



**Request for City Council Committee Action
From the Department of Community Planning & Economic Development**

Date: November 1, 2005

To: Council Member Scott Benson, Chair
Intergovernmental Relations Cmte

Prepared by: Pam Miner, Community Planning Supervisor, Phone 612-673-3240

**Presenter in
Committee:** Pam Miner, Community Planning Supervisor

Approved by: Barbara Sporlein, Director, Planning _____

Subject: City of Minneapolis Response to 2005 Metropolitan Council System
Statement

RECOMMENDATION: Approve response to 2005 Metropolitan Council System
Statement for submittal to Metropolitan Council

Previous Directives: N/A

Financial Impact (Check those that apply)

- No financial impact - or - Action is within current department budget.
(If checked, go directly to next box)
- Action requires an appropriation increase to the Capital Budget
- Action requires an appropriation increase to the Operating Budget
- Action provides increased revenue for appropriation increase
- Action requires use of contingency or reserves
- Other financial impact (Explain):
- Request provided to the Budget Office when provided to the Committee
Coordinator

Community Impact (Summarize below)

Ward:

Neighborhood Notification:

City Goals:

Comprehensive Plan:

Zoning Code:

Living Wage/Job Linkage:

Background/Supporting Information

Pursuant to state statute, the Metropolitan Council has issued a System Statement for each community in the metro area, summarizing the local implications of the adoption of the 2030 Regional Development Framework and the more recent adoptions of the Transportation Policy Plan, the Water Resources Management Policy Plan, and the Regional Parks Policy Plan. The System Statement is intended to help a community prepare or update its comprehensive plan, as required by the Metropolitan Land Planning Act:

Within three years following the receipt of the metropolitan system statement, every local governmental unit shall have prepared a comprehensive plan in accordance with sections 462.355, subdivision 4, 473.175, and 473.851 to 473.871 and the applicable planning statute and shall have submitted the plan to the Metropolitan Council for review pursuant to section 473.175.

The System Statement includes forecast densities that assure regional growth is achieved consistent with adopted regional policies. The forecasted densities are to help ensure that regional services and costly regional infrastructure can be provided as efficiently as possible, and that development and growth within the metropolitan area occurs in a coordinated manner.

Local comprehensive plans will be reviewed by the Metropolitan Council for conformance with metropolitan system plans, consistency with Council policies, and compatibility with adjacent and affected governmental units. The Metropolitan Council is to maintain an ongoing dialogue with communities to consider any changes in growth trends or expectations about growth that may change over time and that may have an impact on regional systems.

The City of Minneapolis has reviewed the System Statement. The City is in agreement with the System Statement however several concerns remain and are included with this report. Upon approval by the Intergovernmental Relations committee, a copy of this report shall be forwarded to the Metropolitan Council.

The review of Metropolitan Council system statements marks the official first step as the City of Minneapolis embarks upon its mandatory 2008 comprehensive plan update. The City of Minneapolis understands that the information and forecasts contained in the 2030 Regional Development Framework and reflected within the system statements are to the basis upon which our comprehensive plan update is to be based. The City has reviewed the statement and is in agreement with its components however several concerns remain and are explained in more detail in the following.

As stated by the Metropolitan Council:

“The system statement includes forecasts at densities that assure regional growth is achieved consistent with adopted policies. These forecasted densities help ensure regional services and costly regional infrastructure can be provided as efficiently as possible, and that development and growth within the metropolitan area occur in a coordinated manner.”

The City of Minneapolis is highly supportive of the effort to ensure that regional services and infrastructure are provided efficiently. As the primary population and employment center of the region, Minneapolis is acutely aware of and consistently strives to meet the need for maximizing resources in a coordinated manner to attain the greatest benefit to its residents.

The City of Minneapolis agrees that the metropolitan region will grow substantially by the year 2030. The Metropolitan Council forecasts as noted in the September 2005 system statement will be taken into account as Minneapolis continues to plan for its future.

Minneapolis System Statement Forecasts (September 2005)

	2000	2010	2020	2030
Population	382,747	402,000	423,000	435,000
Households	162,352	172,000	181,000	187,000
Employment	301,826	317,000	332,500	346,500

In recent estimates prepared by the City of Minneapolis Department of Community Planning and Economic Development-Planning Division, Minneapolis population could grow at an even greater rate than anticipated by the Metropolitan Council forecasts. Based upon calculations of approved building permits through September 2005, calculating population based on the number of housing units shows that the City’s population could reach 417,065, or 15,000 more people than anticipated by Metropolitan Council forecasts.

CPED Population Projections as of 10/4/05	2010	2020	2030
	417,065	450,893	466,045
	Includes group quarters	Includes group quarters	Includes group quarters

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d by the City’s projections, Minneapolis population could be expected to grow at a faster rate, absorbing a higher percentage of the regional population than projected by the Metropolitan Council. Accepting a higher percentage of the projected regional growth within the central cities would serve to further the principle of maximizing and coordinating limited resources. By growing the central cities of the region rather than outlying areas, system efficiencies are maximized and resources can be concentrated in the areas serving the highest density of population.

