

2024 REGIONAL SOLICITATION APPLICATION

Public Comment Report



METROPOLITAN
C O U N C I L

July 2023

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

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

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Background

This report summarizes comments received for the draft 2024 Regional Solicitation application. The draft application was released for public comment on May 17, 2023. Comments were accepted through June 23, 2023. During this time, the draft application materials were available on the Metropolitan Council's website and through printed copies as requested.

The following report includes a spreadsheet listing comments received, the individual or organization that made the comment, and the staff response to the comment.

Summary of Engagement Methods

Thirteen (13) commenters participated, including individuals, local government, and non-profit organizations. Eighteen (18) comments were received, through web form or email. The following organizations engaged during the comment period:

- The Center for Economic Inclusion
- East Metro Strong and Hourcar, jointly
- Hennepin County
- The Minnesota Department of Transportation
- Richfield Public Schools
- Three Rivers Park District

The comment period was advertised through the following methods:

- Website announcement – 901 unique visitors
- GovDelivery email announcement
- Facebook post – 342 reached, 14 engaged
- Twitter post – 709 impressions, 24 engaged

Engagement Themes

Public comments produced the following themes:

Applications & Scoring

- 1 commenter requested application process changes to simplify the application process, clarify scoring guidance, and adjust various measure methodologies.
- 1 commenter requested changes to bridge replacement and rehabilitation prioritization and eligibility.
- 1 commenter requested changes to planning requirements for Safe Routes to Schools projects.
- 1 commenter requested changes the Unique Projects category's measures and scoring process.
- 1 commenter encouraged a more holistic approach to transportation equity, including changes to measurement of engagement quality, measures of accessibility, and construction impacts on businesses.

Regional Solicitation Investment Direction

- 1 commenter opposed funding for strategic capacity and other projects that promote driving as detrimental to safety and discouraging transit, biking, and walking.
- 1 commenter supported prioritizing projects that reduce carbon emissions and single-occupancy vehicle trips.
- 1 commenter supported considering safety for “vulnerable users” in all projects and investing in active transportation.
 - *“Vulnerable users” typically references people outside of a private vehicle, like those walking, rolling, biking, and connecting to transit.*

Other

- 3 commenters had requests relative to specific projects or locations, separately:
 - Supported Highway 610 Strategic Capacity interchange project in the City of Coon Rapids
 - Opposed to METRO Purple Line alignment in downtown White Bear Lake
 - Supported pedestrian and bicycle facilities in Lakeville and Apple Valley
- 1 commenter supported improving public safety on transit to increase ridership.
- 1 commenter inquired about transit service planning and network design.
- 1 commenter opposed speed enforcement cameras.
- 1 commenter requested a website correction.

Comments and Responses

Comments are sorted alphabetically by comment topic and commenter name. Commenters that commented on multiple topics may find separate responses for each topic.

#	Commenter	Topic	Comment	Staff Response
2.1	Chris Bower, Minnesota Department of Transportation	Application Process	HSIP application link doesn't work (as of the morning of 5/19)	Thank you for your comment. The HSIP application link is now functioning.
13.4	Kelly Grissman, Three Rivers Park District	Application Process	<p>Thank you for the opportunity to provide comments on the draft regional solicitation applications. We noted several recent improvements and attention to several of our previous comments submitted via the online survey last year. As an agency which has both successfully and unsuccessfully applied for funding for many years, Three Rivers offers the following Multiuse Trails and Bicycle Facilities comments for Metropolitan Council and Transportation Advisory Board consideration:</p> <p>...</p> <p>5. Multimodal Elements and Connections</p> <p>a. Three Rivers would appreciate an automated transit map which shows all routes/stops along/adjacent to a project to supplement the narrative.</p> <p>...</p> <p>7. General Comments</p> <p>a. The revised timeline puts many agencies, including Three Rivers, at a disadvantage as our 2023 Budget did not include consulting support to prepare/assist with regional solicitation applications since that would have typically occurred in 2024; likewise, our 2023 workplans did not anticipate this timeframe. As such, we have a greater need for external consultant support but no identified resources to secure that support.</p> <p>b. Three Rivers does not agree that prorating scores is fully appropriate. While it creates a point spread, if a project meets the scoring criteria, it should be eligible for full points. An alternative approach is to better define how points are to be awarded similar to how the risk category assigns points: projects score 100% of points if they do A, B, or C; score 75% of points if they do E, F or G; score 50% of points if they do H, I or J; etc.</p> <p>c. The scoring methodology still tends to prioritize urban projects (population/number of jobs within 1 mile, targeted equity community groups, affordable housing within ½ mile, connectivity to multi-modal transportation, etc.). This may not be in the best interest of the whole region and it likely puts a greater emphasis on 'retroactive' projects (i.e. fixing things that were not done correctly to begin with) at the expense of proactively planning for and investing in the transportation needs of the developing areas of the region (i.e. getting it right to begin with). Three Rivers urges the Council to identify ways to provide a stronger balance between the rural, developing, and developed areas of the region so the entire region benefits from these critical federal transportation dollars.</p> <p>d. Combine the project qualifying document and application into one form.</p>	<p>Thank you for your comment. We agree that a quick reference table that shows all the scoring guidance would be helpful for applicants. We will create this table and make it available for the 2024 Regional Solicitation funding cycle.</p> <p>The Metropolitan Council and its stakeholders will put a great deal of effort into the Regional Solicitation between now and 2026 including the 2024 Regional Solicitation; a 2.5-year evaluation of the Regional Solicitation process; and the 2026 Regional Solicitation. The Transportation Advisory Board agreed that a quicker schedule for the 2024 Regional Solicitation was the best way to go, knowing that there was no ideal schedule for all stakeholders. With limited changes to the applications, we hope that applicants can easily resubmit unfunded applications from the last funding cycle.</p> <p>In terms of the way points are allocated, proration of points was decided upon by the TAB in 2014 when it created the format used today. That said, there have been conflicting opinions on this approach. This will likely be a topic of discussion during the Regional Solicitation Evaluation, and we welcome this input into that process.</p> <p>While the Multiuse Trails and Bicycle Facilities category has had a fairly wide geographic spread in funding over the years, this is another topic that could be approached in the Evaluation. Rating criteria in all funding categories will be open to examination.</p> <p>The examination may also explore the physical structure of the Regional Solicitation (i.e., the formation of the document(s), chapters, etc. and the layout of the measures and scoring guidance).</p>

