



October 8, 2021

Chair Charlie Zelle and Members of the Metropolitan Council  
390 North Robert Street  
St. Paul, MN 55101

**RE: Proposed American Blvd. Transitway**

Dear Chair Zelle and Metropolitan Council Members,

For decades, Bloomington has closely partnered with the Metropolitan Council, Metro Transit, MnDOT, Hennepin County, land owners and developers to implement the region's transit oriented development vision along future transitways set forward in the Transportation Policy Plan (TPP). We greatly appreciate these partnerships and the progress that has been made. The region has long planned a transitway to serve the significant employment and residential density along the I-494 Corridor. Labeled as the "American" line, this transitway would connect the Blue, Red, Orange, Green, Riverview and D lines to the employment centers along I-494.

The American line has been planned within the TPP for the last two comprehensive plan update cycles. As required and guided by the Metropolitan Council, the City of Bloomington went to great lengths to implement transit oriented development along the future American transitway. Three district plans and two small area plans were adopted; new zoning districts were created; land was reguided and rezoned; minimum floor area ratios and densities were set; countless public hearings were held, many with strong opposition; significant public investment was made including a new freeway on-ramp; and land owners and developers were assured that a transitway was planned for the future. Working with our partners, we've had great success. Twenty-two multi-family projects have been constructed or are in the pipeline along the corridor, many with densities near or above 100 units per acre and most with affordable components. The Metropolitan Council requested density and affordability in this future transit corridor and Bloomington has delivered.

These actions across multiple decades were made in reliance upon inclusion of the American corridor in multiple TPPs. Given the countless hours and significant resources the City has invested toward implementing the regional vision, it was with great disappointment that we learned that Metro Transit staff is recommending that the American corridor be removed altogether from the lists and maps of future transitway priorities, setting the stage for removal from the TPP during the coming update.

The rationale for the proposed removal is a change in the criteria used to evaluate transitways. While previous evaluation efforts prioritized connecting trunk lines with employment centers, which the American transitway excels at, the criteria were recently changed to prioritize lines with higher levels of existing service and higher existing ridership. The American bus route

(542) has had poor service and a meandering route historically and therefore has had fewer riders. Since the pandemic, the Route 542 was altogether suspended and removed from service. Forty of 100 points in the new criteria are based on existing service and ridership levels. Scorers gave American 0 of 40 possible points in these categories. The revised criteria make it impossible for future oriented lines, like American, that are reliant on connecting employment centers with uncompleted trunklines like the Green and Orange line, to score well.

We understand that the transitways included in the TPP are planned to be updated every five years and that evaluation criteria will evolve. Under this system, transitways may show up and be planned in some TPPs and be removed in others. Given that implementation of land use changes to support future transitways takes decades, we are very concerned that this approach to long-term transitway planning (here today, removed tomorrow) will have negative impacts. Cities will not be able to rely upon inclusion in the TPP as a commitment that one day the transitway will be implemented. Land owners and developers will be much more resistant and hesitant to accept new land use controls meant to foster the region's transit oriented vision knowing that a transitway may or may not be included in future TPPs.

Given the significant planning, implementation and investment that has already taken place along the American transitway, Bloomington requests that the Metropolitan Council not remove the transitway altogether from future plans or from the TPP. We understand that the Metropolitan Council does not plan to fund the line in the short term. While disappointing, we accept that outcome. However, removal of the transitway from the TPP altogether is a much more significant step and one that makes it harder for the City to implement transit oriented development along the corridor. Please include the American corridor in the 2040 transitway plans. Strong arguments for the American transitway include:

1. **Creating a More Robust Network beyond a Hub and Spoke Model.** The current Metro Transit system is predominantly a hub and spoke model, especially in the southwest metro. Several transitways (Blue Line, Red Line, Green Line, Orange Line, D-Line) either already do or soon will provide high quality north-south service focused on Downtown Minneapolis. Expanding the reach and potential to grow transit use will require new connections between the various spokes to allow future trips which today can only be completed with a transfer in Downtown Minneapolis and therefore are not viable from a time perspective. The American route links numerous spokes and creates a more robust network.
2. **Connecting the Transit Network to Employment.** Employment in the Southwest Metro is highly concentrated in the I-494 Corridor. Having most employment concentrated along a corridor makes it easier to serve with transit. However, as discussed above, most transit resources bisect the I-494 employment corridor rather than serving the length of it. The American Transitway provides an opportunity to connect the major investments that have recently been or are being made in north-south transit (Blue Line, Red Line, Green Line, Orange Line, D-Line) with a significant number of jobs throughout the east-west I-494 Corridor. There are more jobs in the I-494 Corridor than in Downtown Minneapolis and St. Paul combined.
3. **Chicken vs. Egg.** In scoring routes, Network Next places a high level of emphasis on existing ridership and service. This approach is especially challenging for the American