In order to accommodate either of the population forecasts, as provided by the Metropolitan Council or as developed by the City of Minneapolis, there will need to be adequate public investment by the regional, state and federal government. The adopted 2030 Development Framework and system plans provide for some investment, but do not provide the level of regional infrastructure investment that will be required to adequately accommodate population growth, particularly in the central cities.

The following sections address specific issues regarding transportation, water resources and wastewater, and regional parks. Also included are the responses presented to each individual regional policy plan as previously submitted by the City of Minneapolis.

I. Transportation

The roadway system in the City of Minneapolis is fully developed. With the exception of a few new roadway connections, the City does not anticipate additional capacity expansion of the roadway system within the City. Although the system currently functions at or near capacity during the peak traffic hours, there is excess capacity available during the off-peak hours. In response to the addition of the planned development projects, the City could adjust the on-street parking regulations to increase vehicular capacity and meet the population estimates and the associated travel demand. The City also could implement operational improvements and/or other Transportation Systems Management (TSM) measures to maximize the efficiency of the system.

Currently the City and its partner agencies (Met Council, Metro Transit, Hennepin County and Mn/DOT) are undertaking a major multi-modal transportation study for assessing the short- and long-term transportation needs of the City. The project is focused on both finding solutions that could be implemented in the near future (within 1 to 2 years) to address the existing transportation problems and the necessary measures to meet the anticipated population growth and the associated travel demand. The study is primarily focused on transit improvements and TSM measures as the main tools for addressing future growth.

The planned development projects and the associated population growth in the City of Minneapolis are predominantly concentrated in the Downtown and along the major transit corridors where the surface transportation system is fully developed. Developing transportation infrastructure systems necessary to support the Met Council's projected population growth is significantly more cost-effective along these major transit corridors than in the outlying areas where the land use densities are low and the transportation system is underdeveloped.

Addressing the projected population growth for the City depends greatly on the regional transportation system plan identified in the Met Council's 2030 Transportation Policy Plan (2030 TPP) Tier I and II. Specifically, the transit corridors identified in the 2030 TPP (Cedar Ave, I-35W BRT, Central, Northwest, NorthStar, Red Rock, Rush Line and Southwest) are critically important to the future growth of the City.

As we have stated before, the City of Minneapolis shares the Met Council's concerns that the expected population growth will generate millions of additional trips and further burden an already over-congested system. Also, we agree with the Met Council that there is no single solution to the region's transportation issues.

As we have stated before, the City is very concerned that current funding levels are totally inadequate for highways, transitways and transit operation. The City was particularly disturbed with the recent transit service cuts and price hikes. The continuation of current transportation funding levels would constrain the growth of the region and the City. The growth of the region depends on securing additional transportation funding. We urge the Met Council to pursue a meaningful funding plan.

II. Wastewater

Met Council Projections

SEWERED	2000	2010	2020	2030
Population	382,747	402,000	423,000	435,000
Employment	301,826	317,000	332,500	346,500
Employment Fort Snelling/Airport *		36,400	37,200	37,900
Total Employment		353,400	369,700	384,400
Average Annual Wastewater Flow (mgd)		57.54	57.82	58.52

As previously noted ,

there is a potential for the City of Minneapolis to grow at an even greater rate than that predicted by the Metropolitan Council forecasts. To be able to adequately serve this growth, Minneapolis' sewer services must be of sufficient capacity. While it is anticipated that the City of Minneapolis system is of sufficient capacity to absorb projected population increases – using either the Metropolitan Council or City of Minneapolis figures – the ongoing concern is the capacity of the entire regional system. As stated by the Metropolitan Council, “The Council will not provide additional capacity within its interceptor system to serve excessive inflow and infiltration (III).” The older communities within the regional system, such as Minneapolis, are most likely to be affected by this policy. While the City currently has three I/I reducing programs underway, it remains a large financial commitment by the City. To manage an efficient program, it will be critical that the City understand the details of any proposed I/I reduction program from the Metropolitan Council, and any associated financial impacts.

The City continues to be very concerned about the Met Council implementation strategy regarding the reconveyance of a regional interceptor to a local beneficiary in cases where the Council has determined that the interceptor does not serve a regional benefit. It is stated that this determination would be based on the "interceptor no longer providing a regional role when it serves primarily as a local trunk sewer (including service to an upstream community for 200,000 gallons per day or less wastewater flow)..." The City of Minneapolis believes that reconveyance would result in the following adverse impacts to our City:

- Unless the interceptor is turned over to the City in good condition, we will experience and increased draw on community maintenance and capital budgets. In addition, based on the condition and age of the interceptor, the City may have to increase its capital budget to cover the cost of total replacement of the interceptor. Again, these are funds that would not be programmed into our five-year capital budget.
- The City of Minneapolis believes that any interceptor that conveys flow from an upstream community is providing a regional benefit no matter how small the flow may be. If a reconveyed interceptor were to provide flow into Minneapolis from another upstream community, the City would realize an increase in risk and resultant liability from a potential blockage and backup of the system.

