts are mentioned just in passing, but they are very important. They drive the forecasted traffic along area routes. This plan doesn't focus on this analysis, but it underlies the assumptions behind the projects. Additionally, there is a need to have more than one set of forecasts and traffic modeling scenarios – based on alternative policy directions.

F. Transit Investment

p. 207, Paragraph 7 – Section C (Land Use) seems to imply market forces guide all development, but this section shows it under the control of local government. Need to resolve these internal inconsistencies in tone and assumptions.

p. 208-211 – The illustrations on these pages are very valuable in assisting communities to better accommodate accessible, safe, and friendly transit. They are clear, concise, and an asset to include in this plan. The guidance and graphics here regarding urban design seems like it should be showing up in the land use chapter as well. The land use chapter focuses primarily on densities, but this section seems to focus on design. But they should go together.

p. 212, Paragraph 2 – Are the transit facilities and expenditures on bus service in RCAPs proportional to the transit use? How does this investment compare to the addition of park and rides in suburban

communities? What are the trade-offs? What are the equity impacts? How do these decisions impact our growth projections?

p. 220, Paragraph 1 - Will these services see greater demand as the population ages? Or do we anticipate serving the transit needs of seniors more through the existing transit network?

p. 221, Paragraph 3 – May want to highlight the general trade-off between frequency of stops and speed of service, which underlies much of the difference between the options.

p. 223, Paragraph 1 – Reverse commute and suburb-to-suburb trips are linked to land use patterns – dispersed job centers means these are increasingly necessary, including from an equity job access perspective. Land use guidance to concentrate development in transit served areas can help increase system efficiencies and decrease costly route variations.

p. 225, Paragraph 3 – Bus passenger facility design, placement and amenities should be examined from an equity perspective to ensure that high volume stops in all areas of the transit network are well served and equipped. Additionally, transit station investments should be commensurate with both the existing boarding numbers and the boarding numbers desired by facility type. Some of the busiest bus routes in Minneapolis have stops without shelters, etc.

p. 227, Paragraph 2 – Investments in park and rides should be weighed against investments in areas where transit infrastructure is not commensurate with current and projected ridership numbers. Have the maintenance cost of these facilities been considered in future revenue scenarios?

p. 229, Paragraph 2 – The text mentions the need for bus layover facilities, including locations at the University of Minnesota and Downtown Minneapolis. Is there more information available as to the proposed size, timing, and location of these facilities?

p. 232, Paragraph 4 – The highway plan lists specific projects and dollar amounts in the constrained scenario, but the transit plan has only general categories and then lists technical and policy factors that will be considered in project selection (except for a short list of transitways on p. 249). Why the difference?

pp. 235-238 – The City of Minneapolis supports the existing transitway modes included in the TPP (Commuter Rail, Light Rail Transit, Dedicated Busway, Arterial BRT, and Highway BRT). We also strongly support including Modern Streetcar as a transitway mode in this TPP Update, similar to LRT, Highway BRT, Arterial BRT, Dedicated Busway, and Commuter Rail. We are eager to participate in the ongoing policy discussion that is likely to result in including Modern Streetcar as a transitway mode in a future amendment to the TPP. Modern Streetcar has a significant regional benefit. It will allow the region to develop a broader rail transit network and attract more people, jobs and investment to these connected transit corridors. The current definition of transitways in the TPP significantly limits the opportunities for the region to expand the rail transit network beyond the Blue and Green LRT lines and Northstar Commuter Rail line. There are no other future LRT corridors identified in the region that have both the physical right-of-way for an exclusive runningway and the transit market potential necessary to support

an LRT investment. Modern streetcar and light rail transit (collectively defined in Europe as “tramways”) are fundamentally very similar technology. Modern streetcar vehicles are small light rail vehicles, the smallest of which is larger than an articulated bus. However, Modern Streetcar and Light Rail Transit differ in how they’re designed and operated on the street. Modern streetcars typically have closer stop spacing than LRT over shorter distances, single car vehicles, less substantial passenger facilities, and operate in mixed traffic; however, they can operate similar to light rail with wider stop spacing, trained vehicles, exclusive lanes/tracks, and more extensive passenger facilities. Including Modern Streetcar as a transitway mode - or alternatively expanding the definition of Light Rail Transit to address shorter corridors with closer stop spacing and the ability to operate in mixed traffic lanes - will allow the region to extend the rail transit network to more places with high transit rider demand and strong transit-oriented development opportunities.

p. 238, Paragraph 2 – The plan states that dedicated busways haven’t been developed in the region. But earlier in the document, it says that the University transitway is an existing example of this type. However, it cites no existing examples of arterial BRT. This needs to be clarified.