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			<p>e. Include the complete scoring methodology into one scoring table for quick reference – this will help applicants quickly assess whether they have a viable project and/or identify where their project weaknesses are.</p> <p>As you can see from our comments above, Three Rivers has a strong vested interest in this funding program and process. Please do not hesitate to reach out at any time to float ideas, obtain more background, or better understand our comments and concerns. Thank you for your thoughtful consideration of our feedback.</p>	
1.1	Jennifer Crill	Project - Highway 610	The City of Coon Rapids has applied for a grant to add multi-directional access to and from HWY 610 at East River Road. This is a necessity for emergency vehicles to access this highway in emergencies. It also needs to happen for the traffic to even out in multiple areas that this project would assist with.	This Strategic Capacity project scored well in the last regional solicitation, including one of the highest scoring projects for equity. However, due to limited available funds, it has not yet been awarded funds. The Minnesota State Legislature provided \$1 million during the last session to support this project. We encourage the project sponsor to continue to pursue funds through the Regional Solicitation and other available sources.
4.1	Linda Woodstrom	Project - METRO Purple Line	I am against any transit project that goes through downtown WBL, up hwy 61, through Hugo and Forest Lake.	<p>Thank you for your comments on potential METRO Purple Line routes. They will be shared with the lead project agencies, Metro Transit and Ramsey County, for consideration.</p> <p>The METRO Purple Line project is currently undergoing a route modification study to evaluate whether the line should travel along the Bruce Vento Trail or on White Bear Avenue. The study is also considering where the line ends. The route modification study is expected to continue through 2024. The latest project bulletin is available here: https://content.govdelivery.com/accounts/MNORGMETC/bulletins/35778f0</p>
3.1	Susan Meyers	Safety	We need more bike and ped facilities in Lakeville / Apple Valley. There are some regional trails, but too many unsafe crossings and high speeds on all the county highways. I've seen bad crashes and many close calls on County Road 46 and 42.	Thank you for your comments on the need for safer facilities and crossings for people walking and biking in these communities. We will share your comments with these two cities, as well as Dakota County, for their consideration. The Metropolitan Council is working with local partners on a Regional Safety Action Plan to address traffic crashes that result in deaths or serious injuries; this planning work should be complete in the first half of 2024. The 2023 Minnesota Legislative session's transportation omnibus bill included a new regional sales tax for transportation purposes. Five percent of this sales tax is focused on active transportation projects; this amount for active transportation is projected to be approximately \$24 million annually. At this time, we anticipate we will begin to distribute these funds for walking and biking through our 2024 Regional Solicitation.
5.2	Emily	Safety	All projects should include a safety component for vulnerable users...Major investments in active transportation must be made as soon as possible.	Thank you for your comments. We will be doing an evaluation of the Regional Solicitation beginning later this year and will re-evaluate how safety is included in each application category. The 2023 Minnesota Legislative session's transportation omnibus bill included a new regional sales tax for transportation purposes. Five percent of this sales tax is focused on active transportation projects; this amount for active transportation is projected to be approximately \$24 million annually. At this time, we anticipate we will begin to distribute these funds for walking and biking through our 2024 Regional Solicitation. This new regional funding source is an exciting major investment in these modes, especially when combined with potential investments in walking and biking using federal funds through the Regional Solicitation.
5.3	Emily	Safety	Safety must be prioritized on transit to increase ridership.	Thank you for your comment on transit system safety and security. It is the Metropolitan Council's goal to ensure the regional transportation system is safe and secure for all users. Metro Transit's Safety and Security Action Plan (https://www.metrotransit.org/public-safety) summarizes the steps being taken to improve public safety on transit. Recent changes to state transportation law invest in social service outreach efforts and allows transit providers to issue

