

# PUBLIC COMMENT REPORT

2024-2027 Transportation Improvement Program



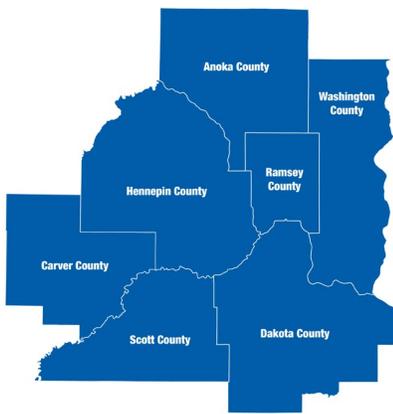
August 2023

The Council's mission is to foster efficient and economic growth for a prosperous metropolitan region

---

### Metropolitan Council Members

Charlie Zelle	Chair	Diego Morales	District 9
Judy Johnson	District 1	Peter Lindstrom	District 10
Reva Chamblis	District 2	Gail Cederberg	District 11
Tyronne Carter	District 3	Susan Vento	District 12
Deb Barber	District 4	Chai Lee	District 13
John Pacheco Jr.	District 5	Toni Carter	District 14
Robert Lilligren	District 6	Tenzin Dolkar	District 15
Yassin Osman	District 7	Wendy Wulff	District 16
Anjuli Cameron	District 8		



The Metropolitan Council is the regional planning organization for the seven-county Twin Cities area. The Council operates the regional bus and rail system, collects and treats wastewater, coordinates regional water resources, plans and helps fund regional parks, and administers federal funds that provide housing opportunities for low- and moderate-income individuals and families. The 17-member Council board is appointed by and serves at the pleasure of the governor.

On request, this publication will be made available in alternative formats to people with disabilities. Call Metropolitan Council information at 651-602-1140 or TTY 651-291-0904

## Background

The Metropolitan Council sought public comments on the region's draft 2024-2027 Transportation Improvement Program (TIP) between May 17 and July 3, 2023. The Met Council hosted a public meeting on June 20 2023. The Met Council proactively promoted availability of the comment draft and public meeting, advertising them through social media and other means.

The TIP lists and describes all proposed federally funded transportation projects within the metropolitan planning area, including highway, transit, bike and pedestrian improvements. The program is pulled together yearly and spans a four-year period. During this time, the program was available on the Met Council's website and through printed copies as requested.

The following report includes a spreadsheet of comments received, and responses from Met Council staff and any recommended changes. Five commenters participated and provided 18 topical comments. One commenter provided a majority of topical comments.

### People engaged

- Web page
  - 243 unique visitors
- Facebook post 1
  - 346 people reached
  - 1 person engaged
- Facebook post 2
  - 257 people reached
  - 19 people engaged
- Facebook public meeting post
  - 155 people reached
- Twitter Post 1
  - 709 people reached
  - 24 people engaged
- Twitter Post 2
  - 448 people reached
  - 14 people engaged
- Public meeting
  - 11 people registered
  - 8 attendees
  - 3 commentors

### Methods used

- Web announcement and web page notice
- GovDelivery email announcement and reminder
- Facebook
- Twitter
- Star Tribune classified advertising
- Public meeting (virtual)

### Comments received through

- Email
- Web form
- Public meeting
- Social media

## Engagement Themes and Recommended Changes

- Seven comments covered questions and concerns regarding Highway 252, associated projects in the TIP, and the TIP process around those projects. These comments all came from one commenter. Themes in these comments included:
  - Environmental justice and equity impacts of the project;
  - Project climate impacts;
  - Explanation of the TIP's relationship with federal and state policy and law like the Clean Air Act;
  - Use of funds from specific federal programs including Carbon Reduction program (CRP) and Congestion Mitigation and Air Quality (CMAQ); and
  - Public engagement around the TIP and generally from the Met Council.
- Three comments provided feedback on bicycle and pedestrian facilities and projects.
- Two comments requested information and provided feedback regarding compliance with the Americans with Disabilities Act (ADA).
- Two comments specifically provided feedback on the TIP document elements such as a map of the Twin Cities region Principal Arterial system.
- Two comments touched on transit; one about a specific project change in the TIP from Metro Transit, and one regarding Northstar commuter rail service.
- Two comments requested more explanation within the TIP about how it conforms with environmental justice and climate change policy in the TPP and state and federal law.

## Comments and Responses

The table below contains written comments as received and paraphrased summaries of verbal comments in the public meeting, along with a response from Met Council staff and any recommended change to the TIP. Comments are ordered alphabetically by first name.

