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 TTP (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).
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> "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)
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> "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., I-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 supports the Met Council's plan to increase ridership by 50 percent by 2020, and double ridership by 2030. (2030 TPP, p. 3)

- As you know, the City has not been supportive of building additional lanes on I-35W to downtown Minneapolis. However, we commend the Met Council for including the completion of a new fifth through lane in each direction reserved for "priority transit/HOV" within the 2030 TPP. (2030 TPP, p. 67). We agree that completion of the lane is "the logical extension" of the I-35W/Crosstown common area project, and recognize that the 2001 TIP now includes $185 million for this project. (2030 TPP, p. 90)

- The City is concerned that the planned improvement project on I-35W north of 46th Street to I-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 I-35W north of 46th street as an advance design project. As acknowledged in the 2030 TPP on page 100, I-35W is considered a candidate for funding if the region receives an additional 30 percent. Based on congestion and safety, the I-35W 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 I-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.

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- 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 operations 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 & 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 TTP can be realistically implemented. (Mention I-35W and the Tier 1 Corridors?)