

Thrive MSP POLICY PLAN

Draft 2040 Transportation Policy Plan Summary of Public Comments Received, Responses and Revisions

> Transportation Advisory Board November 18, 2014

Comments Received

• 126 "commentors" via letters, e-mails, testimony

- 38 local governments
- 23 state, local or non-profit agencies
- 64 individuals
- 1 state legislator
- Approximately 880 comments, ≈750 unique comments
- Continuing work on draft responses for TAB and Council review
- TPP adoption schedule revised to accommodate response to comments

Revised Adoption Schedule

| October 15, 2014 | TAB presentation - summary of public comments received and new adoption schedule |
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| November 5, 2014 | TAC presentation - summary of public comments received and new adoption schedule |
| November 5, 2014 | Council Committee of the Whole (CoW) discussion on responding to public comments |
| November 19, 2014 | TAB and CTIB information item on public comment report, proposed responses and revisions |
| December 3, 2014 | Council CoW information item on public comment report, proposed responses and revisions |
| Week of December | Post revised 2040 TPP with TAB and Transportation |
| 3rd | Committee agendas |
| December 17, 2014 | TAB recommendation |
| December 22, 2014 | Transportation Committee recommends adoption |
| January 14, 2015 | Council adopts and submits to FHWA/FTA |
| February 23, 2015 | Deadline to submit to FHWA/FTA |

Draft 2040 TPP Public Comment Report & Revisions

- Draft public comment report available for TAB review online after today's meeting
- Comments sorted by general topic, include commentor(s), response and text changes to be incorporated into the revised TPP
- Over 170 comments resulted in TPP revisions
- Report continues to be revised, final Public Comment Report available early December

General Comment Themes

- General comments expressing support or a lack of support for elements of the plan
- Many comments reflect different sides of the same issue
- Many comments on topics outside of TPP content
 - i.e. Thrive MSP 2040, Housing Policy Plan, TPP preparation process and Regional Solicitation
 - Provide high level general responses and pass on to appropriate entity
- Editorial comments

More funding; advocating for funding

Comment: The TPP should say more about the need for additional funding

Response:

- Plan notes that the Thrive MSP 2040 vision won't be realized without additional funding
- Plan includes Increased Revenue Scenario to show needs beyond anticipated revenue
- Additional text added to clarify the need for more funding for all modes, system-wide

Change: Text added to clarify the Council will work with partners to identify and advocate for additional transportation funding

Thrive MSP 2040 Outcomes

Comment: Thrive MSP 2040 outcomes should be applied equally throughout the region

Response:

- While the outcomes and principles reflect shared values throughout the region, Thrive does not envision that they are applied equally throughout the region – different parts of the region will have different needs and different development patterns.
- Thrive MSP 2040 notes that the Council will intentionally consider regional balance and that balance has many dimensions to assure that no part of the region is consistently favored or consistently ignored.

TRANSPORTATION POLICY PLAN

Land Use and Local Planning Comments and Responses

Comment: Multiple comments on disagreement with Community Designation in *Thrive MSP 2040* and its application to system plans

Response:

- Many of these comments were not submitted through the *Thrive* MSP 2040, which established Community Designations
- Communities have ongoing discussions with the Council about their community designation through the Comprehensive Plan update process and the Council experience working through these issues with many communities in the past

Comment: Density requirements too high to suit the current condition of suburban communities. Also lacks flexibility and differs from the federal New Starts guidance on minimum density of land use near stations.

Response:

- Housing unit densities apply to new development or redevelopment, not all development, and those areas are defined through local planning process;
- Recommended 7,000 people, jobs, or students is guidance based on observed expectations for land use change in current comprehensive plans

Change: Suburban edge densities reduced to 8 and 15 units/acre; methodology and language clarifications

Comment: Council does not have the authority to limit local planning decisions. Land use restriction is inconsistent with the current conditions of suburban Transitway stations. "Encourage" instead of "prohibit", provide guidance and resources to maximize use

Response:

- Council strongly supports encouraging transit-supportive uses and discouraging auto-oriented uses and designs near transit stations
- Council is looking for strong partners that support the stewardship of the transit system and financial viability of long-term investments

Change:

- Section changed from requirement to guidance; includes discussion on what uses and urban forms should be discouraged <u>and</u> those that should be encouraged
- Added language on how this will be a focal point of the Council's financial support for a transitway, especially operating funding

Sample of proposed new language:

"As described in *Thrive*, setting minimum average densities for new development and redevelopment provides communities with the flexibility to determine which areas are best suited for higher or lower density development under the framework of meeting that overall minimum on available developable lands."