Commenter	Topic	Comment	Response
David Frenkel	ADA Accessibility	The west side of France Ave from 66th St to I-494 needs a lot of ADA upgrades. Why can't all of France Ave from Excelsior Blvd to I-494 get ADA upgrades to make it ADA compliant?	France Avenue from Excelsior Boulevard to Interstate 494 is a Hennepin County road. The Met Council will share your comments with Hennepin County. We understand frustration with infrastructure that hasn't been made accessible over decades and agree that all levels of government should be working on compliance with the Americans with Disabilities Act (ADA). All public agencies are required to have completed a self-evaluation, and public agencies with 50 or more employees are required to have ADA transition plans that include a schedule for bringing facilities into compliance with the ADA requirements. Enforcement of the ADA is done at the federal level through the Department of Justice; their web site is <a href="http://ada.gov">ada.gov</a> .
David Frenkel	Pedestrian and bicycle  Roadway safety	Curb bump outs are safety features for pedestrians but make bike lanes dangerous by decreasing the vehicle lane width that bikes must share with vehicles.	Thank you for your feedback on curb extensions (bump outs). Curb extensions can provide a variety of benefits like shortening crossing distances for pedestrians, increasing pedestrian visibility, and slowing vehicle speeds and turning movements. Some implementing partners have begun installing curb extensions with dedicated ramps for bicyclists to continue through the intersection while bending away from traffic. The Metropolitan Council will continue to share with implementing partners information it receives on innovative bikeway and pedestrian design features.
David Frenkel	ADA Accessibility  Pedestrian and bicycle	<p>Via hearing: How much of the pedestrian money is going towards new pedestrian and bicycle bridges? MnDOT says there are approximately 114 existing pedestrian bridges in Minnesota that are not ADA compliant, and I am wondering how many are within the Twin Cities 7-county area? MnDOT is building more new bridges than retrofitting old bridges. There are two MnDOT pedestrian bridges in Edina but only one has funding to bring it into compliance.</p> <p>Via form: I was told MNDOT has around 114 pedestrian-only bridges in MN that are not ADA compliant. How many of those are in the Twin Cities/7 County area? How many new pedestrian-only bridges are being built in the Twin Cities with TIP? Does the Met Council do any type of tracking of non-compliant ADA facilities (bridges/sidewalks/public building entrances)?</p>	<p>Thank you for your comments. MnDOT shared information with us to help address your question; out of approximately 104 pedestrian bridges in the region, 78 are MnDOT's responsibility. Of those 78 pedestrian bridges in the Twin Cities region, 39 are not currently compliant with the Americans with Disabilities Act (ADA).</p> <p>In the draft 2024-2027 TIP, six projects include pedestrian bridges in their project descriptions, plus one placeholder for future work on pedestrian bridges in the district by MnDOT. The TIP does not generally include the level of detail that would reliably specify if each bridge is new or a replacement, and there could also be other pedestrian bridge work being done with other funding that is not required to be included in the TIP.</p> <p>To your question about the Council tracking ADA compliance, all public agencies are required to have completed a self-evaluation, and public agencies with 50 or more employees are required to have ADA transition plans that include a schedule for bringing facilities into compliance with the ADA requirements. At the request of the Federal Highway Administration (FHWA) Minnesota Division office, the Met Council surveys local agencies about the status of their federally required ADA transition plans approximately every two years. Thus far, data requested by FHWA has only focused on verifying the existence of a transition plan, the year it was completed, and a website link if it is available online. The Council shares this information with the FHWA office. The Council has not collected detailed data on ADA compliance of the public rights of way, including sidewalks and pedestrian bridges, from local agencies. This level of detail should be included in each agency's transition plan to identify barriers in the public rights of way for transportation, including bridges and sidewalks. Enforcement of the ADA is done at the federal level through the appropriate federal department or the Department of Justice; the main federal web site is <a href="http://ada.gov">ada.gov</a>.</p>
Forest Eidbo  City of Crystal	Project Specific  Pedestrian and bicycle	I am pleased to see pedestrian improvements on CSAH 102 (Douglas Dr) in the plan. These safety and pedestrian improvements are deeply needed and would help mirror trail improvements that Three Rivers is doing on the CP rail trail to crest a pedestrian/bike loop in New Hope and Crystal. I hope to see this project completed soon.	Thank you for your comment.
Kyle Bagley	Transit  Roadway removal	Make sure we focus on other modes of transit instead of the car we have a long way to make the twin cities a better place to get around for everyone. Get rid of freeways in Minneapolis and St. Paul they ruin the city!!	Thank you for your comment. The draft TIP has significant investments in transit that will benefit the region.