p. 240, Paragraph 3 – In the planning and prioritization process, the involvement and contributions of local governments should be taken into account – for instance, the willingness to include signal prioritization that enhances the transit advantage of a new or expanded route.

p. 241, Paragraph 2 – While this list contains a number of identified corridors, there are a number of other possibilities that should be explored on a longer time horizon. It may help to have general language about supporting the preservation of potential transit corridor links for future transit use. One example would be a largely unused rail spur linking the University of Minnesota main campus area to the Midtown Greenway that could be (at some future date) converted to a connection between the Uptown area and the U of M. This does not necessarily mean that these projects would preempt others, but rather there should be a willingness to explore opportunities as they arise and not preclude future projects from happening.

p. 243, Paragraph 2 – What does it mean for Nicollet-Central corridor that “The LPA is under consideration for potential funding commitments in anticipation of being amended into the plan?” It is our understanding that a reasonable funding plan is needed for the LPA to be approved and the project to be included in the current revenue scenario. Please clarify.

p. 246, Table F-6 – Jobs and population growth projections should be taken into account here

p. 249, Paragraph 1 – Priorities for BRT should cross-reference MnPass expansion plans (and any other managed lane improvement projects), as there is overlap and potential for these two functions to work together.

Page 249, Paragraph 2 – The City of Minneapolis supports including Penn Avenue North and Emerson-Fremont/Chicago as arterial BRT projects within the current revenue scenario.

p. 251, Paragraph 4 – The City of Minneapolis supports the inclusion of the Nicollet-Central streetcar project in the acceleration opportunities within the current revenue scenario and expects that this project will be amended into the TPP in 2015.

p. 254, Figure F-7 – Priorities for transitways should cross-reference MnPass expansion plans, as there is overlap and potential for these two functions to work together.

p. 258, Table F-8 – How do revenue discussions relate back to the outcomes that are desired by ThriveMSP 2040? How do these different scenarios adequately respond to those goals?

G. Bicycle and Pedestrian Investment

p. 259, Paragraph 2 – The plan should emphasize the importance of replacing short trips (not just commuting trips) with biking and walking, especially considering that commuting to work does not make up the bulk of car trips in our region. Increasing the opportunities and comfort for all people to make short trips to destinations by cycling or walking could lead to massive improvements in health, both through increased physical activity and through improved air quality. This is especially important in terms of air quality, since a higher portion of air pollutants are released in the first few minutes of a car trip as an engine warms up. The region's cost-savings potential from the health benefits alone is substantial. Additionally, this section focuses on bicycle trips of three miles or less, though more than half of cycling trips to work are longer than this distance. This seems like an arbitrary cutoff, especially considering that many people could comfortably cover trips of five to six miles in 30 minutes or less. Local governments should consider trips of longer than three miles when planning bicycle routes. We suggest you expand the number of miles for bicycle trips described in this section.

p. 259, Paragraph 3 – The plan states earlier (p. 79) that the Metropolitan Council's primary interest in pedestrian access is to and from transit. However, here it notes that pedestrian activity has a much broader importance. This should be reconciled. And as it's also indicated here, there is significant ability to influence this mode at a regional level (as evidenced by a significant increase in bicycle/pedestrian activity in the wake of large-scale investments in supporting infrastructure).

p. 260, Paragraph 2 – Also contrary to earlier statements in the plan that bicycle and pedestrian planning and implementation is mostly a local function, this chapter calls out the important role of regional trails and off-street systems in the network – particularly those in the regional parks system. This also should be reconciled.

p. 260, Paragraph 3 – While protected and off-road facilities are particularly attractive for less experienced cyclists, they are actually designed to handle all levels of cyclist. The benefits include increased cycling rates and safety.

p. 260, Paragraph 4 – The plan states that facilities near congested activity centers can be particularly effective. However, these projects are often particularly challenging and expensive. Prioritizing these improvements would be helpful.

p. 261, Paragraph 3 – Guiding principles for bicycle facilities is a helpful thing to include. It would be worthwhile to have a similar set of principles for pedestrian (or shared use) facilities. While the Metropolitan Council may not be the lead on stand-alone pedestrian facilities, they are involved in many projects with pedestrian facilities as an element. Additionally, local pedestrian routes play a key role in access to transit stations, including transitways. Finally, the principles should address economic development and equity considerations more directly.

p. 264, Paragraph 1 – While the Cycloplan data is useful, it is not enough to form a basis for the analysis. Current and potential future demand should be determined through demographic analysis, income, race, current facility use, etc.