"The intensity of land use drives the cost-effectiveness of transit investments, particularly the ongoing cost to operate service...If local governments choose not to commit to transit-supportive development patterns, the Council's stewardship of regional resources will limit its funding share for such corridors."

Comment: City officials will need to consider whether to incorporate the 10 dwelling units per acre density requirement and policies to promote Transit Oriented Design along the Cedar Avenue corridor when there is no funding for Red Line extension.

Response:

- Council understands that land use planning around unfunded investments has risks for local governments
- Local governments can still be proactive to have plans in place, should investments become viable in the future

Change:

- Text in Land Use and Local Planning has been clarified in multiple places to indicate that requirements do not apply to corridors in the increased revenue scenario
- Proactive planning still encouraged in text, however

Comment: Highways, freight, and airports should be addressed in a similar level of detail as transit in the Land Use chapter.

Response:

- Land use considerations for freight and airports are discussed in those investment directions and plans, referenced in Land Use and Local Planning
- Council does not have specific requirements for land use planning around highways, but there are ties to highway planning that related to land use

Change: Discussion in Land Use and Local Planning strengthened to acknowledge the role of A-minors, Appendix D classifications and their relation to land use

TRANSPORTATION POLICY PLAN

Transit and TDM Comments and Responses

Comment: 1% annual growth in regular route bus services is not enough; needs to be more balanced with transitway investments

Response:

- 1% annual growth is likely a conservative estimate of bus expansion opportunities
- Basis of estimate originated from 2012-2016 Regional Service Improvement Plan, but RSIP is updated regularly as the region grows and system changes
- Balance between transitways and bus will need to be coordinated

Change: Text edited to "at least 1%" annual growth and acknowledges the potential variability in timing of implementation, coordination with transitway investments

Comment: Many needs for bus service expansion:

- Growing suburban transit demand, jobs moving to suburbs
- Inadequate service in urban core, existing riders being ignored
- Need to provide valuable future connections to transitways

Response:

- Council agrees that there are many unmet needs in the transit system today, supported by the Increased Revenue Scenario
- Expansion opportunities are developed by regional transit providers and prioritized through the Regional Service Improvement Plan
- Strategy C11 and route descriptions on pages 221-223 describe these opportunities

Change: Minor edits to descriptions of route types and Transit Market Areas for greater transit provider flexibility

Comment: Term "high-frequency," in regards to bus service, needs a clear definition in the plan

Response:

- Council agrees
- Updated definition will be more consistent with current Council TOD grant program, Regional Transitway Guidelines, and national practice

Change:

- High-frequency service will be defined consistent with current Metro Transit marketing definition: at least 15 minute frequency from 6 am – 7 pm on weekdays and 9 am – 7 pm on Saturdays.
- Change will result in updated map, Figure F-2: Existing and Potential High-Frequency Arterial Routes

Comment: Request that the TPP adopt definitions for "transitway" and "bus rapid transit" that conform to federal policy and funding requirements

Response:

- Transitways are defined for the purposes of funding eligibility and transparency in investment decision-making for the public
- Transitways indicate the highest priority investment corridors in the region, identified through the Transit Master Study, but some corridors do not have sufficient ROW for dedicated guideway investments despite high demand and need for improvements
- Federal definition for New Starts and Small Starts includes "corridorbased bus improvements" that are consistent with Arterial BRT and Highway BRT investments
- Mix of BRT definitions allows for flexible project delivery and a more regionally balanced approach to investments

Comment: The Council should remove all references to the West 7th Street arterial bus rapid transit project in St. Paul from the text and graphics.