Commenter	Topic	Comment	Response																
Matt Woestehoff	Transit operations Highway Project - US 10 in Anoka	<p>Hello! Please note I am submitting comments as an individual, and not a representation of the entire city council in Ramsey.</p> <p>But I do hear from many residents as a council member and I ask that further funding and support is added to the Northstar line. Currently, Anoka County won't fulfill its funding obligation because a lack of services - however we can't have those services and use them without funding it. Sadly, these politics only make residents and commuters worse off. I ask that the routes expand in frequency daily, and also allow for special event routes for events like Twins or Vikings games. With Highway 10 under construction for the next few years, now is the time to lean into Northstar as a viable system for commuting to take stress off an extremely fluid highway project.</p>	<p>Thank you for your comment about operating support for Northstar Commuter Rail. Metropolitan Council agrees about the importance of providing a variety of travel options in the northwest metro area. Our staff recently completed a study detailing potential scenarios for transit service in the Northstar Corridor. You can learn more about this study and its findings on this webpage:</p> <p><a href="https://metrocouncil.org/Transportation/System/Transit/Studies/Northstar-Rail-Corridor-Post-Pandemic-Study.aspx">https://metrocouncil.org/Transportation/System/Transit/Studies/Northstar-Rail-Corridor-Post-Pandemic-Study.aspx</a>.</p> <p>Metro Transit is evaluating Northstar service levels considering the 2023 Transportation Omnibus Bill that includes a new seven-county metro sales tax for regional transportation. The new sales tax goes into effect on October 1, 2023, and a portion of the sales tax revenue will pay for transitway operations costs that counties are currently responsible for paying.</p>																
Nahid Khan	Document Feedback	<p>I would like to make a Public Comment on the Met Council's Draft 2024 - 2027 Transportation Improvement Plan: Federally-funded transportation improvements for the region for the Public Comment period ending today: <a href="https://metrocouncil.org/TIP.aspx">https://metrocouncil.org/TIP.aspx</a></p> <p>Figure 1: Twin Cities Metropolitan Area Political Boundaries - Also includes parts of Sherburne and Wright Counties (MN) and St. Croix County (WI) on page 6 / numbered page 3):</p> <p>I notice that this map shows principal arterial highways, including I-94 and MN (Hwy 252) as well as Hwys 169, I-694, Hwy 610, Hwy 10 and Hwy 65 (Central Ave.), but it does not show Hwy 47 (University Ave.)</p> <p>I therefore request that Hwy 47 (University Ave.) be included in this map.</p>	<p>Thank you for your comment. Minnesota Highway 47 is not a principal arterial (PA), which is why it is not included on the map. PAs are classified as part of the Council's and MnDOT's functional roadway classification system, which is approved by the Federal Highway Administration. Highway 47 is classified as a minor arterial.</p>																
Nahid Khan	Highway Project - MN 252 and I-94	<p>What is the estimated cost of the Hwy 252 / I-94 project?</p> <p>Was the Hwy 252 freeway conversion / I-94 expansion / addition of MnPass lanes in the 2022 version of this document, and what was the date of that document?</p> <p>What funding has already been allotted to this Hwy 252 / I-94 project?</p> <p>How many years has the Hwy 252 freeway conversion (etc) project been in the TIPs? (How far back has it been included?)</p> <p>I would like a list of all funding sources in writing for the Hwy 252.</p> <p>I would like a full history of the Hwy 252 &amp; I-94 project inclusion in all the past TIPs going back to whenever it was first included, and any past history prior.</p>	<p>The project cost estimate for the 252/94 project has not been determined as a scope and alternative has not been selected. There are elements that could be included in the project that have received funding through the Regional Solicitation and other competitive sources like Corridors of Commerce, as well as local agency contributions. The combined value of the funding received and estimated needed local contribution as listed in the TIP is \$183,064,845.</p> <p>The six projects listed below are also included in the current 2023-2026 TIP, which was adopted by the Met Council on September 28, 2022, and received approval from the U.S. Department of Transportation on October 19, 2022 (similar to schedule the draft 2024-2027 TIP is on).</p> <ol style="list-style-type: none"> <li>027-709-029. Separate grades, improve safety, improve ped/bike, construct curb and gutter, replace drainage elements, replace traffic signals CR 109 and Hwy 252 in Brooklyn Park. \$28,937,700 (\$7,000,000 federal). Funded by the Regional Solicitation and Hennepin County.</li> <li>109-010-007. Construct interchange, convert to freeway, close intersection on MN Hwy 252 at 70th Avenue, multi-use trail, and noise walls at 66th Avenue North in Brooklyn Center. \$9,796,000 (\$7,000,000 federal). Funded by the Regional Solicitation and Hennepin County.</li> <li>109-101-007F. Same project as above row; different source. \$12,000,000 (\$10,000,000 federal). Funded by the National Highway Freight Program (NHFP) and Brooklyn Center.</li> <li>110-010-010. Construct interchange and trail on north and south sides at Hwy 252 and Brookdale Dr, Humboldt Ave to West River Rd in Brooklyn Park. \$33,215,015 (\$10,000,000 federal). Funded by the Regional Solicitation and Brooklyn Park.</li> <li>2748-65. Improve the safe and reliable movement of people and goods across multiple modes on and across Hwy 252 from I-94 to Hwy 610 and on I-94 from 4th St N to Hwy 252 in Mpls, Brooklyn Center and Brooklyn Park. \$96,000,000 (All state funding). Funded by the Minnesota Department of Transportation's Corridors of Commerce program.</li> <li>109-090-002. Construct 14-foot wide pedestrian/bike overpass from Camden Avenue North to West River Road in Brooklyn Center. \$2,616,130 (\$1,902,640 federal). Funded by the Regional Solicitation and Brooklyn Center.</li> </ol> <p>These projects total \$183,064,845 (\$35,902,640 federal) in the draft 2024-2027 TIP. The projects listed above that could be elements of the 252/94 project first appeared in the TIP as noted in the chart below.</p> <table border="1"> <thead> <tr> <th>Proj #</th> <th>First Inclusion in TIP</th> <th>Proj #</th> <th>First Inclusion in TIP</th> </tr> </thead> <tbody> <tr> <td>109-090-002</td> <td>2018-2021 TIP</td> <td>109-010-007</td> <td>2023-2026 TIP</td> </tr> <tr> <td>2748-65</td> <td>2020-2023 TIP</td> <td>109-101-007F</td> <td>2023-2026 TIP</td> </tr> <tr> <td>027-709-029</td> <td>2020-2023 TIP</td> <td>110-010-010</td> <td>2023-2026 TIP</td> </tr> </tbody> </table>	Proj #	First Inclusion in TIP	Proj #	First Inclusion in TIP	109-090-002	2018-2021 TIP	109-010-007	2023-2026 TIP	2748-65	2020-2023 TIP	109-101-007F	2023-2026 TIP	027-709-029	2020-2023 TIP	110-010-010	2023-2026 TIP
Proj #	First Inclusion in TIP	Proj #	First Inclusion in TIP																
109-090-002	2018-2021 TIP	109-010-007	2023-2026 TIP																
2748-65	2020-2023 TIP	109-101-007F	2023-2026 TIP																
027-709-029	2020-2023 TIP	110-010-010	2023-2026 TIP																

