

DATE: January 23, 2020
TO: Transportation Committee
FROM: Heidi Schallberg, Senior Planner
SUBJECT: Summary of Public Comments on Draft Public Transit and Human Services Transportation Coordinated Plan

The Council held a public comment period on the Draft Twin Cities Public Transit and Human Services Transportation Coordinated Plan from November 12 through December 27, 2019. Comments were accepted by email, mail, or telephone. During this time, the Council used its web site, email lists, and social media to promote the public comment period. Staff also made presentations about the draft plan to the Minnesota Department of Human Services Transportation Coordination Work Group and the Washington County Transportation Consortium Steering Committee.

The Council's use of its web site and social media to promote the public comment period resulted in the following:

- 312 Web page users
- 41 Twitter likes and retweets
- 27 Facebook post likes, shares, comments, and clicks

The Council received public comments by email and mail from 10 individuals and organizations. The full comments are included after this summary. Commenters are referenced in the summary tables by the corresponding numbers shown below:

1. Kathryn Barton
2. Dennis Westlin
3. East Metro Strong
4. Susan Sanger
5. Washington County Board of Commissioners
6. Washington County Community Development Agency
7. Roger Wilson
8. SouthWest Transit
9. Saint Therese Woodbury
10. Vocational Rehabilitation Services

While the Council is the lead agency in producing this plan, the work needed to address the varied transportation needs of older adults and people with disabilities involves a wide range of partners, such as other public transit providers, human and social service agencies, and non-profit agencies. Because of the Council's role in providing services such as Metro Transit, Metro Mobility, and Transit Link, some of the comments addressed existing service concerns with these services. Comments on this plan are also valuable inputs for other broader planning processes, including Metro Transit's Network Next bus service planning. Comments are summarized below with staff responses.

Comment Number	Comment Summary with Staff Response	Commenter
1	Pilot more Lyft/Uber style programs to provide more freedom to riders.	1, 4
Staff Response:	The Council has issued an RFP for subsidized on-demand service for Metro Mobility customers and hopes to implement a pilot by the third quarter of 2020. Current pilots in Dakota and Washington Counties using these services are also described in the pilot programs section of the Existing Conditions chapter. Change made: On page 39, ride-hailing was added to the strategy related to vouchers for taxis.	
2	Expand the ADA zone for Metro Mobility to areas with heavy use that are limited	1
Staff Response:	The plan includes a strategy to expand Metro Mobility service based on feedback from stakeholders during the plan process.	
3	Host Metro Mobility community conversations throughout the metro, not at just one central location.	1
Staff Response:	The comment has been forwarded to staff who work on these events.	
4	Train drivers and reservationists in customer service.	1
Staff Response:	The plan includes a strategy to provide consistent training for transportation providers.	
5	Concerns about safety on regular route transit can deter potential riders, especially among vulnerable adults such as older adults or people with disabilities. Change made: On page 32, concerns about safety was added to challenges with using fixed-route transit.	4
Staff Response:	During the plan process, we heard many concerns about challenges using fixed-route transit, including personal safety. Service providers in the region are aware of the concerns and working to make transit a more comfortable experience for all users.	
6	Bus capacity issues for riders who use wheelchairs and experience service delays that could be more than 30 minutes because a bus is already at capacity for accommodating riders with wheelchairs.	4
Staff Response:	When buses are already at capacity for riders who use wheelchairs, Metro Transit drivers are required to immediately call in reports of any of these riders who cannot be accommodated to ensure they have appropriate alternatives within 30 minutes. If another bus with capacity is not scheduled within 30 minutes, other transportation is provided within that time frame. Metro Transit monitors data on these situations.	

Comment Number	Comment Summary with Staff Response	Commenter
7	Concerns about Transit Link/Smart Link dial-a-ride service ending in Chaska and Chanhasen; other available options do not provide the same type of service and lack of assurance of timely service	2
Staff Response:	<p>There are many demands for transit service that go beyond what can be supported by the Council's current resources. The avoidance of duplicative coverage is key to meeting the needs of more residents. The Council supports expansion to unserved and underserved populations. The discontinuation of Transit Link trips wholly within the SouthWest Transit service area is consistent with service delivery in the communities of Plymouth and Maple Grove. From the beginning of Transit Link service in 2010, trips wholly within those communities were served by Plymouth and Maple Grove, who had existing dial a ride service to eliminate service duplication.</p> <p>SouthWest has jurisdiction in the cities of Chanhasen, Chaska and Eden Prairie and determines what services will be provided and the program rules around those services. SouthWest Transit chose the service model currently in place for those communities.</p> <p>Metro Mobility is ADA complementary transit service and uses a different funding source than those managed by SouthWest Transit so Metro Mobility services will continue to be managed by the Metropolitan Council and will continue to provide trips wholly within the SouthWest Transit jurisdiction.</p>	
8	Concerns about driver shortages and hours of Metro Transit customer support that affect service.	7
Staff Response:	<p>Challenges with hiring and retaining drivers affect all transportation services in the region, from Metro Transit and other service providers as well as volunteer driver programs. This plan is intended as a higher-level strategic plan with areas for needed improvement for all transportation services in the region that serve older adults and people with disabilities. All providers that experience ongoing driver shortages continue to work to address these challenges. The Transit Information Center is open by phone on weekdays from 6:30 a.m. to 9 p.m. and on weekends and holidays from 8 a.m. to 4:30 p.m. NexTrip also provides automated information online or by phone 24 hours a day.</p>	
9	Strategies for making technology enhancements don't address ongoing maintenance needs and existing challenges with current technology.	7
Staff Response:	<p>The strategy related to technology enhancements for riders has been edited to include maintenance. Complaints about Metro Transit-specific technology and maintenance issues have been shared with Metro Transit staff. Change made on page 34.</p>	

Comment Number	Comment Summary with Staff Response	Commenter
10	When identifying duplicative service and making changes to services provided, all providers and users should be engaged to ensure any transition addresses all needs.	8
Staff Response:	<p>When Transit Link was created in 2010, there was no general public dial-a-ride available within SouthWest Transit. To the contrary, the Suburban Transit Providers (Maple Grove and Plymouth) that had existing dial-a-ride programs continued to provide rides wholly within their jurisdiction and Transit Link provided rides that crossed boundaries of providers. This was consistent with a basic program premise of eliminating duplication given constrained resources.</p> <p>SouthWest Transit recently added Prime to their menu of serviced options and it has clearly moved beyond the pilot stage. Therefore, to be consistent with one of the original program principles of Transit Link, and given that we still have constrained resources, the Council has made the decision to not duplicate geographic coverage with the same mode of service.</p> <p>SouthWest Transit determines the service model and has the prerogative to adopt changes to meet the needs of its residents.</p>	
11	Plan references daily activities but does not include enough emphasis on access to employment.	3, 5, 6, 10
Staff Response:	<p>The plan is intended to address higher-level strategies across the region and provide flexibility to the many different transportation providers, both public and private, that operate in the region. Additional information was included in the Needs chapter about incomplete access to all destination needs, including employment and healthy food access. Rather than identifying separate strategies for the wide range of different potential destinations, broader strategies identified in the plan can be applied to different contexts as appropriate by implementing service providers. The strategy for local shuttles or circulators has been changed to also reference employers to more clearly address this concern and has been recategorized as a high-priority strategy (from medium priority). Changes made on pages 32 and 35.</p>	