route as existing transit service does not adequately meet commuting and mobility needs in the area. Because the level of transit service is low, ridership is also low. Moreover, many of the north-south routes that would feed a future American route are not yet in place (Green Line, Orange Line, D-Line).

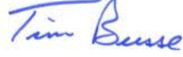
More emphasis needs to be placed on potential ridership and enhancing connectivity. If enhancements can only come to areas with strong ridership today, rather than removing long planned transitways from future plans, we would recommend working together to develop more transit ridership in the corridor, otherwise our regional transit network and ridership will never reach its highest potential. Focusing only on existing ridership and service levels will not allow our transit network to evolve and expand.

4. **Dramatic Land Use Changes are Underway.** The I-494 Corridor is undergoing dramatic change. While the corridor has been employment rich for decades, in recent years we've seen a large amount of new high density housing. Bloomington has made significant investments in the South Loop, Penn American, and Normandale Lake areas. Twenty-two multi-family housing developments, many with near or exceeding 100 units per acre, has followed. Numerous projects are in the planning stages and we see this trend continuing, not only in Bloomington but along the corridor in Richfield, Edina and Eden Prairie as well. These land use patterns will likely increase demand for inter-community transit travel throughout this east-west corridor.
5. **Equity.** The I-494 Corridor is rapidly diversifying. The corridor added BIPOC residents between 2010 and 2020 at a very fast pace. The 2020 Census results show multiple block groups along the corridor are 75 to 100% BIPOC. Multiple census tracts close to doubled the number of BIPOC residents in ten years time. This data underscores the need for transit service along this corridor to expand mobility and access to jobs for BIPOC residents.
6. **Future Funding.** The prospect for increased federal transit funding has greatly improved compared with previous years. Given that increased funds may become available, it is important to retain within the TPP long planned transitways like American, where significant land use implementation has already taken place, so that candidate sites are available if new and unanticipated funding materializes.
7. **Geographic Equity.** Almost all the lines proposed as priorities focus on downtown Minneapolis or St. Paul. Given that the transit system is regionally funded and given that there are heavy employment centers, such as the I-494 Corridor, outside of the two downtowns, the creation of a true regional transit system requires BRT lines beyond those that focus on the two downtowns.
8. **Coordination with MnDOT/Congestion Mitigation.** The I-494 Corridor, outside of the pandemic, is heavily congested. The State of Minnesota has allocated significant funds to help address congestion within the corridor and even more funds are needed in the future. The Cities of Bloomington, Richfield, Edina, Eden Prairie and Minnetonka have created a joint powers organization, the I-494 Corridor Commission, with the express purpose of reducing congestion both through transportation demand management and through transit/transportation improvements. One of the best ways to address congestion

in the corridor is to improve transit service. Running parallel to I-494, the American Transitway is well situated to help address this issue and move people from a congested freeway to transit. Recently, the State made a major investment in a new I-494 on-ramp at East Bush Lake Road. A key argument for the on-ramp was its importance in serving the planned American transitway.

The region has long planned for the American corridor transitway. Based on those plans, the City of Bloomington, partnering with the Metropolitan Council, Metro Transit, MnDOT, Hennepin County, land owners and developers, has spent significant time, effort and resources to implement the policies and infrastructure to facilitate the American transitway. Given these efforts and given the many merits of the American transitway, Bloomington requests that the Metropolitan Council and Metro Transit continue to work with the City to develop ridership and refine the future American corridor rather than eliminate it from the Network Next and TPP designation of future transitways.

Sincerely,

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Tim Busse  
Mayor

Copy via e-mail:      Bloomington Legislative Delegation  
Deb Goettel, Hennepin County Commissioner