Commenter	Topic	Comment	Response
Nahid Khan	<p>Highway Project - MN 252 and I-94</p> <p>Public Meeting Feedback</p>	<p>I would like to make a Public Comment on the Met Council's Draft 2024 - 2027 Transportation Improvement Plan: Federally-funded transportation improvements for the region for the Public Comment period ending today:  <a href="https://metro council.org/TIP.aspx">https://metro council.org/TIP.aspx</a></p> <p>I only found out about the Met Council's Draft 2024 - 2027 Transportation Improvement Plan and the Public Comment period in mid-June, and attended the only Public Meeting for it (held virtually) on June 20.</p> <p>So far as I can tell, I was one of only two members of the Public in attendance: one made a short comment on bike lanes / facilities, and I asked questions about MnDOT's Hwy 252 / I-94 project. My questions were about:</p> <p>(a) all the sources and amounts of funding allocated for this project, and all the projected costs of this project in all its various forms and segments, including all its possible features and configurations. In other words, I would like a full accounting of all its possible costs;</p> <p>(b) the history of this project and its various earlier permutations appearing in the Met Council's previous Transportation Improvement Plans, and any other Met Council transportation and other planning documents. In other words, how long (how many years, or even decades) has turning Hwy 252 through Brooklyn Center and Brooklyn Park into a freeway and expanding I-94 through Brooklyn Center and North Minneapolis, been included in Met Council transportation and planning documents?</p> <p>Met Council staff in attendance kindly responded that they would get back to me in writing with regard to these information requests, but as of this writing, they have not done so.</p> <p>Since there no other members of the Public present, the Public Meeting closed out early.</p> <p>I find the fact of there being little Public Notice of this meeting, or even of the lack of Public Information about the existence of this important document, and its significance and meaning for Twin Cities residents and taxpayers, through any form of Public Outreach and Community Education, and that it was available for Public Comment, extremely disturbing to say the least. There appears to be a serious lack of openness, transparency and accountability involved in this Public Comment period process, that does not support the claim made in the document:</p> <p>Page 4 / numbered page 1:  The 2024-2027 TIP is fiscally constrained, is consistent with the TPP, is in conformity with the Clean Air Act Amendments of 1990, and its development process provides acceptable opportunity for public involvement.</p> <p>Your Public Comment procedures are in great need of revamping so as to provide more opportunities for the Public to find out about the existence of this document, learn about this document and Met Council plans, which seem to be made with little if any public stakeholder involvement, and then for the Public to be able to make their important Public Comments as the People, Residents and Taxpayers who will be impacted by Met Council plans and be on the hook for paying for them.</p>	<p>The Transportation Improvement Program (TIP) is one of several elements in the transportation planning and programming process. The TIP tends to receive a limited amount of public comment as it is primarily documenting the results of other decision-making processes, such as the Regional Solicitation, in one place. The primary reason for this is that by the time the TIP is produced, most of the projects have been through other vetting and decision-making processes by the various sponsor agencies, many of which included public processes or opportunities for public input. For the Council, public input is much more directed at the Transportation Policy Plan (TPP), which sets much of the direction for these other processes and ultimately impacts what comes into future TIPs.</p>