p. 265, Figure G-1 – Figure G-1 is difficult to read and interpret due to the numerous overlapping corridors. It should be revised for clarity. As a more general comment, it would be beneficial if all the maps in the document were expanded (perhaps made a full page each) to make them more readable. The job and other activity center locations would also be useful in other chapters, including highway and transit, as organizing around them is a common theme – not just for bicycles. Additionally, it would be helpful to have some geographic prioritization around pedestrian facilities as well (both in terms of mapping and text), since guidance is very general.

p. 266, Figure G-2 – As with G-1, Figure G-2 is difficult to read due to overlapping lines, especially very broad ones. A larger format map would help. On the content: Since the region is already benefitting from investments made in cycling infrastructure through a major federal level investment, it looks like we might be in a position of being non-competitive for future federal funding. This comes into play when you consider that these Tiers do not have design standards. Can a community apply for funding to put sharrows on a Tier 1 facility and successfully get funding on a network gap when competing against a funding request for a facility in Minneapolis with many users that is applying to convert from an on-street lane to a protected facility? This document should set us up to make these decisions.

p. 268, Paragraph 1 – We support these guiding principles.

p. 268, Paragraph 2 – The reference to cyclists “8 to 80” is a nice reference to Gil Penalosa, but perhaps a little out of context. He says we should plan for both 8 and 80 year olds to make truly livable cities. But this isn’t meant as a range – we should still be planning for 5 year olds and 90 year olds, for instance. This would be definitely true for bicycle facilities, which should be able (for instance) to accommodate bike trailers for very young children.

p. 268, Paragraph 2 – In addition to the factors listed here, bicycle facility placements should also take into account supporting amenities and facilities, like bike racks, bike lockers, repair facilities, public restrooms, workplaces with changing facilities, etc.

p. 269, Paragraph 2 – How does this plan help prioritize one bicycle facility type over another?

p. 270, Paragraph 1 – It is not clear what is meant by the statement that bike lanes are located “on the right hand side of the street,” as they are typically located on both sides, unless the street is a one-way corridor.

p. 270, Paragraph 2 – While Safe Routes to School is referenced as a funding source, the language does not specifically call out safe routes to school as a priority. This should be added. These projects should also not be directly competing with longer regional routes, as they serve a different purpose.

p. 271, Paragraph 4 – This section should more clearly emphasize the importance of winter maintenance on both bicycle and pedestrian facilities in winter in order to ensure year-round use. People who cannot drive because of age, disability, or lack of access to a car rely on these facilities all year, and they are often not adequately cleared of snow.

p. 272, Paragraph 7 – This section should reference the need for minimum standards for facility design.

p. 273, Paragraph 5 – The other key investment section addresses how some stand-alone bicycle/pedestrian projects might get funding. However, it would be helpful to have policy support to avoid these needs in the first place. If our LRT transit station areas were developed with minimum pedestrian and bicycle access standards, local units of government wouldn't have to come back to the Metropolitan Council asking for funding to fill these gaps.

p. 273, Paragraph 5 – Investment guidance for pedestrian facilities is very general in this section. We understand that these issues are covered in more detail in other parts of the plan (which are referred to in this section); however, we recommend that you summarize and consolidate these recommendations from other sections in this section in order to provide clear, consolidated direction on pedestrian investments.

H. Freight Investment

p. 275, Paragraph 1 – While other sections describe existing conditions in the system, the description of the freight network is fairly minimal. It should at least call out main truck routes, high volume rail corridors, ports, and major intermodal facilities.

p. 276, Paragraph 4 – The freight capacity section should address overlapping needs and challenges with commuter rail and potential intercity high speed rail, which share the same corridors.

p. 278, Paragraph 1 – In response to rail safety concerns, how can the Metropolitan Council partner with rail providers to identify, prioritize, and implement important upgrades needed to the rail network and supporting facilities?

p. 278, Paragraph 4 – Why does Minnesota oppose rail policing if 48 other states support this practice? Should this be changed?

p. 278, Paragraph 6 – This should acknowledge that the Minneapolis port terminal is closing, and why (underperforming, plus permanent closure of lock and dam due to invasive species). It is worth noting that pressure for land use change is not due just to regulators, as stated here.

p. 279, Paragraph 2 – Metropolitan Council should prioritize investments and upgrades to the highway system that directly serve major intermodal facilities and other major trucking hubs. This should include a focus on safety and capacity issues.

p. 280, Paragraph 1 – Assuming freight will be mostly on trucks ignores the possibility that greatly increased gas prices in the future will change the economics of the industry, and make rail and other modes more attractive. Rail could expand significantly as a mode, especially if there are upgrades to increase efficiency and throughput.