Comment Number	Comment Summary with Staff Response	Commenter
12	Use data from the SHAPE public health survey to supplement or replace ACS data used in the plan. Concerns about ACS data not being current.	3, 5
Staff Response:	<p>The plan uses American Community Survey (ACS) data from the Census Bureau for identifying demographic distribution within the seven-county region. This data is consistently available for the entire region covered by the plan, and new estimates are released each year. The survey is administered on a continuous monthly basis by the Census Bureau. The 5-year data estimates used in the plan represent an average of this monthly survey across the 5-year period. We appreciate your bringing the six-county SHAPE public health survey to our attention. Because this survey does not cover the entire seven-county region, it could not replace the use of ACS data for the scope of this plan. Once data is published for all counties that participated in the 2018 SHAPE survey, we will review that data for use in future updates to the plan or other relevant planning work. In addition, the Council's Travel Behavior Inventory, which collects data on how people travel in the region, has changed from being collected every decade to being collected every two years. As current data from this survey becomes available, we can look for ways to use it to further help illustrate how older adults and people with low incomes travel.</p>	
13	Recognize the impact of transportation on access to healthy foods.	5, 6
Staff Response:	<p>The plan is intended to address higher-level strategies across the region and provide flexibility to the many different transportation providers, both public and private, that operate in the region. Additional information was included in the Needs chapter about incomplete access to all destination needs, including employment and healthy food access. Rather than identifying separate strategies for the wide range of different potential destinations, broader strategies identified in the plan can be applied to different contexts as appropriate by implementing service providers. Change made on page 32.</p>	

Comment Number	Comment Summary with Staff Response	Commenter
14	Consider including a representative from the Suburban Transit Association on the Steering Committee for the next plan update for broader representation.	8
Staff Response:	We have noted this suggestion for the next update of the plan. All of the suburban transit providers were invited to the stakeholder workshop for this plan that identified current needs and brainstormed strategies. This workshop was considered one of the three Steering Committee meetings and included stakeholders beyond the Steering Committee. Our records indicate that staff from Plymouth Metrolink was able to attend this workshop; other service providers such as non-profit organizations that provide circulator, shuttle, or volunteer driver service also participated in this workshop.	
15	Consider other public or private providers for providing service beyond current Metro Mobility service hours and area. Strategy to expand Metro Mobility service strains state funding.	8
Staff Response:	Comment noted. The strategy to expand Metro Mobility service is driven by stakeholders. The Council understands the implications to funding and is not currently proposing service expansion.	
16	Medical Assistance requirements should be more flexible to allow public providers to provide service.	8
Staff Response:	Comment noted. The plan includes a strategy to address regulatory issues related to shared transportation.	
17	Concerns about obstacles for non-profit or volunteer transportation services	4
Staff Response:	The plan includes strategies for regional partners to address obstacles for providing volunteer transportation services, such as addressing insurance issues, providing stipends, and providing training.	
18	Elevate vanpooling as a viable option for commuters as a core transit option rather than viewing it as competitive with transit. Prioritize commuting destinations such as warehouses and other locations with large numbers of entry-level jobs.	3, 5, 6, 9, 10
Staff Response:	We are evaluating the vanpool program in 2020 and have forwarded this comment for consideration in that process.	

Comment Number	Comment Summary with Staff Response	Commenter
19	Include implementing site-specific shuttles or last-mile connections for major employers, institutions, or retail destinations.	3, 5, 6, 9, 10
Staff Response:	The plan currently includes a strategy to provide local shuttle or circulator service to connect with transit stations or destinations. This strategy can include these types of shuttle and last-mile connections. The strategy description has been changed to also reference employers to more clearly address this concern and has been recategorized as a high-priority strategy (from medium priority). Changes made on page 35.	
20	Pilot services to make connections with destinations in adjoining counties outside the plan scope (i.e. the 7-county metro region).	5, 6
Staff Response:	Text was added to the needs section of the plan about the challenges with coordinating service to destinations outside the 7-county region scope in the plan. Strategies identified in the plan can be applied to these contexts as appropriate where they are locally supported. Change made on page 31.	
21	Pilot flexible microtransit options with a focus on reverse commute challenges.	6, 9, 10
Staff Response:	The plan currently includes a strategy to provide local shuttle or circulator service to connect with transit stations or destinations. The text was edited to include microtransit options. Change made on page 35.	
22	Seek opportunities to share information.	5
Staff Response:	Text was added to the strategy for mobility management programs to include sharing information. Change made on page 34.	
23	Include a map illustrating projected populations of older adults across the region to provide a more complete picture of needs for potential investments.	3, 5, 6
Staff Response:	Council forecast data was used to add maps for the older adult population. Changes made on pages 5 through 7.	

Comment Number	Comment Summary with Staff Response	Commenter
24	Include the Metro Mobility Task Force report recommendations in this plan to support, strengthen, and sustain Metro Mobility.	3, 5, 6
Staff Response:	<p>The Metro Mobility Task Force report is discussed in the Existing Conditions chapter section on Metro Mobility, including task force recommendations that have since been implemented. The recommendations referenced in the comments are currently being addressed. Legislation in 2019 provided for data sharing between the Council and the Department of Human Services (DHS) to enable the Council to seek federal reimbursement for eligible Metro Mobility rides, and the Council is currently working with DHS on this data sharing. The recommendation to explore creating a service specifically for DHS clients is a follow up step after the data sharing collaboration is complete. Also in 2019, the Minnesota Legislature provided separate funding for Metro Mobility with structural changes in the budget. The Council has also issued an RFP for subsidized on-demand service for expanded service options for Metro Mobility customers and hopes to implement a pilot by the third quarter of 2020.</p>	
25	Add cities to provider area in the list in Appendix A	8
Staff Response:	<p>Change made in the final plan on page 42.</p>	
26	Correct service area for SouthWest Transit description on page 25	8
Staff Response:	<p>Correction made in the final plan. Due to other changes, the page number is now 27.</p>	

The full text of the comments received follows this summary.

Comments Received

From: Kayte Barton <littlebarty@me.com>
Sent: Tuesday, November 12, 2019 2:36 PM
To: PublicInfo <public.info@metc.state.mn.us>
Subject: Comments on proposed plan

I use Metro Mobility, and have gone to using Uber due to the lack of a time window, and overhead bus ride time. Metro Mobility isn't reliable enough to use. This Metro Mobility is my only option for transportation, I live close to a bus stop and cannot use Transit Link.

I have to plan my work hours around Metro's time frame, which some employers don't like. This is another nice thing about Uber/Lyft, can use it anytime.