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				citations for fare non-compliance with non-police personnel. Beginning this summer, Metro Transit will lead the Transit Safety Intervention Project (TSIP), a coordinated, high-visibility effort to provide enhanced social services and Code of Conduct enforcement on transit.
9.1	Beth Schlangen, Benton County	Safety	<p>Cameras for automatic tickets, not a reasonable idea.</p> <p>Issues with traffic management technologies. Don't push for automatic tickets for over the speed limits. Could consider for 10mph over speed limit in traffic, or caused an accident. If someone is tagged at multiple cameras, and doesn't cause an accident, they could have loss of license, job, and other problems. Let's not exaggerate the problem. Cameras could assist in accident cases to assess what happened. Would also need testimonies from parties before penalties. I have heard of people who obey the speed limit, get pulled over for going too slow and being a traffic hazard, speeders keep on speeding. I guess that's why focus is on hazardous driving habits. Weather also has an impact.</p>	Thank you for your comment. Cameras are not currently used in Minnesota for automated speed enforcement, and therefore that use would not be expected to be included in an application for federal transportation funding through the Regional Solicitation in the Minneapolis-St. Paul region. The reference to new or replacement closed-circuit televisions (CCTV) in the Traffic Management Technology application category would be for cameras used in monitoring traffic but not for automated enforcement at this time. The Minnesota state legislature has directed the Commissioner of Public Safety to submit a report by November 1, 2024, on the subject of speed safety camera systems; this work is not being done by the Metropolitan Council. For additional information or provide feedback on that work, we encourage you to contact your state representatives.
5.1	Emily	Safety, Environment	Projects that reduce carbon emissions and SOV trips should be prioritized.	We appreciate these concerns as we invest limited resources in a transportation system to serve all users and achieve multiple goals. The Met Council has new funding through the federal Carbon Reduction Program and state's regional active transportation sales tax to fund additional projects in these areas.
6.1	Scott Engel	Safety, Transit, Land Use	<p>It's discouraging that the Met Council is dolling out funds for "strategic capacity"/ road expansions in the region when it is proven such projects do not actually improve safety. A conversion from a two to four lane layout or four to six lanes has proven to cause more crashes. In fact, Minneapolis and Hennepin County are in the process of getting rid of four lane "death roads" converting them to safer 3-lane layouts. This program needs to be reworked or eliminated in favor of road projects that actually improve safety for all users.</p> <p>Besides the safety issue, why is the Met Council funding projects that promote more driving, auto oriented land uses and sprawl? The agency is failing to draw riders back to the transit system and should be implementing projects that improve the land uses that encourage transit use. Four and six-lane roads are unpleasant, dangerous and discourage walking, biking and transit. The existence of this program works against the other programs in the Regional Solicitation.</p> <p>As a blind person who lives in Minneapolis whose bus now runs only once an hour, I am furious that the Met Council is involved in the Strategic Capacity and other highway "improvement" programs through the Regional Solicitation. MNDOT has plenty of dedicated money and newly allocated funds to continue the region's over reliance on cars. Met Council should be putting all efforts into making the transit system efficient, comfortable and preferable to driving. This includes making streets for people, incentivizing sustainable land uses and improving frequency of transit service.</p> <p>The MSP region is going in the wrong direction with continued sprawl, more driving and traffic deaths and cratering transit ridership. The Met Council needs to do a lot better because the planet is warming quickly and promoting driving for every activity isn't going to help with that.</p>	Thank you for your comment. In the 2022 Regional Solicitation funding cycle, the Transportation Advisory Board and Met Council funded 18 Roadway Reconstruction projects, many of which were urban "road diet" projects that proposed to reduce the number of lanes to improve safety and multimodal options. In contrast, only four Strategic Capacity projects were funded (three were suburban interchanges and one was a suburban lane expansion project) and they are also expected to improve safety outcomes. Safety is the highest scoring criterion used in both the Roadway Reconstruction and Strategic Capacity projects and this leads project applicants to propose projects and specific project elements to address the safety needs of the corridor, specific to the project's context within the region. The Transportation Advisory Board and Met Council will continue to prioritize safety in its project selection moving forward.
11.1	Carla Stueve, Hennepin County	Scoring - Bridges	Thank you for the opportunity to comment on the proposed 2024 Regional Solicitation application and scoring criteria. Hennepin County would like to highlight the following items for your consideration as they relate to bridges. We continue to appreciate the effort of Met Council staff and Technical Advisory Committees in facilitating a data-driven and transparent evaluation process for awarding federal formula funds to agencies within the metro region.	Thank you for your comments on the bridge application. We are proposing some minor adjustments to the Regional Solicitation materials to reflect updated state-aid standards as requested in your letter. Additionally, work groups will be established as part of the Regional Solicitation Evaluation to further discuss how to best measure and select bridge projects moving forward.