III. City and Regional Parks

The City of Minneapolis is scheduled to update its comprehensive plan by 2008. In accordance with the Regional Parks systems statement, the comprehensive plan will be updated to include the Above the Falls Master Plan and St. Anthony/Stinson Boulevard Regional Trail. Additionally, Columbia, Stinson and Ridgeway Parkway will be add, as by statute, they are permanent parts of the regional park system in Minneapolis.

The Minneapolis Park and Recreation Board (MPRB) is responsible for preserving, protecting, maintaining, improving and enhancing parkland, recreational opportunities and boulevard trees in Minneapolis. It strives to provide a high level of service to park users who live, work, learn and play in the city. Cornerstones of that service are:

- A park within walking distance of every home in the city, which equates roughly to a park within six blocks of every home, and
- The Grand Rounds system of parkways and parks, which encircles much of the city and represents much of the regional park system in Minneapolis.

Consequently residents of Minneapolis have come to expect a high level of service from, and access to, park facilities.

The Metropolitan Council's system statements set the expectation that Minneapolis will absorb a portion of the population increases projected for the metropolitan region. Projections of Minneapolis planning staff show that housing units, and consequently population, will increase significantly over the next 25 years in any case.

A view of projected housing units between 2005 and 2010 shows much of the increase occurring in areas that are historically non-residential. These areas, therefore, have not required parks or park services, but their development will drive a need for additional parkland. Areas of particular interest include Downtown, the Central Riverfront and Above the Falls riverfront between Plymouth Avenue and Camden Bridge in north Minneapolis. On both a citywide and regional level, resources will be needed to first determine the needs of new residents in these areas and then to provide adequate services.

Over the next 25 years, the MPRB will be seeking to serve the new populations that arrive in the areas of targeted growth. The Above the Falls Master Plan begins to address the needs of these individuals; early estimates show that the cost of implementing the park component of this plan could be \$200 million. This would be in addition to the rehabilitation of existing regional parks, which is estimated at \$215 million and the investment in neighborhood parks which could reach \$4 million. With existing funding sources now divided by an increasingly diverse number of environmental and park initiatives throughout the state, finding these additional resources becomes an ever greater challenge, but a challenge that must be met.

The Metropolitan Council will play a key role in advocating for and assisting metropolitan communities in providing livable environments if goals for increasing population are to be met. Options such as dedicated funding sources and other creative funding mechanisms will need strong consideration.

**Minneapolis Parks and Recreation Board
Comments on Regional Parks Policy Plan**

April 18,2005
Mr. Glen Skovholt, Chair
Metropolitan Parks and Open Space Commission
c/o Mr. Arne Stefferud
Mears Park Center
230 East 5th Street
St. Paul, MN 55101

Re: Proposed Policy Plan Constitutional Amendment and Other Policy
Additions/Revisions

Dear Mr. Skovholt:

The Minneapolis Park and Recreation Board (MPRB) generally approves of the proposed DRAFT Policy Plan revision of the Metropolitan Council. It is well thought out and very comprehensive. It will encourage the continued development of a regional park system that is second to none in the world, and will help to promote healthy, positive natural resource based activities and environmental preservation and restoration. This is beneficial to people, business, jobs, and wildlife, will help to reduce costs associated with environmental degradation, and will increase air, water and soil quality.

As you know, funding needs seem to be a continual challenge for all metropolitan regional park implementing agencies (IAs). At our April 4, 2005 IA meeting the group mentioned including the idea of a constitutional amendment allowing tax levy funds (A.K.A., the "3/16ths or 14% bill") for metropolitan parks. This would help to ease the ever increasing strains of inflating land acquisition costs, backlog of rehabilitation, and the need for new development to accommodate the needs of the estimated additional 1 million people that will move into the metro area in the next couple of decades by providing millions of dollars in extra funds. Other environmental interests are also requesting funds from the legislature, and this adversely affects funding for metro regional parks. A bill that is dedicated to environment and parks will better help to address the long term needs of the region.

This added funding would also help to take care of the need to get large projects completed sooner that do not fit neatly into the CIP. A dedicated funding source would help to even out economic cycles as well. We respectfully request the MPOSC to include language to the effect of recommending that a constitutional amendment be passed that allows state government to pass on sales tax revenues to metro regional park agencies. In addition, there are several other provisions in the DRAFT Policy Plan that need to be revised.

The first is that some of the figures used in the Finance section do not seem to be reflective of current prices, or may be in error. This includes land prices (as was also brought up at the public hearing at the Metropolitan Council on April 6, 2005), and the development costs cited as an average of \$144/acre in past years. Although that figure may also include undeveloped acres, it offers a misleading figure to the general public and officials to actually develop land for parks. As you know actual development costs can run in the hundreds of thousands to millions of dollars per developed acre. The FULL cost to develop the system should also be included, reflect inflation pressures, and THEN be divided evenly over the years through 2030 to give a realistic portrait of the true need to acquire, develop and rehab the regional parks. In 2001 the Implementing Agencies (IAs) were requested to provide a 10 year estimated CIP for rehabilitation that came to around \$335 million. Is that amount (now around \$407 million if 5% inflation is factored in) included in the figures? If that is added to the other amount of \$428 million you get a figure of \$842 million. If factored at only 7% inflation (to account for rapidly inflating land, oil, steel and concrete prices, as examples) and divided into 23 years at a flat spending level the true need is more like an additional \$69,000,000 a year (assuming \$15 million per year from traditional sources), reinforcing the need for all IAs to find additional sources of funding. By not factoring this in, the IAs as a group could risk losing well over \$1 billion in purchasing power!

