

TRANSIT for Livable Communities



Transit for Livable Communities, 626 Selby Avenue, Saint Paul, MN 55104
Phone: 651-767-0298 E-mail: tlc@tlcminnesota.org Web site: www.tlcminnesota.org

November 18, 2011

Metropolitan Council
Regional Data Center
390 Robert St. N.
St. Paul, MN 55101

Via email: data.center@metc.state.mn.us

RE: Comments on Proposed Regional Transitway Guidelines

We appreciate the opportunity to provide input on the proposed guidelines for future development of transitways that serve the Twin Cities region. These new policy guidelines are essential to achieving a consistent, equitable and predictable system of transitways that provide access and mobility throughout the Twin Cities region.

The proposed guidelines are an important step to ensuring that the region uses the right technology in the right corridor and that we get the most out of the region's transit investments. Given that transitways are a means to an end, we would ask that the Metropolitan Council's Transit-Oriented Development Guidelines also be updated and expanded to fully articulate the regional goals for new housing and employment to fully utilize transitway investments.

Our detailed comments are attached.

Sincerely,

A handwritten signature in blue ink that reads "Barb Thoman".

Barb Thoman
Executive Director

c. Bill Neuendorf, Dave van Hattum

TLC Comments on Proposed Regional Transitway Guidelines

General Comments:

- 1) The guidelines should include criteria for evaluating and prioritizing transitway alignments to achieve the optimum alignment from a ridership, maintenance, and TOD perspective and to minimize political considerations.
- 2) This document should include a separate and prominent section that fully articulates the goal of better alignment of transit, land use planning and sustainable communities (see Section 1.1, fourth bullet). We recommend that this section include the following topics:
 - a. Establish a goal for a large share of future housing and employment growth along the current and planned transitways, specifically within walking distance of transit stations and stops,
 - b. Encourage an increasing share of employment to occur in the two downtowns, which are the origin-destination of all currently planned transitways,
 - c. Clearly state the typical land use densities necessary for optimal LRT implementation, and
 - d. Specify an appropriate mixture of complimentary land uses that create vibrant neighborhoods around transitway stations. For example, see Dallas Area Rapid Transit (DARTS) TOD policy: *“Discourage uses in station areas that result in low density populations, generate significant non-work car trips, or are incompatible with residential uses. Examples include stand-alone fast food restaurants, drive-through or bulk product discount retailers oriented to driving customers, automobile sales and repair services, industrial manufacturing, truck stops, 24-hour entertainment businesses, and others.”*
 - e. Suggest best-practice approaches to parking at transitway stations. See, for example, language in the DART TOD Guidelines:
 - “The hierarchy of station area circulation around LRT facilities is as follows, from highest to moderate priority: light rail, pedestrians, feeder buses, kiss-and-ride autos, vans, shuttle buses, and park-and-ride autos.”*
 - “Park-and-ride parking should be reasonably convenient to the station, but should not preclude immediately adjacent transit-oriented development. Evaluate development rights over park-and-ride facilities with provisions for shared parking.”*
 - “At the beginning phases of TOD at stations, allow surface parking at slightly higher ratios The ultimate goal is to shift into to structured parking in station areas to allow intensive use of land.”*

“Provide parking for station area development at a rate commensurate with actual demand. Most commercial parking and some residential parking is over-supplied. Establish minimum and maximum parking requirements for allowed uses per zoning.”
“Design structured parking as a part of major buildings; either below grade, at-grade (behind retail space) or above-grade. Design stand-alone parking garages as neighborhood architecture with appropriate wall materials, window opening scale, proportion and pattern, and active ground floor uses.”

Section 1.1, first bullet point – “The regional goal of doubling ridership by 2030” should be better explained by giving the context (between 2003 and 2030) and stating explicit goals (145 million riders by 2030). With stronger policy direction that encourages new development along existing and planned transitways, this goal could be accelerated to 2020. A large share (42%) of a doubling of transit ridership results simply from a growing regional population in an environment where development occurs in convenient proximity to existing and planned transit routes.

Section 1.1, 4th bullet point - We urge the Council to develop clear benchmarks for progress in creating greater residential and employment density near transit stations.