1. Pilot more Lyft/Uber programs. This would grant us more freedom, and not rely on Metro Mobility and reduce the number of riders, reduce the stress of the drivers, even put Uber/Lyft into your same day cab option.
2. Expand ADA zone to areas with heavy use, that are limited.
3. Host community conversations in all metro areas, not just one central location.
4. Train drivers, and reservationists in customer service. Some drivers are rude, and don't escort. Some reservationists are short, and don't have the patience to get rides set up.

I would be happy to talk in person too, and help provide guidance.

Kathryn Barton

From: dennis <denwest@comcast.net>
Sent: Wednesday, November 13, 2019 4:08 PM
To: PublicInfo
Subject: Met Council Transportation Coordinated Plan

November 13, 2019
Metropolitan Council
390 Robert St. N.
St. Paul, MN 55101

public.info@metc.state.mn.us

Public Transit Human Services Transportation Coordinated Plan for the Twin Cities Area

Looking at your proposed Transportation Coordinated Plan, I did not see mention of discontinuing the SmartLink dial-a-ride service within the cities of Chaska, Chanhassen and Eden Prairie – for those riding in these cities only, of which I am included.

In reviewing your proposed Transportation Coordinated Plan, one strategy listed was for Increased dial-a-ride Capacity, by expanding the dial-a-ride service, adding drivers and vehicles to meet demand for the service. This appears to be contrary to what is happening.

My understanding of the 'Discontinued Service' letter I received in the mail, is that beginning January 1, 2020 I would not be eligible to use this service as my ride starts in Chaska, and ends in Chanhassen. I've been using the dial-a-ride service for six years, within these cities. During the years I have used the service, I rarely rode the bus with anyone that was going to an area outside these three identified cities. This will impact a lot of current passengers.

I am aware of the other available providers, namely Metro Mobility and SW Transit (both of which I have used), but I think their services are not the same as the current SmartLink dial-a-ride. On one you can request a ride in advance, but even with advance notice it may be difficult to obtain a ride, and/or the ride time may be lengthy. On the other, the On-Demand is sometimes good, but it can also lead to excessive waits and/or missed appointments – there is no assurance you will get a ride in a timely manner.

Dennis Westlin
Chaska, MN 55318
denwest@comcast.net

From: Susan Sanger <suesanger@comcast.net>
Sent: Friday, December 20, 2019 2:26 PM
To: PublicInfo
Subject: Public Transit & Human Services Transportation Coordinated Plan

I have reviewed the above draft plan and offer the following comments:

I do not have concerns about what is stated in the draft plan, but rather what is not covered therein. Specifically, given that the demand for Metro Mobility services is not currently fully accommodated, and that this demand will only grow as our population ages and develops more disabling conditions, it seems obvious that Met Council should support more programs and services that could help riders use “regular” mass transit and other community services whenever feasible, thus allowing Metro Mobility to serve the most disabled passengers. To this end, I hope that Met Council will address:

1. What are the current barriers or challenges that deter some older riders from using mass transit? I am an older, visually-impaired person who uses “regular” busses and trains, not Metro Mobility. In my experience, and that of others with whom I have spoken, the biggest challenge is safety. While threatening and criminal behavior on busses, trains and at the stations can be a problem for all riders, it can be a particular challenge for vulnerable adults. Until Metro Transit addresses this seriously, some potential riders will be deterred. Another issue I have observed on several occasions is when bus drivers won’t pick up a waiting wheelchair user because there are already two wheelchair users on the bus. This means that the waiting individual must wait till the next bus, which could be another half hour or more, depending on the route - again, a factor which could encourage that rider to opt for Metro Mobility, instead.
2. What are the obstacles to operating non-profit or volunteer transportation services? I previously used the services of one non-profit senior transportation provider which had to close because, in significant part, the insurance requirements were unaffordable. There may be other obstacles as well. Anything that Met Council can do to assist such organizations would be helpful introducing the demands on public services.

Additionally, I noted in the report that some entities are subsidizing taxi rides for seniors and/or disabled persons, but was startled to see no mention of similar subsidy programs using ride-hailing services. Since Uber and Lyft offer rides that are significantly cheaper than taxis (and, in my experience, are also fair more timely and reliable than taxis), I hope Met Council will explore contracting with these services.

Thank you for studying this issue.

Susan Sanger
St. Louis Park

From: Roger Wilson <rogerw@alpineblue.com>
Sent: Friday, December 27, 2019 10:49 AM
To: PublicInfo <public.info@metc.state.mn.us>
Cc: Schallberg, Heidi <Heidi.Schallberg@metc.state.mn.us>; Lindstrom, Peter <Peter.Lindstrom@metc.state.mn.us>
Subject: Public comment on the Draft Public Transit and Human Services Transportation Coordinated Plan

To whom it may concern:

The [Draft Public Transit and Human Services Transportation Coordinated Plan](#) is an ambitious plan for the Minneapolis Metro region. It is good to see the Metropolitan Council undertaking this effort to improve communication between transit providers to assist older adults, individuals with disabilities, residents with low incomes, and households without vehicles. However, I have some significant concerns about the capability of Metro Transit being able to deliver on these promises.

Section 5 of the document talks about the different strategies and priorities to make this plan a reality. Page 32 talks about “Increase dial-a-ride capability”, page 33 mentions “Expand Metro Mobility service beyond current service hours and area”, page 35 mentions “Provide local shuttle or circulator service”, page 37 mentions “Increase transit service within and connecting between suburbs”. These are great goals/objectives and each of these require a significant increase in drivers, vehicles, and other resources.

Over the past 2 years, Metro Transit has struggled in finding enough drivers and working busses to manage their current commitment of published routes and current ridership levels. Metro Transit operations and customer support centers promptly close at 4:30pm before the evening rush when riders need that type of support. When Metro Transit is pressed to provide a reason why busses failed to make the scheduled runs then the excuses of “no driver available” or “bus had an equipment problem” are given, but there seems to be no public long-term plan to fix the underlying issue. For example, every month there are days that Metro Transit fails to provide reliable and on-time service on the 264C route, either in the morning or in the evening, requiring me to take alternative modes of transportation to get to/from work. While I have the opportunity of taking other modes of transportation, others – like those that this plan is targeting – do not have that flexibility. What is the plan to acquire, train, and retrain transit drivers and to ensure that there is enough drivers to support this proposed increase?

Section 5, page 32 mentions “Make technology enhancements for riders” and “Make technology enhancements for scheduling” – again great objectives for improvement. The existing NextTrip signs provided by Metro Transit are a great communication tool and definitely fall under these objectives to “Use technological improvements to provide real-time information to riders”, unfortunately the signage at the County Road C/I35W Park & Ride, 200 Iona Rd, Roseville constantly has the incorrect time. I’ve opened numerous cases with Metro Transit throughout 2019 and the time is corrected for a day or two then the time starts to drift again; which makes me wonder how many other signs have the same issue. If Metro Transit is unable to support the technology they currently have in place, what is the plan to ensure that there are enough technical and trained resources available to support new technology solutions?