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			<p>The table below provides bridge statistics for each metro county (excluding Washington County) representing the year 2022. The average bridge age indicates the potential near-term expense. Based on this information, more than 20 percent of the bridges in our region exceed their expected 50-year design life. These bridges require significant cost and resources to maintain or replace. Structurally deficient bridges also require increased resources to replace or rehabilitate in order to keep the bridge in service. A Local Planning Index (LPI) value below 60 indicates a bridge, due to its deteriorating condition, is eligible for federal replacement funding. While it is important to continue to invest in these bridges that are in the worst condition, as a region we also need to invest in preserving bridges to extend their service life and maximize the federal bridge investments.</p> <table border="1" data-bbox="540 427 1534 719"> <thead> <tr> <th>County</th> <th># of bridges</th> <th>Average Age</th> <th>% over 50 years</th> <th>% SD(1)</th> <th>Average LPI(2)</th> <th>LPI(2) < 60</th> </tr> </thead> <tbody> <tr> <td>Anoka</td> <td>67</td> <td>31</td> <td>10%</td> <td>9%</td> <td>86.5</td> <td>9.0%</td> </tr> <tr> <td>Carver</td> <td>76</td> <td>28</td> <td>13%</td> <td>1%</td> <td>88.8</td> <td>2.6%</td> </tr> <tr> <td>Dakota</td> <td>101</td> <td>29</td> <td>20%</td> <td>0%</td> <td>95.5</td> <td>1.0%</td> </tr> <tr> <td>Hennepin</td> <td>149</td> <td>40</td> <td>32%</td> <td>5%</td> <td>83.9</td> <td>5.4%</td> </tr> <tr> <td>Ramsey</td> <td>30</td> <td>43</td> <td>33%</td> <td>10%</td> <td>81.7</td> <td>10.0%</td> </tr> <tr> <td>Scott</td> <td>67</td> <td>36</td> <td>27%</td> <td>1%</td> <td>92.4</td> <td>1.5%</td> </tr> </tbody> </table> <p>Notes:</p> <p>(1) SD indicates Structurally Deficient, meaning that an element requires substantial improvement.</p> <p>(2) LPI is an indication of the overall condition.</p> <p>We are requesting that TAB consider changing the distribution of bridge funding to not only prioritize the region's bridges in the poorest condition, but also preserve bridges to extend their useful life, to avoid significant capital costs and maximize the federal investment. This approach is consistent with current guidance provided by the FHWA for the Bridge Formula Program: FHWA Bridge Formula Program Guidance. As an example, MnDOT's Bridge Preservation and Improvement Guidelines suggest that 50 percent of the statewide bridge funding is invested in rehabilitation and preservation activities to manage the region's bridge assets: MnDOT Bridge Preservation and Improvement Guidelines)</p> <p>We also request that Met Council work with MnDOT State Aid to update the eligibility requirements for bridge replacement and rehabilitation (as described below) and develop eligibility requirements for bridge preservation that does not include strict condition criteria to encourage applicants to leverage cost-effective alternatives and avoid costly capital bridge replacements. County staff believe the following requirements align with the criteria described in the State Aid Manual for bridge replacement and rehabilitation projects.</p> <ol style="list-style-type: none"> 1) State Aid Office Clear span over 20 feet; and 2) Local Planning Index (LPI) of less than 60, or 3) National Bridge Inventory (NBI) Appraisal Rating ≤3 for Deck Geometry, Approach Roadway, or Waterway Adequacy. 	County	# of bridges	Average Age	% over 50 years	% SD(1)	Average LPI(2)	LPI(2) < 60	Anoka	67	31	10%	9%	86.5	9.0%	Carver	76	28	13%	1%	88.8	2.6%	Dakota	101	29	20%	0%	95.5	1.0%	Hennepin	149	40	32%	5%	83.9	5.4%	Ramsey	30	43	33%	10%	81.7	10.0%	Scott	67	36	27%	1%	92.4	1.5%	
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			<p>Federal funding is important to replace and preserve the region’s bridge assets that continue to age and deteriorate. In addition, this funding provides an opportunity to promote safety and multi-modal elements for people walking, biking and using transit, including Arterial Bus Rapid Transit (BRT) service. These bridge investments provide connections across barriers such as railroads, waterways, and roadways and maximize multi-modal investments along the corridor.</p> <p>A balanced investment approach across replacement, rehabilitation, and preservation activities is necessary to maintain a satisfactory condition rating both now and into the future. Therefore, Hennepin County requests these changes to the bridge category to maximize the life of our bridge assets and provide critical connections within the region.</p>	
10.1	Isaac Russell, Center for Economic Inclusion	Scoring - Equity	<p>We have some general comments for the applications.</p> <p>The Center for Economic Inclusion appreciates the opportunity to provide feedback on the Regional Solicitation Process and Transportation Funding Applications. This process plays a critical role in determining the prioritization and distribution of transportation investments across our region and has significant implications for equity and inclusive growth.</p> <p>We recognize the steps being taken to make the process more transparent and inclusive. However, achieving systemic equity requires a holistic approach. To ensure equitable, just, and inclusive transportation investments are made in the region, it’s critical for those selected and/or appointed to manage the process to be reflective of the racial and ethnic diversity of our growing region. Racial and ethnic diversity in these roles is of utmost importance, as it’s critical to have decision-makers that have both the professional and lived experience to understand community needs, challenges, and opportunities. True systemic equity extends beyond fair project distribution and processes.</p> <p>We think the emphasis of the applications on outreach is very good. The challenge that we have seen when it comes to units of government engaging with the public is the presentation of information or a plan in a way that makes the process feel like a fait accompli. Engagement in this situation comes off as an ex-post box-checking measure, and the application does not inform more substantive engagement. However, when engaging populations, we advise to not use the term ‘equity population.’ This terminology can be seen by some as problematic regardless of the best of intentions.</p> <p>We also applaud the emphasis on equity in this process. An up-front commitment on behalf of organizations is significant. However, we suggest that the concept of equitable access to transportation be expanded beyond those in affordable housing. There are many folks who are lower middle-income but have challenges with access to amenities such as grocery stores, schools, places of worship, etc.</p> <p>Lastly, these projects will have varying effects on local businesses. We strongly encourage engagement with businesses of color that may be negatively affected by these projects. Many of these business owners have difficulty engaging with units of government because they are busy as active managers of their enterprises. Substantive thought as to the impacts on these folks in the application process helps balance the mindset of equity from being largely focused on those with lower incomes.</p> <p>A summation of our suggestions is below:</p> <p>The measure of engagement progression does well to emphasize the need for substantive outreach.</p>	<p>Thank you for your comments. We will propose a better way to refer to the populations prioritized in the equity scoring measures for the 2024 application. More substantial revisions to this section will be considered in the Regional Solicitation Evaluation, which will begin later this year. This work will also be informed by the Equity Evaluation of Regional Transportation Investments work underway, as well as the 2050 Transportation Policy Plan in development.</p>

