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Minnesota Department of Transportation
395 John Ireland Boulevard
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Re: Mn/DOT Statewide Transportation Plan

Transit for Livable Communities is pleased to provide comments on the Draft Minnesota Statewide Transportation Plan 2009 – 2028. Our letter provides several big-picture comments and then provides a listing of specific chapter by chapter comments. We appreciate recently being invited to a meeting (3/17/09) with Mn/DOT staff and some of our coalition partners to discuss the Draft plan. We also appreciate that Mn/DOT scheduled an evening hearing to accept public comments. We believe that, given more advance notice, this evening hearing would have attracted additional public input.

What We Like in the Plan

There is very useful, informative, and highly detailed information in this plan. It gives a good overview of transportation in Minnesota. We are encouraged by the recognition and attention paid to changing trends and the importance of a more multi-modal focus that includes high speed rail, expanded transitways, and expanded networks for safe biking and walking.

We support the movement toward greater transparency and performance measurement, but will describe later how this effort should be strengthened. We support much of the new language about mobility in the plan (Policy 6: Twin Cities Mobility) with an emphasis on “lower cost” highway investments that optimize the use of existing capacity rather than a continuing focus on more costly highway expansion projects. The language on street design and development (page 7.8-4) is excellent.

Major Areas of Concern

1. Fix it First. While the plan identifies preservation/maintenance as high priorities, they are not identified as Mn/DOT’s TOP priority. They should be. If the amount of pavement in poor condition (“which can result in increased costs due to vehicle damage...as well as safety problems,” pg 7.2-5) is expected to double in the next 10 years, the state should

adopt a fix-it-first approach, not an approach that includes three other priorities including expansion projects and local priority projects.

“Mobility” concerns (traffic congestion) should be addressed in the short term using increased transit options and pricing of both roads and parking, and in the long term through land use changes and complete and better connected streets. The likely consequences of roadway expansion--induced demand and increasing car travel--should be discussed in the plan. The Metropolitan Council’s Transportation Policy Plan (TPP), for example, states that “experience has shown that there are never enough highway lanes to meet the growing demand for peak-hour urban travel. Instead of retaining future capacity for decades, new highway lanes can fill up in a matter of months” (TPP, pg 1).

2. Performance Measurement and Accountability. Mn/DOT should increase accountability by more clearly identifying 1) measurable goals, 2) new policy strategies likely to be pursued to reach those goals, and 3) performance measures specific to those policy goals. Much of the plan describes the existing system and provides historical information which makes it hard to discern the goals, policies, strategies, and performance measures (pg 6-5).

More peer comparisons would be helpful in communicating system performance. For example, how do vehicle miles traveled (VMT) per capita in Minnesota compare with VMT per capita in other states (pg 3-6)? Another example could be relevant innovations by other metropolitan regions, such as the extensive use of signal preemption for public transit in Los Angeles (page 3-27).

Mn/DOT’s vision of a “Safe, Efficient and Sustainable Transportation System” (pg 3) highlights the movement of people as opposed to vehicles. The Draft plan includes the development of an indicator of person throughput. This performance measure is a critical innovation that should not wait until completion of a study in the end of 2010. To effectively measure an increase in the movement of people rather than cars, vehicle occupancy rates (i.e. number of people divided by the number of vehicles) should be tracked at the corridor level, and modal shares (i.e. trips by drive alone, carpool, transit, bicycling and walking) should be tracked at the regional and state level.

3. Transparency. The final Statewide Plan should more prominently list the key performance measures and a schedule and process for accountability. Transparency would be improved by consistent presentation on the Mn/DOT website of progress toward a limited number of key performance measures. If the annual Department Results scorecard (pg 7.10-5) is currently on the Mn/DOT website, it would be helpful to list the specific web address. Transparency would also be improved by listing the statutory goals for Minnesota’s transportation system in an appendix.

Giving more prominence to the 2009 Twin Cities Metropolitan Area Highway System Strategy Study (pg 9-1) which will “articulate a long term vision for the regional highway system in terms of number of lanes and regional access points as well as major transit facilities” would also increase transparency.

The plan should call an expansion project an “expansion” and not use the word “improvement” which is overly vague and biases the interpretation (pg 8-35 and others). Budgets in the plan should contain more detail and explanation. Does the cost of each project include planning, design, and engineering? Are these costs tracked by project? Can costs be broken down between expansion, replacement/preservation, and safety components? Bridge projects, for example, should be broken into their expansion and replacement costs in all budgets presented. For example, the Cayuga, Hastings and Stillwater bridges, while listed as preservation projects (pg 8-39), all include a substantial capacity expansion.