Section 5, page 32, mentions “Create and maintain accessible pathways and transit stops”, which discusses the possibilities to “encourage development of technology for clearing snow and ice, such as heated sidewalks...”, again, another great suggestion for improving ridership. However, Metro Transit has failed to maintain the heaters in the Bus Stop Enclosures; a similar solution of using an electric

heating device. For example, the heater for the bus stop enclosure at 2nd and 5th downtown Minneapolis has been vandalized and out of service since early fall. This is yet another example of where Metro Transit is unable to manage their current infrastructure. What is the plan to manage (and fix) the existing infrastructure before taxpayers invest in new infrastructure that is susceptible to the same type of maintenance issues?

Overall I feel that this plan is very optimistic and ambitious, however, it is unfair to make the promises that this plan makes without an action plan to resolve the on-going issues at Metro Transit, specifically with regards to the driver shortage, the constant “equipment failures”, and high-tech infrastructure management.

Sincerely,

Roger Wilson

From: Dave Jacobson <djacobson@swtransit.org>
Sent: Friday, December 27, 2019 1:13 PM
To: PublicInfo <public.info@metc.state.mn.us>
Cc: Fyten, Matt <mfyten@swtransit.org>
Subject: Comments from SouthWest Transit (SWT)

To Whom it May Concern:

Thank you for the opportunity to comment on the Draft Public Transit and Human Services Transportation Coordinated Plan. SouthWest Transit (SWT) has a few comments listed below:

Duplicate Service

When the Metropolitan Council decides on replacing “duplicative” services, consider what duplicative means. For example, a dial-a-ride service is not the same as a micro transit service. Transit Link and SW Prime have vastly different operating rules. SW Prime service does not have standing orders or take advanced booking and the rider needs to be able to navigate the system by understand how it works and the ability to use technology. Additionally, all of those being served need to be contacted about the elimination of one of the service as well as the entity considered its replacement. There also needs to be operating and capital dollars to transition those who are able to make the move to a micro-transit system or any system. These are always issues when attempting to replace duplicative service with one service because one size doesn’t always fit all. A better job of understanding what is being removed and what is being replaced will help reduce the confusion of the transition for not only the providers but those who receive services.

Medicaid/Medical Assistance and Public Providers, page 24

Public providers would like to see MA requirements for providing service be more flexible by allowing public providers, like Metro Mobility and suburban providers, the ability of being a service provider. Remove the barriers.

Page 25, First Paragraph

In the middle of the paragraph the write-up refers to “Ridgeview medical facilities in Waconia and Excelsior”. Instead of Excelsior it should read Chanhassen. This change has also been sent to Heidi Schallberg of Met Council staff requesting change.

5. Strategies, page 33.

In this section one of the suggested strategies is to expand Metro Mobility service beyond current service hours and area. The current Metro Mobility program does exceed the ADA definition. The Legislature has created a budget line in the General Fund for Metro Mobility too. Operating costs are an issue with Metro Mobility and when the ADA is exceeded it only causes more strain on the General Fund as well as takes funding away from other transit providers. Consider other public/private providers for serving beyond the ADA definition.

6. Plan Process, Steering Committee

With the exception of Metro Transit and Metro Mobility there are no operators as part of the Steering Committee. A vast majority of those on the Steering Committee are consumers or policy makers. I

would suggest that more providers should be included the next time the plan is updated. The Suburban Transit Association (STA) is a potential source for a representative.

Appendix A: Transportation Providers

Please add the Cities of Carver and Victoria to the list. SWT, in addition to the areas identified, also serves Carver and Victoria as a contracted provider.

Dave Jacobson,

SouthWest Transit

Ms. Molly Cummings, Interim Chair
Metropolitan Council
390 Robert Street North
Saint Paul, MN 55101

By email

December 20, 2019

Dear Ms. Cummings:

Thank you to Metropolitan Council staff for their work on the Draft 2020 *Twin Cities Public Transit and Human Services Transportation Coordination Plan*, and for seeking comments on it. East Metro Strong is pleased to submit these comments.

The Draft Plan opens by observing:

“For people with disabilities or older adults, transportation to daily activities can be challenging.”

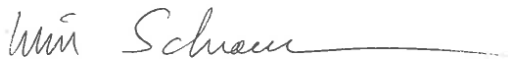
In many cases these “daily activities” include traveling to work. In many other cases they *should include* traveling to work, but do not, because the regional transportation system contains too many gaps and barriers.

The Draft Plan recognizes the transportation barriers that wholly or partially preclude access to employment for persons with disabilities, and low-income persons who cannot drive and/or do not have access to a vehicle that they can legally operate and financially maintain. And the Draft Plan describes innovative work being done around to region to help overcome some of those gaps and barriers.

However, we believe it is fair to say that overall, the Draft Plan does not give this important regional challenge the attention that it needs, and particularly not in the recommended strategies.

We appreciate the opportunity to provide these comments and look forward to our continuing work together to support greater access and connectivity in our region.

Sincerely,



Will Schroer
Executive Director

cc: Heidi Schallberg

Comments:

The Draft Twin Cities Public Transit and Human Services Coordination Plan Update

East Metro Strong is a public/private partnership between Washington and Ramsey Counties, six east metro cities, several large employers, and the Saint Paul Area Chamber of Commerce. Our mission is to work together and with stakeholders like the Metropolitan Council to improve transit in the east metro. While our members support better transit service for many reasons, access to employment is a primary interest, and our comments focus there.

1. Transportation barriers related to travel to work

The Draft Plan opens by observing. “For people with disabilities or older adults, transportation to daily activities can be challenging.” These “daily activities” include traveling to work; in many cases they *should include* traveling to work, but do not, because the regional transportation system contains too many gaps and barriers.

The Draft Plan recognizes (especially on page 9) the transportation barriers that wholly or partially preclude access to employment for persons with disabilities, and low-income persons who cannot drive and/or do not have access to a vehicle that they can legally operate and financially maintain. And the Draft plan describes innovative work being done around to region to help overcome some of those gaps and barriers.

However, we believe it is fair to say that overall, the Draft Plan does not give this important regional challenge the attention that it needs. Of the 33 recommended strategies, perhaps 7 deal directly with the challenge of getting to work.

The region has already done quite a bit of work on this subject. A short and incomplete list would include:

- *Washington County Transit Needs Study*
- “Those who Need it Most: Maximizing Transit Accessibility and Removing Barriers to Employment in Areas of Concentrated Poverty,” Fan and Guthrie, U of M Center for Transportation Studies

We recommend the Plan focus further on this important area, and consider additional strategies to address gaps and barrier. These include:

- Implementing site-specific shuttles or last-mile connections for major employers, institutions, or retail destinations. Metro Transit has been examining piloting such; this Plan would be a good opportunity to underline the value of doing so.
- Elevating vanpooling as a viable option for commuters by treating it as a core transit option, rather than as competitive with transit. Identified as a core transit option, outreach, engagement, and partnership efforts to reach commute destinations, such as warehouses and other locations with large numbers of entry-level jobs, should be prioritized.