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			<p>Good emphasis on areas of concentrated poverty, but it would be helpful to gauge just how much multi-use trails would be utilized in certain areas. Perhaps a question such as “is this the best transportation option?”</p> <p>Reconsider the utilization of the term ‘equity population’ as a category. When discussing the populations served it’s essential to</p> <p>Expand the project to include those who do not live in affordable housing but need to be connected to grocery stores, schools, places of worship), etc).</p> <p>One concern that comes from the business community, and especially in marginalized communities. We think there should be a question regarding any evaluation on the potential impacts on businesses of transit modernization projects. There may be none, but this would signal much to entrepreneurs of color.</p>	
13.2	Kelly Grissman, Three Rivers Park District	Scoring - Equity	<p>Thank you for the opportunity to provide comments on the draft regional solicitation applications. We noted several recent improvements and attention to several of our previous comments submitted via the online survey last year. As an agency which has both successfully and unsuccessfully applied for funding for many years, Three Rivers offers the following Multiuse Trails and Bicycle Facilities comments for Metropolitan Council and Transportation Advisory Board consideration:</p> <p>...</p> <p>3. Equity and Affordable Housing</p> <p>a. Merge the Engagement and Equity Population Benefits and Impacts questions and reformat the response into a table with an optional support narrative so the information is easier to prepare/organize and score. See below example:</p> <p>Focus Community Groups (list and compare project area to region)</p> <p>i.e.: BIPOC: 40% of community members within the project area are BIPOC which is 10% more than the region</p> <p>Engagement Notification</p> <p>i.e.: Flyers at the Cultural Community Center, Emails sent via community leader</p> <p>Engagement Offering/Tools</p> <p>i.e.: Listening Session with child care at the Cultural Community Center, Meeting with Community Leader</p> <p>Key Findings</p> <p>i.e.: abc...</p> <p>How Findings Impacted Project</p> <p>i.e.: abc...</p> <p>Additionally, if the project is part of a Council approved regional trail master plan since the Regional Parks Equity Tool requirement was established, the project should automatically get</p>	<p>Thank you for your comments and suggestions. With regard to affordable housing data, this information is currently generated by the mapping application within the on-line application, but the Council's existing data agreement does not allow us to share locations, only a number of units aggregated to Census geography. The Access to Affordable Housing measure is meant to assess how access to affordable housing locations is being impacted and improved by the project. If the proposed project provides improved access to expanded/important destinations reachable within an average bicycle trip this should be articulated in the response regarding project benefits.</p> <p>The bonus points are meant to apply due to the specific area the project is located within and the populations served within the half mile. If there are benefits provided to other populations outside of this buffer this should be articulated in the response regarding project benefits and will be considered for points as part of scoring this section.</p> <p>Regarding the potential double counting of public engagement, in the Equity scoring the scorers are looking specifically at underrepresented populations near, or benefited by, the project, how these populations were engaged and how their input was responded to. It does not consider or score general public engagement.</p> <p>We will look more at the issues raised in these comments along with other potential revisions to this section in the Regional Solicitation Evaluation, which will begin later this year. This evaluation work will also be informed by the Equity Evaluation of Regional Transportation Investments work underway, as well as the 2050 Transportation Policy Plan in development.</p>

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			<p>full points as this work and information is a Council requirement of the master planning work already.</p> <p>b. As an agency which is not responsible for planning or providing housing, Three Rivers has a difficult time accessing local affordable housing information as there is not a centralized database or mapping application with this information. In fact, Three Rivers has found that ever city handles this differently and it is often labor intensive to obtain, map and analyze the information. Three Rivers requests that the Council provide this information so that it is consistent from one city or project to another.</p> <p>Again, the question only looks at affordable housing within ½ mile of the project – yet the Council’s own bicycle data shows that the average bicycle trip exceeds 3 miles. There should be flexibility for the applicant and scorer to understand how a project may benefit/serve affordable housing at a scale appropriate to the project/corridor.</p> <p>Are the points dedicated to affordable housing intended to reward communities with strong affordable housing or to incentivize communities to better prioritize affordable housing? If it is the latter, has there been any assessment to determine if this ‘carrot’ is achieving its goal?</p> <p>c. Bonus points: Instead of looking at just where the project is physically located, look at the communities which will be served. For example, a project may be located just outside an Area of Concentrated Poverty census tract boundary but clearly serve that area/community group. In those cases, projects should be eligible for the additional bonus points.</p> <p>The separate bullet points for Regional Environmental Justice Area are confusing – can these be combined into one bullet point? The information and scoring guidance box does not say how the ‘10 points for other area’ will or could be obtained.</p> <p>...</p> <p>6. Risk Assessment</p> <p>a. Projects with good engagement and public involvement are rewarded twice as they are eligible for Engagement points and Public Involvement points. This generally works to Three Rivers benefit, but the ‘double’ points may be unintentional by the Council.</p> <p>...</p> <p>As you can see from our comments above, Three Rivers has a strong vested interest in this funding program and process. Please do not hesitate to reach out at any time to float ideas, obtain more background, or better understand our comments and concerns. Thank you for your thoughtful consideration of our feedback.</p>	
13.1	Kelly Grissman, Three Rivers Park District	Scoring - Multiuse Trails	<p>Thank you for the opportunity to provide comments on the draft regional solicitation applications. We noted several recent improvements and attention to several of our previous comments submitted via the online survey last year. As an agency which has both successfully and unsuccessfully applied for funding for many years, Three Rivers offers the following Multiuse Trails and Bicycle Facilities comments for Metropolitan Council and Transportation Advisory Board consideration:</p> <p>1. Role in the Regional Transportation System and Economy</p>	<p>1.a.: A statement has been proposed to the scoring guidance about the 50-point allocation for locally planned projects; however, all projects that have been determined eligible to receive Regional Solicitation funds have already met the requirement of inclusion in a local, regional, or statewide planning or programming document which meets the requirement to receive those points. Thus, all projects receive at least these 50 points when applying for Regional Solicitation funding.</p> <p>1.b.: The Regional Solicitation project mapping tool and the RBTN online interactive map are being updated to reflect the eligible RBTN administrative adjustments proposed by agencies. RBTN designated alignments shown in these maps are not as precise as project design</p>