4) Joint Planning and Implementation by Mn/DOT and the Metropolitan Council.

While the Executive Summary (pg 8) recognizes that a “multi-jurisdictional approach to transportation is needed to achieve major goals,” only a single mention of the Metropolitan Council is made in the Executive Summary (ES pg 18). Further, the Metropolitan Council and other statewide Metropolitan Planning Organizations are not specifically identified in the Transportation Funding Chart (pg 5-7). The Metropolitan Council has a significant role in transportation planning in the metro region, primarily related to its decision-making authority on federal funding (see the Council’s Transportation Policy Plan for more detail). We repeat our recommendation in our report: *Transportation Performance in the Twin Cities Region* (pg 3) that Mn/DOT and the Metropolitan Council should collaborate in setting, and reporting on, key transportation performance measures for the metropolitan region.

5. Energy and the Environment. The strategies to meet the energy and environment goals (Policy 9) are not well articulated. Not until page 7.9-1 does the reader learn that “reducing the total number of vehicle miles driven” is a strategy to meet energy and environment goals. VMT can be reduced through shorter or less frequent car trips and an expanded share of trips by transit, carpooling, bicycling, walking and telecommuting. Whether the Governor agrees with its recommendations or not, the plan should describe the transportation and land use recommendations of the Minnesota Climate Change Advisory Group, made up of members appointed by the Governor.

Mn/DOT’s role in land-use strategies to reduce VMT is far too constrained: “local governments must carefully consider and address the transportation needs and implications of their land use and community development decisions” (ES pg 13). Can we assume Mn/DOT will also carefully consider and address the implications of its investment choices and other policies on land use configurations that will ultimately greatly shape the effectiveness in achieving mobility, safety, maintenance, and community goals?

Like Washington state, Minnesota should set a specific numerical goal for reducing vehicle miles driven per person, increasing vehicle occupancy, and increasing the mode share for the percentage of trips by walking, bicycling, and transit.

6. Mn/DOT leadership needed. The plan should include existing and expanded strategies for providing technical assistance to communities to help them partner with Mn/DOT to achieve key goals. Examples include:

- Impact of good land use on reducing congestion and increasing the mode share for public transit, bicycling, and walking. The location of public facilities, schools, and job

sites greatly impacts whether those locations are accessible by any mode besides a car. This effort should go far beyond current access management. (pg 7.9-4)

- Appropriate pedestrian design to ensure that any community project funded with state and federal funding meets federal Americans with Disabilities Act (ADA) standards.
- Design of well connected streets that keep local traffic local and reduce congestion on county and state roads. (pg 7.9-4)

7. Condition of local roads. Since this is the statewide transportation plan, it should contain some information on the municipal and county road systems. Does Mn/DOT or any state agency collect information on trends in pavement condition on local roads and local financial capability for roadway maintenance? (pg 7.2-6).

Additional Comments Metropolitan Area Transit Funding is incorrect (pg 5-27). “This share may change to some extent following the 2008 Legislative session, which included legislation giving counties the authority to levy a 0.25 percent sales tax to fund transit programs if approved locally through a referendum vote.” The referendum requirement, in 2008, Chapter 152, only applies to counties outside of the Twin Cities Metropolitan Area.

9. It should be noted that there is currently no rail in place between the Twin Cities and Rochester (pg 3-22).

10. The plan should include more on bus service in Greater Minnesota by, at a minimum, referring to the Greater Minnesota Transit Plan (pg 3-22).

11. It would be informative to have percent of total Metro Area transit rides in addition to the percent growth (pg 3.23).

12. The mode share data (pg 4-33) should be more prominently featured. The increase in driving alone demonstrates a failure to achieve the goals--increasing high-occupancy vehicle, and increasing transit use in urban areas--in state law (1976,Chapter 166 and 1991, Chapter 298). Mode share data for the Twin Cities metro, which is available from the Metropolitan Council, should also be presented.

13. How does the change in VMT compare with population growth over the same period (pg 3-5, pg 4-27)? A graph of VMT per capita over time would be a very useful addition.