2. Support, Strengthen, and Sustain Metro Mobility

It is unlikely that Metro Mobility will ever become a service than can be reliably used to get to work. However, in a report aimed at coordination and searching for efficiencies, the region should be looking for every opportunity to put more people on Metro Mobility vehicles that are already in service.

The following strategies were included in the Metro Mobility Task Force Report provided to the Minnesota Legislature in February 2018. We believe these recommendations should also be integrated into the Region’s Plan. These include:

- Facilitate collaboration between DHS and Metro Mobility by modifying Data Practices language to allow the agencies to share available non-medical data for limited purposes, including leveraging available federal funding.
- Explore creating a service specifically for DHS/County-waivered clients and medical assistance transportation program.
- Advocate for a dedicated funding source to ensure Metro Mobility demand is met.
- Pilot the expanded service options approach described in the Metro Mobility Task Force Report.

Advocating in particular for dedicated Metro Mobility funding would free up Metro Transit funds for closing some of the gaps in the regular-route system that create so many transportation challenges.

3. Demographic projections that illustrate the transportation challenges of the future

As a Plan to guide work and investment over multiple years, we encourage the Metropolitan Council to include maps that illustrate the projected populations of older adults across the region. Per the Minnesota State Demographer, “the most pronounced demographic shifts over the next 30 years are expected to occur in the region’s five all-suburban counties... All five (suburban counties) will see their 65-plus populations more than double in that time.

While the maps in the Draft Plan illustrate where population are currently aggregated, having the forward view of those most likely to encounter transportation challenges would provide a more complete picture as the Draft Plan contemplates needs, and recommends potential investments.

Similarly, the life expectancy for persons with intellectual and developmental disabilities (IDD) has grown over the last few decades due to medical advances and improved living conditions. The US Census Bureau estimates that the number of adults with IDD age 60 years and older is projected to nearly double from 641,860 in 2000 to 1.2 million by 2030. While their disabilities alone would increase the likelihood that an adult with IDD may require transportation supports, it is the concurrent aging of their parents that will likely accelerate the need for innovative services and supports in which the Council should invest. These concurrent demographic changes—and their likely seismic impact- highlight the importance of developing tools that illustrate the likely future of transportation challenges and therefore, the shape of future investment.

4. Using “real-time” data that specifically speaks to the transportation barriers that the region’s residents encounter

Public health agencies from six counties and three cities in the Metro region have administered the Survey of the Health of All the Population and Environment, or SHAPE. The counties and cities have intentionally oversampled those populations who are under-represented in traditional surveys, including young adults, lower-income families, residents with lower educational attainment, racially- and ethnically-diverse communities, and communities for whom English is not a primary language. Completed every four years since 2002, counties have added questions over time that capture demographic change and trending issues.

In 2018, the following question was added: “During past 12 months, how often did lack of transportation keep you from getting places where you needed to, such as jobs, medical appointments, or shopping?” The initial data provides significant nuance to the aggregate data offered by the American Community Surveys (ACS) on which most of the Draft Plan is based.

We encourage the Council to review this data and as feasible, and either opt for this data over the dated ACS data, or mediate its demographic mapping and conclusions with the benefit of this information.



Board of Commissioners

Fran Miron, District 1
Stan Karwoski, Chair, District 2
Gary Kriesel, District 3
Wayne A. Johnson, District 4
Lisa Weik, District 5

Ms. Molly Cummings, Interim Chair
Metropolitan Council
390 Robert Street North
Saint Paul, MN 55101

Dear Ms. Cummings:

Washington County is pleased to submit comments on the 2020 update of the *Twin Cities Public Transit and Human Services Transportation Coordination Plan*. We commend the Metropolitan Council for updating this important plan.

Our comments are organized by our recommendations for inclusion of:

- Employment-related transportation barriers as a significant gap between current services and needs, with several proposed strategies that may minimize their impacts on those seeking work and those seeking talent;
- Access to food as a significant gap between current services and needs, with proposed activities and strategies that may increase options for older adults, persons with disabilities, and/or low-income residents;
- Activities that will strengthen and sustain Metro Mobility, efforts originally identified by the legislatively-mandated Task Force;
- Emerging opportunities to innovate;
- Demographic projections that illustrate the transportation challenges of the future; and
- Using “real-time” data that specifically speaks to the transportation barriers that the region’s residents encounter.

These recommendations reflect the collaborative work of multiple County Departments and the stakeholders who participated in the November 21 Washington County Transportation Consortium meeting in which the Council’s Senior Planner Heidi Schallberg presented the Draft Plan.

We appreciate the opportunity to provide these comments and look forward to our continuing partnership to support greater access and connectivity in our County and across the region.

Sincerely,

A handwritten signature in black ink that reads "Stan Karwoski".

Stan Karwoski
Washington County Board Chair

cc: Heidi Schallberg

Washington County Comments:

The Draft Twin Cities Public Transit and Human Services Coordination Plan Update

Employment-related transportation barriers

A gap in the Draft Plan is specific recognition of the transportation barriers that wholly or partially preclude persons with disabilities and low-income persons who cannot drive and/or do not have access to a vehicle that they can legally operate and maintain for employment-related opportunities. The *Washington County Transit Needs Study* documented this issue. We recommend the plan consider strategies to address this barrier. These include:

- Implementation of “site-specific shuttles” or “last-mile connections for major employers, institutions, or retail destinations, providing a service that offers a link to and from a regional transit hub”.
- Piloting flexible microtransit options, such as demand responsive transit or pooled on-demand trips, that focus on reverse commute challenges
- Elevating vanpooling as a viable option for commuters by treating it as a core transit option, rather than as competitive with transit. Identified as a core transit option, outreach, engagement, and partnership efforts to reach commute destinations, such as warehouses and other locations with large numbers of entry-level jobs, should be prioritized.

Access to high-quality, nutritious food

We recommend the Plan include recognition of the impact of transportation on access to healthy foods for those who cannot drive and/or those unable to legally operate and maintain a vehicle. Strategies, activities, and projects that will address limited food access include

- Implementation of community circulators, subsidized taxi or ride hailing services, and volunteer driver programs.
- Working in collaboration with local communities, faith communities, food shelves, grocery stores, and others, deployment of these strategies may provide support to individuals who are otherwise challenged to access healthy foods.
- Piloting trips to high-quality, nutritious foods in a partnership with Non-Emergency Medical Transportation providers, including health plans, for beneficiaries experiencing or at risk for limited food access.