Commenter	Topic	Comment	Response
Nahid Khan	Climate change, emissions, greenhouse gasses  Environmental Justice	<p>I would like to make a Public Comment on the Met Council's Draft 2024 - 2027 Transportation Improvement Plan: Federally-funded transportation improvements for the region for the Public Comment period ending today: <a href="https://metro council.org/TIP.aspx">https://metro council.org/TIP.aspx</a></p> <p>Regarding: 1. Introduction: (on page 5 / numbered page 2), under Federal Requirements and Regional Planning Process:</p> <p>It states: Fulfill requirements of the March 14, 2012, final rule as required by the U.S. Environmental Protection Agency (EPA), Transportation Conformity Rule.</p> <p>I request that the Met Council's Draft 2024 - 2027 TIP fully explain how it supposedly fulfills this U.S. EPA requirement. I also request that the other provisions/rules of the U.S. EPA be addressed to explain how the TIP fulfills their requirements and works holistically to advance the mission and directives of the U.S. EPA, which should be presented in the TIP.</p> <p>Furthermore, I request that the TIP fully discuss and address all forms of pollution resulting from highways and freeways, as well as all the provisions / rules of the U.S. EPA on impacts / harms to the human and natural environment (i.e. not cherry-picking through them and ignoring the ones that don't advance the apparent Met Council goals of never-ending freeway construction and expansion).</p> <p>It also states: Fulfill requirements of the Executive Order 12898 on Environmental Justice.</p> <p>I request that the Topic of this Executive Order be fully explained (Environmental Justice) in the TIP, with links as supplied below, and that this was issued by the Biden Administration on April 21, 2023:</p> <p>Executive Order on Revitalizing Our Nation's Commitment to Environmental Justice for All <a href="https://www.whitehouse.gov/briefing-room/presidential-actions/2023/04/21/executive-order-on-revitalizing-our-nations-commitment-to-environmental-justice-for-all/">https://www.whitehouse.gov/briefing-room/presidential-actions/2023/04/21/executive-order-on-revitalizing-our-nations-commitment-to-environmental-justice-for-all/</a></p> <p>FACT SHEET: President Biden Signs Executive Order to Revitalize Our Nation's Commitment to Environmental Justice for All <a href="https://www.whitehouse.gov/briefing-room/statements-releases/2023/04/21/fact-sheet-president-biden-signs-executive-order-to-revitalize-our-nations-commitment-to-environmental-justice-for-all/">https://www.whitehouse.gov/briefing-room/statements-releases/2023/04/21/fact-sheet-president-biden-signs-executive-order-to-revitalize-our-nations-commitment-to-environmental-justice-for-all/</a></p> <p>I also request that the Met Council's Draft 2024 - 2027 TIP fully explain its relationship with Executive Order 12898 on Environmental Justice, and how it fulfills its requirements as claimed in the TIP. I request that the TIP show how it works to advance work on the issues presented in this Executive Order in a holistic manner to advance Environmental Justice (i.e. not cherry-picking through them and ignoring the ones that don't advance the apparent Met Council goals of never-ending freeway construction and expansion).</p> <p>I did not see any mention of the Minnesota Climate Action Framework in this Met Council Draft 2024 - 2027 TIP or how the TIP fulfills any provision of this Framework: <a href="https://climate.state.mn.us/sites/climate-action/files/Climate%20Action%20Framework.pdf">https://climate.state.mn.us/sites/climate-action/files/Climate%20Action%20Framework.pdf</a></p> <p>I request that the TIP fully explain its relationship with the Minnesota Climate Action Framework, how the Framework informs and influences the TIP, and how it works to advance work on the issues presented in this Framework in a holistic manner (again, not cherry-picking through them and ignoring the ones that don't advance the apparent Met Council goals of never-ending freeway construction and expansion).</p>	<p>The TIP meets requirements for addressing pollution found in transportation planning regulations and responds to federal requirements for EPA on air quality conformity analysis. Additional project information on environmental impacts, including cumulative impacts, can be found in project specific environmental documents.</p> <p>The Council scores and selects projects through the Regional Solicitation, which accounts for roughly 20% of total funding in the TIP, using an equity criterion in addition to other scoring factors. This project-level criterion addresses engagement with, benefits for, and impacts on people of color, people with low incomes, people with disabilities, youth, and older adults – all populations included in federal environmental justice and other equity-related requirements. In addition, all applicants for federal funding through the Regional Solicitation must have an Americans with Disabilities Act transition plan or self-evaluation for the public rights of way. The Transportation Policy Plan includes additional equity-focused analysis of projects in the long-range plan as a whole. The Council is currently working on an Equity Evaluation of Regional Transportation Investments to help identify ways to make these decision-making processes more equitable. In completing this project, the Council is working with a community-based Equity Policy Group to pilot an evaluation of three investment processes and develop recommendations for making investment processes more equitable. This work will be completed in 2024 and should inform other Council investment decision-making processes.</p> <p>Minnesota's Climate Action Framework, released in September of 2022, guides the state to work toward being carbon-neutral by 2050, being resilient to the impacts of climate change and ensure equitable distribution of the costs and benefits, now and to future generations. It will guide the Council as we develop the region's Regional Development Guide and 2050 Transportation Policy Plan during 2023 and 2024. The Transportation Policy Plan guides future investments from federal formula funds through the Regional Solicitation and through road authorities' own investments in the region. These results show up as projects in subsequent TIPs. We are also undertaking a project through 2024 that will, in part, evaluate ways that we could report estimates of greenhouse gas emissions that result from projects included in the TIP in a consistent and logical way.</p>