14. The comparison of mileage with VMT can be misleading (pg 4-29). People cover more miles on the state roadway system because they are driving at a higher speed. The measurement of vehicle time traveled would contribute to a better understanding of customers’ experience. Drivers may spend half of their time driving on city streets and may be frustrated by the poor condition of many of those local roads.

15) Minnesota Transportation Funding section would benefit from greater precision.

Pg 5-8: We question whether bonding “helps avoid inflationary construction cost increases.” While the graph (pg 5-14) shows construction costs outpacing general inflation

this is unlikely to occur over the long run. As noted (pg 5-18), “it is assumed that supply and demand changes in the marketplace will lead to prices going back to normal levels in the long run.”

Pg 5-9: Federal funding. The plan should mention that most federal funding is flexible. National Highway System can be transferred into Surface Transportation Program (STP) and used for a rail line or bus capital improvements in the same corridor (pg 5-9).

Pg 5-19: How exactly is relying substantially on a gas tax not sustainable and runs contrary to state and national energy conservation and environmental goals? No doubt there is a need for new mechanisms to tax vehicles that run primarily or exclusively on electricity or other new fuels. The gas tax, however, is likely to remain an effective user fee that it is proportionate to energy consumption.

Pg 5-20: Mn/DOT should choose the primary goal sought from increased pricing/tolling strategies. Tolling holds much greater promise for managing demand and “achieving better performance from their system” than for generating revenue. The Executive Summary, which references high-occupancy-toll (HOT) lanes and managing demand through “potential expansion of pricing,” suggests the same direction.

Pg 5-20: Since the plan stresses the importance of partnerships and innovation, it should include a description of mileage-based charges related to private vehicle insurance and leasing.

Pg 5-20: We agree that the economic efficiency and fairness of any application of mileage-based fees should be carefully considered. To this end, it would be helpful to have definitions of economic efficiency and fairness.

Pg 5-25: The transit funding table is confusing. The key identifies five sources of funding, but there are only four bar segments (these do not show up in black and white).

18. The safety benchmarks (pg 7.1-7) provide critical information. The extent of severe and moderate injuries, and fatalities by age grouping (pg 4-32) should also be reported.

19. The plan should state that there is currently no projected funding for expanding the regional bus system (pg 7.6-8). A map of bus service (in addition to transitways) should be added.

20. Roadway connectivity as measured by intersections per square mile should be a performance measure (pg 7.6-9).

21. The Twin Cities congestion ranking in the 1980s is no longer relevant and should be dropped (page 7.6-10).

22. It should be noted that the increase in congestion in 2007 was impacted by the absence of a 35W crossing over the Mississippi River (pg 7.6-11).

23. The plan (pg 7.6-13) should describe the percentage of peak period trips on transit in key highway corridors. (See Met Council, Transportation Policy Plan, pg 96)

24. The plan should talk about the process Mn/DOT uses to insure that its projects comply with ADA requirements (pg 7.8-4)? How much is spent annually on ADA implementation?
25. What happened to “super twos?” Why are they not a low-cost alternative to a more costly 2 lane to 4 lane expansion on low-volume roads? (pg 8-5)
26. The plan should include a table of lane miles per Mn/DOT district (Chapter 8).
27. The plan should not use the estimate of \$65 billion in “needs” to meet system performance targets (8-23). “Needs,” particularly as they relate to mobility (\$42 billion of total) is not well defined and the person throughput performance measurement (which could substantially change the extent of “need” is in the initial stages of development. Also, the 2009 Twin Cities Metropolitan Area Highway System Strategy Study “will likely result in a revised estimate of needs” (pg 8-23).
28. What will be the criteria for selecting “the panel of prominent stakeholders” (pg 8-15)?
29. The process and criteria Mn/DOT uses to determine if a bypass is needed should be briefly described. (Pg 8-22).
30. How does Mn/DOT facilitate the discussion about “community priorities” (pg 8-22)?
31. Who decides and what criteria are used to decide the optimum allocation of revenue? (pg 8-25) Who are the stakeholders who participate in this discussion (pg 8-26)?
32. What is the plan for the 1,800 miles of pavements that will be in poor condition (pg 8-28)? Will those roadway segments be turned back to gravel? Those roadway segments should be identified on a map.
33. What is the ADT on the expansion projects (pg 8-32)?
34. The estimated costs, to the extent available, of the anticipated major projects from 2009-2018 (pg 8-37, 8-41) should be included.

We appreciate the opportunity to submit comments and would be interested in providing additional information on any of the issues we’ve raised above.

Sincerely,

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