Language that encourages matching grants from only non-state sources (essentially prohibiting use of other state sources) should be eliminated from the Policy Plan in favor of encouraging matches from all other sources.

Please have this letter officially included in the DRAFT Policy Plan comments. Thank you for your time and consideration,

Sincerely,

Jon Olson
President

Jon Gurban
Superintendent

cc: Minneapolis Legislative Delegation
Peter Bell, President, Metropolitan Council
Arne Stefferud, Planning Analyst, Metropolitan Council
Metropolitan Park and Open Space Commission Members
Brian Rice, MPRB Counsel

City of Minneapolis
Comments on Transportation Policy Plan

The following comments on the 2030 TPP were reviewed and approved by the Minneapolis City Council on October 22, 2004.

The City shares the Metropolitan Council's concerns that the expected population growth of nearly a million people by 2030 will generate millions of additional daily trips and further burden an already over-congested system. The City, like the Met Council, understands there is no single solution to the region's transportation issues. We commend the Met Council for identifying a variety of measures including but not limited to: increasing transit ridership; increasing multi-model transportation corridors; and focusing highway investments and mixed use development that could decrease the growth of congestion and improve the transportation system.

Minneapolis strongly agrees with the Met Council that current funding levels are sorely inadequate for highways, transit, and the general health of the region. While the City is highly supportive of adequate Transportation Resource Policy, [also outlined in the 2030 TIP (p.38)], we are disappointed there are no clear strategies cited for implementing this policy.

We urge the Met Council to pursue a meaningful funding plan consistent with the Criteria for Evaluation Revenue Sources. (2030 TPP, p.121) The continuation of current transportation funding, combined with the projected increase of additional daily trips makes the goals of the plan unrealistic and will severely constrain the movement of people and goods throughout the region.

The City is pleased that the need for additional funding for highways, transitways, and transit operations is acknowledged throughout the 2030 TPP. As the Met Council acknowledges:

"Maintaining highway funding at current levels will result in significant increases in traffic congestion, delaying the movement of people and goods, reducing the region's economic competitiveness and harming our quality of life. Transit service improvements which could help ease the pressure on our highways will not be possible at current funding levels. Indeed, current funding levels will not be adequate to maintain transit service at current levels." (2030 TPP Summary, p. 3).

"Mn/DOT estimates that the cost of the unmet highway needs to hold the level of congestion to 1998 levels could reach \$14 billion by 2030. The region will also need \$2.4-3 billion in additional transit capital funds between 2005-2020 and \$120 million annually by 2020 in additional transit operating funds to implement the transit system described in this document. Failure to fund these services will result in the deterioration of regional accessibility for work and personal trips. Funding sources and levels established in the past are not adequate to meet the growing and changing needs of the region. New revenue sources must be secured." (2030 TPP, p. 38)

"Highway funding levels resulting from extrapolating current revenue trends will result in significant highway congestion, reducing the region's competitiveness in the national and international markets... Transit services, which could mitigate the effects of unfounded highway needs, will not be possible at current levels... building a network of transit corridors will require new revenues for both capital and operating needs from a new and yet unidentified revenue source." (2030 TPP, p. 109)

As acknowledged in the 2030 TPP, our region compares poorly to other regions in terms of transit funding. Even with the implementation of all of the rail transit projects planned for the region we compare poorly to other major metropolitan areas. We rank ninth out of the eleven regions studied by the Council in both transit subsidy and transit expenditures per capita. (2030 TPP, p. 110- 112). According to the recent Urban Mobility Report of the Texas Transportation Institute, the region posted the highest increase in hours of delay per traveler between 1982 and 2002 (Star Tribune Editorial, "Traffic Jams: Pressure to Fix Transportation," September 13, 2004 p. A9).

It is critical that the Met Council --as the preeminent regional planning agency in the state -- be the leading metropolitan advocate for *Mn/DOT* Metro's share of state and federal funding. As the Met Council is well aware, the continued implementation of the current formula leads directly to a decreased target percentage for *Mn/DOT* Metro. This is unacceptable. With the expected growth in this region, it is virtually imperative that the Met Council communicate with both the *Mn/DOT* Commissioner and Governor regarding this issue. Any new formula should lead to an increased share for *Mn/DOT* Metro based on actual growth and system needs. *Mn/DOT* should be basing funding distribution on meeting the state plan targets and not the current formula.