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			<p>a. Projects which are part of a local system but not on or directly connected to the RBTN are eligible for up to 50 pts.; however, the scoring guidance box does not outline how these points are to be assigned.</p> <p>b. It is not clear if the associated mapping tool will be modified/enhanced to address previously provided comments (i.e. mapping tool/downloadable RBTN data is not consistent, the drawn in project line covers the RTBN linework making it appear as though a project is not along the RTBN, needing multiple maps for project with multiple segments, etc.)</p> <p>c. Projects that are on or directly connect to the Metropolitan Council Regional Parks Policy Plan – Regional Trail System Plan (which also serves a strong active transportation function in the regional) should be scored as if they are part of or directly connect to the RBTN.</p> <p>2. Potential Usage</p> <p>a. This scoring methodology prioritizes 'local' benefit/impact (looks at population/employment within 1 mile of project area) at the expense of projects which may serve a greater regional benefit (look at the population/jobs of the entire 'corridor' which is made whole/connected via the project). This scoring methodology seems in conflict with the RBTN and associated scoring methodology which recognizes the importance of regional bicycle 'corridors' - as this scoring criteria only looks at the population and jobs within the immediate area.</p> <p>Projects that result in an entire corridor functioning better (i.e. remove fill critical gaps or resolve significant safety barriers) should have the population and jobs along the entire corridor considered as the entire corridor benefits from the 'spot' improvement. This is really important as 17% of the total score is attributed to this criterion, and a project with greater regional significance (i.e. removal of a critical highway barrier on a 20 mile RBTN corridor) could score very low and not make the funding cut compared to a project that may be mediocre at best but located in an area of high population and jobs.</p> <p>Additionally, Three Rivers urges the Council to look at the type of facility improvement/development when considering usage as not all facilities/improvements generate the same use or serve all potential users. For examples, multi-use, off-road regional trails serve users of all skill and ability levels and will generate greater use than a bike lane improvement that primarily serves a more limited sector of the population.</p> <p>Projects that truly serve a bigger sector of the population and have the most potential to reduce VMT and GHG by providing a safe, connected active transportation network which serves all potential users should be prioritized and score the strongest.</p> <p>b. The automated maps have the potential to double count population/jobs if the project has multiple, disconnected segments that are within 1 mile of each other. It is not clear as to whether this has been addressed.</p> <p>...</p> <p>As you can see from our comments above, Three Rivers has a strong vested interest in this funding program and process. Please do not hesitate to reach out at any time to float ideas, obtain more background, or better understand our comments and concerns. Thank you for your thoughtful consideration of our feedback.</p>	<p>alignments, as they are usually based on the more general line work of local plans. Minor deviations of project alignments from the RBTN alignment are often accepted and all project alignments are reviewed by staff to ensure that the most appropriate scores are obtained.</p> <p>1.c.: The 2014 update to the 2040 Transportation Policy Plan adopted the RBTN as a network of on-street bicycle facilities and off-road trails that facilitates daily bicycle travel to and between regional destinations and the regional transit system. In 2021 the Met Council established a formal RBTN update process which affords planning agencies an opportunity to propose new, or revise existing, RBTN corridors and alignments. Agency proposed updates are evaluated based on measures developed in the RBTN Guidelines and Measures Study. Met Council will continue to update the RBTN about every 2 years and will consider accepting new regional trails (along with local trail and on-street bikeways) on a case-by-case basis, as proposed by agencies and based on the evaluative criteria previously established.</p> <p>2.a.: The scoring of the original RBTN corridors with respect to jobs and population has differences as well as similarities to the 'Potential Usage' measure in the Regional Solicitation. Population density was measured similarly but the RBTN used projected 2030 data rather than existing population. The job density measures were very different in that the RBTN allocated points for corridor segments according to the number of regional destinations it connected to with relatively higher weightings for metropolitan, regional, and sub-regional job clusters than other regional destinations while the Usage measure is a pure and more localized density measure. Comments about corridor-long benefits are acknowledged but it's hard to imagine that most local projects like a barrier crossing would have any extensive impact over a 20-mile-long corridor. (Also, note that crossings of major regional bike barriers receive points under measure 4A.) Comments about facility types are acknowledged; however, current data on bicycle facilities is limited and inconsistent across the region. To this shortcoming, the regional bicycle system inventory will be updated in 2024 and will include a specific data attribute for bike facility type that may be useful for this conceptual measure. The 'Usage' scoring measure will be re-evaluated through the forthcoming Regional Solicitation Evaluation Study upon which revisions to existing or alternative measures will be considered by Met Council and its transportation partners.</p> <p>2.b.: Our current software limits our ability to account for multiple segment facilities and maintain continuity of the summary statistics. There are typically several project applications each Solicitation cycle that have multiple and overlapping segments for which the population and jobs numbers can be accurately derived during the scoring process. Applications such as these are typically flagged for checks on specific criteria scores and for manually-generated score adjustments, if necessary.</p>