Response:

- West 7th Street arterial bus rapid transit was analyzed and recommended for implementation through the Arterial Transitway Corridor Study
- Riverview Study will look at additional options in this corridor

Change:

- Remove West 7th Street ABRT from all maps and investment plans
- Change total ABRTs funded in the current revenue scenario from 4 to 3 in the first 10 years of the plan

Comment: Clarify intent with transitway prioritization, remove draft measures, amend in later after work program item

Response:

- Prioritization is essential to performance-based planning and helping the region's stakeholders and the public understand investment decision-making
- Many projects competing for the same resources (federal, state, CTIB, local); many more simultaneously than in the past
- Many partners have requested a more defined process for transitway investment decision-making, including Minneapolis, St. Paul, State Auditor, regional transit providers
- Example measures that are provided are viewed as paramount to help build the understanding of what prioritization will look like

Travel Demand Management

Comment: Insert a map of the region that identifies the coverage areas for each of the TMOs. The inclusion of information for each of the TMOs is also recommended.

Response:

- Council agrees that TMOs should be described in the existing conditions section
- A detailed description of all TDM activities, including those provided by TMOs, is included in Part 3, Congestion Management Process

Change: A list of TMOs and the areas they serve will be added to the Existing Conditions discussion, similar to the discussion of transit providers on page 74-75.

TRANSPORTATION POLICY PLAN

Highways, Freight Comments and Responses

Comment: Not enough spending on roads, road expansion, especially to address suburban growth

Response:

- Plan must be fiscally constrained with expenditures not to exceed reasonably expected revenues
- If state or federal government provides new revenue additional spending and projects will be amended into the plan
- Increased Revenue Scenario is meant to provide a realistic context for the level of funding need and investment areas where increased expenditure will be focused
- All areas of the region will experience growth, plan identifies important highway investment factors including regional balance of investments

Comment: Requests for specific road improvements such as capacity expansion or new and improved interchanges Response:

- Current Revenue Scenario must be fiscally constrained with expenditures not to exceed reasonably expected revenues, no additional projects can be added to plan until new revenue is received
- Identified Principal Arterial investments are consistent with MnDOT plans (MnSHIP)
- Increased Revenue Scenario identifies priorities and categories of investment, specific projects amended in when revenue is received

Comment: Recognize the importance of major river crossings

Response:

 Agree that major river crossings are a significant component of regional road system

Change : Added section to "Existing System" chapter titled "Bridges Across the Major Rivers"

Comment: Plan needs more recognition of role and importance of A-minors

Response:

- Agree that plan needs more discussion of A-minors
- A-minors play an important role in relieving principal arterial congestion and providing local connectivity

Change: Additional text added to "Existing System" and "Highway Investment Direction and Plan" chapters on role of A-minor system

Comment: Questions regarding local transportation revenues and expenditures; plan needs more recognition of funding needs on local road system

Response:

- Identification of local transportation revenues and expenditures is a federal planning requirement
- Based on existing state auditor data
- Additional data collection and analysis of local transportation spending and needs is required and will be conducted to inform next plan update

Change:

- Wheelage tax and vehicle lease sales tax estimates corrected
- Revised Work Program study item on Operations and Maintenance Needs refocused to include both PA and A-minor system



Comment: Plan needs more recognition of highway freight needs

Response:

 Plan includes map of truck ADT that identifies most heavily used principal arterial routes, but agree more detailed analysis of freight needs should be undertaken

Change: Added Work Program study item titled "Identify Truck/Highway Freight Needs" will include both principal arterial and A-minor system

TRANSPORTATION POLICY PLAN

Bicycle, Aviation Comments and Responses



Comment: Clarify relationship between regional trails system and the Regional Bicycle Transportation Network (RBTN) Response:

- Many regional trails identified as important components of RBTN
- Text amended to improve clarity on how the RBTN and regional trails complement each other to provide for both regional transportation and recreational opportunities

Changes: Text added "Recreational bicycling...is significant to the region in that it represents an important entry point for many cyclists to become familiar with the regional system and because ultimately, many recreational cyclists will become users of the system for commuting and other transportation purposes."