Support, Strengthen, and Sustain Metro Mobility

The following strategies were included in the Metro Mobility Task Force Report provided to the Minnesota Legislature in February 2018. We believe these recommendations should also be integrated into the Region’s Plan. These include:

- Facilitate collaboration between DHS and Metro Mobility by modifying Data Practices language to allow the agencies to share available non-medical data for limited purposes, including leveraging available federal funding.
- Explore creating a service specifically for DHS/County-waivered clients and medical assistance transportation program
- Advocate for a dedicated funding source to ensure Metro Mobility demand is met
- Pilot the expanded service options approach described in the Metro Mobility Task Force Report

Emerging Opportunities to Innovate

The Region's Plan needs to be bold and recognize opportunities to innovate. We suggest these are such opportunities:

- Pilot and document services that efficiently connect individuals with disabilities, older adults, and low-income residents to destinations, particularly medical services, in adjoining counties, including those non-urban counties outside the seven metro counties
- Seek opportunities to share information and to encourage projects that braid federal funding

Demographic projections that illustrate the transportation challenges of the future

As a Plan to guide work and investment over multiple years, we encourage the Metropolitan Council to include maps that illustrate the projected populations of older adults across the region. Per the Minnesota State Demographer, "the most pronounced demographic shifts over the next 30 years are expected to occur in the region's five all-suburban counties... All five (suburban counties) will see their 65-plus populations more than double in that time. Older adults are already the fastest growing population demographic in Washington County. While the maps in the Draft Plan illustrate where population are currently aggregated, having the forward view of those most likely to encounter transportation challenges would provide a more complete picture as investments are contemplated.

Related, the life expectancy for persons with intellectual and developmental disabilities (IDD) has grown over the last few decades due to medical advances and improved living conditions. The US Census Bureau estimates that the number of adults with IDD age 60 years and older is projected to nearly double from 641,860 in 2000 to 1.2 million by 2030. While their disabilities alone would increase the likelihood that an adult with IDD may require transportation supports, it is the concurrent aging of their parents that will likely accelerate the need for innovative services and supports in which the Council should invest. These concurrent demographic changes—and their likely seismic impact- highlight the importance of developing tools that illustrate the likely future of transportation challenges and therefore, the shape of future investment.

Using "real-time" data that specifically speaks to the transportation barriers that the region's residents encounter

Public health agencies from six counties and three cities in the Metro region have administered the Survey of the Health of All the Population and Environment, or SHAPE. The counties and cities have intentionally oversampled those populations who are under-represented in traditional surveys, including young adults, lower-income families, residents with lower educational attainment, racially- and ethnically-diverse communities, and communities for whom English is not a primary language. Completed every four years since 2002, counties have added questions over time that capture demographic change and trending issues.

In 2018, the following question was added: "During past 12 months, how often did lack of transportation keep you from getting places where you needed to, such as jobs, medical appointments, or shopping?" The initial data provides significant nuance to the aggregate data offered by the American Community Surveys (ACS) on which most of the Draft Plan is based. We would encourage the Council to review this data and as feasible, to either opt for this data over the dated ACS data or to mediate its demographic mapping and conclusions with the benefit of this information.



WASHINGTON
COUNTY
Community
Development
Agency

7645 Currell Boulevard, Woodbury, MN 55125
office: 651-458-0936 fax: 651-458-1696

December 19, 2019

Ms. Molly Cummings, Interim Chair
Metropolitan Council
390 Robert Street North
Saint Paul, Minnesota 55101

Dear Ms. Cummings:

On behalf of the Washington County Community Development Agency, I am pleased to submit the following comments as the Metropolitan Council seeks public input into the 2020 update of the *Twin Cities Public Transit and Human Services Transportation Coordination Plan*.

Authorized by the Minnesota Housing and Redevelopment Act, Minnesota Session Laws of 1974, to undertake certain types of housing and redevelopment activities, the Washington County Community Development Agency (CDA) provides critical services and supports to individuals, families, and small businesses throughout the County. As the owner and operator of over 1,100 units of affordable housing, the CDA ensures that all of our neighbors, including older adults, persons with disabilities, and working families, have a good, safe, and decent place to call home. In collaboration with multiple community partners, the CDA has been actively engaged in supporting and funding critical services for individuals and families experiencing homelessness. Deploying its award-winning economic development staff, the CDA also provides tangible, targeted resources, services, and supports to small businesses and partners with major employers to ensure their continued growth and success.

The CDA has been deeply involved in the Washington County Transportation Consortium, whose development and engagement was a recommendation of the *Washington County Transit Needs Study* accepted by the County Board in February 2018. While I have served on the Consortium's Steering Committee, the Washington County Economic Development Agency Director has served on the Access to Employment Workgroup. Related, the Director of Housing Assistance and Administrative Services has served on the Access to Community and the Region Workgroup. Seeking to ensure that our Board, our staff, and our neighbors are aware of the County's mobility efforts, the CDA has facilitated multiple presentations and engagement processes with our Board, staff, and our neighbors across the County. ***Our organizational mission and work, as well as our active role in the County's mobility efforts informs our comments and recommendations.***

Unaddressed Gap: Employment-related transportation

As an organization that dually provides safe and affordable housing that low-income working families call home and also supports the economic growth afforded by both small businesses and major employers, we are deeply concerned that the Draft Plan does not speak to the transportation barriers that constrain persons with disabilities and/or low-income families from pursuing and retaining employment.

Although Metro Transit provides express and fixed-route service in Washington County, the viability of these services as a connection to work in either the Twin Cities or in the County is highly constrained. Express services are largely limited in their usefulness to those who work “traditional 9 – 5” schedules, an approach that does not allow for the schedules most commonly associated with entry-level jobs. For those who do not live or work in the western portion of Washington County, fixed-route service is largely inaccessible.

Much of Washington County falls outside the federally-mandated ADA Service Area for Metro Mobility. Thus, trips to work that begin or end outside the federally-mandated Service Area are not guaranteed, but, are instead, placed on stand-by. Further challenging timely and regular attendance at work, Transit Link- which offers vital services to individuals throughout the County- is also capacity constrained.

The impact of these barriers is clear. With very few options for connecting to employment via express commuter services, fixed-route, or demand-response services, small businesses, major employers, *and their potential employees* cite chronic challenges in accessing and retaining employment. Able to patch together options initially, many low-income residents of Washington County are unable to maintain employment as these informal networks are often not flexible or sustainable over the long-term.

We would recommend the following strategies, activities, and projects that will address employment-related gaps be added to the Plan:

- **Per the February 2018 *Washington County Transit Needs Study*, the County Board adopted the implementation of “site-specific shuttles” as a specific strategy.**

Described as “last-mile connections for major employers, institutions, or retail destinations, providing a service that offers a link to and from a regional transit hub,” this approach focuses on offering the tangible connections that, in their absence, precludes or severely limits employment for persons with disabilities and low-income residents.

- **Piloting flexible microtransit options, such as demand responsive transit or pooled on-demand trips, that focus on reverse commute challenges**

Deploying microtransit pilots that focus on suburban first-mile/last-mile connections, including zone-based demand responsive transit (DRT) or pooled on-demand trips provides flexible options to respond to the specific commuting challenges that often confront persons who cannot drive and/or are unable to legally operate and maintain a vehicle.