#	Commenter	Topic	Comment	Staff Response
13.3	Kelly Grissman, Three Rivers Park District	Scoring - Safety	<p>Thank you for the opportunity to provide comments on the draft regional solicitation applications. We noted several recent improvements and attention to several of our previous comments submitted via the online survey last year. As an agency which has both successfully and unsuccessfully applied for funding for many years, Three Rivers offers the following Multiuse Trails and Bicycle Facilities comments for Metropolitan Council and Transportation Advisory Board consideration:</p> <p>...</p> <p>4. Deficiencies and Safety</p> <p>a. Three Rivers appreciates that additional information regarding funding eligible for maintenance type work items was added.</p> <p>b. Bikeway Network Gaps: Three Rivers appreciates the two different scoring methodology options. This could be utilized in other areas as well as it allows the applicant to really tell the story/need of a project rather than relying heavily on automated processes which may not fully appreciate the nuisances or importance of site specific factors and considerations.</p> <p>c. Deficiencies Corrected or Safety Problems Addressed: Crash data is difficult for Three Rivers to obtain easily due to MnDOT barriers (i.e. don't release data to planners – must be an engineer with training on how to read data, etc.), local partners didn't have data readily available or were not timely in providing data, etc. This is an area where it would be helpful for the Council to provide the data or autogenerate reports/tables for the applicant to refer to.</p> <p>If an applicant does not have crash data – it cannot receive full points in this category. That point differential is likely greater than the point differential of the highest and lowest ranked funded project from last solicitation – meaning a project could have gotten every other possible point but not received funding solely due to an applicant's access to timely crash data.</p> <p>...</p> <p>As you can see from our comments above, Three Rivers has a strong vested interest in this funding program and process. Please do not hesitate to reach out at any time to float ideas, obtain more background, or better understand our comments and concerns. Thank you for your thoughtful consideration of our feedback.</p>	<p>Thank you for your comments and suggestions. We will talk with our safety partners to address the issue of obtaining crash data for these applications.</p>
12.1	William Schroeer, East Metro Strong, Hourcar	Scoring - Unique Projects	<p>Thank you for the invitation to comment on draft TAB Regional Solicitation Application materials. The Regional Solicitation is an important tool for meeting regional goals. We applaud the TAB for its continuing work to sharpen this tool and ensure that it both meets the needs of the region as those needs change; and, that the process learns from each round. Our comments focus on the draft materials for the Unique Projects category.</p> <p>These comments submitted on behalf of East Metro Strong and HOURCAR.</p> <p>Draft application materials</p> <p>Measure 1. Significance</p> <p>We applaud the changes in the draft application materials that elevate "Significance" and ask applicants to detail project characteristics that might previously have fallen under less precise terms, such as innovation. "Regional Impact" and "Expandability" are both clear, useful measures. There may be a mismatch between the text in the "Criteria and Measures" table</p>	<p>Thank you for your comments.</p> <p>We have made proposed corrections to measures 1A, 1B, and 1C to clarify the intent and scoring guidance that should address the mismatch referred to in your comments. We also proposed the correction to reference new approach rather than innovation.</p> <p>In measure 1A, "Directly impact" is vague by design. Quantification of users of various types of project can be very difficult to estimate. It can also be difficult for scorers to determine whether an estimate is rooted in sound methodology. Given the unknown and potentially broad nature of projects, this was designed to be more qualitative than many scoring measures in the other funding categories.</p> <p>Regarding the examples, throughout the funding categories, examples are provided to help give applicants ideas. Some of the ideas reflect specific project types and we believe the clarifying value of these outweighs any threat of applicants being pushed away from a project</p>

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			<p>starting on page 4, and the text starting on page 6. The Table suggests “Scalability” as a possible 1A measure of “Regional Impact;” “Scalability” does not appear in the Measure 1A text. “Scalability” might overlap with Measure 1C “Expandability” in various ways. We encourage you to clarify. We propose making 1A a measure of immediate impact, and 1C a measure of potential impact over time.</p> <p>We also think that the notion of “direct impact” should be more clearly and carefully defined to avoid rewarding projects that may have broad but extremely shallow impacts. Would an Impression in a marketing campaign count for the same “direct impact” as a trip on a new transportation mode? We suggest requiring applicants to quantify what the impact will be rather than simply counting the number of people impacted.</p> <p>Measure 1B is a helpfully clear discussion of how applicants can describe what makes a project a “new approach.” Overall, “new approach” is a clearer term than “innovation.” So, we suggest also using a different word in the sentence “Also briefly describe the risk assessment of the innovation,....” “New approach” should work here as well.</p> <p>Measure 1B gives “Leveraging connected and automated (CAV) vehicle technology and infrastructure” as an example. Later, Measure 2A gives “Access to electric vehicle charging stations” as an example. There can definitely be overlap between describing an approach and describing a project. And we recognize the value of giving an example. Nonetheless, we suggest erring on the side of not using an example that may sound like a particular technology approach, lest it suggest that that approach is preferred in some way. And in bullet 2, we suggest replacing “innovation” with “new approach.”</p> <p>The term “innovation” is the subject of a great deal of discussion and argument in many circles. What constitutes an “innovation”? Can an innovation be iterative, or does it need to be something completely new? The term “New approach” doesn’t entirely solve the problem, but it is helpful in part because “innovation” seems to raise suggest ‘new technology’ to some, while “new approach” allows for a wider range of ideas. “New approach” should also allow for what some might call iterations, without getting bogged down in whether an iteration is an innovation. In sum, we applaud the use of the term “new approach” and simply urge that it be used throughout.</p> <p>The proposed weighting of Criterion 1 “Significance” is 40% of the total score. In 2022, Criterion 1 “Innovation” was 28% of the total weighted score. We think 40% is too high and may perpetuate the notion that the Unique Projects category stands or falls on innovation, even by other words. We recommend reducing the weighted score of Criterion 1 to 30%, and increasing Criterion 2 “Environmental Impacts” to 25% and Criterion 5 Partnerships to 15%. (We also note here that the current weighted scoring matrix adds up to 101%.)</p> <p>Measure 2. Environmental Impact</p> <p>This measure should focus entirely on actual impact. “Access to electric vehicle charging stations” on its own does not have an environmental impact, as these charging stations may or may not be used.</p> <p>For Measure 2B, it would be helpful to define a “Climate change improvement.” Does this include GHG emissions reductions only, or does it also include adaptation measures that would reduce climate-change-induced temperatures, flooding, drought, etc. in the region’s communities, and/or for the region’s residents?</p>	<p>type. Regarding weighting of Significance, in 2022, Innovation and Regional Impact/stability were two separate criteria worth 28% and 11%, respectively, for a total of 39%. This keeps 2024 close to 2022 in that respect. The weighting of the criteria is based on deliberation among TAB members. Most likely the weighting of environmental impacts, and all criteria, will be examined in the Regional Solicitation Evaluation. We will suggest a change to the weighting to make sure it equals 100%.</p> <p>Criterion 2 (Environmental Impact). While the existence of charging stations may be not a direct impact, the same could be said of other examples (for example, more non-motorized trips may or may not detract from auto trips). For Measure 2B, we understand why you find confusion in Measure 2B, given the one sentence mentioning greenhouse gas emissions. The question is meant to address any of the ways a project can address climate change.</p> <p>Criterion 5 (Partnerships) We acknowledge that it is difficult to quantify partnerships, though more partners and types of partners does lead in that direction. Regarding weighting, as referenced above with the 20% weighting of the Environmental Impacts criterion, this is unlikely to change prior to the 2026 Regional Solicitation.</p> <p>Regarding the evaluation process, by design, Unique Projects is scored by TAB members with the objective of generating scores that are less precise than in other categories. The primary reason for this is the broad range of applications that can be provided in the category. Quantitatively comparing projects that have no resemblance to each other would be a challenge. That said, TAB members have expressed interest in undergoing essentially the same process at least one more time, leaving the future of Unique Projects fairly wide open (and to be addressed in the Regional Solicitation evaluation).</p>