Commenter	Topic	Comment	Response
Nahid Khan	<p>Highway Project - MN 252 and I-94</p> <p>Climate change, emissions, greenhouse gasses</p>	<p>I would like to make a Public Comment on the Met Council's Draft 2024 - 2027 Transportation Improvement Plan: Federally-funded transportation improvements for the region for the Public Comment period ending today: <a href="https://metro council.org/TIP.aspx">https://metro council.org/TIP.aspx</a> Regarding the following:</p> <p>Federal Program Areas in the Transportation Improvement Program Highway and transit funding programs are described below. (See page 15-16 / numbered pages 12 - 13.)</p> <p>A couple of them:            Congestion Mitigation and Air Quality Improvement Program (CMAQ). CMAQ directs funds toward transportation projects in non-attainment and maintenance areas for ozone, carbon monoxide (CO), and particulate matter. These projects contribute to meeting or maintaining the attainment of national ambient air quality standards. Historically in the Twin Cities region, CMAQ funds have been used for travel demand management, transit service expansion, or highway traffic management technology projects (such as traffic signal coordination). (See page 15/ numbered page 12.)</p> <p>My Comment: I request that funds from the program be used to research ozone, carbon monoxide (CO) and particulate matter levels in the areas of North Minneapolis, Brooklyn Center and Brooklyn Park, in particular, the neighborhoods adjacent to MnDOT's Hwy 252 / I-94 project area. These areas require focus given the well-known high levels of pollution of all forms in these areas (N Mpls and BC, in particular), and the high levels of respiratory diseases, hospitalizations and deaths: N Mpls and BC having the highest and second highest levels in the state. Please be reminded that these three cities are predominantly lower income and working class areas, and are majority BIPOC communities.</p> <p>A freeway expansion for the overbuilt I-94 freeway through N Mpls and BC, and converting Hwy 252 local road (as MnDOT defines it: any road that is not a freeway) into a freeway through BC and BP, that will double traffic, effectively increase its speeds to above 70-75 mph, and turn it into a Tier 1 Truck Route for diesel-burning heavy freight trucks, all through almost an entirely residential area of BC and BP, with the whole project area located next or within the Mississippi National River and Recreation Area (a National Parks Service administered area) needs major attention and research regarding ozone, carbon monoxide (CO) and particulate matter pollution, as well as many other forms of pollution.</p> <p>Carbon Reduction Program (CRP). This provides funding for projects designed to reduce transportation emissions, defined as carbon dioxide (CO2), from on-road highway sources. (See page 15 / numbered page 12.)</p> <p>My Comment: I request that funds from the program be used specifically to REDUCE transportation emissions, defined as carbon dioxide (CO2), from on-road highway sources, FROM CURRENT LEVELS, for all the reasons mentioned above.</p>	<p>Thank you for your comment. Unfortunately, the research you have requested is not eligible for CMAQ funding (See Title 23, Chapter 1, section 149 of United States Code). CMAQ funding is primarily spent on transit and travel demand management projects in our region. Further discussions on the best use of CMAQ funds moving forward will be discussed as part of the Regional Solicitation Evaluation starting this fall.</p> <p>The Carbon Reduction Program is a new program. To date, the Transportation Advisory Board and Council have used this funding on bicycle and pedestrian projects. However, the state is finalizing its required federally required Carbon Reduction Strategy and these recommendations may influence the use of this funding source moving forward.</p>
Nahid Khan	<p>Document Feedback</p> <p>Climate change, emissions, greenhouse gasses</p>	<p>I would like to make a Public Comment on the Met Council's Draft 2024 - 2027 Transportation Improvement Plan: Federally-funded transportation improvements for the region for the Public Comment period ending today: <a href="https://metro council.org/TIP.aspx">https://metro council.org/TIP.aspx</a></p> <p>Page 4 / numbered page 1 makes the following statement / claim:</p> <p>The 2024-2027 TIP is fiscally constrained, is consistent with the TPP, is in conformity with the Clean Air Act Amendments of 1990, and its development process provides acceptable opportunity for public involvement.</p> <p>I request that the TIP explain what the Clean Air Act Amendments of 1990 are, and explain how it is in conformity with these Amendments.</p>	<p>The Clean Air Act of 1990 established tighter pollution standards for automobile transmission and fuels. For the MPO, The Clean Air Act Amendments (CAAA) require a State Implementation Plan (SIP) for air quality for all areas that have not attained the National Ambient Air Quality Standards (NAAQS). The SIP is a planning document prepared by the MPCA and submitted to the U.S. Environmental Protection Agency (EPA) for approval. The SIP contains the programs and plans that will result in achievement of the NAAQS. The SIP serves as the state's legally binding commitment to actions that will reduce or eliminate air quality problems. All federally approved or financially funded functions must conform to the SIP and be consistent with the TPP. MPOs can only legally approve projects, plans, or programs that conform to the SIP. The CAAA require transportation conformity in nonattainment and maintenance areas. Conformity is the process that links transportation to the SIP to reduce emissions and keep the area in compliance with air quality standards. Conformity determinations are required on MTPs, TIPs, and federally funded or federally approved transportation projects.</p> <p>For most of the past 30 years, the Council has been in conformity with the CAAA by working with the Minnesota Interagency Air Quality and Transportation Planning Committee to determine that the TIP will not increase emissions. However, as of fall, 2022, the Twin Cities Metro Area is considered a federal air quality attainment area and no longer undertakes this process.</p>