- **Elevating vanpooling as a viable option for commuters by treating it as a core transit option, rather than as competitive *with* transit.**

While the Met Council’s vanpool program provides a vital service to the region, participation has leveled off and in fact, has fallen behind other regions that more directly invest in- and benefit from- vanpooling, according to the Shared Use Mobility Center’s *Twin Cities Shared Mobility Action Plan*. Envisioned as “competitive” with transit, Met Council-funded vanpools that travel to

downtown areas during peak hours are prohibited—a restriction initially adopted to avoid duplication of bus and rail routes.

For commuters in Washington County, however, these constraints have a perverse impact: Those unable to drive and/or those unable to legally operate and maintain a vehicle are not in danger of competing commute options, but instead, face fewer options as they are often without reliable or viable access to transit, rail, and vanpools that could connect them to work. Identified as a core transit option, outreach, engagement, and partnership efforts to reach commute destinations, such as warehouses and other locations with large numbers of entry-level jobs, should be prioritized.

Not only do these prohibitions minimize commute options in Washington County, they fail to acknowledge substantive differences between vanpooling and transit services. For low-income persons and/or individuals with disabilities, vanpooling may offer a more user-friendly option, one in which the challenges of outdoor conditions, pedestrian infrastructure, daily fare payments, and transfers between routes and vehicles are minimized. Often, traveling with the same individuals, vanpools create natural opportunities for social connectedness and support, personal relationships that often bolster the likelihood of retention and success in the workplace.

Unaddressed Gap: Access to high-quality, nutritious food

As an organization that seeks to support and enhance the quality of life of our neighbors across the County's communities, we are concerned that the *Draft Plan* does not speak to the impact of transportation on access to healthy foods for those who cannot drive and/or those unable to legally operate and maintain a vehicle. As described by the US Department of Agriculture's Economic Research Service's *Access to Affordable and Nutritious Food: Measuring and Understanding Food Deserts and Their Consequences*, "Some consumers are constrained in their ability to access affordable nutritious food... In small-town and rural areas with limited food access, the lack of transportation infrastructure is the most defining characteristic." (US Department of Agriculture- Economic Research Service. 2009. *Access to Affordable and Nutritious Foods*, v.)

We would recommend the following strategies, activities, and projects be added to the Plan:

- **Per the February 2018 *Washington County Transit Needs Study*, the County Board adopted the implementation of community circulators, subsidized taxi or ride hailing services, and volunteer driver programs, each strategies that might offset these critical challenges in particular locations.**

Working in collaboration with local communities, faith communities, food shelves, grocery stores, and others, deployment of these strategies may provide support to individuals who are otherwise challenged to access healthy foods.

- **Piloting trips to high-quality, nutritious foods in a partnership with Non-Emergency Medical Transportation providers, including health plans, for beneficiaries experiencing or at risk for limited food access.**

With the increased recognition of social determinants on overall health, particularly among older adults, persons with disabilities, and/or low-income families, piloting transportation to/from high-quality grocery stores, food shelves, farmers' markets, and other sources of high-quality nutritious foods in partnership with health plans may offer additional insights into the specific challenges that these trips present to older adults, persons with disabilities, and low-income individuals and the benefits that accrue when these challenges are overcome.

Unaddressed Gap: Support, Strengthen, and Sustain Metro Mobility

Because the CDA owns and operates safe and affordable housing in partnership with persons with disabilities across the lifespan, we are particularly attuned to the challenges that confront the strength and sustainability of Metro Mobility as a critical transportation service.

Drawing from the legislatively-mandated *Metro Mobility Task Force Report*, we recommend that each of the following elements should be integrated into the Plan:

- **Facilitate collaboration between DHS and Metro Mobility by modifying Data Practices language to allow the agencies to share available non-medical data for limited purposes, including leveraging available federal funding.**

Currently, DHS and Metro Mobility are not able to share client information, so it is not possible to fully understand the clients involved, the programs they are enrolled in, the prevalence of Metro Mobility ridership, and the scope of federal funding lost. Having authority to share the information is a critical first step in understanding the return on investment and general approach to designing a new program structure and associated policies and procedures.

- **Explore creating a service specifically for DHS/County-waivered clients and medical assistance transportation program**

DHS programs are bound to federal "usual and customary" charge requirements, meaning a provider cannot charge more for a covered client than what is charged to other customers. It is possible and legal for Metro Mobility to charge more if the service provided is a higher level of service than service offered to other customers paying the public transit fare.

- **Pilot the expanded service options approach**

Within the Report, the Task Force proposed integration of taxi services and transportation network companies as expanded service options under the umbrella of Metro Mobility. With Metro Mobility continuing to provide the federally-compliant base services, the Task Force recommended implementation on a pilot basis and advised targeting the 30% of Metro Mobility trips that serve residents outside of the federally-mandated ADA area. While Metro Mobility will continue to provide critical safety net services in Washington County, both inside and outside of the federally-mandated service area, increasing access to a wider ecosystem of shared mobility options can fill gaps in times and places when these options are not available—particularly during peak hours. These additional options will support greater autonomy, independence, choice, and dignity among those persons with disabilities eligible for Metro Mobility.

Unaddressed Gap: Emerging opportunities to innovate services that parallel the travel needs of older adults, persons with disabilities, and low-income residents, including those in adjoining non-urban counties

In its 2017 *Social Determinants of Health Series: Transportation and the Role of Hospitals*, the American Hospital Association identified that transportation barriers were the third leading cause of missing a medical appointment for older adults. While the mobility management efforts of some of the region's TCAPs aim to assist older adults in understanding whether their private or publicly-funded health plans offer a transportation benefit, significant challenges remain as Medicare does not. Because the political boundaries of counties and transit services do not necessarily match or mesh with where and when individuals need to travel, piloting and documenting innovations that reduce barriers to care- including those that cross county lines and transit service areas- should be included as a strategy in the Plan.

We believe that the following recommendation should be integrated into the Plan:

- **Pilot services that connect individuals with disabilities, older adults, and low-income residents to critical destinations in adjoining counties, including those non-urban counties outside the seven metro counties**

Unaddressed Gap: Expanding the perspective of the Plan to include projected demographic data, thereby illustrating the transportation challenges of the future

As a Plan intended to guide work and investment over multiple years, we would encourage the Met Council to consider and integrate data that illustrates the projected populations of targeted demographic groups across the region. Per the Minnesota State Demographer, "the most pronounced demographic shifts over the next 30 years are expected to occur in the region's five all-suburban counties... All five (suburban counties) will see their 65-plus populations more than double in that time." (**Source:** Emma Nelson. Suburbs brace for wave of older adults who want to age in their homes. *Star-Tribune*, February 13, 2016). As identified in the *Washington County Transit Needs Study*, older adults are already the fastest growing population demographic in Washington County.