The City's specific comments regarding several strategies reflected in the 2030 Plan are as follows:

TRANSIT

- The 2030 TPP does not address transit services or facilities in downtown Minneapolis at all. It should include a description of the transit services and facilities and address the future needs of the downtown Minneapolis. This should be addressed in chapter four, strategy two.
- The identified corridors (Cedar Ave., 1-35W, Central, Northwest, and Northstar) are the regions most heavily traveled routes. Transit and highway improvements as a regional priority, is the proper focus to ensure the continued growth and vitality of the region.
- The City is concerned that the planned improvement project on 1-35W north of 46th Street to 1-94 will not be added to the Mn/DOT work plan during the next five years "unless new funds materialize" that are not currently provided under today's constrained funding scenario. (2030 TPP, p.90). It is critical that the Met Council and Mn/DOT designate 1-35W is considered a candidate for funding if the region receives an additional 30 percent. Based on congestion and safety, the I035W corridor north of 46th Street should be the first project considered for funding in a modified TPP. This segment of I-35W:
 - Experiences extreme congestion in both directions during the a.m. and p.m. peak hours;
 - Lacks HOV and transit advantages; and
 - Features the highest volume interchange in region at 1-94, with two of the highest crash rate segments in the region.
- In, the 2030 TPP should better articulate and take a position on funding and pricing strategies in creating an efficient and responsive transportation system. Furthermore, it should articulate how particular investments and strategies contribute to a growing and vibrant regional economy rather than just mitigating the costs of growing congestion or helping people "move around". It should emphasize what characteristics make local and county arterial roads work for transit, pedestrians, and which also reduce vehicles miles travel (VMT).
- The importance of a multi-modal and inter-modal transportation system cannot be overemphasized. Such a system is necessary to support the continuing renaissance and evolution of Minneapolis in an increasingly large, and economically and culturally vibrant region. Many of the jobs available to many Minneapolis residents are now located outside of the City. Access and mobility from the City to the rest of the region is as important of an issue as access for commuters to and through Minneapolis.
- Policy 12. The policy seems to limit the investments to preservation and safety. The policy should be redrafted to permit investments that relieve congestion and provide for transit.
- Strategy 3b Transit Capital and Operating Investments. As written, the policy appears inconsistent. The policy recommends that investments will support the 2030 TPP, but due to funding constraints, priority will be on supporting preservation, maintenance and replacement of existing assets. Most of the transit system's assets are maintenance facilities, rolling stock and park and ride lots and ramps that are supported by regional bonds and federal funds. The Met Council should consider the policy of maintaining the existing assets while strategically investing in new projects that are part of the Tier I corridors.
- While addressing financial constraints in the political arena, the plan should advocate for interim transit system expansion in the form of HOV/BRT lanes. Such facilities will be far superior to bus-shoulder lanes pending necessary investments. Such facilities, including those with mainline transit stations, should generally reinforce access to central locations like the downtown areas of Minneapolis and St. Paul.
- The 2030 TPP should identify progress made toward meeting the previous goal of doubling transit ridership in a similar timeframe. It should articulate what strategies the Met Council might take to ensure that the goals are periodically monitored, and if necessary, corrective measures are introduced. It should de-emphasize strategies like flexible work hours, preferential parking, and telecommuting which are less effective.
- Table 4-4. Arterial/Local Corridor Transit Investment Priorities – we strongly recommend that Lake Street and Lowry Avenue be included in Table 4-4.
- Strategy 6b. Transit Fare Structure. The proposed Transit Fare Structure policy is supportive of increased fares - which may reduce ridership and adversely affect transit dependent populations. The City is supportive of transit pricing strategies that recognize market forces, but do not adversely affect transit dependent populations.
- The 2030 TPP emphasizes a variety of traditional approaches to support transit ridership, improve safety, and manage access in the midst of growing regional congestion and limited funding environment. However, the plan should resolve funding constraints, strategize to reduce inefficiencies, and prioritize investments to improve access and mobility in the fully developed area.
- The 2030 TPP should articulate what it means by "encourage local governments to implement a system of fully interconnected arterial and local streets, pathways, and bikeways."

LAND USE

- The City has concerns about the designation of bus layover facilities along the Hiawatha LRT line. We recognize the importance of efficient bus operations and connections, but the immediate presence of layover facilities limits development potential immediately adjacent to the stations that could generate transit ridership. The need for layover facilities should be reevaluated at some point prior to 2030 as redevelopment and in-fill development occurs. Increasing transit ridership and development should eventually eliminate the need for timed transfer facilities.
- Chapter 3, Policy 1, Land Use and Transportation Investments. The policy supports development and redevelopment but makes no mention of the central cities. The policy should be clarified by adding "and reinvestment" to the end of the sentence. (2030 TPP, p. 37)
- Chapter 3, Policy 18, Transportation and Land Use Elements in Local Comprehensive Plans. There could be a conflict between the goals for housing density and congestion. The 2030 Development Framework and the 2030 TPP encourages dense multi use development that is transit oriented. This policy however could result in non-conformance (strategy 18a) if the development, which is consistent with the framework, causes an increase in congestion. (2030 TPP, p. 58)
- Strategy 18B. Balance between Demand and Transportation Capacity. It is expected that locally generated trips will not exceed the capacity of local or regional transportation facilities. There are references elsewhere to the idea that development density should reflect transportation capacity rather than the other way around. This would tend to argue for lower densities rather than an intensification of land use density. (2030 TPP, p. 58)

AVIATION

First and foremost, we are disappointed that the aviation element is given such little emphasis within the Transportation Policy Plan marginalizing the importance of this transportation mode to the region.