Section 3.1 – The Guidelines make frequent reference to the “*Metropolitan Council’s Guide for Transit Oriented-Development.*” We strongly recommend that this TOD Guide be updated and expanded to be a useful tool for municipalities and real estate developers. A less detailed version may also be helpful for citizens less familiar with zoning and development. The revised TOD Guide should be expanded to include explicit TOD goals, greater specificity about tools and collaborative strategies to achieve these goals, explicit procedures for advancing affordable housing, and annual reporting on TOD outcomes. The City of Saint Paul and Denver Regional Transportation District have good examples of TOD Strategy and Guides.

Section 3.1 – The revised *Guide for Transit-Oriented-Development* should be created with early input and guidance from a broad range of interests. A communication and outreach plan is essential to share this tool with all of the region’s cities and counties.

Section 3.2 - “*Transitway stations should be sited under existing and planned future conditions, with primary emphasis on existing conditions.*” The last clause “*with primary emphasis on existing conditions*” should be deleted. This constraint is contrary to the future outlook for transitways. This statement also conflicts with the Corridor of Opportunities vision (see page 15) “*to develop transitway corridors that will guide the region’s growth, vitality and competitiveness by creating distinctive places and strengthening local assets.*” If this vision is truly about creating places and guiding the region’s future growth, emphasizing existing, rather than future, conditions at transitway stations is misguided.

Section 3.2 – The attention to bicycle and pedestrian connections to transit is essential. It should be retained and emphasized. “*Access for transit customers includes high-quality, convenient pedestrian and bicycle connections between stations and adjoining land uses as well as good pedestrian access between the transitway station and both transferring buses and park-n-ride facilities.*”

Section 4.2 - Reserved parking spaces for car-share vehicles should be planned at transitway stations with high daily boardings and no park-n-ride spaces.

Section 4.4 - 4th bullet point – We reject the notion that “*surface lots are generally preferred for cost reasons.*” This approach fails to appreciate the highest and best use of land adjacent to transitway stations over the long-term. Structured parking should be required for any park-n-ride inside the 494/694 beltway. Any surface parking should be built with future staged uses in mind.

The Dallas Area Rapid Transit (DART) TOD guidelines are a good example: “*At the beginning phases of transit-oriented development at stations, allow surface parking at slightly higher ratios, gradually reducing rates to maximum allowances as development intensifies. The ultimate goal is to shift into structured parking in station areas to allow intensive use of land.*”

Section 5.1 - The Guidelines should provide clear direction regarding light rail transit (LRT) alignment considerations. We recommend that the planning process begin from a sketch diagram of an alignment that would best serve the goals of transit ridership and foreseeable transit-oriented-development. While many factors will potentially alter this ideal alignment, the burden of proof for an alternative alignment should reside with those entities with a primary interest other than transit. For example, we believe a Central Corridor alignment on Wabasha St. (traversing the St. Paul CBD north-south) and then on to Martin Luther King Blvd (thru the middle of the State Capitol) and connecting to University Avenue would have been a superior choice for the Central Corridor LRT in terms of ridership and operating costs. TLC believes the Humphrey Terminal Station on Hiawatha should have been located closer to the terminal building, not on the far side of the yet to be constructed parking ramp.

Section 8.4 – The expanded use of transit signal priority should be included in the Guidelines. Such a policy follows the region’s Transportation Policy Plan’s emphasis on maximizing people-throughput vs. vehicle throughput capacity.

Section 8.6 - The description of transit signal priority should be moved up to the start of section 8.4. We would imagine that optimizing for person throughput--and minimizing cross traffic delays--would often be at odds. We believe that optimizing person throughput should be the highest priority.

Section 10 – We recommend that the Council maintain an up-to-date, user-friendly, web page on the region’s transitways. The web page should provide a one-stop resource to track all key decision points (and opportunity for public input) related to the transitway planning process and to key land use planning along the transitway corridors by cities and counties.

Section 10.2 – Greater emphasis should be placed on robust public engagement in the early and later stages of transitway planning. While agency coordination is important for efficiency, the inclusion of early stakeholder input is essential to achieve a project that is embraced by the community residents and that meets the needs for generations to come.

###