Commenter	Topic	Comment	Response
Nahid Khan	Highway Project - MN 252 and I-94  Document Feedback  Climate change, emissions, greenhouse gasses  Environmental Justice	<p>I would like to make a Public Comment on the Met Council's Draft 2024 - 2027 Transportation Improvement Plan: Federally-funded transportation improvements for the region for the Public Comment period ending today: <a href="https://metrocouncil.org/TIP.aspx">https://metrocouncil.org/TIP.aspx</a></p> <p>2. REGIONAL PLAN AND PRIORITIES (page 17 / numbered page 14).</p> <p>All projects in the TIP are reviewed for consistency with the Transportation Policy Plan (TPP). The Metropolitan Council adopted the TPP on November 18, 2020, with FHWA/FTA conformity determination established on December 4, 2020. The Plan is in balance with anticipated revenues over the 20-year planning period. The Council carried out an extensive public participation process and held a public hearing on the TPP prior to adoption.</p> <p>Conformity to the Clean Air Act Requirements The Minneapolis-Saint Paul region is within an EPA-designated attainment area for all transportation related pollutants. In the past, portions of the region had unacceptably high measured concentrations for carbon monoxide and for PM10. The region has been in full attainment for carbon monoxide since November 29, 2019, and for PM10 since September 24, 2022. Formal conformity requirements under the federal Transportation Conformity Rule no longer apply to the TIP.</p> <p>My Comment: "Region" does not account for specific areas with particular air pollution issues, and a regional level decision to discontinue work to conform to this federal Transportation Conformity Rule ignores serious problems in local areas.</p> <p>The areas of North Minneapolis, Brooklyn Center and Brooklyn Park, in particular, the neighborhoods adjacent to MnDOT's Hwy 252 / I-94 project area require focus given the well-known high levels of pollution of all forms in these areas (N Mpls and BC, in particular), and the high levels of respiratory diseases, hospitalizations and deaths: N Mpls and BC having the highest and second highest levels in the state. Please be reminded that these three cities are predominantly lower income and working-class areas, and are majority BIPOC communities.</p> <p>Formal conformity requirements under the federal Transportation Conformity Rule must continue to apply to the TIP, especially for specific areas adjacent to any proposed highway projects such as MnDOT's Hwy 252 / I-94.</p> <p>Thrive MSP 2040 The TIP is consistent with the 2040 TPP, which is a system plan under the umbrella of Thrive MSP 2040, adopted by the Metropolitan Council on May 28, 2014. Thrive MSP 2040 is the vision for the Twin Cities metropolitan area. It reflects concerns and aspirations, anticipates future needs in the region, and addresses responsibility to future generations. The region's investments provide an important economic foundation, so all residents can prosper. Thrive MSP 2040 works towards five outcomes: stewardship, prosperity, equity, livability, and sustainability. It is also guided by three principles for how the Council should implement its policies: integration, collaboration, and accountability.</p> <p>My Comment: I request that explore equity, livability and sustainability further by reading and applying the findings of the three Equity and Health Assessment Reports on the Hwy 252 / I-94 project available at the MnDOT Hwy 252 /I-94 (misnamed) "environmental review" web site, under the Equity and Health Assessment tab:</p> <p>See column on right-hand side of page entitled "Related Materials": <a href="https://www.dot.state.mn.us/metro/projects/hwy252study/eha.html">https://www.dot.state.mn.us/metro/projects/hwy252study/eha.html</a> And then read the EHNA Public Comment on its main page by scrolling down to EHNA meeting materials, May 8, 2023.</p>	<p>The Clean Air Act of 1990 established tighter pollution standards for automobile transmission and fuels. For the MPO, The Clean Air Act Amendments (CAAA) require a State Implementation Plan (SIP) for air quality for all areas that have not attained the National Ambient Air Quality Standards (NAAQS). The SIP is a planning document prepared by the MPCA and submitted to the U.S. Environmental Protection Agency (EPA) for approval. The SIP contains the programs and plans that will result in achievement of the NAAQS. The SIP serves as the state's legally binding commitment to actions that will reduce or eliminate air quality problems. All federally approved or financially funded functions must conform to the SIP and be consistent with the TPP. MPOs can only legally approve projects, plans, or programs that conform to the SIP. The CAAA require transportation conformity in nonattainment and maintenance areas. Conformity is the process that links transportation to the SIP to reduce emissions and keep the area in compliance with air quality standards. Conformity determinations are required on MTPs, TIPs, and federally funded or federally approved transportation projects.</p> <p>For most of the past 30 years, the Council has been in conformity with the CAAA by working with the Minnesota Interagency Air Quality and Transportation Planning Committee to determine that the TIP will not increase emissions. However, as of fall, 2022, the Twin Cities Metro Area is considered a federal air quality attainment area and no longer undertakes this process. Subareas of the region can be classified separately from the region as a whole, as evidenced by a small area that was out of compliance for two years beyond the region as a whole. This area was bounded by the Mississippi River from US Highway 52 to Interstate-494, Interstate-494 east to US Highway 61, US Highway 61 north to Interstate-94, Interstate 94 west to US Highway 52, and US Highway 52 south to the Mississippi River.</p>