Comment: More emphasis on bicycle connections to transit system

Response:

- Local connections to transit system are very important
- Emphasized in multiple sections of the plan

Change: Added "Bicycle Connections to Transit" as funding prioritization factor in Bicycle Pedestrian Investment Direction section

Bicycle

Comment: Concerns about strategy text (C2) relating to the development of on-road bicycle facilities on A-minor arterials

Response:

- Strategy (C2) revised to clarify
- Changes to Bicycle-Pedestrian Investment Direction section:
 - Emphasize the need to consider alternatives to on-road facilities in constrained corridors
 - Planning should address unique needs of each corridor

Change: Revised C2 language "On-road bicycle facilities are appropriate along minor arterials where the bicycle facility can be designed to support safe travel for all users and the addition of the facility maintains the road's overall function and capacity for other modes."

Bicycle

Comment: Expand the number of miles for bicycle trips described in bike/ped section; three miles seems like an arbitrary cut-off. Local governments should consider trips longer than three miles when planning bicycle routes.

Response:

 Plan did not intend to apply 3 miles as a "cut-off" to local/regional planning for bicycle transportation.

Change: Added text to Bicycle Investment and Existing System sections "In fact, more than half of the region's trips by bicycle (roughly 55% according to the Council's 2010 TBI) are greater than three miles in length. The Council and its transportation partners will plan for these longer bicycle trips in order to maximize the potential impact of choosing bicycling over driving alone for transportation."

Bicycle and Pedestrian

Comment: Emphasize "users of all ages and abilities" in Complete Streets definition; ensure that people "of all ages and levels of mobility" can safely/comfortably get to desired destinations.

Change: Text amended to emphasize the need to focus on "users of all ages and abilities" or "users of all ages and levels of mobility" in various strategies and modal sections of the plan

Aviation

Comment: The city of Crystal and Hennepin county request closure of Crystal airport to accommodate redevelopment and TOD

Response:

- The Crystal airport remains a viable and sustainable airport within the regional system. It is currently the 6th busiest airport in the state of Minnesota.
- The regional airport system has 9 airports that are located throughout the region.
- Regional airports do not have sufficient excess capacity to absorb Crystal users
- MAC has committed to right sizing the airport, while the FAA, MnDOT Aeronautics, the Metropolitan Airports Commission (MAC) and the Council support the continued operation of the airport

Aviation

Comment: City of Minneapolis requests clearer expectations on noise and air pollution near MSP and to provide guidance to airports on land use compatibility

Response:

- The Council recognizes that all Council "systems" have an impact on the surrounding communities and understands the need to balance between economic competitiveness and livability
- Although the Council's responsibilities include review of development and planning projects at MSP, the Council is not involved in operations or airspace regulation, and has very limited authority in areas related to airport noise
- The Council will continue to work with organizations and communities to find workable solutions to environmental concerns, and will continue to provide guidance to airports and communities on land use compatibility near airports

TRANSPORTATION POLICY PLAN

Equity Comments and Responses



Comment: Plan should clarify importance of equity in transportation context

Response:

- The plan identifies that this is an emerging issue that requires greater analysis and a broader regional conversation about what equity means in the transportation context.
- A Work Program study item Equity Analysis for Transportation outlines the elements of future analysis and discussion with stakeholders



Comment: Transportation and Housing Policy Plans should be better integrated.

Response:

Council is working towards better alignment of all system plans, this will be an ongoing effort beyond adoption of plan

Change:

- Added language emphasizing the need to "create and preserve a mix of housing affordability" particularly near transitway stations
- Added housing explicitly to Work Program study item on Equity Analysis to include effective use of equity as a prioritization measure



Comment: Recognize that poverty exists throughout the region.

Response:

- The Environmental Justice maps now use two overlapping categories of poverty by census tracts that identified some additional areas. This more expansive approach will better help identify neighborhoods experiencing poverty.