p. 283, Paragraph 5 – There is a need to partner with public agencies and rail carriers on plans for rail system improvements. Is there the potential to identify projects here, as was done in the other chapters? This impacts not only freight travel, but commuter rail – as evidenced by delays on the Northstar system earlier this year.

p. 284, Figure H-2 – Figure H-2 is numbered, but there is no key to the areas shown. The legend or accompanying text should identify these areas and any approaches that are being taken (or could be taken) to address congestion issues.

p. 285, Paragraph 1 – The closure of the lock and dam was not just about capacity issues. It was also driven by concerns about Asian carp and the potential economic impacts of the spread of this invasive species. The lock and dam were seen as an effective barrier. This was a competing interest with keeping the lock and dam open for transportation purposes. Since it was used for relatively low levels of barging, it was determined the potential impact to recreation and fisheries was greater than the economic loss of this form of transportation to the upper river.

p. 286, Paragraph 2 – The web link to the Twin Cities freight study doesn't work.

I. Aviation Investment

See overall comments at beginning of document.

J. Work Program

p. 310, Paragraph 1 – How is this work plan reflected in the overall plan budget?

p. 310, Paragraph 1 – The text states it does not include all ongoing work items the Metropolitan Council does. If available, should add a link to where this information can be found. For one thing, does this

ongoing work include additional travel demand model updates and results for alternative scenarios, as the Thrive 2040 process suggested would be ongoing in 2015?

p. 310, Paragraph 3 – Just for clarity, are principal arterials and expressways covered under the Regional Traffic Management Center or the proposed Arterial Traffic Management Center? It is unclear from the text.

p. 313, Paragraph 4 – The text states that the streetcar discussion is supposed to inform the Transportation Policy Plan. However, since it is included as a recommendation in the Transportation Policy Plan, it is difficult to see how the results will influence this document. How will results from this discussion be incorporated? Please address the timeline and process for addressing regional policy on modern streetcar as a transitway mode.

p. 313, Paragraph 5 – It would be helpful to have the guide to TOD updated ahead of work by local municipalities on updating their comprehensive plans

p. 314, Paragraph 4 – We look forward to involvement in the industrial lands assessment.

p. 317, Paragraph 3 – The evaluation of outcomes related to spending by race and income probably should mention a geographic component (e.g. for RCAPs), as is most likely intended. Additionally, may want to include reference to evaluation of air quality impacts.

Part 3: Federal Requirements

p. 320, Paragraph 5 – When new federal targets are identified and released, will they be incorporated into the plan? It seems that this might be useful to have in the chapters, to provide accountability and context for how decisions are made and results are tracked.

p. 322, Paragraph 4 – For some indicators with only one year of data reported, there is not yet a trend to track. What is the intent regarding the frequency of reporting on an ongoing basis? Is it annually?

p. 326, Paragraph 1 – How does the analysis predict a change in the number of crashes? The plan states the funded projects will have a net benefit, but doesn't explain how.

p. 331, Paragraph 5 – Are there any possible measures for rail system performance anticipated?

p. 334, Paragraph 4 – The work group should also look at possible rail system measures. Even if these are not required, this would be helpful to provide a basis for joint planning with rail companies.

p. 339, Figure B-2 – Congestion analysis and mapping provides a useful context for looking at proposed highway projects. This might be worth highlighting in the highway chapter.

p. 342, Paragraph 3 – The travel demand model reflects not just the impacts of highway improvements, but also the impacts of changes in location and number of households and jobs (and how that drives

origins and destinations). This can both inform and reflect policy directions related to land use planning and economic development.

p. 345, Paragraph 2 – The TTI analysis is interesting. Are there any implications or best practices coming from cities that outperform the Twin Cities?

p. 353, Paragraph 3 – The ITS initiatives on this page have past dates but future tense language. Were they actually completed, or just anticipated?

p. 365, Paragraph 1 – The equity issue is about more than just fairness. Demographic projections show that people of color will be an increasing percentage of the population for years to come. As they are also significantly younger on average than the remainder of the population, they will be driving growth and change in the future. It is therefore in everyone’s best interest to support improvements that will provide them more access to jobs and opportunities.

p. 373, Paragraph 1 – The series of maps showing the overlaying of planned projects with RCAPs is a useful analysis at the macro level. Has there been any thought to how to address micro level impacts, for instance during the construction phase?

Appendices

p. 1, Paragraph 1 – There are several terms missing from the glossary that might be helpful to add, including: buffered bike lanes, the various types of BRT (as described in transit chapter), cycle tracks, expressways, MNPASS, and racially concentrated areas of poverty (RCAP)

p. 94, Table G-7 – Why don’t bus stops ever have trash receptacles, cameras, or benches? It seems like all of these might be advisable at high volume locations.