Commenter	Topic	Comment	Response
Nahid Khan	Highway Project - MN 252 and I-94	<p>I would like to make a Public Comment on the Met Council's Draft 2024 - 2027 Transportation Improvement Plan: Federally-funded transportation improvements for the region for the Public Comment period ending today: <a href="https://metro council.org/TIP.aspx">https://metro council.org/TIP.aspx</a></p> <p>Under: Competitive Regional Solicitation Project Selection Process (beginning on page 35 / numbered page 32):</p> <p>Environmental Justice and Prioritizing Criteria (page 37 / numbered page 34)</p> <p>To assist with addressing Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, as well as Thrive MSP 2040, equity, including affordable housing, was included in the 2014 Regional Solicitation as part of the prioritization criteria. This criterion has continued to be used with some refinement through the 2020 Regional Solicitation. In November 2019, the Council hosted workshops for potential applicants on engaging underrepresented populations. The socio-economic equity measure asks applicants to address engagement with, benefits for, and impacts on people of color, people with low incomes, people with disabilities, youth, and older adults. Consistency with the Regional Transportation Plan and Priorities (pages 42-43 / numbered pages 39-40)</p> <p>All projects in the TIP must be consistent with the region's 2040 Transportation Policy Plan (TPP). The region's transportation goals are:</p> <ul style="list-style-type: none"> <li>• Transportation System Stewardship: Sustainable investments in the transportation system are protected by strategically preserving, maintaining, and operating system assets.</li> <li>• Safety and Security: The regional transportation system is safe and secure for all users.</li> <li>• Access to Destinations: People and businesses prosper by using a reliable, affordable, and efficient multimodal transportation system that connects them to destinations throughout the region and beyond.</li> <li>• Competitive Economy: The regional transportation system supports the economic competitiveness, vitality, and prosperity of the region and state.</li> <li>• Healthy Environment: The regional transportation system advances equity and contributes to communities' livability and sustainability while protecting the natural, cultural, and developed environments.</li> <li>• Leveraging Transportation Investments to Guide Land Use: The region leverages transportation investments to guide land use and development patterns that advance the regional vision of stewardship, prosperity, livability, equity, and sustainability.</li> </ul> <p>My Overall Observations:</p> <p>Firstly, I request that explore environmental justice issues, as well as the topics of equity, livability and sustainability further by reading and applying the findings of the three Equity and Health Assessment Reports on the Hwy 252 / I-94 project available at the MnDOT Hwy 252 /I-94 (misnamed) "environmental review" web site, under the Equity and Health Assessment tab:</p> <p>See column on right-hand side of page entitled "Related Materials":</p> <p><a href="https://www.dot.state.mn.us/metro/projects/hwy252study/eha.html">https://www.dot.state.mn.us/metro/projects/hwy252study/eha.html</a></p> <p>And then read the EHNA Public Comment on its main page by scrolling down to EHNA meeting materials, May 8, 2023.</p> <p>Secondly, I don't see how changing Hwy 252 into a 6-lane freeway and major truck route, and expanding the overbuilt I-94 freeway by two lanes, and adding EZ Pass toll lanes to both, meets these environmental, health or equity types of criteria or priorities, including community livability, sustainability or protection of natural, cultural or developed environments. The TIP must address these in relation to the Hwy 252 / I-94 project.</p> <p>Thirdly, I also notice that in terms of changes to the TIP, etc., that there is a lot of information on continuing or expanding a project, etc., but there is no procedure (etc.) listed for how to reduce, or close out a project that is harmful on so many levels as the Hwy 252 / I-94 project. Clearly that concept hasn't occurred to you, although many other freeway construction and expansion projects nationally have been closed out permanently. One local example is the absolutely ridiculous I-335 freeway project through NE Minneapolis that did get closed out in the late 1970s, so there is a precedent for closing out such harmful projects.</p> <p>The TIP and all other transportation planning documents should review all existing projects and provide a procedure for closing them out, given our era of climate change issues and the need to address them, and prevent further harms to our environment. The new Transportation Bill just passed this Spring 2023 would not allow a harmful project such as the Hwy 252 / I-94 project move forward, and therefore its provisions must be retroactively applied to close out this harmful project.</p>	<p>Thank you for your comments. Once a preferred alternative is selected as part of the EIS for the project, then the TIP will be refined to identify these specific project elements. This change to the TIP could also include removing the project from the document if that is the preferred path forward coming out of the EIS.</p>

Commenter	Topic	Comment	Response
Nahid Khan	Highway Project - MN 252 and I-94	Metropolitan Council received a copy of their comments on MnDOT's Highway 252/I-94 Scoping Decision Document	Thank you for your comment. The Council did receive a copy of MnDOT's Highway 252/I-94 Scoping Decision Document.
Patrick McDougle	Pedestrian and bicycle	It'd be cool if you studied pedestrian priority signal timing. As soon as the pedestrian requests a crossing, cycle the light immediately to minimize wait time at a signal.	Thank you for your comment. Signal timing, including those for pedestrians, is generally coordinated by local agencies who own or operate the signal systems. We will pass along this comment to our local partners for their consideration.
Ruth Crowe-Lane, Metro Transit	Transit Project - METRO F Line	Please move F Line funds in the 2024-2027 TIP-STIP from TRF-TCMT-24AD to 2026. Thank you.	Because this project does not have a signed Full Funding Grant Agreement (FFGA), this project will be placed in 2026 for the final 2024-2027 TIP.



---

390 Robert Street North  
St Paul, MN 55101-1805

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

Follow us on:  
[twitter.com/MetCouncilNews](https://twitter.com/MetCouncilNews)  
[facebook.com/MetropolitanCouncil](https://facebook.com/MetropolitanCouncil)