- The Met Council is charged with the development of aviation system planning for the region; however, it appears that it has willingly abdicated that responsibility by simply reiterating three legislative directives. We need a much stronger the Met Council role in the timely development of regional aviation system planning and periodic updates.

Prepare and Implement a MSP 2010 Development and Mitigation Plan:

- The TPP does not address the fact that MSP is currently experiencing passenger and operations activity levels which are above or near those projected for 2020 under the dual track forecasts. NWA's recent proposal, Vision2020, projects an additional increase in passenger activity by more than 66% over the next 16 years from 33.2 million passengers in 2003 to 55 million in 2020.
- Given that operations and passenger activity at MSP already is at 2020 projected activity levels 16 years early, it is inconceivable that the Met Council would not be at the forefront looking at changed conditions. Environmental impacts including noise, traffic congestion, emissions as well as economic impacts and possibly airfield and system capacity may change significantly from those associated with much lower activity projected in the dual track process.
- The Met Council should be actively and immediately involved with reevaluating and developing forecasts for the next planning horizon and not wait until 2007 to initiate this effort.
- A critical element of the 2010 plan is the noise mitigation program that was adopted in 1996 and most recently has been decimated by the MAC. With the exception of MC's efforts in 2002 when the Met Council refused to approve MAC's CIP unless MAC reaffirmed its commitment of \$150 million to mitigate noise in the 60-64 DNL impacted areas, the silence from the Met Council has been deafening on this issue.
- We are concerned that the Met Council's Land Use Compatibility Guidelines, on one hand, support and sustain the 60 DNL noise level as the threshold of significant impact for the region, but undercuts that threshold by continuing to use FAA's interior noise threshold of 45 DNL which is met by normal building construction without any additional attenuation.
- The Met Council needs to revise the interior noise thresholds to a 45dBA (Single event level) criteria or to thresholds adopted by the World Health Organization providing a consistent and meaningful regional policy for airport noise.

Develop a plan to divert the maximum feasible number of general aviation aircraft from MSP to the reliever airports:

- Removal of additional GA operations from MSP will be increasingly difficult since most of what is left at MSP is turbine operators. Improvements at both Flying Cloud and Anoka serving the corporate fleet will also be critical to absorb additional demand as the region grows.
- Improvements at these fields may prove increasingly difficult due to the pressure that Northwest Airlines is exerting to keep MSP revenues at MSP rather than developing the reliever airport system.

- The Met Council should be in the vanguard advocating aviation system development for the region rather than acquiescing to NWA's arguments of jettisoning the reliever airports, withholding revenues generated at MSP from the relievers, or otherwise weakening the Region's system of airports.

Plan and maintain a viable, state of the art airport system:

- The City of Minneapolis has been working on developing a coalition of Minnesota's regional service centers extending beyond the "Tier 2" cities to develop a stronger statewide aviation strategy. Fundamentally, the Met Council needs to address a long term strategy to make better use of existing resources, reduce environmental impacts, and achieve sound and sustainable economic growth throughout the state.
- At both the state and regional level, the question of whether to continue to simply "grow MSP" is the best and only answer to the region's passenger and cargo needs has to be evaluated. The Met Council could and should be an integral partner in this effort.
- We are concerned that the Met Council believes the 1996 Aviation Policy Plan should remain in effect when significantly different circumstances prevail at the region's airports and with the airline industry, in particular.

HIGHWAYS AND BRIDGES

- Bridges over the Mississippi River need to be further addressed in the Plan. These bridges are vital to the transportation of goods and services in the region. A dedicated funding source for the rehabilitation and improvement of these bridges is crucial. These bridges can't be funded by local dollars alone due to their size and cost.

In summary, Minneapolis would like to reiterate our concerns regarding transportation funding and the role of the Met Council. We feel it is crucial that the Chair and Members of the Met Council play an active role in working with the Governor and Legislature regarding transportation funding. The City shares the Met Council's strategic view that a new funding source for transit is required. The City agrees with the Met Council that this new funding source for transit must be stable and reliable enough to allow long-range planning dedicated to transit; remain able to grow with the economy and population; broad-based; and applicable to both capital and operating costs. (2030 TPP, p. 115).

Without a stable, reliable, and dedicated source of funding to provide priority transitways and operating funds (for transit as well as highway construction), the Met Council's 2030 Transportation Policy Plan will remain a lofty yet elusive dream. The City is committed to ensuring that such funds are provided so that the TIP can be realistically implemented.

City of Minneapolis
Comments on Water Resources Management Policy Plan

The following comments on the draft Metropolitan Council's 2030 Water Resources Management Plan (plan) were reviewed and approved by the Minneapolis City Council on February 11, 2005:

General:

The City is very supportive of the Met Council taking a system-wide, integrated approach in its *2030 Framework* that "sets out a plan for growth that protects water resources and the region's quality of life." With that in mind, we would encourage additional language that makes a stronger link throughout the Plan between transportation, aviation, water resource management and the protection of natural resources/open spaces.