Change: Updated maps of regional poverty

Equity

Comment: Don't use equity to direct roadway investments Response:

- Low income families and communities of color have historically received less investment, received fewer benefits and have borne a disproportionate share of impacts.
- The focus on equity is intended to create benefits for and mitigate impacts to historically underrepresented communities throughout the region and in all modes.

Change:

- Additional supporting data in qualitative equity analysis
- Additional narrative in Part 1 on continuing history of disproportionate impacts of roadway construction being born by historically underrepresented communities

Equity

Comment: Opposition to exceeding federal environmental justice requirements

Response:

- Equity requirements are derived from federal environmental justice requirements and Thrive MSP 2040
- Federal Environmental Justice requires that the TPP:
 - 1. provide a fully inclusive outreach program
 - 2. not disproportionately impact minority and low income populations, and
 - 3. assure receipt of benefits by minority and low income communities
- Thrive MSP 2040 requires that the TPP connect all residents to opportunity and create viable transportation options for people of all races, ethnicity, incomes and abilities

TRANSPORTATION POLICY PLAN

Travel, Performance Measurement and Congestion Management Comments and Responses

Demographics and Travel

Comment: Recognize changing growth; the shift in transportation behavior (flattening of VMT/capita) and changing household size

Response:

- Changing demographics are documented in Thrive and were used in forecasts prepared for the TPP
- The change in travel behavior was considered in the development of the TPP
- Household size is forecast to decline between 2010 and 2040 from 2.5 to 2.43, -7%

Changes: Add link to Thrive demographic analysis and text on household size decline

Travel and Technology

Comment: Plan should include more about anticipated technology advancements and potential impacts on travel behavior and investment needs

Response:

- Agree technology changes have the potential to change travel and needed investments
- Potential impacts and timing are uncertain and difficult to plan for

Change: Text changes to recognize analysis and monitoring will be necessary as technologies evolve and emerge to understand impacts on travel behavior

Comment: When federal performance measures are released, will they be incorporated into the plan?

Response:

- USDOT is expected to release Notice of Proposed Rulemaking for the national goal areas (except safety) by end of 2014
- USDOT is expected to release final performance measures during second quarter of 2015.
- MnDOT has one year to set state targets
- Following MnDOT, Council has 180 days to set regional targets
- Anticipated that selected measures and targets will be amended into the plan

Changes: Text added to indicate that USDOT performance measures and targets will be amended into the plan

Comment: What will be the frequency of reporting performance measures on an on-going basis?

Response:

- MAP-21 requires plan to include a System Performance Evaluation to document progress after selecting measures and targets, thus maximum interval is 4 years.
- MAP-21 also requires a performance analysis of each TIP to show progress towards targets this would provide an annual analysis
- The Metropolitan Council *Performance Based Transportation Planning* study recommends that most performance measures be updated on an annual basis.

Change: Text added to the Work Program item on data collection to clarify the reporting schedule

Comment: Performance measures used in the plan need to be clear, easily measurable and applicable to specific objectives

Response:

- This TPP represents a first step in converting the document to a performance-based planning process.
- Additional review and refinement of the performance measures, along with the setting of targets is identified as a task in the Work Plan.

Change: Performance measures that do not have data are deleted

- Comment: The TPP does not include a greenhouse gas reduction plan that outlines clear and measurable outcomes
- Response:
 - The TPP includes a Work Program study item to develop specific strategies for meeting Next Generation Energy Act targets and to inventory regional greenhouse gas emissions.

Congestion Management Process

Comment: Strategy C3 should be broadened to recognize principal arterials that are under county jurisdiction

Response:

- Agree, change incorporated
- Change: Text added to Strategy C3 to include relevant jurisdictions (Anoka, Dakota, Ramsey, Scott counties, City of St. Paul)

Congestion Management Process

Comment: Congestion analysis and mapping provides a useful context for looking at proposed highway projects. Congestion maps from CMP should be brought forward into the highway chapter.

Response:

- Agree map will be added

Change: 2013 Congestion map added to highway chapter