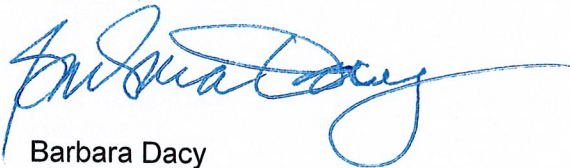
We believe that the following change, if integrated, would improve the Plan:

- **Use both current and future demographic data and tools**

While the data cited in the Draft Plan illustrates where various demographic groups are currently aggregated, complementing this information with a future-forward view of where those most likely to encounter transportation challenges are expected to live, work, and/or play would provide a more complete picture as investments are contemplated.

In closing, as a Washington County Transportation Consortium Steering Committee member, I appreciated the November presentation of the Draft Plan by Heidi Schallberg. Leading an agency that engages and collaborates with diverse stakeholders, I also appreciate the complexity of the task and the diligent efforts of Met Council staff in developing this Draft Plan. On behalf of the individuals and families we serve, the businesses we support, and the communities with whom we partner, I appreciate the opportunity to provide these comments and recommendations.

Sincerely,



Barbara Dacy
Executive Director

cc: Heidi Schallberg



Saint Therese
WOODBURY

December 20, 2019

Ms. Molly Cummings, Interim Chair
Metropolitan Council of the Twin Cities
390 Robert Street North
Saint Paul, Minnesota 55101

Metropolitan Council

JAN 03 2020

Received Chair's Office

Dear Ms. Cummings:

On behalf of Saint Therese of Woodbury, I am pleased to provide the following comments on the *Draft Public Transit and Human Services Transportation Coordinated Plan* released by the Metropolitan Council in November 2019. Focused on the specific transportation needs of older adults, persons with disabilities, and low-income residents, the Plan, once approved, is intended to prioritize needs, establish strategies, and guide regional investments.

After careful review of the Draft Plan, we are concerned that the transportation-related barriers that limit talent recruitment, acquisition, and retention are not specifically identified as a gap. Metro Transit provides very limited express and fixed-route service *to and from* Washington County, constraining the viability of employment opportunities to which the region's residents can connect. For those who both live and work in Washington County, transportation options are even more limited as Transit Link is capacity-constrained.

The impact of these barriers is very clear. With very few options for connecting to employment via express commuter services, fixed-route, or demand-response public transportation, we confront chronic challenges in recruiting, employing, and retaining employee talent. **Although we offer living wage jobs and high-quality benefits,** many who express interest in employment do not apply because they cannot identify ongoing options for timely travel to and from work. **With few viable public transportation options that will flexibly connect employees to our site,** we lose talent as the patchwork of options they cobble together, including rides from family, friends, and co-workers, are not sustainable over the long-term.

We would encourage the Council to include the following strategies, activities, and projects to address employment-related gaps in the Draft Plan:

- **Per the February 2018 *Washington County Transit Needs Study*, the County Board adopted the implementation of "site-specific shuttles" as a specific strategy.**

Described as "last-mile connections for major employers, institutions, or retail destinations, providing a service that offers a link to and from a regional transit hub," this approach focuses on offering the tangible connections that, in their absence, precludes or limits employment.

- **Piloting flexible microtransit options, such as demand responsive transit or pooled on-demand trips, that focus on reverse commute challenges**

Deploying microtransit pilots that focus on suburban first-mile/last-mile connections, including zone-based demand responsive transit (DRT) or pooled on-demand trips, would offer an opportunity to respond to the

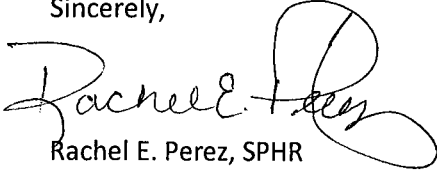
specific commuting challenges that often confront persons who cannot drive and/or are unable to legally operate and maintain a personal vehicle.

- **Elevating vanpooling as a viable option for commuters by treating it *as* a core transit option, rather than as competitive *with* transit.**

For some, vanpooling may offer a more user-friendly option, one in which the challenges of outdoor conditions, pedestrian infrastructure, daily fare payments, and transfers between routes and vehicles are minimized.

We appreciate the opportunity to provide input into this important regional Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel E. Perez". The signature is fluid and cursive, with a large loop at the end.

Rachel E. Perez, SPHR
Human Resources Director

December 26th, 2019

Ms. Molly Cummings, Interim Chair
Metropolitan Council of the Twin Cities
390 Robert Street North
Saint Paul, Minnesota 55101

Dear Ms. Cummings:

On behalf of Vocational Rehabilitation Services, I am pleased to provide the following comments on the *Draft Public Transit and Human Services Transportation Coordinated Plan* released by the Metropolitan Council in November 2019. Focused on the specific transportation needs of older adults, persons with disabilities, and low-income residents, the Plan, once approved, is intended to prioritize needs, establish strategies, and guide regional investments.

After careful review of the Draft Plan, we are concerned that the transportation-related barriers that limit talent recruitment, acquisition, and retention are not specifically identified as a gap. Metro Transit provides very limited express and fixed-route service *to and from* Washington County, constraining the viability of employment opportunities to which the region's residents can connect. For those who both live and work in Washington County, transportation options are even more limited as Transit Link is capacity-constrained.

The impact of these barriers is very clear. Because there are very few options for connecting to employment via express commuter services, fixed-route, or demand-response public transportation, the people we serve often confront chronic challenges in finding ways to get to jobs that offer living wages and high-quality benefits. Many who express interest in employment cannot identify ongoing options for timely travel to and from work. With few viable public transportation options that will flexibly connect employees to work sites, employers often lose talent as the patchwork of options they cobble together, including rides from family, friends, and co-workers, are not sustainable over the long-term.

We encourage the Council to include the following strategies, activities, and projects to address employment-related gaps in the Draft Plan:

- **Per the February 2018 *Washington County Transit Needs Study*, the County Board adopted the implementation of "site-specific shuttles" as a specific strategy.**

Described as "last-mile connections for major employers, institutions, or retail destinations, providing a service that offers a link to and from a regional transit hub," this approach focuses on offering the tangible connections that, in their absence, precludes or limits employment.

- **Piloting flexible microtransit options, such as demand responsive transit or pooled on-demand trips, that focus on reverse commute challenges**

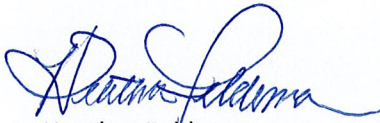
Deploying microtransit pilots that focus on suburban first-mile/last-mile connections, including zone-based demand responsive transit (DRT) or pooled on-demand trips, would offer an opportunity to respond to the specific commuting challenges that often confront persons who cannot drive and/or are unable to legally operate and maintain a personal vehicle.

- **Elevating vanpooling as a viable option for commuters by treating it as a core transit option, rather than as competitive *with* transit.**

For some, vanpooling may offer a more user-friendly option, one in which the challenges of outdoor conditions, pedestrian infrastructure, daily fare payments, and transfers between routes and vehicles are minimized.

We appreciate the opportunity to provide input into this important regional Plan.

Sincerely,



Heather Felderman
Rehabilitation Area Manager
Vocational Rehabilitation Services
6043 Hudson Rd, Suite #170
Woodbury, MN 55125