The Plan, if approved, could have a large financial impact to the City. At the same time, legislation is being proposed that could also generate funds for some of these same services. It appears that at some point, state dedicated funds could be directed to water resource issues. If this were to happen, what would be the Met Council's steps to evaluate and perhaps change funding related activities as outlined in the Plan?

Water Supply:

Policy 1: The Met Council will work with communities to promote and support the efficient use of water resources to ensure that water supplies are adequate for the region's projected growth.

Policy 2: The Council will work with regional partners to protect the water supply system for the region.

The City commends the Met Council for attempting to address the concern of an adequate water supply. The City, in partnership with some of its surrounding neighbors, has reached agreement once again to continue delivering water wisely and in a coordinated fashion as outline in the Plan.

The Plan supports the efforts of the River Defense Network. The City of Minneapolis is a founding member of this effort to ensure a safe, reliable drinking source for those using the Mississippi. It is important to note that what happens to the Mississippi River — above Minneapolis - is critical to the metropolitan areas' future.

On page 14 please note that Bloomington uses both surface water and groundwater as drinking water sources.

We agree that the Metropolitan Council's strong regional planning role in water supply is appropriate. The Minnesota Department of Health (MDH) completed a Source Water Assessment with Minneapolis in September 2001 per EPA requirements. Minneapolis and technical advisory teams continue source water protection efforts through the Upper Mississippi River Source Water Protection Plan. The Met Council has a presence with the project.

We support the Met Council's strategy to further evaluate the feasibility of cost effective wastewater reuse opportunities. We would appreciate the opportunity to participate because of concerns about potential cross connections to potable water systems.

Surface Water Management:

The Mississippi River is the primary drinking water source for the City of Minneapolis. As a result, the connection between water supply and surface water management is critical. The Metropolitan Council's goal of improving surface water management is laudable. Indeed, great strides have been made to improve the surface water quality through point source strategies. However, non-point source pollution remains a serious threat to the area's natural systems.

Overall, it would be helpful for the Metropolitan Council to provide clearer strategies as to their role in this area. We would welcome a partner interested in supporting a stronger role in surface water management technical assistance. At the same time we are concerned about redundancy between the Metropolitan Council, the Minnesota Health Department, the Minnesota Pollution Control Agency, the Minnesota Department of Natural Resources and the four watershed organizations in Minneapolis. It will be critical that these agencies work together in order that limited resources are used to their fullest potential.

Policy 1: The Council will provide technical assistance and resource assessment information to assist others in their efforts to implement practices that will protect water resources (wetlands, lakes, streams, rivers and natural drainage courses). Best management practices help to maintain and improve water

quality, control runoff rates and volumes to reduce streambank erosion and flooding, and preserve designated beneficial use.

We are very supportive of the Met Council's policy of providing "technical assistance and resource assessment information." It would be helpful if the implementation strategies addressed this further. Promoting Best Management Practices is a starting point. This policy may be better served if the BMP statement is revised to be consistent with other

Policy sentences by reflecting more of the expectation of the Council. It would be helpful if the Met Council could also develop incentives that could protect our water bodies. What will be the Metropolitan Council's role/focus in non-point source reductions in the rural areas, especially as it relates to the agricultural industry, besides establishing load allocations on a watershed basis? Some of these watersheds are partially outside of the Met Council's jurisdiction, yet they could have a significant impact on our water quality and drinking water source.

Priority Lakes/Impaired Waters: In reviewing the criteria of what constitutes a Priority Lake (Appendix A-2), it appears that some lakes in the City should be re-evaluated and added to this list. This is especially a concern if Priority Lakes will be receiving priority funding in the future. Most Minneapolis Lakes have recreation options and park land attached. It is unclear why some rivers and creeks also are also not deemed priorities. There is also a concern that there could be future confusion as to the differences between the distinctions of Priority Lakes and Impaired Waters.

Policy 2: The Council will review local comprehensive plans, watershed management plans, local surface water management plans, local stormwater ordinances, environmental permits and other environmental documents to ensure that the local units of government are fulfilling their non-point source reduction requirements and therefore not impacting the metropolitan disposal system.

The City requests clarification on what specific changes the Plan is proposing as it relates to the Metropolitan Council's existing statutory responsibility in reviewing these various plans. The more timely and upfront that the Met Council can review and provide comments, the smoother the process. As mentioned previously, we are concerned about issues of coordination and redundancy.

Total Maximum Daily Load (TMDLs): The City is already in the process of working with a few of our local watershed districts to determine realistic TMDLs and implementation strategies for bodies of water listed as impaired within our city limits. What will happen if this TMDL determination is not as restrictive as Met Council's view?

Wastewater Service/System Plan (7 policies):

Policy 1: The Metropolitan Council will use the wastewater system plan to support the orderly and economic development of the metropolitan area including the long-term service area of communities. The long-term service area will be generally defined by a community or watershed boundary. A community's comprehensive plan and plan amendments are expected to meet the forecasts and densities specified in the Council's 2030 Regional Development Framework. Inconsistencies will provide the Council with grounds for finding that the community's plan is more likely than not to have a substantial impact on, or contain a substantial departure from, the metropolitan system plan, thus requiring modifications to the local comprehensive plan.