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			<p>The text is clear that 2A is local air, 2C is local water, and 2D is local habitat, and noise or light pollution. That would make put GHG emission reductions in 2B. Unclear is where an applicant should discuss an adaptation measure such as green street infrastructure. Clearly many good investments will have multiple benefits, and this is a relatively minor comment.</p> <p>Lastly, as noted above, we think Criterion 2 should have a higher weighted score of ~25%.</p> <p>Measure 5. Partnerships</p> <p>The draft text reads “The applicants will receive higher scores if elements of their response are quantitative using proven methodologies. Applicants should provide appropriate justification of their quantitative methodologies.” It is not clear what kind of quantitative approaches or methodologies would be useful in evaluating partnership approaches. We suggest asking applicants to describe the role of partnership in ensuring that the project includes the people necessary for it to succeed.</p> <p>As noted above, we also think a 10% weighted score for this section is too low, and underplays the role of robust partnerships in the development of regionally significant projects. We suggest that the weighted score for this section should be at least 15%.</p> <p>Process for evaluating Unique Projects</p> <p>As part of the TAB’s continuous improvement process, we would also like to suggest that the Unique Projects category be scored by the scoring committee. The revisions to the Unique Projects (UP) Application do an excellent job of clarifying the goals of this funding category. Whether or not UP was previously a category that was difficult to score and thus more in the realm of ‘judgment,’ this revision now describes what the region needs from projects in this category. As such, application to the category should be scored by the scoring committee as the other categories are.</p>	
8.1	Will Wlizo, Richfield Public Schools ISD #280	Scoring Criteria	<p>I suggest that you update the question/criteria for Safe Routes to School item 1.B.</p> <p>Many communities now have overlapping plans in additional to SRTS plans -- including bike master plans, pedestrian master plans, and active transportation plans created through the Active Transportation program at MnDOT. Additionally, many communities have created these plans one after another and identify different projects.</p> <p>If the community has a project identified in a non-SRTS plan that can be deemed a legitimate SRTS-related project, I suggest that this should project application should not be penalized.</p>	<p>Thank you for your comment. Projects that do not fit the Safe Routes to School category as well could be submitted as applications in either the Pedestrian Facilities or Multiuse Trails and Bicycle Facilities categories as appropriate. The Safe Routes to School category is intended for projects that are part of an overall program, not just infrastructure near a school. The 1B measure you reference is part of the criterion for Relationship to Safe Routes to School Program Elements, which is designed to address the holistic approach of this program. This measure currently includes a way for projects that are not included in Safe Routes to School plans to receive points. Scoring is intended to help differentiate projects in a competitive process. We will be doing an evaluation of the Regional Solicitation beginning later this year that will review the process and measures for all application categories.</p>

#	Commenter	Topic	Comment	Staff Response
7.1	Raymond Smith	Transit	<p>Why force almost all bus riders to go to Transit Centers to ride the bus?</p> <p>Example:</p> <p>Met Transit has removed most of the bus routes in the neighborhoods of White Bear Lake. How do you expect bus riders lacking personal transportation to get to these Transit Centers?</p>	<p>Thank you for your comments on connecting bus service. Due to shortages in drivers since the onset of the COVID-19 pandemic, Metro Transit and other regional transit service providers have made difficult decisions to reduce service or suspend routes to balance driver availability across the transit system. In areas not served by a regularly scheduled bus route, the Metropolitan Council offers Transit Link, a shared-ride service you may reserve for trips that cannot be accomplished on regular transit routes alone. Information about how to ride Transit Link is available here: https://metro council.org/Transportation/Services/Transit-Link.aspx</p> <p>Metro Transit makes changes to transit service every quarter based on current and projected ridership, available resources, and driver workforce. As stability in Metro Transit's workforce continues to improve and ridership increases, they are working on a project called Network Now to determine how to strengthen service over the next five years. Information about that project is available here: https://www.metrotransit.org/network-now</p>



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