In order to develop cost-effective and efficient use of existing and planned infrastructure on a regional basis, local land-use planning must be consistent with the Council's adopted long-range policy plans, system plans, and capital improvement programs for regional wastewater service, and all communities currently served the Metropolitan Disposal System must remain in the system.

It is important that "orderly and economic development" be implemented through a framework that also takes into consideration a local government's plans to protect natural areas. This is important because there is a strong correlation between healthy environmental areas and the nearby water quality.

Policy 3: The Council will not provide additional capacity within its interceptor system to serve excessive inflow and infiltration (III). The Council will establish III goals for all communities discharging wastewater to the Metropolitan Disposal System based on the designed peak-hour capacity of the

interceptor(s) serving the community. Communities that have excessive III in their sanitary sewer systems will be required to eliminate the excessive III within a reasonable time period.

Older communities in the MDS are most likely to be affected by this policy. The City currently has three I/I reducing programs underway: a capital improvements and maintenance program related to combined sewer overflow elimination, a rain leader separation program, and implementation of storage or other improvements that increase connected. We appreciate the opportunity to participate in the 2003 Infiltration and Inflow Task Force, and consequently for having that group's recommendations incorporated into the Plan. This is a large financial commitment from the City, and our goal is to reduce our excessive I/I. We are supportive of the objective to make funds available.

In order to manage an efficient program, it is critical that the City understand the details of the proposed I/I reduction program. When will the Metropolitan Council release information and procedures for the 2007 surcharge program so we can determine if it is appropriate option for the City?

In the Task Force Recommendations starting in 2015 (not 2013 as stated in the Plan), the Council would limit future increases in services and institute a wastewater rate demand charge program. Please explain the change in dates.

Policy 4: Interceptors and related facilities that are no longer a necessary part of the Metropolitan Disposal System will be reconveyed, abandoned or sold pursuant to related statutes

The City is very concerned about implementation strategy regarding the reconveyance of a regional interceptor (Met Council) to a local beneficiary (the City) in cases where the Met Council has determined that the interceptor does not serve a regional benefit. It is stated that this determination would be based on the "interceptor no longer providing a regional role when it serves primarily as a local trunk sewer (including service to an upstream community for 200,000 gallons per day or less wastewater flow)..." We believe any reconveyance would result in the following adverse impacts to our City:

- A. Increase draw on community maintenance and capital budgets: Unless the interceptor is turned over to the City in good condition, we will experience an adverse impact on our maintenance and repair budget in the year in which the reconveyance would occur. In addition, based on the condition and age of the interceptor, we may have to increase our capital budget to cover the cost of total replacement of the interceptor. Again, these are funds that would not be programmed in our budget. Most often the diameter of the interceptor pipe is quite a bit larger than trunk line because they carry more flow. The slope of the interceptor pipe is often flatter than a collector pipe. As a result, once the interceptor is reconveyed, there may not be sufficient flow in the interceptor to self clean - resulting in backups. To help minimize this impact, we recommend that the Council adopt a policy similar to what is used when roads are turned back to a city. In this case, a condition survey is done on the interceptor in accordance with NASSCQ's Pipeline Assessment and Certification Program. Based on this survey, the Met Council would repair or modify the interceptor to an agreeable condition, prior to reconveyance.
- B. Increased city liability: We believe that any interceptor that conveys flow from an upstream community is providing a regional benefit no matter how small the flow may be. If a reconveyed interceptor were to provide flow into our city from another community upstream, we would realize an increase in risk and resultant liability from a potential blockage and backup of the system. We have no control on what is being sent to us in the flow from an upstream community that could result in a backup in our city or even the upstream community. Therefore, they should not be reconveyed to a city.

Policy 6: The Met Council will design and adopt fees and charges using a regional cost of service basis ...

The Met Council will seek customer input prior to, and give at least three months notice of, any material changes in the design of fees and charges.

We strongly support the concept of fees based on usage. It is critical that the wastewater system is managed in a cost effective manner and that Minneapolis bear its fair share of the expected growth since our sewer system is aged and in need of costly repairs that will be paid for by the City for the most part.

A fee increase could have a significant impact on the City of Minneapolis depending on where we are at in our annual budget process. A twelve month notification period would allow for a more orderly process since the City has to revise financial pro formas, and notify users of any rate increase.

Policy 7: The Council will continue to use the Council's review authority under the Metropolitan Land Planning Act to ensure that communities that permit the construction of private wastewater systems within their communities (community systems and individual sewage treatment systems) ensure that these systems are installed, maintained, managed and regulated by the community consistent with MPCA rules.

... The Council will allow the community to connect a failing private wastewater treatment system to the Metropolitan Disposal System (MDS), where there is available capacity, at the community's expense.

We recognize and support the concept of the Council allowing communities to connect a failing private wastewater treatment system to the MDS. As outlined in the Plan, it is critical that such decisions are made based on available capacity and that those operating under the existing system do not fund the extension of the MDS.

Because the City of Minneapolis has very few, if any private wastewater systems, it is assumed that we would not be required to provide ordinances/ management plans as a part of the Comprehensive Plan.